April, 2023

McDill Pond Property Owner or Occupant
Portage County, WI

Re: Proposed Management for Exotic Invasive Species control on McDill Pond.

Dear McDill Pond Lake Property Owner or Occupant:

The McDill Inland Lake and Rehabilitation District (the District) proposes to assess and manage up to 100 acres on McDill Pond to control the excessive growth of the exotic invasive aquatic plants, Eurasian watermilfoil (EWM), its hybrid (HWM), and Curlyleaf pondweed (CLP). The District proposes to conduct applications of Reward or Tribune (diquat) and/or ProcellaCOR EC (florpyrauxifen-benzyl) to be performed sometime in spring, 2023 by Clarke Aquatic Services, a SOLitude Lake Management Company, proceeding only after the District obtains a permit for the management from the Wisconsin Department of Natural Resources.

Notification of the exact dates of application and water use restrictions associated with the use of Reward/Tribune and ProcellaCOR EC will be provided by the posting of shoreline in and adjacent to treatment areas, and public access points.

The water use restrictions associated with use of the products mentioned above:

5 Day Irrigation Restriction

Additional details regarding the proposed management including a copy of the permit application and the WDNR aquatic herbicide fact sheets can be found at: www.mcdillpond.com.

For questions about the proposed management or a hard copy of the permit application, please contact:
Krista Olson, McDill Inland Lake and Rehabilitation District
mcdillpond@gmail.com
(715) 347-8901

Aquatic Plant Management

NOTE: Missing or incomplete fields are highlighted at the bottom of each page. You may save, close and return to your draft permit as often as necessary to complete your application. If there are no updates in 90 days, your draft is deleted

This Application has been Signed and Submitted by: i:0#.f|wamsmembership|amykay82 signed on 2023-04-17T11:40:49

Site or Project Name:	McDill Pond The permit application will be saved automatically with this name
Activity:	Chemical Control Application
Eligibility: (All questions must be no for it to be considered a private pond.)	**Does the waterbody have:** • More than one property owner? ◉ Yes ○ No • Uncontrolled surface water discharge? ○ Yes ◉ No • Public access? ◉ Yes ○ No

3200-004 Chemical Aquatic Control Application

NOTE: To be considered a private pond, a waterbody must meet all of the following requirements:

1. Confined to one property owner.
2. The pond has no uncontrolled surface water discharge.
3. No public access.

Upon submittal of your permit application, a **non-refundable $20 permit processing fee will be charged**. Additional acreage fees will be refunded if the permit request is denied or if no treatment occurs.

3200-004 Chemical Aquatic Plant Control Application

- Annually complete all pages on Form 3200-004 for chemical plant management applications. Complete form 3200-004a for large scale treatments(exceeds 10.0 acres in size or 10% of the area of the water body that is 10 feet or less in depth) as required by NR107.04(3).
  - Form 3200-004 is competed electronically through this system.
  - Form 3200-004a must be completed outside the system and uploaded to the attachments section. Please refer to this link for a copy of this form: http://dnr.wi.gov/files/pdf/forms/3200/3200-004A.pdf
- Attach a map that shows the treatment location(s), treatment dimensions and riparian landowners. If requesting WPDES coverage, attach a water body map that shows surface outflow and receiving waters.
- For a large-scale treatment, attach evidence that a public notice has been published in a regional / local newspaper and if required that a public informational meeting has been conducted as defined in NR107.04(3).
- Pay fee online.
- Sign and Submit form.
- A signed permit application certifies to the Department that a copy of the application has been provided to any affected property owner's association/district and to landowners adjacent to treatment area.

Contact Information

Applicant Information

Organization	McDill Inland Lake Protection and Rehabilitation District
Last Name:	Olson
First Name:	Krista
Mailing Address:	3317 Della Street
City:	Stevens Point
State:	WI
Zip Code:	54481
Email:	
Phone Number: (xxx-xxx-xxxx)	
Alternative Phone Number: (xxx-xxx-xxxx)	

Waterbody Address

Last Name:	Olson
First Name:	Krista
Street Address:	3317 Della Street
City:	Stevens Point
State:	WI
Zip Code:	54481
Email:	
Phone Number: (xxx-xxx-xxxx)	
Alternative Phone Number: (xxx-xxx-xxxx)	

Applicator

Name of Applicator Firm:	SOLitude Lake Management
Applicator Certification #:	315594, 288191, 312329
Business Location License #:	93-028484-019614
Restricted Use Pesticide #:	
Address:	w173n21440 Northwest Passage
City:	Jackson
State:	WI
Zip:	53037
Email:	amy.kay@solitudelake.com
Phone Number: (xxx-xxx-xxxx)	715-891-6798

Adjacent Riparian Property Owners

NOTE: Phone and email address will not be publicly viewable.

