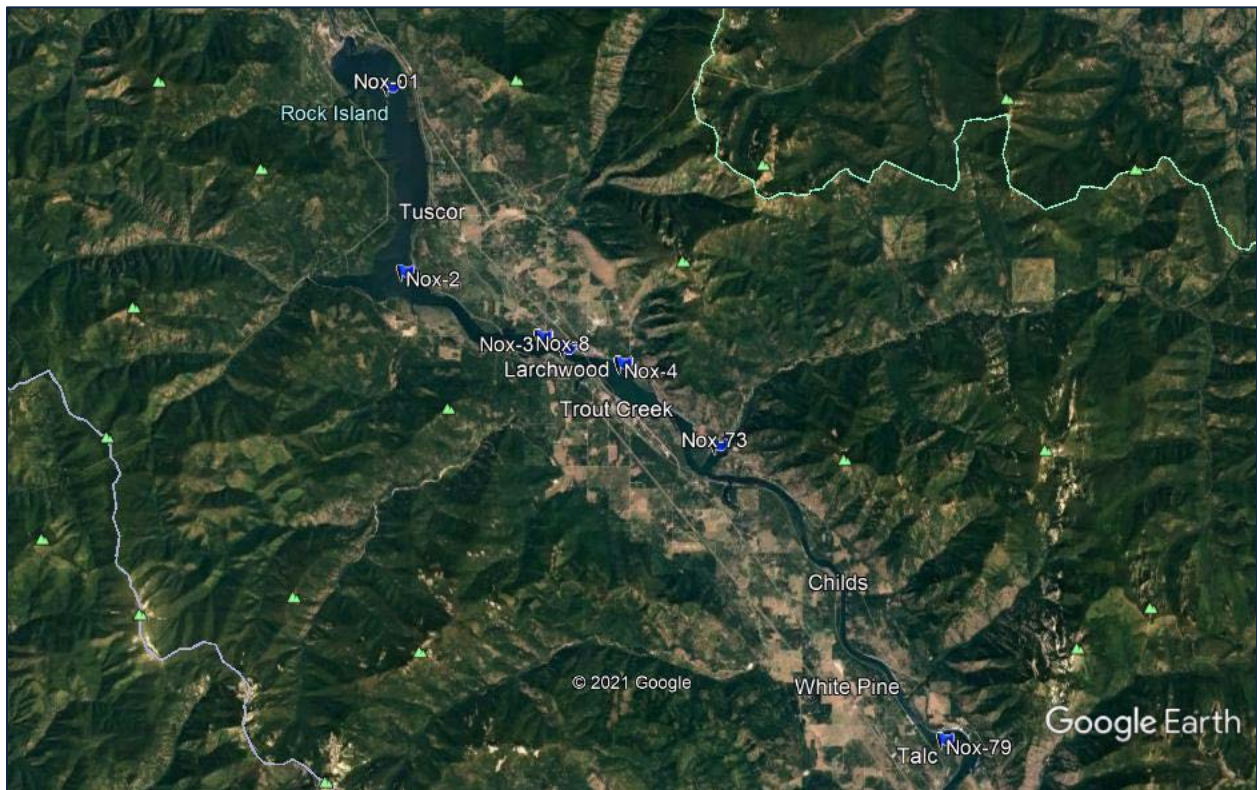


**NOXON RAPIDS RESERVOIR
SANDERS COUNTY, MONTANA**

**2021 Aquatic Invasive Species (AIS)
Aquatic Pesticide Application Report (APAR)**



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October 2021

BACKGROUND INFORMATION: Clean Lakes, Inc. (CLI) was contracted by Sanders County, Montana to provide aquatic herbicide applications for the control of Aquatic Invasive Species (AIS) within discrete areas of Noxon Rapids Reservoir in August 2021. Aquatic herbicide applications were conducted in compliance with the Montana Department of Environmental Quality, Montana Pollutant Discharge Elimination System (NPDES) Pesticide General Permit (PGP) for Pesticide Application (NOI Permit # MTG870011), as well as the Pesticide Discharge Management Plan (PDMP) developed as part of the PGP. The Permit related information is included in the Noxon Rapids Reservoir, Sanders County, Montana 2021 Aquatic Invasive Species Aquatic Pesticide Application Plan (APAP)¹.

