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May 16, 2024

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

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Re: Application for use of ProcellaCOR EC in Highlands Forge Lake

Nancy Bernstein  
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Roger Gray  
Evelyn Greene  
Sidney Harring  
Sheila Hutt  
Dale Jeffers  
Patricia Morrison  
John Nemjo  
Peter O'Shea  
Philip Terrie  
Chris Walsh

Dear Aaron:

Protect the Adirondacks (“PROTECT”) offers these comments for your consideration regarding the application for the use of ProcellaCOR EC (“ProcellaCor”) to treat Eurasian watermilfoil (“EWM”) in Highlands Forge Lake<sup>1</sup>.

PROTECT is concerned about the use of ProcellaCOR because of its potential impacts on nontarget species of plants, and on fish, birds, reptiles and invertebrates. Given the number of applications to APA for the use of ProcellaCOR in the Adirondack Park, we urge APA to hold an adjudicatory hearing on this issue. At the very least, the APA Board should direct staff to conduct a thorough, independent scientific review of ProcellaCOR, similar to the scientific review that staff once conducted for the use of pesticides at the Sagamore Resort (see Project No. 84-1048B). In particular, new information is coming to light about the possible presence of PFAS/PFOS in ProcellaCOR and that information should be evaluated by staff<sup>2</sup>.

**Staff**

Peter Bauer  
**Executive Director**

Claudia K. Braymer, Esq.  
**Deputy Director**

Christopher Amato, Esq.  
**Conservation Director  
and Counsel**

The application for Highlands Forge Lake states that hand harvesting techniques have already been employed and have not been able to effectively control EWM to allow the restoration of native plant populations. Accordingly, the applicant is seeking to use ProcellaCOR to treat EWM.

<sup>1</sup> A chart in the application is titled “Susceptibility of plant species in Brant Lake to ProcellaCOR EC”. APA should confirm that the information in the chart relates to Highlands Forge Lake, not Brant Lake.

<sup>2</sup> The State of Minnesota has identified the active ingredient of ProcellaCOR as meeting that State’s definition of PFAS (meaning that the pesticide contains at least one fully fluorinated carbon atom). 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>.

**Protect the Adirondacks**

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The application indicates that treatment of the lake with ProcellaCOR is planned for two subsequent years. PROTECT strongly opposes ongoing, multiyear chemical herbicide treatments with ProcellaCOR. Accordingly, APA should not approve the applicant's proposed use of ProcellaCOR in Highlands Forge Lake in consecutive years in the absence of scientific data on the long-term and cumulative impacts of the herbicide on lake ecology.

The application also states that the applicant "is dedicated to subsequent study and future control of" EWM. Accordingly, APA should condition any permit for the use of ProcellaCOR on the applicant conducting a follow-up comprehensive plant survey after treatment with ProcellaCOR, and 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 the Adirondack Park.

Sincerely,

A handwritten signature in black ink that reads "Claudia K. Braymer". The signature is written in a cursive, flowing style.

Claudia K. Braymer,  
Deputy Director

cc: David J. Plante, AICP CEP, APA Deputy Director, Regulatory Programs