☑ Uploaded riparian owners to attachment tab

Name	Address	Phone	Email Address

Site Information - Complete

Waterbody Containing Control Area(s)

Waterbody Property Owners Association or Waterbody District Representative : Krista Olson

☐ None

Water Body Name: McDill Pond

Primary County: Portage

Latitude: 44.506375

Longitude: -89.548671

Section: 03

Township: 23

Range: 08

Direction: ◉ E ○ W

Waterbody Surface Area: 263 acres

Estimated Surface area that is 10ft or less 240 acres

Proposed Control Area(s)

Area(s) Proposed for Control:

Site Name (Optional)	Treatment Length		Treatment Width			Estimated Acreage		Average Depth		Calculated Volume	
	0	ft. x	0	ft.	÷ 43,560 ft.^{2} =	99.00	ac	3	ft =	297.00	ac-ft

Estimated Acreage Grand Total: 99.00 ac

Calculated Volume Grand Total: 297.00 ac-ft

Is the area with in or adjacent to a sensitive area designated by the Department of Natural Resources. More Information

○ Yes ◉ No

If the estimated acreage is greater than 10 acres, or is greater than 10 percent of the estimated area 10 feet or less in depth in Section II, complete and attach Form 3200-004A, Large-Scale Treatment Worksheet.

Chemical Aquatic Plant Control Information - Form 3200-004 (R 2/17)

Notice: Use of this form is required by the Department for any application filed pursuant to s. 281.17(2), Wis. Stats., and Chapters NR 107, 200 and 205, Wis. Adm. Code. This permit application is required to request coverage for pollutant discharge into waters of the state. Personally identifiable information on this form may be provided to requesters to the extent required by Wisconsin's Open Records Law [ss. 19.31-19.39, Wis. Stats.].

Treatment Type:

◉ *Lake* ○ *Pond* ○ *Wetland* ○ *Marina* ○ *Other*

Has a Lake Management plan been provided to the DNR?	If Yes, date approved of most current copy	Link to Approved Plan:
◉ Yes ○ No ○ Don't Know	4/13/2023	https://mcdillpond.com/wp-content/uploa
		☐ Uploaded Plan copy as an Attachment

Does the proposed plant removal agree with the approved plan? ◉ Yes ○ No

If NO, explain, Attach additional sheets if necessary.

Goal of Aquatic Plant Control:

- ☑ Maintain navigation channel
- ☐ Maintain boat landing and carry in access
- ☐ Improve fish habitat
- ☐ Maintain swimming area
- ☑ Control of invasive exotics
- ☐ Other

Nuisance Caused By:

- ☐ Algae
- ☑ Emergent water plants (majority of leaves & stems growing above water surface, e.g. cattail, bulrushes)
- ☐ Floating water plants (majority of leaves floating on water surface, e.g., water lilies, duckweed)
- ☐ Submerged water plants (leaves & stems below surface, flowering parts may be exposed: milfoil, coontail)
- ☐ Other

List Target Plants

☐ Algae	☐ Flowering Rush	☐ Purple Loosestrife
☐ Common/Glossy Buckthorn	☐ Hybrid Cattail	☐ Reed Canary Grass
☐ Coontail	☑ Hybrid Watermilfoil	☐ Reed Manna Grass
☑ Curly-Leaf Pondweed	☐ Japanese Knotweed	☐ Starry Stonewort
☐ Duckweed	☐ Naiad	☐ Yellow Floating Heart
☐ Elodea	☐ Narrow-Leaf Cattail	☐ Yellow Iris
☑ Eurasian Watermilfoil	☐ Phragmites	☐ Pondweed

Other Target Plants:

Note: Different plants require different chemicals for effective treatment. Do not purchase chemical before identifying plants.

Chemical Control

Full Trade Name of Proposed Chemical(s)