SCOPE OF WORK: The scope of work was for the application of aquatic herbicides for the control of Eurasian watermilfoil (EWM) and Curly-leaf pondweed (CLP) in a total of 63.96 acres within previously identified and demarcated areas of Noxon Rapids Reservoir.

PRE-TREATMENT SURVEYS: In July 2021 Craig McLane (Montana Fish, Wildlife and Parks (MTFWP)) carried out visual and point intercept surveys in areas where nuisance growths of aquatic invasive species (AIS) were identified in previous surveys. On July 20, 2021, CLI received the 2021 treatment GIS polygons and survey points from Kim McMahon. CLI developed a budgetary plan on July 22, 2021 with a final plan approved that day. A treatment day was established for the week of August 2, 2021.

SUMMARY OF ACRES TREATED: The final plan consisted of treating 63.96 acres of EWM and CLP in Noxon Rapids Reservoir. Treatment plots were identified through GIS shapefiles and treatment plans at the direction of the county.

TREATMENT SCHEDULE: The aquatic herbicide applications were performed on Wednesday, August 4, 2021, by CLI staff Thomas Moorhouse and Drew McNabb as outlined in Table 1 below:

¹ NOXON RAPIDS RESERVOIR, SANDERS COUNTY, MONTANA, 2021 AIS Aquatic Pesticide Application Plan (APAP)

Table 1: Treatment Plots, Dates and Times

2021 Noxon Rapids Reservoir Treatment Plan									
Plot Number	Acreage (Ac)	Mean Depth (ft)	Date	Start	Stop	Wind (mph)	Wind from Direction	Sky	Water Temp (F)
NOX-03	1.34	8.4	8/4/2021	6:16 PM	6:26 PM	6	N	PC	80.80
NOX-73	0.51	5.4	8/4/2021	6:51 PM	6:55 PM	4	W	PC	79.90
NOX-79	1.00	6.6	8/4/2021	7:32 PM	7:35 PM	5	N	PC	81.20
Sub Total	2.85								
NOX-04	1.26	5.9	8/4/2021	5:26 PM	5:28 PM	0	0	Hazy	80.60
NOX-08	8.45	4.6	8/4/2021	5:38 PM	5:54 PM	0	0	Hazy	
Sub Total	9.71								
NOX-01	19.25	5.5	8/4/2021	10:25 AM	10:57 AM	0	0	Hazy	77.00
NOX-02	32.15	7.1	8/4/2021	12:52 PM	3:36 PM	4	N	Hazy	78.30
Sub Total	51.40								
Total	63.96								

EQUIPMENT USED: A CLI Littoral Zone Treatment vessel (LittLine[®]) was used to perform the aquatic herbicide applications on August 4, 2021. The herbicide applications were made to the lower portion of the water column to increase herbicide concentration and exposure time (CET) relationships for the control of the target species. CLI secured an Montana Aquatic Invasive Species Prevention Pass (AISPP) on August 3, 2021 (AISPP#201600). The application vessel was inspected on August 4, 2021 at the Clark Fork, Idaho Aquatic Invasive Species inspection station prior to entering Montana.

