

# PROTECT THE ADIRONDACKS!

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May 7, 2026

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

Re: Use of ProcellaCor in Minerva Lake (APA Project ID: 2026-0074)

Dear Mr. Ziemann:

Protect the Adirondacks (“PROTECT”) offers these comments for your consideration regarding the application submitted on behalf of the Town of Minerva for the use of ProcellaCOR EC (“ProcellaCor”) to treat Eurasian watermilfoil (“EWM”) in Minerva Lake.

PROTECT believes that much more comprehensive and objective recognition and public presentation of the known and unknown risks are necessary before APA approves continued use of ProcellaCor in Adirondack waters, including in Minerva Lake.

The use of ProcellaCor in Minerva Lake was approved by the Adirondack Park Agency (“APA”) in 2020 (see Exhibit A). After that treatment, APA acknowledged that EWM was eliminated from the entire 79 acre lake clearly suggesting that ProcellaCor spread beyond the 41 acres approved for treatment. This situation may have constituted a Pesticide Label Violation. The label with the registration of the parent compound in ProcellaCOR, under “Environmental Hazards” on the Product Label, indicates that no more than “1/3 to 1/2 of the water area” of the lake should be treated in a single operation because “treatment of aquatic weeds can result in oxygen loss from the decomposition of dead weeds”, which may cause fish suffocation.”<sup>1</sup> The current label states that “Water bodies containing very high plant density should be treated in sections to prevent the potential suffocation of fish”.<sup>2</sup> As

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<sup>1</sup> U.S. Environmental Protection Agency, Notice of Pesticide Registration and Product Label for EPA Registration No. 62719-699, This is available at <https://www.regulations.gov/document/EPA-HQ-OPP-2016-0560-0067>.

<sup>2</sup> [https://sepro.com/Documents/ProcellaCOR\\_SC--Label.pdf](https://sepro.com/Documents/ProcellaCOR_SC--Label.pdf)

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such, for this application, APA should take steps to mitigate this risk and assume that ProcellaCor will spread beyond the 31 acres requested for treatment in Minerva Lake in 2026.

We commend the Town for its ongoing focus on tackling the EWM infestation and for its many years of plant surveys and reports. However, we do not see in the application materials to APA a lake management plan that sets out the Town's goals and plans for using a variety of tools to address the multitude of threats facing Minerva Lake.

We urge APA to require that the applicant have and follow a robust lake management plan to explicitly reduce EWM with non-chemical treatments. It is well within APA's existing statutory and regulatory authority to require the applicant to monitor results and follow a management plan into the future. 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).

While we support robust lake management plans to address EWM, and other lake problems, PROTECT does not support ongoing, multiyear applications of ProcellaCor in the same waterbody. Our position is due in part to the paucity of data about the potential long-term impacts of this herbicide on Adirondack waters, plants and animals. This chemical herbicide has only been used for a few years (its first use in New York was in 2019 and its first use in the Adirondack Park was in 2020), and studies are currently ongoing to understand its immediate impacts and its long-term impacts on lake ecology.<sup>3</sup>

The application materials state an often-repeated claim that ProcellaCor "breaks down and disappears rapidly". This is a highly misleading statement and is perhaps an example of the proponents for use of ProcellaCOR have not accurately and completely represented the underlying science on the registration of the active ingredient, florpyrauxifen-benzyl. The U.S. Environmental Protection Agency's ("EPA") Environmental Fate and Ecological Risk Assessment clearly states that while the active ingredient may undergo rapid transformation in ideal conditions (e.g. sunlight driven photolysis), it transforms into degradants that are persistent and can pose long term ecological concerns.<sup>4</sup> Following are selected example excerpts that demonstrate the concerns and limitations on what is known about the long-term impacts:

- *"In aqueous systems, the octanol/water partition coefficient suggests that the chemical has the potential to sorb onto benthic detritus as well as bioconcentrate in aquatic organisms such as fish".*
- *"In the laboratory studies conducted with florpyrauxifen-benzyl, a number of degradates were observed in variable amounts, depending on the study."*

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<sup>3</sup> <https://lakegeorgeassociation.org/news-events/news/lga-releases-initial-effects-procellacor-plants-lake-george>

<sup>4</sup> U.S. Environmental Protection Agency, Florpyrauxifen-benzyl Environmental Fate and Ecological Risk Assessment, available at <https://www.regulations.gov/document/EPA-HQ-OPP-2016-0560-0011>.