☐ Agristar 2,4-D Amine	☐ Clipper	☐ K-Tea	☐ SCI-62
☐ Algimycin PWF	☐ Clipper SC	☐ Littora	☐ Sculpin G
☐ Alligare 2,4-D	☐ Current	☐ Milestone	☐ SeClear
☐ Alligare Argos	☐ Cutrine-Plus	☐ Nautique	☐ SeClear G
☐ Alligare Diquat	☐ Cutrine-Plus Granular	☐ Navigate	☐ Shoreklear-Plus
☐ Alligare Ecomazapyr	☐ Cutrine-Ultra	☐ Navitrol	☐ Shredder Amine
☐ Alligare Glyphosate 5.4	☐ DMA 4 IVM	☐ Navitrol DPF	☐ Sonar AS
☐ Aqua Neat	☐ Earthtec	☐ Phycomycin SCP	☐ Sonar Genesis
☐ Aqua Star	☐ Element 3A	☐ Polaris	☐ Sonar H4C
☐ AquaPro	☐ Flumioxazin 51% WDG	☐ Polaris AC	☐ Sonar PR
☐ Aquashade	☐ Formula F-30	☐ Pond-Klear	☐ Sonar Q
☐ Aquashadow	☐ Garlon 3A	☑ ProcellaCOR EC	☐ Sonar RTU
☐ Aquastrike	☐ Green Clean	☐ Refuge	☐ Sonar SRP
☐ Aquathol K	☐ Habitat	☐ Renovate 3	☐ SonarOne
☐ Aquathol Super K	☐ Harpoon	☐ Renovate LZR	☐ Stingray
☐ Avast! SC	☐ Harvester	☐ Renovate LZR Max	☐ Symmetry NXG
☐ Captain	☐ Havoc Amine	☐ Renovate Max G	☐ Touchdown Pro
☐ Captain XTR	☐ Hydrothol 191	☐ Renovate OTF	☑ Tribune
☐ Chinook	☐ Hydrothol Granular	☐ Reward	☐ Trycera
☐ Clearcast	☐ Komeen	☐ Rodeo	☐ Weedar 64
☐ Clearigate	☐ Komeen Crystal	☐ Roundup Custom	☐ Weedestroy AM-40

Other Proposed Chemical(s):

Have the proposed chemicals been permitted in a prior year on the proposed site?

◉ *All* ○ *Some* ○ *None*

What were the results of the treatment?

Seasonal control of EWM/HWM and CLP with Tribune has been achieved, longer term control of EWM/HWM with ProcellaCOR has been achieved.

Method of Application: Injection

Other Method of Application

NOTE: Chemical fact sheets for aquatic pesticides used in Wisconsin are available from the Department of Natural Resources upon request.

Alternatives to Chemical Control:	Feasible?	If No, Why Not?
1. Mechanical harvesting	○ Yes ◉ No	active harvesting program in place, many shallow areas harvester cannot ...
2. Manual removal	○ Yes ◉ No	area too large
3. Sediment screens/covers	○ Yes ◉ No	area too large, prevents beneficial plant growth
4. Dredging	○ Yes ◉ No	dredging work has been done in primary areas of concern, too expensive ...
5. Waterbody drawdown	○ Yes ◉ No	not site specific
6. Nutrient controls in watershed	○ Yes ◉ No	not site specific
7. Other:	○ Yes ○ No	

Note: If proposed treatment involves multiple properties, consider feasibility of EACH alternative for EACH property owner.

Will surface water outflow and/or overflow be controlled to prevent chemical loss?

◉ *Yes* ○ *No*

Is the treatment area greater than 5% of surface area?

◉ *Yes* ○ *No*

Waterbody concentration calculations (in ppm.)

Refer to DNR Waterbody pages http://dnr.wi.gov/lakes and https://dnr.wisconsin.gov/topic/lakes/plants/forms to answer the following:

Does the waterbody stratify? ○ *Yes* ◉ *No*

- If yes, calculate whole waterbody concentration using volume above thermocline.
- If no, calculate whole waterbody concentration using total lake value

Herbicide Name	Other Herbicide	E PA Reg. No.	Whole Waterbody Concentration (mg/l = ppm)
Tribune Herbicide		100-1390	0.0
ProcellaCOR EC		67690-80	0.0

WPDES Permit Request

Is WPDES coverage being requested? Refer to http://dnr.wi.gov/topic/wastewater/aquaticpesticides.html for more information

○ *Yes - complete section VII with signature.*

◉ *No*

- ◉ *Already have WPDES*
- ○ *WPDES coverage not needed*

Required Attachments and Supplemental Information

Upload Required Attachments (15 MB per file limit) - Help reduce file size and trouble shoot file uploads

* indicates completion of this item is required

Note: To add additional attachments using the down arrow icon. To replace an existing file, use the 'Click here to attach file ' link. To remove additional items, select the item and press CNTRL Delete.

Riparian Owners	File Attachment	Lake District Mailing Master 2023.xls
Public Notice	File Attachment	McDill Pond 2023 Proof of Publication.jpg
Large Scale Worksheet	File Attachment	
Site Map	File Attachment	McDill Pond 2023 Potential AIS Control Sites.pdf

Fee Calculation

Chemical Control Application

1. s. NR 107.11(1), Wis. Adm. Code, lists the conditions under which the permit fee is limited to the $20 minimum charge.
2. s. NR 107.11(4), Wis. Adm. Code, lists the uses that are exempt from permit requirements.
3. s. NR 107.04(2), Wis. Adm. Code, provides for a refund of acreage fees if the permit is denied or if no treatment occurs.