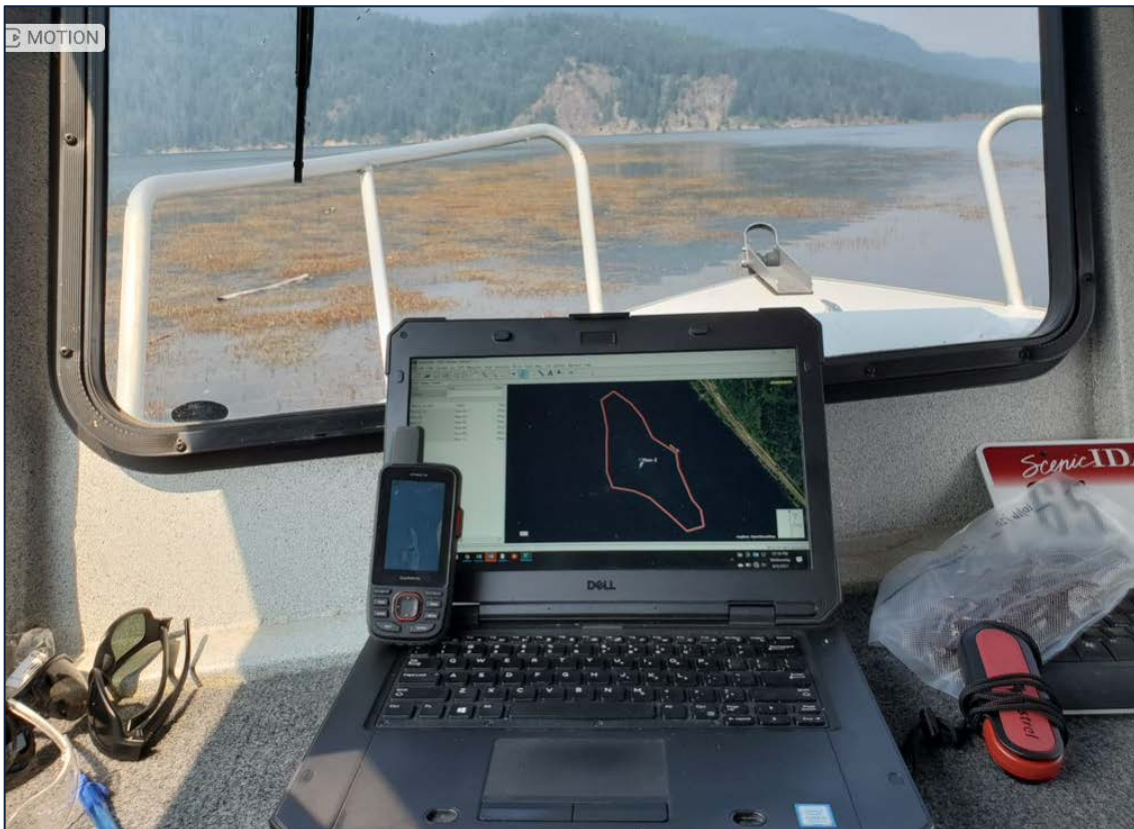


The AIS treatment area GIS shapefiles were loaded into the LittLine® computer system for vessel guidance and herbicide application data recording. The LittLine® can place herbicides at any depth within the water column (2 - 30 feet), as well as within the bottom 2 foot of the water

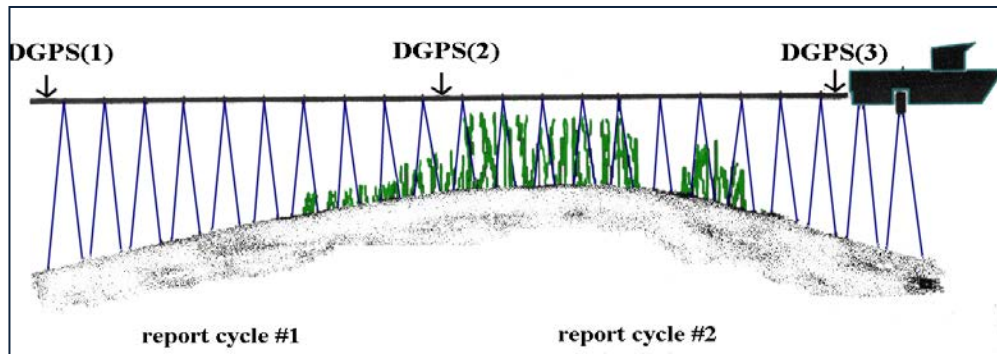


column. Impacts from currents, wind and wave action are reduced in deep water applications through the use of the LittLine® application system when compared to conventional subsurface applications. The herbicide application in all of the plots was within the bottom portion of the water column.

