

April 2023

**Virgin Lake Property Owner or Occupant
Oneida County, WI**

Re: Proposed Management for Eurasian Watermilfoil on Virgin Lake.

Dear Virgin Lake Property Owner or Occupant:

The Three Lakes Waterfront Association (the Association) with support from Onterra, LLC and Clarke Aquatic Services, Inc., a SOLitude Lake Management Company, proposes to manage approximately 12 acres on Virgin Lake to control the excessive growth of the exotic invasive aquatic plant, Eurasian Watermilfoil. The Association proposes this site be managed with the aquatic herbicide, ProcellaCOR EC (florpyrauxifen-benzyl), and the application will be carried out by Clarke.

We anticipate the application to occur sometime in late spring (June), 2023 and will proceed only after the Association obtains a permit for the project from the WDNR.

Notification of the exact date of application and water use restrictions will be provided by the posting of shoreline in and adjacent to application areas, and public access points.

**THERE ARE NO RESTRICTIONS ON SWIMMING, FISHING, OR OTHER RECREATIONAL ACTIVITIES.
DO NOT USE TREATED WATER FOR IRRIGATION OF ORNAMENTAL FLOWERS AND CROPS FOR 3 DAYS
(IMMEDIATE IRRIGATION OF TURF IS FINE).**

Additional details regarding the proposed management including a copy of the permit application and the WDNR aquatic herbicide fact sheet on florpyrauxifen-benzyl can be found at: <http://tlwa.org/>.

If you do not have internet access, would like a hard copy, or have additional questions about the proposed management, please contact:

Fred Knoch, President
Three Lakes Waterfront Association
longlake@newnorth.net
(715) 479-4158

Three Lakes Waterfront Association

701

STATE OF WISCONSIN } ss.
Vilas County

Kurt L. Krueger being duly sworn, deposes and says that he (she) is an authorized representative of the Vilas County News-Review and The Three Lakes News, a weekly newspaper published at Eagle River, the seat of government of said county, and that an advertisement of which the annexed is a true copy, taken from said paper, was published therein on

March 8, 2023

(One Week, 3/8/23)
PUBLIC NOTICE
The Three Lakes Waterfront Association (the Association) proposes to manage approximately 12 acres of Virgin Lake with an aquatic herbicide to control excessive growth of the exotic invasive aquatic plant, Eurasian watermilfoil (EWM). Clarke Aquatic Services, Inc., a SOLitude Lake Management Company (Clarke) will conduct an application of the aquatic herbicide, ProcelacOR EC, targeting the EWM for control. It is anticipated that the application will occur sometime in late spring or early summer (June), 2023 and will proceed only after the Association obtains a permit for the treatment from the Wisconsin Department of Natural Resources.
The water use restriction for ProcelacOR EC are as follows:
There are no swimming, fishing or other recreational restrictions. Do not use water from application area for non-turf irrigation purposes for 3 days, turf can be irrigated immediately.
The Association will hold a public informational meeting on the proposed treatment 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 Three Lakes Waterfront Association, PO BOX 145, Three Lakes, WI 54552 and to Wisconsin Department of Natural Resources, 107 Suttell Avenue, Rhinelander, WI 54501 within 5 days after the public notice is published.
0901

(Signed) Kurt L. Krueger (Title) Publisher

Subscribed and sworn to before me this 8th day of March, 2023

Dawn R. Molina
Notary Public, Vilas County, Wisconsin

My Commission expires May 22, 2024
43 lines, one insertion @ .8478 per line \$ 36.46

lines, insertion @ _____ per line \$ _____
Office Fee \$ 1.00
Total \$ 37.46

(Seal)

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 2023-04-04T07:34:38

Site or Project Name:

Virgin Lake

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 completed 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 Three Lakes Waterfront Association

Last Name: Knoch

First Name: Fred

Mailing Address: PO Box 145

City: Three Lakes

State: WI

Zip Code: 54562

Email:

Phone Number:

(xxx-xxx-xxxx)

Alternative Phone Number:

(xxx-xxx-xxxx)

Waterbody Address

Last Name:

First Name:

Street Address: Safar Road

City: Three Lakes

State: WI

Zip Code: 54562

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
<input type="text"/>	<input type="text"/>		

Site Information - Complete

Waterbody Containing Control Area(s)