If Proposed treatment is over 0.25, calculate acreage fee: (round up to nearest whole acre, to maximum of 50 acres)	99.00
acres X $25 per acre = $	$1,250.00
If proposed treatment is less than 0.25 acre, acreage fee is $0	
Basic Permit Fee (non-refundable)	$20.00
Total Fee	$1,270

Payment Information

Invoice Number:	WP-00040479
Payment Confirmation Number:	WS2WT3009945934
Amount Paid:	$1,270

Sign and Submit

Applicant Responsibilities and Certification

1. The applicant has prepared a detailed map which shows the length, width and average depth of each area proposed for the control of rooted vegetation and the surface area in acres or square feet for each proposed algae treatment.
2. The applicant understands that the Department of Natural Resources may require supervision of any aquatic plant management project involving chemicals. Under s.NR 107.07 Wis. Adm. Code, supervision may include inspection of the proposed treatment area, chemicals and application equipment before, during or after treatment. The applicant is required to notify the regional office 4 working days in advance of each anticipated treatment with the date, time, location and size of treatment unless the Department waives this requirement. Do you request the Department to waive the advance notification requirement?
   ○ **Yes** ◉ **No**
3. The applicant agrees to comply with all terms or conditions of this permit, if issued, as well as all provisions of Chapter NR 107, Wis. Adm. Code. The required application fee is attached.
4. The applicant will provide a copy of the current application to any affected property owners' association inland Lake District and, in the case of chemical applications for rooted aquatic plants, to all owners of property riparian or adjacent to the treatment area. The applicant has also provided a copy of the current chemical fact sheet for the chemicals proposed for use to any affected property owner's association or inland Lake District.
5. Conditions related to invasive species movement. The applicant and operator agree to the following methods required under s.NR 109.05(2), Wis. Adm. Code for controlling, transporting and disposing of aquatic plants and animals, and moving water:
   - Aquatic plants and animals shall be removed and water drained from all equipment as required by s.30.07, Wis. Stats., and ss. NR 19.055 and 40.07, Wis. Adm. Code.
   - Operator shall comply with the most recent Department-approved 'Boat, Gear, and Equipment Decontamination and Disinfection Protocol', Manual Code #9183.1, available at http://dnr.wi.gov/topic/invasives/disinfection.html

All portions of this permit, map and accompanying cover letter must be in possession of the chemical applicator at the time of treatment. During treatment all provisions of Chapter NR 107 107.07 and NR 107.08, Wis. Adm. Code, must be complied with, as well as the specific conditions contained in the permit cover letter.

I hereby certify that that the above information is true and correct and that copies of the application shall be provided to all affected property owners promptly and that the conditions of the permit will be adhered to. All portions of this permit, map and accompanying cover letter must be in possession of the applicant or their agent at time of plant removal. During plant removal activities, all provisions of applicable Wisconsin Administrative Rules must be complied with, as well as the specific conditions contained in the permit cover letter.

Steps to Complete the signature process

IMPORTANT: All email correspondence will be sent to the address associated with your WAMS ID).

1. Read and Accept the Responsibilities and Certification
2. Press the Initiate Signature Process button
3. Open the confirmation email for a one time confirmation code and instructions to complete the signature process.