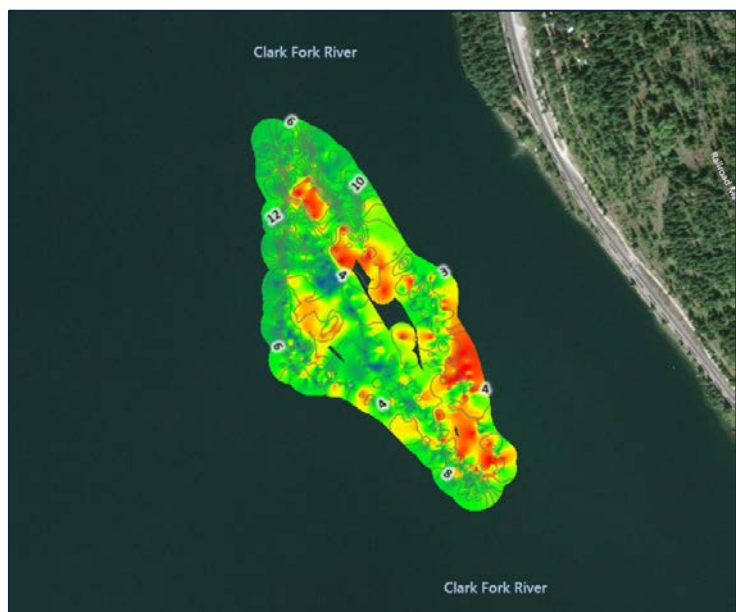
The LittLine system's computerized rate controllers regulate the aquatic herbicide applications through preset treatment rates.



A Digital Echosounder System with a Structure Scan Module (Lowrance model) was used to record data of the submerged aquatic vegetation (SAV) profile in the control plots during treatment and during the post treatment survey. Data was collected in both the .SLG (traditional sonar on HDS line) and the .SL2 (multi-channel structure scan) formats.



The sonar data collected was processed and analyzed for At Time of Treatment Submerged Aquatic Vegetation (SAV) in the treatment plots (August 4, 2021), and at six (6) Weeks Post Treatment (September 16, 2021). Data was collected to compare At Time of Treatment to six (6) Week Post Treatment SAV coverage, height in the water column, and bio-volume to support post-treatment efficacy evaluations. An



example of SAV conditions At Time of Treatment for Plot 2, Noxon Reservoir, is pictured above.

AQUATIC HERBICIDES CLI provided the aquatic herbicides for the project. CLI provided the required support equipment for material handling (herbicide transfer) as well as support vehicles for the vessels assigned to the project. The aquatic herbicides were applied to the specified areas of Noxon Rapids Reservoir for the control of Eurasian watermilfoil and Curly-leaf pondweed, as outlined in the Site Data Tables below (Herbicide Label's and Material Safety Data Sheets (MSDS's) are included in the Aquatic Pesticide Application Plan (APAP), provided previously). Provided in Table 2 is the Treatment Site Data outlining treatment information for each plot.



TREATMENT SITE DATA

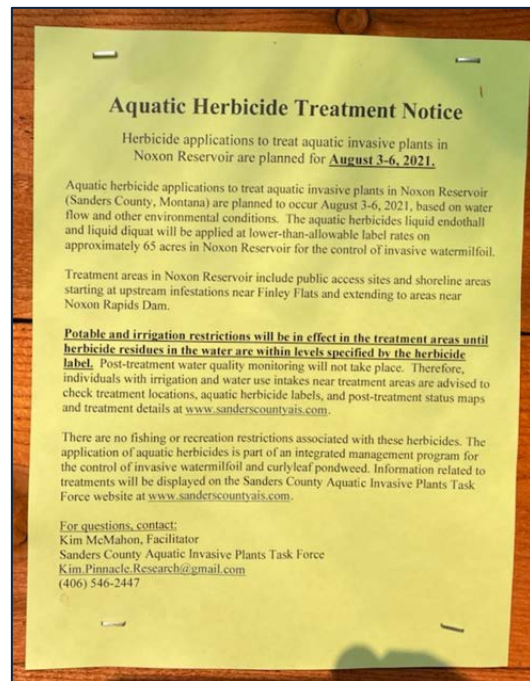
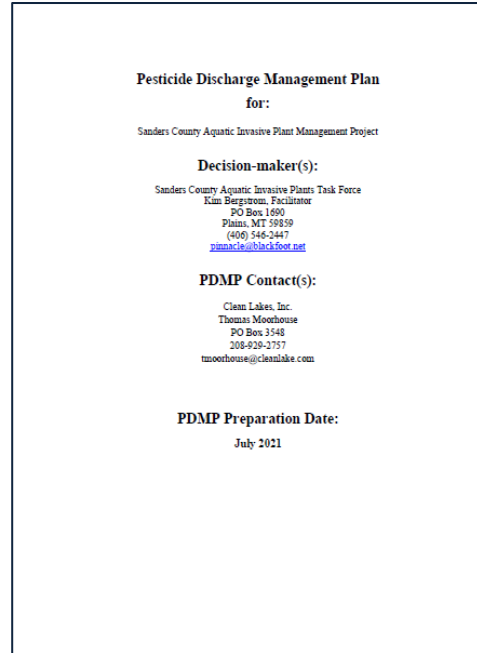
Table 2: Noxon Rapids Reservoir Reservoir, Plot Treatment Site Data, Aquatic Herbicides Used:

