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June 3, 2025

Aaron Ziemann
Adirondack Park Agency
PO Box 99
1133 NYS Route 86
Ray Brook NY 12977

Re: APA Project ID: 2025-0078; Use of ProcellaCor in Chateaugay Lakes

Dear Mr. Ziemann:

Protect the Adirondacks (“PROTECT”) offers these comments for your consideration regarding the application by the Chateaugay Lake Foundation for the use of ProcellaCOR EC (“ProcellaCor”) to treat Eurasian watermilfoil (“EWM”) in 168 acres of the Chateaugay Lakes. The use of ProcellaCor was approved in 2024 for 97 acres in the Chateaugay Lakes’ “narrows”, the stretch of water connecting Upper and Lower Chateaugay Lakes. That area is adjacent to one of the treatment areas that is proposed to be treated by this application. The dilution zone/area for the treatment area approved in 2024 for the “narrows” overlaps with the treatment area and the dilution zone/area proposed in this application. *See Exhibit A.*

As we have noted in prior comment letters to APA regarding the use of ProcellaCor, EWM is not likely to be eliminated completely with this herbicide and it will need to be controlled with sustained active management. We urge lake associations and managers to develop robust lake management plans that include a variety of tools to address the multitude of threats facing Adirondack lakes. We also urge APA to include in all permits issued a requirement that the applicant develop and implement a robust lake management plan that includes reducing EWM with non-chemical measures.

The Chateaugay Lake Foundation has submitted a “Chateaugay Lake Milfoil Management Program” that includes managing invasive species through “chemical treatment in selected target areas and hand-harvesting in untreated areas that are high priorities”. The management plan prescribes application of ProcellaCOR throughout the Chateaugay Lakes at selected locations on an annual basis. While we commend the Chateaugay Lake Foundation for developing a lake management plan, PROTECT does not support ongoing, multiyear applications of ProcellaCOR in the same waterbody. Our position is

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due in part to the paucity of data about the potential long-term impacts of this herbicide on Adirondack waters, plants and animals.

We note that APA has failed to respond to our repeated requests for an adjudicatory hearing to examine the long-term impacts of ProcellaCor, which would provide a forum for expert testimony on the environmental impacts, both short- and long-term, of this herbicide and potentially identify application conditions or restrictions that will avoid undue adverse impacts to the natural resources of the Adirondack Park.

EWM is an invasive species that may outcompete native species and have negative consequences on the ecosystem, and application of ProcellaCOR may be an appropriate last resort if the use of mechanical techniques (e.g., hand harvesting) has already been employed and cannot effectively control EWM. However, development of a lake management plan, monitoring during treatment, and multiyear post-treatment, comprehensive plant surveys after treatment should, at a minimum, be included by APA as conditions to any permit granted for the use of ProcellaCOR.

It is well within APA's existing statutory and regulatory authority to include conditions in its permits that require the applicant to monitor results and follow a management plan. As set forth in the Freshwater Wetlands Act, APA may "impose conditions or limitations" to "preserve, protect and conserve freshwater wetlands and the benefits derived therefrom, to prevent the despoliation and destruction of freshwater wetlands, and to regulate use and development of such wetlands to secure the natural benefits of freshwater wetlands". ECL §§ 24-0103; 24-0705(4).

Finally, the Chateaugay Lake Foundation's proposed annual use of ProcellaCor over multiple years in the same waterbody should be reviewed by the full APA Board.

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 the Chateaugay Lakes.

Sincerely,

A handwritten signature in black ink that reads "Claudia K. Braymer". The script is cursive and fluid, with the first letters of each word being capitalized and prominent.

Claudia K. Braymer,
Executive Director

Exhibit A – Map showing the Chateaugay Lakes’ treatment areas. Zones J, K and DD were treated with ProcellaCor in 2024. Zones B, D, H and W are proposed for treatment with ProcellaCor in 2025 (although Zone W has since been withdrawn from consideration).