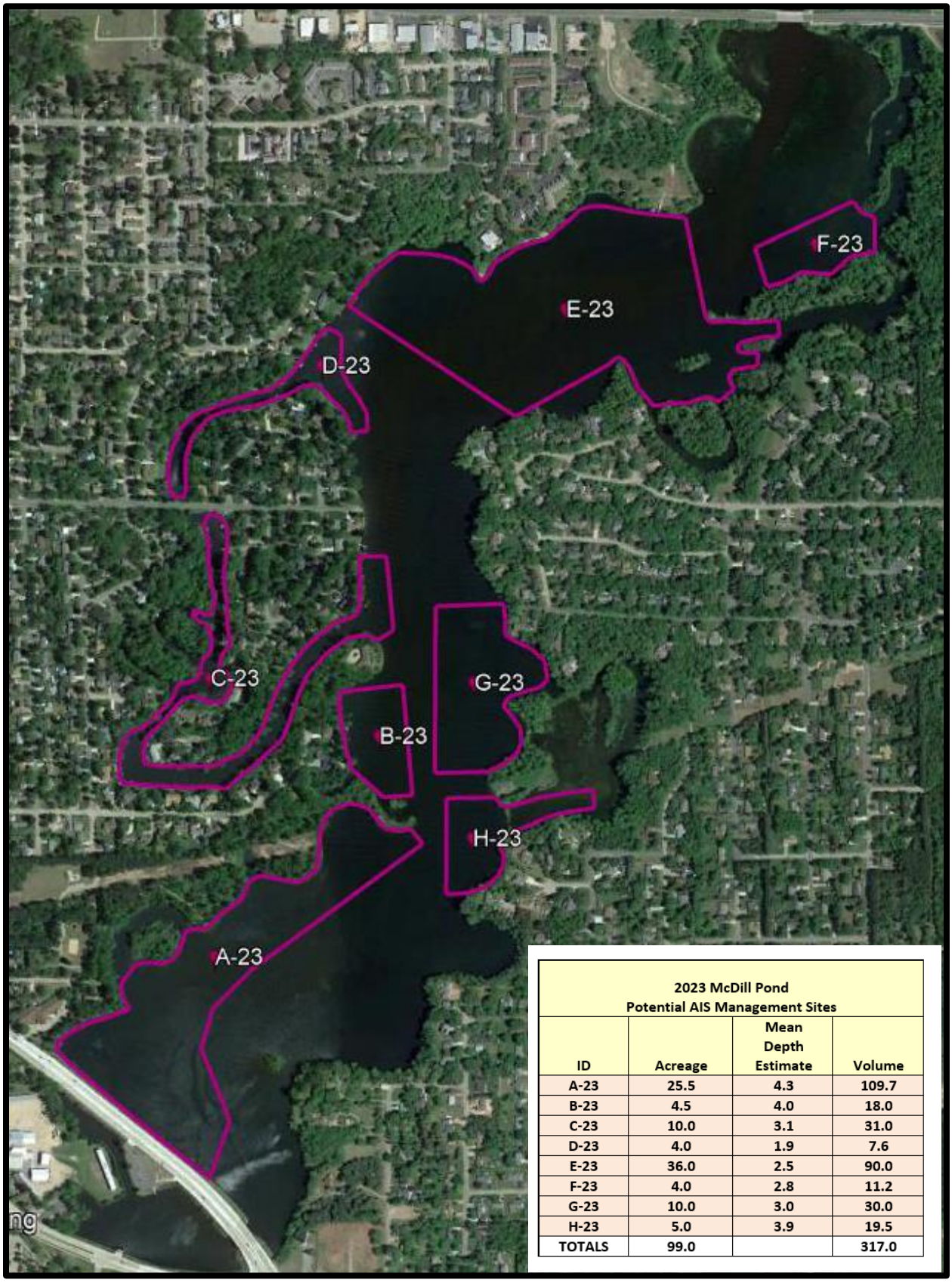
You will receive a final acknowledgement email upon completing these steps .

☑ Check if you are signing as Agent for Applicant.

i:0#.f|wamsmembership|amykay82 signed on 2023·

☑ I hereby certify that the above information is true and correct and that copies of this submittal shall be provided to the appropriate parties named in the contact section and that the conditions of the permit and pesticide use will be adhered to.

MCDILL POND 2023 POTENTIAL MANAGEMENT SITES



2023 McDill Pond Potential AIS Management Sites			
ID	Acreage	Mean Depth Estimate	Volume
A-23	25.5	4.3	109.7
B-23	4.5	4.0	18.0
C-23	10.0	3.1	31.0
D-23	4.0	1.9	7.6
E-23	36.0	2.5	90.0
F-23	4.0	2.8	11.2
G-23	10.0	3.0	30.0
H-23	5.0	3.9	19.5
TOTALS	99.0		317.0

To be refined following 2023 Spring Vegetation Survey

Legals 7700

PUBLIC NOTICE

The McDill Inland Lake and Rehabilitation District (the District) proposes to manage up to 100 acres of McDill Pond with aquatic herbicides to control excessive growth of exotic invasive aquatic plants.

The proposed applications of the aquatic herbicides Reward or Tribune and ProcellaCOR EC to infestations will be performed by Clarke Aquatic Services, a SOLitude Lake Management Company. It is anticipated that the applications will occur in spring, 2023 and will proceed only after the District obtains a permit for the treatment from the Wisconsin Department of Natural Resources.

The water use restrictions for the products listed above are as follows: *There are no swimming or fishing restrictions. Do not use water from application areas for irrigation purposes for 5 days after application.*

The District will hold a public informational meeting on the proposed management if five or more individuals, organizations, special units of government, or local units of government request one in writing. The person or entity requesting the meeting shall state a specific agenda of topics including problems and alternatives to be discussed. The request for a public informational meeting must be sent in writing to the McDill Inland Lake and Rehabilitation District, 3317 Della Street, Stevens Point, WI 54481 and to Wisconsin Department of Natural Resources, 473 Griffith Avenue, Wisconsin Rapids, WI 54494 within 5 days after the public notice is published.

