



**Joes Pond Association**  
**Information on the Use of ProcellaCOR**  
**For Control of Eurasian Watermilfoil in Vermont Lakes**

With the goal of maximizing our Eurasian Watermilfoil (EWM) management and control options, the Joes Pond Association (JPA) EWM Management Committee (EWMMC) has been researching, discussing and considering the many varying aspects of applying ProcellaCOR (PC), an herbicide used by several VT lake associations to control the spread of EWM.

As of March, 2025, treatment of EWM in Joes Pond with PC is not an available option due to the interpretation and application, by the VT Agency of Natural Resources (ANR), of the regulatory provisions in state statute governing the use of aquatic herbicides.

The JPA EWMMC is participating in on-going discussions with ANR and the Federation of VT Lakes and Ponds (FOVLAP) to determine whether a different regulatory approach might enhance the EWM containment or eradication options available to a lake association soon after a new infestation is confirmed. Such a change as is being discussed also has the potential of dramatically reducing or eliminating the long term application of herbicide in lakes experiencing new infestations such as Joe's Pond.

Detailed information supporting the discussions by the EWMMC is provided in four documents that are now posted on the JPA website on the Milfoil page.

The documents consist of the following with a short synopsis of each:

A Proposal to Reduce and Minimize the Use of Herbicide in VT Lakes With New Infestations of Eurasian Watermilfoil, Joe's Pond Association, 03/2025

This proposal has been made by the JPA to make accessible the most effective EWM treatment option to achieve eradication of a new infestation. It does not constitute a commitment by the JPA to conduct EWM management via herbicide application.

Permitting Aquatic Herbicide Projects in Vermont, VT Agency of Natural Resources, 2022

This document describes the process and the technical information and the performance criteria upon which the VT ANR based its evaluation of whether the use of PC for management of aquatic invasive species was acceptable in VT.

The Case for an Accessible Path for Vermont Lake Associations to Use ProcellaCOR to Control Invasive Milfoil, Federation of VT Lakes and Ponds (FOVLAP), 2023

In this document, FOVLAP presents a rational argument to sustain the option of applying PC for control of EWM by VT lake associations. At that time, a moratorium on the use of PC in VT lakes had been introduced for consideration as an act of the VT legislature. A potential ban or moratorium persists to the present.

ProcellaCOR, Lake George Park Commission (LGPC), 2024

The LGPC is an agency of New York State government and is responsible for protecting, the economic, recreational, social and ecological values of Lake George. Its evaluation of the use of PC as an EWP control is consistent with that of VT ANR and FOVLAP.

Following is a short list of facts about PC and its use in VT lakes to control EWM:

- PC is the only aquatic herbicide approved by ANR for use in VT
- PC is a highly targeted and species-specific herbicide exhibiting negligible to no toxicity to non-target species. Any short term toxic response typically has been quickly offset by regeneration of the non-targeted species into the area formerly infested by EWM
- PC accomplishes complete eradication of EWM at extremely low concentrations (5-9 parts per billion)
- PC reduces to undetectable levels (< 1 ppb) within 48 hours
- Both the VT Dept. of Health and the VT Dept. of Environmental Conservation have indicated that PC is of such low toxicity that even drinking water or irrigation systems sourced from the treated waterbody need not be interrupted at the time of treatment

- After 25 EWM treatments applying PC to 683 acres of VT lakes since 2019, there have been no observed or reported negative effects on human or ecological health
- Although no hazards to ecological or human health, due to PC application, have been observed or documented in any treated waterbody, it is a legitimate concern that such hazards may become evident as a result of long term usage
- It is also a legitimate concern that EWM may develop biological resistance to PC after multiple treatments in the same waterbody

Following several extensive discussions with a FOVLAP sponsored PC Working Group made up of representatives of lake associations all struggling to contain EWM, some for 20 years or more, it became apparent that an important opportunity to achieve full eradication of EWM is being missed because of ANR's prohibition on application of PC while there is still a new, small, contained population of plants. Instead, ANR's regulatory approach restricts lake associations to using only non-chemical controls for multiple years at great expense which in all cases but 1 have failed to contain the infestations but rather, has resulted in EWM running rampant throughout the waterbody. In desperation, lake associations then turn to applying large doses of PC over large areas of their lakes with virtually no possibility of ever achieving eradication.

Acknowledging the legitimate concerns about discharge of herbicides into Joe's Pond, it remains the conclusion of the EWMMC, that the best path forward to contain, and if possible eradicate EWM, may include the limited use of PC; especially if allowed to exercise this management option at an early stage of infestation such that herbicide use will be minimized in the short term, and potentially eliminated and avoided in the long term.

This is why the JPA is engaged in these discussions with ANR and FOVLAP to see if there is a possible pathway to make available this treatment option at an early stage of infestation when there is a high probability of eradication. We do not want to see Joe's Pond follow the same path as so many other lakes have done who now must spend tremendous energy and funding every year just to try and stay even with EWM proliferation and ultimately must apply herbicide for control, potentially in perpetuity.

If the option of a PC treatment becomes available for the JPA, any decision to treat with PC shall be a decision of the JPA Board of Directors following full engagement and discussion with the membership.