

**From:** [Susan Glenny](#)  
**To:** [APA Regulatory Programs Comments](#)  
**Subject:** APA Project No. 2023-0038  
**Date:** Wednesday, March 15, 2023 9:03:50 PM

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Mr. Ziemann,

I am writing in support of the permit application for APA Project #2023-0038 by Horseshoe Pond Deer River Flow Association, Inc. This organization for over 25 years has selflessly and voluntarily advocated for and acted upon the milfoil problem both in Horseshoe Pond and Deer River Flow. A small band of residents successfully wrote for and received grants, fund-raised, hand harvested along with the use of benthic mats, employed divers from AWI/ Paul Smith's College, educated local and county officials and until recently, was able to mitigate the growth of milfoil in both water bodies. It has been nothing less than heroic that a small band of residents and seasonal residents have now raised more than \$40,000 in private donations to be able to fund the use of ProcettaCOR EC to more effectively and finally eradicate the milfoil. We are a small lake community committed to the health and beauty of our waterways in the Adirondack Park.

I am a full time resident of Duane on Deer River Flow and past Secretary of the Horseshoe Pond Deer River Flow Association. I consider myself acutely aware of the history, actions and progress that has been made that is yet not sufficient in managing this invasive species. The Application of the herbicide in Horseshoe Pond, which is privately owned, will indeed help the inflow of invasives from Horseshoe Pond, as it feeds into the Flow. Boats and kayaks entering the Flow from County Route 14 are numerous and may be less likely to carry plants from there if Horseshoe Pond is treated. That is one impactful reason that may mitigate new plants from being deposited here in the Flow. As I am sure you are aware, the lake bottom of the Deer River Flow is owned by the state of New York as is most of the shoreline and land surrounding the Flow. Previous mitigation efforts in the Pond and Flow were funded by our small lake association without any support from the State of New York.

I am one of 6 households on Deer River Flow. We continue to have a worsening milfoil problem, which I believe should be addressed by the State of New York; That being said, even though the Procetta application in the Pond will not directly affect the numerous milfoil beds in the Flow, it will certainly curb the entry of new plants into it. The Pond and the Flow are connecting water bodies; with paddlers often traversing back and forth between both. Treatment of the Pond would be a great success; preventing it from becoming re-infested by paddlers from the Flow is a reality we will inevitably face. In a perfect world, the APA and the State of New York would see the value of treating both water bodies simultaneously, to

effectively treat this long standing issue once and for all. To begin this project is vital, even if not optimal. Doing nothing is unthinkable. My husband and I completely support the permit application you have received for APA Project 2023-0038.

Thank you for your kind attention to this matter.

Susan P. Glenny

125 Deer River Drive  
Malone, NY 12953  
Cell (978) 582-6958

**From:** [Gil Paddock](#)  
**To:** [APA Regulatory Programs Comments](#)  
**Subject:** APA Project No. 2023-0038  
**Date:** Saturday, March 18, 2023 7:07:17 PM

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Mr Ziemann,

We are writing in support of the Horseshoe Pond/DeerRiver Flow Association Application, project No. 2023-0038, for the application of ProcellaCOR in Horseshoe Pond. The organization, with limited membership, has been fighting milfoil tirelessly for over 25 years. I, Gil, have been involved in their efforts as well as being Past President of the association. We worked with Paul Smiths College AWI, who provided the divers to hand harvest and lay Benthic Mats and then move them annually. Money to fund the divers and purchase materials for mats came from donations, garage sales, bake sales and grants. In these past years the grants have dried up. The group has tried to control the milfoil in both Horseshoe Pond and the adjoining Deer River Flow but is losing the battle.

The Horseshoe Pond lake bottom is entirely owned by the adjacent landowners. These lake residents have raised approximately \$40,000.00 to attempt to stem the overtaking of the pond by milfoil. The research that has been done over the past years indicates that ProcellaCOR can work. HOWEVER, there is a down side. The pond dumps into Deer River Flow and if it is not also treated, fisherman, boaters and kayakers will certainly reinfest the pond from milfoil from the Flow. The landowners on the Pond and Flow, as well as volunteers, have spent countless hours raising funds and hand harvesting, along with the college divers, which has been all too little and to no avail.

The Deer River Flow lake bottom, all 365 acres is 100% owned by the State of New York, as is approx. 85 % of the shoreline. There are on 6 landowners on the shoreline. The milfoil in the Flow is expanding its beds in a dramatic fashion, and as seen in other areas, will take over the lake. While some of the chemical may seep into the flow, it would have an ever so slightly effect.

Not only does this permit need to be approved the APA, DEC and NYS, but, in general, NYS needs to step up and take care of their lake, i.e. Deer River Flow. The prudent course of action would be to treat both lakes simultaneously.

This past couple of years has seen multitudes of kayakers, fishermen and boaters using this beautiful, serene gem in the Adirondacks, which is one of only a few bodies of water entirely owned by the State of New York.

Delaying action will see the demise of two of the Northern Adirondacks pristine bodies of water.

Thank you for your time.

Gil & Janine Paddock  
123 Deer River Drive  
Malone, NY

**From:** [Mark](#)  
**To:** [APA Regulatory Programs Comments](#)  
**Subject:** Comment regarding APA Project No. 2023-0038 Dear Mr. Ziemann, I want to thank you and the Adirondack Park Agency for the opportunity to submit a public comment on the pending application to use ProcellaCOR to treat Eurasian watermilfoil on Horsesh...  
**Date:** Tuesday, March 28, 2023 9:57:10 PM

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## **Comment regarding APA Project No. 2023-0038**

Dear Mr. Ziemann,

We want to thank you and the Adirondack Park Agency for the opportunity to submit a public comment on the pending application to use ProcellaCOR to treat Eurasian watermilfoil on Horseshoe Pond.