WNAXLP

State of Wisconsin
County of Portage - ss

The undersigned, being duly sworn, doth dispose and say that he/she is principal for the **STEVENS POINT GAZETTE**, which is a newspaper of general circulation published in the City of Stevens Point and County of Portage, and State of Wisconsin, and that the annexed printed notice, take from said newspaper, was regularly published in said newspaper 1 week(s) successively, once in each week, prior to the time specified in said notice, which publication commenced on the 31 day of March A.D. 2023 and was last so published on the 31 day of March A.D. 2023

Signed

Sworn and subscribed to before me
This 31 day of March A.D. 2023
Printer's Fee $ 33.86

KATELYN VOORHIES NOTARY PUBLIC STATE OF WISCONSIN

Notary of Public, WIS.

My Commision Express

May 3 2026

Diquat Chemical Fact Sheet

Formulations

Diquat, or diquat dibromide, is the common name of the chemical 6,7-dihydrodipyrido (1,2-a:2',1'-c) pyrazinediium dibromide. Originally registered by the EPA in 1986, diquat was reregistered in 1995 and is currently being reviewed again. It is sold for agricultural and household uses as well as for use on certain floating-leaf and submersed aquatic plants and some algae. The aquatic formulations are liquids: two of the more commonly used in Wisconsin are Reward™ and Weedtrine-D™ (product names are provided solely for your reference and should not be considered endorsements).

Aquatic Use and Considerations

Diquat is a fast-acting herbicide that works by disrupting cell membranes and interfering with photosynthesis. It is a non-selective herbicide and will kill a wide variety of plants on contact. It does not move throughout the plants, so will only kill parts of the plants that it contacts. Following treatment, plants will die within a week.

Diquat will not be effective in lakes or ponds with muddy water or where plants are covered with silt because it is strongly attracted to silt and clay particles in the water. Therefore, bottom sediments must not be disturbed during treatment, such as may occur with an outboard motor. Only partial treatments of ponds or bays should be conducted (1/2 to 1/3 of the water body). If the entire pond were to be treated, the decomposing vegetation may result in very low oxygen levels in the water. This can be lethal to fish and other aquatic organisms. Untreated areas can be treated 10-14 days after the first treatment.

Diquat is used to treat duckweed (*Lemna* spp.), which are tiny native plants. They are a food source for waterfowl but can grow thickly and become a nuisance. Navigation lanes through cattails (*Typha* spp.) are also maintained with diquat. Diquat is labeled for use on the invasive Eurasian watermilfoil (*Myriophyllum spicatum*) but in practice is not frequently used to control it because other herbicide options are more selective.