- *Florpyrauxifen-benzyl is an ester compound and as such degrades to an acid, especially in high pH environments and/or by metabolism mediated hydrolysis.*
- *Two other degradates of florpyrauxifen-benzyl are ester compounds that also hydrolyze: In aquatic and soil systems, the parent compound hydrolyzes to XDE-848 acid, which is a major degradate and is phytotoxic.*
- *Three of these degradates were considered stressors of concern for ecological exposure to aquatic plants, along with the parent compound, and were included in the expression of the total toxic residues (TTRs, see the next **Section 2.2.4**). The aquatic plants TTRs are much more persistent than the parent alone, especially in aquatic environments and under anaerobic conditions.*

To the last example excerpt above, EPA reported the Benthic Metabolism Half-life of the parent compound as 2.65 days and 33,118 days for the degradant Total Toxic Residues (page 66 of 133).

So, it should come to no surprise to anyone who had reviewed the underlying science analysis by EPA that the research by a team of scientists on the use of ProcellaCor in Lake George in 2024 shows that ProcellaCor persists in the sediment at the bottom of the lake. Additionally, the research found that water circulation spread ProcellaCor beyond the targeted treatment areas (as happened in Minerva Lake in 2020). Dr. Brendan Wiltse has stated that these “findings should be taken into consideration when planning herbicide treatments and in state permitting processes, especially in cases where there are repeat applications because of the potential for long-term accumulation of the herbicide and its degradants, and the unknown ecological impacts from this accumulation.”<sup>5</sup> According to Dr. Curt Stager, Professor of Natural Science at Paul Smith’s College, “There seems to be plenty of research showing that florpyrauxifen-benzyl does what it’s supposed to do in terms of killing invasive plants in lakes. But we need more information about situations in which florpyrauxifen-benzyl does what it’s not supposed to do. This is why our research is crucial.” APA should not approve the repeated use of ProcellaCor in Minerva Lake until additional research is undertaken to understand the impacts of ProcellaCor in lake sediment and its risks to the benthic invertebrate community and the species that rely on these invertebrates for food.<sup>6</sup>

Given that the 2020 Minerva Lake ProcellaCor treatment resulted in a whole-lake application of the pesticide, according to APA representations, the potential for persistence, and the excerpt from EPA below, we urge APA to require a scientifically valid study to assess the parent compound and degradants in the plant material, sediments and fish prior to granting of this new permit request. The Town of Minerva and its residents deserve to know the extent of the persistence of this pesticide in their lake, its sediments and fish, before APA approves another treatment of the lake with ProcellaCor.

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<sup>5</sup> <https://lakegeorgeassociation.org/news-events/news/lake-george-association-releases-new-study-herbicide-persistence-lake-sediments>

<sup>6</sup> The U.S. Environmental Protection Agency registration information states that “For freshwater benthic-dwelling invertebrates, chronic effects were observed in sediment toxicity studies . . . “. This is available at <https://www.regulations.gov/document/EPA-HQ-OPP-2016-0560-0011>.