Waterbody Property Owners Association or Waterbody District Representative :	<input type="text" value="Fred Knoch"/>
	<input type="checkbox"/> None
Water Body Name:	<input type="text" value="Virgin Lake"/>
Primary County:	<input type="text" value="Oneida"/>
Latitude:	<input type="text" value="45.785453"/>
Longitude:	<input type="text" value="-89.087443"/>
Section:	<input type="text" value="10"/>
Township:	<input type="text" value="38"/>
Range:	<input type="text" value="11"/>
Direction:	<input checked="" type="radio"/> E <input type="radio"/> W
Waterbody Surface Area:	<input type="text" value="261"/> acres
Estimated Surface area that is 10ft or less	<input type="text" value="85"/> acres

Proposed Control Area(s)

Area(s) Proposed for Control:

Site Name (Optional)	Treatment Length	Treatment Width	Estimated Acreage	Average Depth	Calculated Volume
<input type="text"/>	<input type="text" value="0"/> ft. x <input type="text" value="0"/> ft.	$\div 43,560 \text{ ft}^2 =$	<input type="text" value="11.70"/> ac	<input type="text" value="6"/> ft =	<input type="text" value="70.20"/> ac-ft
Estimated Acreage Grand Total			<input type="text" value="11.70"/> ac	Calculated Volume Grand Total	<input type="text" value="70.20"/> 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? <input checked="" type="radio"/> Yes <input type="radio"/> No <input type="radio"/> Don't Know	If Yes, date approved of most current copy 5/1/2023	Link to Approved Plan: <input checked="" type="checkbox"/> Uploaded Plan copy as an Attachment
Does the proposed plant removal agree with the approved plan? <input checked="" type="radio"/> Yes <input type="radio"/> No If NO, explain, Attach additional sheets if necessary. <div></div>		

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

- | | | |
|---|--|--|
| <input type="checkbox"/> Algae | <input type="checkbox"/> Flowering Rush | <input type="checkbox"/> Purple Loosestrife |
| <input type="checkbox"/> Common/Glossy Buckthorn | <input type="checkbox"/> Hybrid Cattail | <input type="checkbox"/> Reed Canary Grass |
| <input type="checkbox"/> Coontail | <input type="checkbox"/> Hybrid Watermilfoil | <input type="checkbox"/> Reed Manna Grass |
| <input type="checkbox"/> Curly-Leaf Pondweed | <input type="checkbox"/> Japanese Knotweed | <input type="checkbox"/> Starry Stonewort |
| <input type="checkbox"/> Duckweed | <input type="checkbox"/> Naiad | <input type="checkbox"/> Yellow Floating Heart |
| <input type="checkbox"/> Elodea | <input type="checkbox"/> Narrow-Leaf Cattail | <input type="checkbox"/> Yellow Iris |
| <input checked="" type="checkbox"/> Eurasian Watermilfoil | <input type="checkbox"/> Phragmites | <input type="checkbox"/> 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)

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

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	<input type="radio"/> Yes <input checked="" type="radio"/> No	fragmentation leads to spread of AIS
2. Manual removal	<input type="radio"/> Yes <input checked="" type="radio"/> No	area too large
3. Sediment screens/covers	<input type="radio"/> Yes <input checked="" type="radio"/> No	prevents beneficial plant growth
4. Dredging	<input type="radio"/> Yes <input checked="" type="radio"/> No	too expensive
5. Waterbody drawdown	<input type="radio"/> Yes <input checked="" type="radio"/> No	not site specific
6. Nutrient controls in watershed	<input type="radio"/> Yes <input checked="" type="radio"/> No	not site specific
7. Other:	<input type="radio"/> Yes <input type="radio"/> 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

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

[Virgin Lake 2023 Riparian Notification List.xlsx](#)

Public Notice

 File Attachment

[Virgin Lake 2023 Proof of Publication.PDF](#)

Large Scale
Worksheet

 File Attachment

[Virgin Lake 2023 Large Scale Worksheet + Fisheries Response.pdf](#)

Site Map

 File Attachment

[Map6 Virgin EWM T2023 Prelim NJL Comment.pdf](#)

Lake
Management
Plan

 File Attachment

[ThreeLakesOneida CompPlan May21 VirginLake.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)	11.70
acres X \$25 per acre = \$	\$300.00
If proposed treatment is less than 0.25 acre, acreage fee is \$0	
Basic Permit Fee (non-refundable)	\$20.00
Total Fee	\$320

Payment Information

Invoice Number: WP-00040174

Payment Confirmation Number: WS2WT3009900838

Amount Paid: \$320

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.