2021 Noxon Rapids Reservoir Treatment Plan					Littora (Diquat)			Aquathol K (Endothall)		
Plot Number	Acreage (Ac)	Mean Depth (ft)	Volume (AF)	Product	Rate ppm	Gal/Ac ft	Gal Total Site	Rate ppm	Gal/Ac ft	Gal Total Site
NOX-03	1.34	8.4	11.26	End/Diq	0.37	0.5	5.6	1.8	1.16	13.0
NOX-73	0.51	5.4	2.75	End/Diq	0.37	0.5	1.4	1.8	1.16	3.2
NOX-79	1.00	6.6	6.60	End/Diq	0.37	0.5	3.3	1.8	1.16	7.6
Sub Total	2.85						10.3			23.8
NOX-04	1.26	5.9	7.43	End/Diq	0.37	0.5	3.7	1.8	1.16	8.6
NOX-08	8.45	4.6	38.87	End/Diq	0.37	0.5	19.4	1.8	1.16	44.9
Sub Total	9.71						23.1			53.5
NOX-01	19.25	5.5	105.88	End/Diq	0.37	0.5	52.8	2.0	1.26	133.9
NOX-02	32.15	7.1	228.27	End/Diq	0.37	0.5	113.9	2.0	1.26	288.7
Sub Total	51.40						166.7			422.6
Total	63.96						200.1			499.9

PERMIT COMPLIANCE: CLI developed the Aquatic Pesticide Application Plan on August 2, 2021, as well as the Pesticide Discharge Management Plan (PDMP) required for the new NPDES Permit cycle. Sanders County provided the required permits and approvals for the herbicide treatments from the Montana Department of Environmental Quality. There were no adverse incidents to report. Herbicide equipment calibration occurred on August 2, 2021.

SERVICES PROVIDED BY CLI: All manpower, materials, insurance, equipment and technical advice required to perform aquatic herbicide applications in the project areas.

SERVICES PROVIDED BY SANDERS COUNTY: Sanders County provided the required permits, published legal notices in newspapers, provided notification to property owners, posting at public boat launch facilities, and provided the project area GIS shapefiles from the 2021 Pre-Treatment Surveys that were used to generate the final 2021 Treatment Plan.



POST TREATMENT SURVEY: The Post Treatment survey was carried out by CLI (Tom Moorhouse and Drew McNabb) at Noxon Rapids Reservoir on September 16, 2021, six weeks after treatment. Water temperature was approximately 68 F. Surveys were conducted through a combination of techniques, including visual estimates of injury/control, through rake tosses, and via the use of a Lowrance HDS-9 where depth allowed. Sonar logs were processed as described above. Table 3 provides information related to efficacy in each plot compared to At-Time of Treatment and Post Treatment Control. In Noxon Rapids Reservoir the change in SAV Biovolume (BV) shows a reduction range of 49% to 79%, while Post Treatment EWM Injury ranged from 80% to 100%.