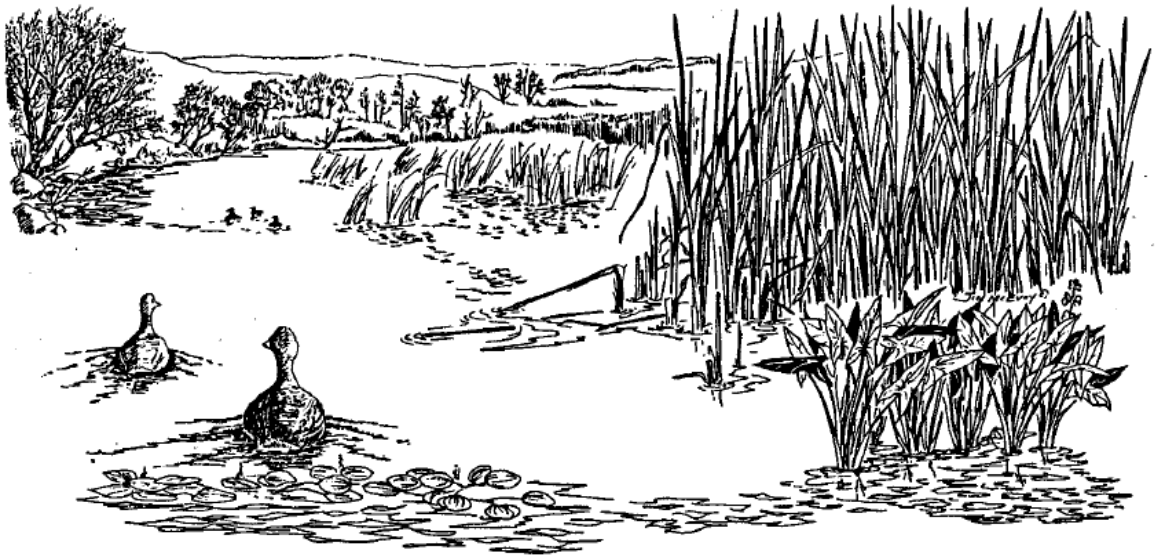
Post-Treatment Water Use Restrictions

There are no restrictions on swimming or eating fish from water bodies treated with diquat. Treated water should not be used for drinking water for one to three days, depending on the concentration used in the treatment. Do not use treated water for pet or livestock drinking water for one day following treatment. The irrigation restriction for food crops is five days, and for ornamental plants or lawn/turf, it varies from one to three days depending on the concentration used.

Herbicide Degradation, Persistence and Trace Contaminants

Diquat is not degraded by microbes. When applied to a waterbody, diquat binds with the organic matter in the sediment indefinitely. It does not degrade and will accumulate in the sediments. Diquat is usually detectable in the water column for less than a day to ~35 days after treatment. Diquat will remain in the water column longer when treating a waterbody with sandy soils due to the low organic matter and clay content. Because of its persistence and very high affinity for the soil, diquat does not leach into groundwater.

Ethylene dibromide (EDB) is a trace contaminant in diquat products. It originates from the manufacturing process. EDB is a carcinogen, and the EPA has evaluated the health risk of its presence in formulated diquat products. The maximum level of EDB in diquat dibromide is 10 ppb (parts per billion), it degrades over time, and it does not persist as an impurity.



Impacts on Fish and Other Aquatic Organisms

At application rates, diquat does not have any apparent short-term effects on most of the aquatic organisms that have been tested. However, certain species of important aquatic food chain organisms such as amphipods and Daphnia (water fleas) can be adversely affected at label application rates. Direct toxicity and loss of habitat are believed to be the causes. Tests on snails have shown that reproductive success may be affected, as well. These organisms only recolonize the treated area as vegetation becomes re-established.

Laboratory tests indicate walleye are the fish most sensitive to diquat, displaying toxic symptoms when confined in water treated with diquat at label application rates. Other game and panfish (e.g. northern pike, bass, and bluegills) are apparently not affected at these application rates. Limited field studies to date have not identified significant short or long-term impacts on fish and other aquatic organisms in lakes or ponds treated with diquat.

The bioconcentration factors measured for diquat in fish tissues is low. Therefore, bioconcentration is not expected to be a concern with diquat.

Human Health

The risk of acute exposure to diquat would be primarily to chemical applicators. Diquat causes severe skin and eye irritation and is toxic or fatal if absorbed through the skin, inhaled or swallowed. Wearing skin and eye protection (e.g. rubber gloves, apron, and goggles) to minimize eye and skin irritation is required when applying diquat.

The risk to water users of serious health impacts (e.g. birth defects and cancer) is not believed to be significant according to the EPA. Some risk of allergic reactions or skin irritation is present for sensitive individuals.

For Additional Information

Environmental Protection Agency
Office of Pesticide Programs
www.epa.gov/pesticides

Wisconsin Department of Agriculture, Trade, and Consumer Protection
http://datcp.wi.gov/Plants/Pesticides/

Wisconsin Department of Natural Resources
608-266-2621
http://dnr.wi.gov/lakes/plants/

Wisconsin Department of Health Services
http://www.dhs.wisconsin.gov/

National Pesticide Information Center
1-800-858-7378
http://npic.orst.edu/

Wisconsin Department of Natural Resources

July 2018
EGAD #: 3200-2018-83

Florpyrauxifen-benzyl Chemical Fact Sheet

Formulations

Florpyrauxifen-benzyl was registered with the EPA for aquatic use in 2017. The active ingredient is 2-pyridinecarboxylic acid, 4-amino-3-chloro-6-(4-chloro-2-fluoro-3-methoxyphenyl)-5-fluoro-, phenyl methyl ester. The current Wisconsin-registered formulation is a liquid (ProcellaCOR™ EC) solely manufactured by SePRO Corporation.

Aquatic Use and Considerations

Florpyrauxifen-benzyl is a systemic herbicide that is taken up by aquatic plants. The herbicide is a member of a new class of synthetic auxins, the arylpicolinates, that differ in binding affinity compared to other currently registered synthetic auxins. The herbicide mimics the plant growth hormone auxin that causes excessive elongation of plant cells that ultimately kills the plant. Susceptible plants will show a mixture of atypical growth (larger, twisted leaves, stem elongation) and fragility of leaf and shoot tissue. Initial symptoms will be displayed within hours to a few days after treatment with plant death and decomposition occurring over 2 – 3 weeks. Florpyrauxifen-benzyl should be applied to plants that are actively growing; mature plants may require a higher concentration of herbicide and a longer contact time compared to smaller, less established plants.