NOTE: Completion of this form is required by the Department, pursuant to s. 144.025(2)(i), Wis. Stats., and Chapter NR 107, Wis. Adm. Code, once every five years for proposed treatments that would cover more than 10 acres on one lake, or more than 10 percent of that portion of the lake that is 10 feet or less in depth.

The purpose of this form is to identify the: (1) recreational needs of the property owners and visitors;
(2) value of the proposed treatment area to fish and wildlife;
(3) cause(s) of the excess plant growth problem; and
(4) short and long-term solutions to the problem.

Please furnish a detailed map(s) of the lake and its watershed. Indicate the watershed boundaries on the map. If you do not have a watershed map for the lake you wish to treat, your DNR lake management coordinator can help you locate or prepare one.

SECTION I. BACKGROUND

Name of Applicant

THREE LAKES WATERFRONT ASSOCIATION, INC.

Date Completed

03/30/2023

Name of Lake

VIRGIN LAKE, ONEIDA COUNTY, THREE LAKES CHAIN

SECTION II. RECREATIONAL USES

Check those uses that apply and complete the information requested:

- ☐ 1. **SWIMMING:** Indicate on your lake map the portions of the proposed treatment area that are used for swimming.
What distance from shore is needed to provide adequate swimming space? _____ feet
What is the average depth at this distance? _____ feet
- ☒ 2. **FISHING:** Indicate on your lake map any fishing areas that are within the proposed treatment area. **ENTIRE TREATMENT AREA**
- ☐ 3. **HUNTING:** Indicate on your lake map any hunting areas that are within or adjacent to the proposed treatment area.
- ☒ 4. **BOATING/NAVIGATION:** Indicate on your lake map where the following boating activities take place within the proposed treatment area:
Sailing _____ Water skiing _____ Fishing **ENTIRE TREATMENT AREA**
Pleasure boating _____ Jet skiing _____ Other _____
- ☐ 5. **AESTHETIC:** Indicate on your lake map any wildlife or nature observation areas within the proposed treatment area.
Do you object to the aesthetic quality (appearance, odor) of the proposed treatment area? ☒ Yes ☐ No
- ☒ 6. **OTHER:** What other activities occur in the proposed treatment area? **SCUBA DIVING FOR HAND HARVESTING OF E.W.M.**

SECTION III. FISH AND WILDLIFE VALUE

1. **Fisheries:** To maintain a quality fishery, a lake must provide good spawning, rearing and feeding habitat. Please indicate on your lake map the location of any quality fisheries habitat. (Contact your local DNR fish manager or your local fishing club for information about your lake's fishery.)
2. **Wildlife:** Indicate on your lake map any portions of the proposed treatment area or adjacent shoreline that are considered to be good wildlife habitat. (Contact your local DNR wildlife manager or your local wildlife or hunting club for additional information about the wildlife around (and in) your lake.)
3. Which organization(s) or individual(s) did you contact for your information? _____

SECTION IV. CAUSES OF THE PROBLEM

What are perceived to be the local or regional causes of the problem? (Check all those that apply.)

- ☐ A. Agricultural runoff (from barnyards or croplands) that contributes sediment, nutrients and/or bacteria to the lake.
- ☐ B. Urban runoff (from stormwater) that contributes sediment, nutrients and other pollutants to the lake.
- ☐ C. Sewage treatment or industrial discharges upstream of the lake.
- ☐ D. Possible faulty septic systems in the area around the lake.
- ☐ E. Runoff from fertilized lawns near the lake.
- ☐ F. Sediments contaminated with nutrients from past pollution activities.
- ☒ G. Naturally fertile - no known human sources of excessive sediment, nutrients or other pollutants.
- ☐ H. Other: _____

Please identify on your watershed map the locations of any land use practices that are perceived to be contributing to excess plant growth problems in the lake.

SECTION V. SOLUTIONS

Control of aquatic plant problems can be temporarily accomplished with short-term measures, but no strategy will be successful without long-term planning to address the source of the problem. A sound plant management program should combine both short-term and long-term control strategies.

1. What level of short-term control do you wish to achieve?

- ☐ Remove 100% of the plants in the treatment area.
☒ Remove 70-99% of the plants in the treatment area.
☐ Remove less than 70% of the plants in the treatment area.

2. Which plants do you wish to remove in the short-term?

- ☐ Remove all plant species.
☒ Remove specific plant species only. (Name(s) of species: E.W.M.)