We know this is well past deadline for comments, but greatly appreciate any consideration you give to it.

We are part of a group of landowners around Horseshoe Pond in the Town of Duane, just south of Malone. We are in urgent need of application of ProcellaCOR in Horseshoe Pond. A severe infestation of Eurasian Watermilfoil has accelerated in its rate of increase in our pond every year in recent years.

We know from the recent adoption of APA guidelines that:

the APA sees a need for efforts that would restore and protect the native ecological communities through early detection and rapid response efforts to eradicate or control existing or newly identified invasive species populations.

experience has shown that eradication of an invasive species becomes progressively more difficult, more expensive, and less effective the longer the species is allowed to grow and spread.

Over the years the list of both species and tools has grown. Older guidelines did not enable staff to react quickly as new species came to the Park and new tools and methodologies were developed to address these invasive species. Now with new guidelines APA staff can react quickly and efficiently.

We have been in consultation over the past couple years with APA aquatic invasive species personnel, and they have not disagreed that the application of ProcellaCOR is our only hope with this extensive and fast-growing invasion in a relatively small body of water.

A permit for us to use ProcellaCOR in our situation is needed very soon.

Respectfully submitted,

Mark and Nancy Beddoe  
47 Horseshoe Lane  
PO Box 443  
Malone, NY 12953

518-483-4495

**From:** [Miriam Harmatz](#)  
**To:** [APA Regulatory Programs Comments](#)  
**Subject:** Comment regarding APA Project No. 2023-0038  
**Date:** Monday, March 27, 2023 6:15:26 PM

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March, 27, 2023

**Comment regarding APA Project No. 2023-0038**

Dear Mr. Ziemann,

I want to thank you and the Adirondack Park Agency for the opportunity to submit a public comment on the pending application to use ProcellaCOR to treat Eurasian watermilfoil on Horseshoe Pond.

My spouse and I have been fortunate to own a camp on Horseshoe Pond in the town of Duane for over 20 years. I first learned about the Adirondacks through a dear friend, [David Sive](#), one of many environmentalists who worked hard to support the "forever wild" Adirondack Park. As people who love the Adirondacks, we are deeply grateful for all that you and your colleagues do to help take care of this unique place we all cherish.

Although my current legal residence is in Florida where I work full time for a nonprofit, I have gone to our camp every year since 2004; and every day that I've been there I have kayaked from Horseshoe Pond into Deer River Flow. It is an utterly glorious paddle in every respect—from the scenery to the wildlife.

We have been aware of the problem with invasive milfoil since we bought the camp. We have been supportive of efforts to control the milfoil through matting and harvesting programs as well as the need for application of ProcellaCOR, which has been [reported](#) as the most effective and least toxic chemical treatment for control of milfoil.

**I also want to stress that over the past 2 years, the growth of the milfoil in Horseshoe Pond has been exponential. The need for application of a chemical treatment is URGENT. In my opinion, if the recent trend in growth continues for even a brief period of time, Horseshoe Pond is at imminent risk of being forever lost as a navigable body of water. The native aquatic plants and fish that are still surviving are also at risk of being lost forever.**

In sum, the milfoil in Horseshoe Pond is far beyond management through conventional means including harvesting and matting. The "*risk of no action*" means the loss of a navigable body of water, native aquatic life and fish. This will also mean a loss of tax funding to support the town of Duane, where homeowners pay taxes and also contribute to the local economy.

Thus, given the urgency of Horseshoe Pond's invasive milfoil situation, I respectfully urge that the pending application be approved asap. Thank you so much for your consideration of these comments and for all that you do.

Respectfully submitted,

Miriam Harmatz  
[miriamharmatz@gmail.com](mailto:miriamharmatz@gmail.com)  
786-853-9385

**From:** [Micah Perks](#)  
**To:** [APA Regulatory Programs Comments](#)  
**Subject:** Project 2023-0038  
**Date:** Monday, March 4, 2024 2:21:33 PM

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Dear Aaron Ziemann,

I write as someone who was born and raised in the Adirondacks and now owns property on Horseshoe Pond to enthusiastically ask that the APA approve APA Project 2023-0038.

Without intervention, invasive species is quickly destroying habitat diversity as well as the simple pleasures of kayaking and swimming on the pond for humans.

Sincerely,

Micah Perks

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Professor of Literature and Creative Writing  
Associate Dean of Faculty Affairs, Humanities

(name pronounced Meekah)

<http://micahperks.com/>

<http://creativewriting.ucsc.edu/index.html>



**From:** [Mary Lewis](#)  
**To:** [APA Regulatory Programs Comments](#)  
**Cc:** [Mary Lewis](#)  
**Subject:** PROJECT 2023-0038  
**Date:** Wednesday, February 28, 2024 4:15:36 PM

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*ATTENTION: This email came from an external source. Do not open attachments or click on links from unknown senders or unexpected emails.*

Dear Aaron Zieman:

I write to support the above referenced project. My husband and I own 58 acres on the Horseshoe Pond, which includes the entire western shoreline of the pond. All of the wetlands bordering the western shore belong to us and except for an old 1880's farmhouse near County Route 14, the land is undeveloped.

We have owned the property since 2012, and since that time, the volume of Eurasian milfoil in the pond has risen at an alarming rate. The milfoil already is negatively impacting our ability to kayak and fish on the pond. Our association has studied, fundraised and hired experts to advise us of best practices to control this invasive. ProcettaCOR EC appears to be our best hope. We hope the APA approves this project. Thanks you!

Sincerely,

Mary M Lewis  
3027 Red Tavern Road  
Malone (Duane), NY