The statement in EPA's Environmental Fate and Ecological Risk Assessment supports the need for fish tissue analyses from Minerva Lake follows:

*Based solely on its octanol/water partition coefficient (at pH 7,  $\log_{10} P_{OW} = 5.5$ ), floryrauxifen-benzyl would be predicted to bioconcentrate in fish tissue, although the Fish BCF study shows that the chemical residues do not bioconcentrate as much as would be expected, suggesting possible degradation and/or metabolism in fish tissue (see more below). (Page 38 of 133)*

Additionally, the Product Label warns that repeated use of this herbicide has the potential to create resistance to ProcellaCor in EWM populations. Eventually, ProcellaCor may no longer work to control EWM where it is used repeatedly. APA and the Town should seriously consider the long-term implications of this possibility and whether it wants to use ProcellaCor now or wait a longer period of time before introducing ProcellaCor again. Hand/diver-assisted suction harvesting should be used to achieve the targeted, selective removal of EWM that is in Minerva Lake while that is still a viable option because the number of EWM plants is relatively low. Notably, for the last few years, the Town has not spent the amount that it has budgeted for control of EWM (\$20,000 per year was budgeted for years 2022 through 2025, but less than the budgeted amount, between \$6,100 and \$11,980 per year, was spent in each of those years); we recognize the significant expenditures that the Town made prior to and including 2020.

Minerva Lake has several native plant species that are susceptible to, and will be negatively impacted by, the application of ProcellaCor, including, among others, Watershield, White Water Lily, Spatterdock, Water Stargrass and potentially Pickerelweed. Minerva Lake's plant survey in 2023 noted that there are several native species that were absent after the 2020 treatment, some species returning one or two years later and others apparently not returning at all (e.g., several pondweeds, Water Stargrass, duckweed and spikerush, bur-reed, and quillwort).

The materials prepared by the Town's contractor indicate that a 100-gallon tank is used to mix the ProcellaCor concentrate with water from the lake and then the mixture is added to the lake through hoses into the lake. That process would be repeated three times to complete treatment of the lake. It is important to understand the proposed depth of introduction to the lake as the chemical properties of the pesticide will result in rapid sinking of the solution to the plants and sediment. We suspect the depth of introduction is between 2' and 4'. Therefore, ambient water sampling at elbow depth is both misleading and meaningless.

The application materials do not state the concentration of ProcellaCor as it enters the lake from the 100-gallon tank. That information should be provided so that APA can accurately represent the introduced (discharged) concentration of the active ingredient to the lake. This is essential information for residents, for example, if they have water intakes that extend into the treatment area or dilution zone.

For these reasons, APA should not permit the proposed use of ProcellaCor at this time. Treatment of Minerva Lake, with a dilution zone area covering the entire lake, will produce unacceptable short-term adverse impacts on nontarget species of aquatic plants and organisms, and has the potential to cause long-term negative impacts. The long-term impacts are relatively

unknown, particularly for Minerva Lakes where the herbicide is being used repeatedly. We suggest APA compel a study of the sediments, aquatic plants and fish tissue to assess the persistence of ProcellaCOR and its degradants following the 2020 treatment of Minerva Lake before issuance of any new permit.

Lastly, it is our understanding that the best time to apply ProcellaCor is early in the growing season (in the spring; prior to mid-June) when the EWM plants are just beginning to grow and the native plants may not be as susceptible to the chemical because they have not yet begun to grow.<sup>7</sup> Having treatment take place when the EWM plants are smaller (10-20% of total biomass potential) means that the biomass die off is less and less nutrients are released into the lake. ProcellaCor treatment should not be permitted to take place past mid-June. Moreover, APA should make it clear to the Town (and other applicants) that any plant material harvested from the lake after the treatment cannot be composted as that would be a violation of the Product Label.<sup>8</sup> The application materials do not state where harvested materials are taken.

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 Minerva Lake.

Sincerely,



Claudia K. Braymer,  
Executive Director

cc: Hon. Stephen McNally, Town of Minerva Supervisor

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<sup>7</sup> “Eurasian water-milfoil . . . elongates from shoots initiated in the fall, beginning spring growth earlier than other aquatic plants.” <https://nas.er.usgs.gov/queries/factsheet.aspx?SpeciesID=237>

<sup>8</sup> [https://sepro.com/Documents/ProcellaCOR\\_SC--Label.pdf](https://sepro.com/Documents/ProcellaCOR_SC--Label.pdf)