3. How often will it be necessary to:

A. Chemically treat? _____ times per year for algae; _____ times per year for other plants

B. Mechanically harvest? 12+ times per year

4. What long-term control alternatives have you begun to implement?

- ☒ Developed a lake plant management plan.
☐ Developed a lake protection plan.
☒ Formed a Lake District, Lake Association or other organization. (Name: THREE LAKES WATERFRONT ASSN.)
☒ Established a monitoring program for the lake.
☐ Contacted the Soil Conservation Service or Land Conservation Commission to identify land use controls that are needed in the watershed.
☐ Conducted a septic survey with the county sanitarian.
☐ Other: _____

Long-term planning can provide an organized approach to solving the problems that are affecting the water quality of your lake. Your DNR lake management coordinator, county extension agent, or regional planning commission can provide specific technical information and assistance.

SECTION VI. PUBLIC INVOLVEMENT

1. Before you conduct a large-scale chemical aquatic plant treatment, you are required to provide the public with formal notice of the planned treatment (s. NR 107.04(3), Wis. Adm. Code). Please attach evidence (e.g., newspaper clipping) that such notice has been made.

2. You are also required to conduct a public informational meeting on the proposed large-scale treatment if 5 or more individuals, organizations or local or special units of government request such a meeting within 5 days of the notice (s. NR 107.04(3), Wis. Adm. Code).

Was a public informational meeting required for the proposed treatment? ☐ Yes ☒ No

If yes, please attach evidence that such a meeting was held.

3. These public notice and public meeting provisions apply each year that a treatment is proposed.

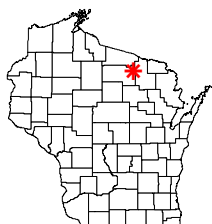
NOTE: This form is to be updated once every 5 years to include new information. Modifications of the proposed treatment within the 5-year period also require re-submittal of this form if the location or target organisms are changed, or if the treatment area is expanded by more than 10 percent.

I hereby certify that the above information is true and correct and that copies of this application have been provided to the appropriate parties named in Section II of Form 3200-4, Application for Permit for Chemical Aquatic Plant Control.