Florpyrauxifen-benzyl has relatively short contact exposure time (CET) requirements (12 – 24 hours typically). The short required CET may be advantageous for localized treatments of submersed aquatic plants, however, the target species efficacy compared to the size of the treatment area is not yet known.

In Wisconsin, florpyrauxifen-benzyl may be used to treat the invasive Eurasian watermilfoil (*Myriophyllum spicatum*) and hybrid Eurasian watermilfoil (*M. spicatum* X *M. sibiricum*). Other invasive species such as floating hearts (*Nymphoides* spp.) are also susceptible. In other parts of the country, it is used as a selective, systemic mode of action for spot and partial treatment of the invasive plant hydrilla (*Hydrilla verticillata*). Desirable native species that may also be negatively affected include waterlily species (*Nymphaea* spp. and *Nuphar* spp.), pickerelweed (*Pontederia cordata*), and arrowhead (*Sagittaria* spp.).

It is important to note that repeated use of herbicides with the same mode of action can lead to herbicide-resistant plants, even in aquatic plants. Certain hybrid Eurasian watermilfoil genotypes have been documented to have reduced sensitivity to aquatic herbicides. In order to reduce the risk of developing resistant genotypes, avoid using the same type of herbicides year after year, and utilize effective, integrated pest management strategies as part of any long-term control program.

Post-Treatment Water Use Restrictions

There are no restrictions on swimming, eating fish from treated waterbodies, or using water for drinking water. There is no restriction on irrigation of turf. Before treated water can be used for non-agricultural irrigation besides turf (such as shoreline property use including irrigation of residential landscape plants and homeowner gardens, golf course irrigation, and non-residential property irrigation around business or industrial properties), follow precautionary waiting periods based on rate and scale of application, or monitor herbicide concentrations until below 2 ppb. For agricultural crop irrigation, use analytical monitoring to confirm dissipation before irrigating. The latest approved herbicide product label should be referenced relative to irrigation requirements.

Herbicide Degradation, Persistence and Trace Contaminants

Florpyrauxifen-benzyl is broken down quickly in the water by light (i.e., photolysis) and is also subject to microbial breakdown and hydrolysis. It has a half-life (the time it takes for half of the active ingredient to degrade) ranging from 1 – 6 days. Shallow clear-water lakes will lead to faster degradation than turbid, shaded, or deep lakes.

Florpyrauxifen-benzyl breaks down into five major degradation products. These materials are generally more persistent in water than the active herbicide (up to 3 week half-lives) but four of these are minor metabolites detected at less than 5% of applied active ingredient. EPA concluded no hazard concern for metabolites and/or degradates of florpyrauxifen-benzyl that may be found in drinking water, plants, and livestock.

Florpyrauxifen-benzyl binds tightly with surface sediments, so leaching into groundwater is unlikely. Degradation products are more mobile, but aquatic field dissipation studies showed minimal detection of these products in surface sediments.

Impacts on Fish and Other Aquatic Organisms

Toxicity tests conducted with rainbow trout, fathead minnow, water fleas (*Daphnia* sp.), amphipods (*Gammarus* sp.), and snails (*Lymnaea* sp.) indicate that florpyrauxifen-benzyl is not toxic for these species. EPA concluded florpyrauxifen-benzyl has no risk concerns for non-target wildlife and is considered "practically non-toxic" to bees, birds, reptiles, amphibians, and mammals.

Florpyrauxifen-benzyl does not bioaccumulate in fish or freshwater clams due to rapid metabolism and chemical depuration.

Human Health

EPA has identified no risks of concern to human health since no adverse acute or chronic effects, including a lack of carcinogenicity or mutagenicity, were observed in the submitted toxicological studies for florpyrauxifen-benzyl regardless of the route of exposure. EPA concluded with reasonable certainty that drinking water exposures to florpyrauxifen-benzyl do not pose a significant human health risk.

For Additional Information

Environmental Protection Agency Office of Pesticide Programs
www.epa.gov/pesticides

Wisconsin Department of Agriculture, Trade, and Consumer Protection
http://datcp.wi.gov/Plants/Pesticides/

Wisconsin Department of Natural Resources
608-266-2621
http://dnr.wi.gov/lakes/plants/

National Pesticide Information Center
1-800-858-7378
http://npic.orst.edu/

Washington State Department of Ecology. 2017.
https://fortress.wa.gov/ecy/publications/documents/1710020.pdf