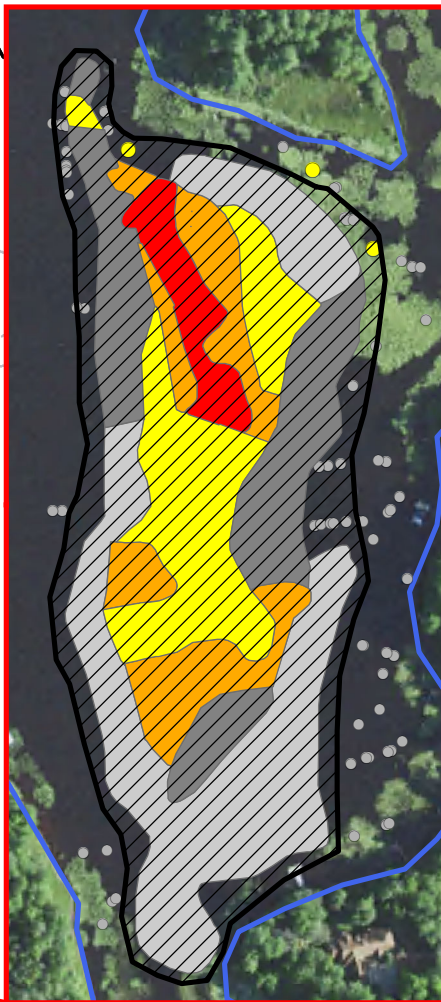
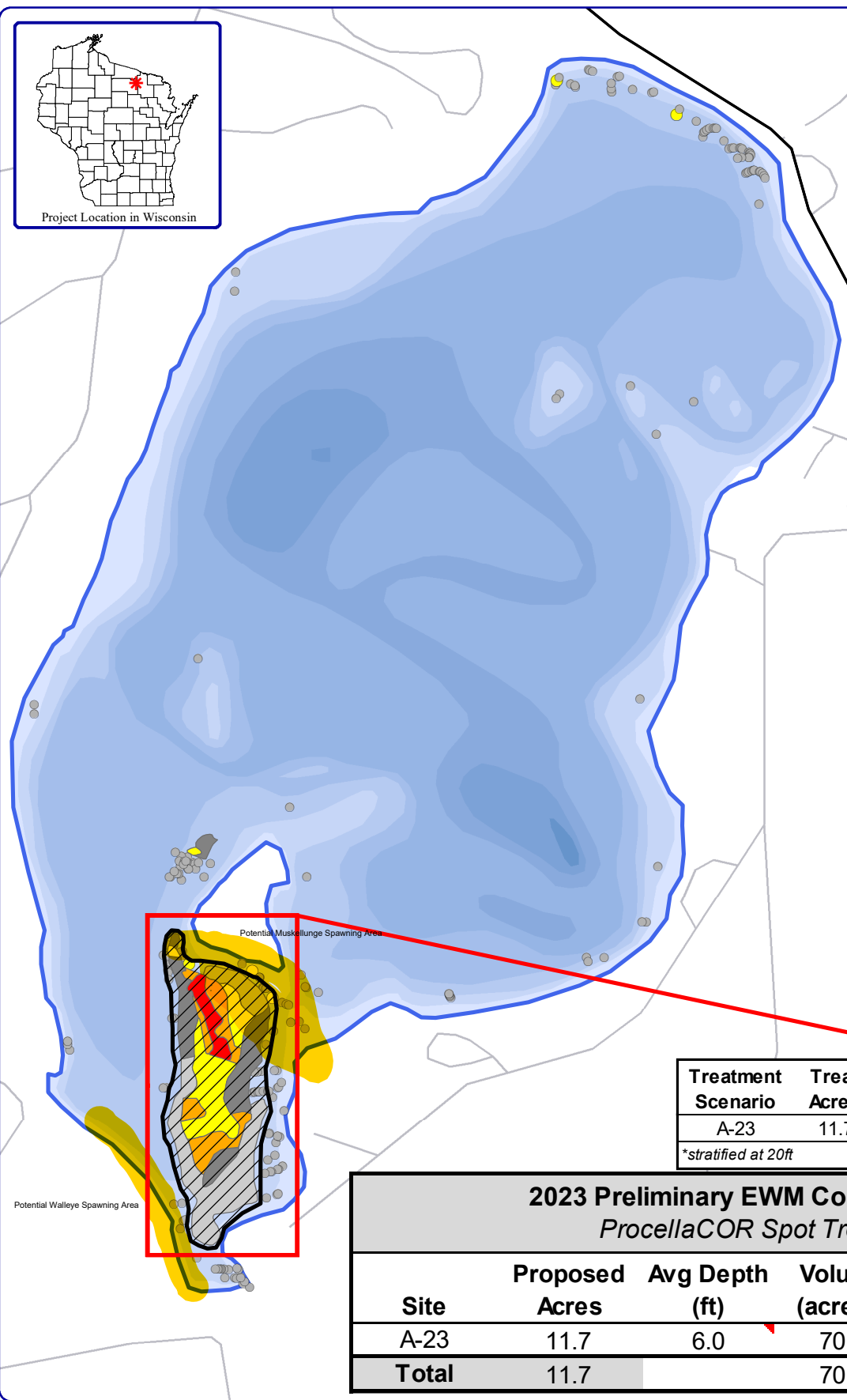
Applicant's Signature

Frederick W. Kroch III

Please attach with map(s) to Form 3200-4, Application for Permit for Chemical Aquatic Plant Control.



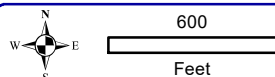
Project Location in Wisconsin



Treatment Scenario	Treat Acres	Treat Area to Lake	*Potential Lake-wide Conc. (PPB)
A-23	11.7	4.4%	0.16
*stratified at 20ft			

2023 Preliminary EWM Control Strategy ProcellaCOR Spot Treatment

Site	Proposed Acres	Avg Depth (ft)	Volume (acre-ft)	PDU Rate (per acre-ft)	PDU Total
A-23	11.7	6.0	70.3	4.0	281
Total	11.7		70.3		281



Onterra LLC
Lake Management Planning
815 Prosper Road
De Pere, WI 54115
920.338.8860
www.onterra-eco.com

Sources:
Roads and Hydro: WDNR
Bathymetry: WDNR, digitized by Onterra
Orthophotography: NAIP, 2020
Aquatic Plants: Onterra, 2022
Map Date: 10-31-22 TWH

- Legend**
- EWM Survey Results (9/15/2022)**
- Highly Scattered
 - Scattered
 - Dominant
 - Highly Dominant
 - Surface Matting
 - Single or Few Plants
 - Clumps of Plants
 - Small Plant Colony
 - 2023 Herbicide Application Area

MAP 6
Virgin Lake
Three Lakes Chain
Oneida County, Wisconsin
**Preliminary 2023 EWM
Treatment Strategy**

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>