Table 3: Plot Percent Submersed Aquatic Vegetation (SAV) Cover and SAV Bio-Volume Present At Time of Application and Six (6) Weeks Post Treatment

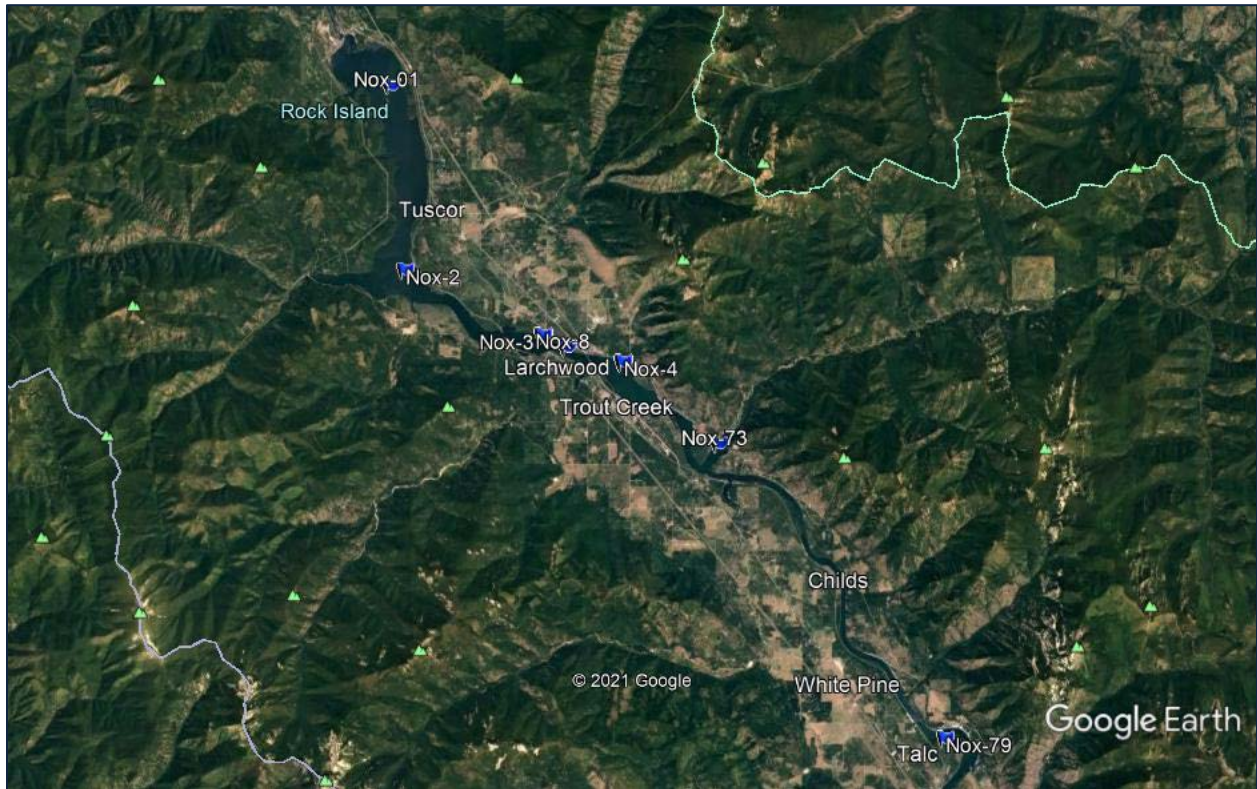
2021 Noxon Rapids Reservoir AIS Treatment Plots: At Time of and ~ Six (6) Week Post Plot SAV % Cover and SAV BioVolume Data (Grid Data)									
Plot Number	SAV % Cover	SAV % Bio-Volume	Date Data Collected Pre Treatment	SAV % Cover	SAV % Bio-Volume	Date Data Collected- Post Treatment	SAV % BV Change	Post Treatment EWM Injury Rank	Herbicides Used (Aquathol K/Tribune)
Noxon Rapids									
NOX-1	91.7	22.4	8/4/2021	70.3	9.3	9/16/2021	-58%	~100%	Endo/Diquat
NOX-2	99.9	38.1	8/4/2021	73.0	10.7	9/16/2021	-72%	~100%	Endo/Diquat
NOX-3	100.0	37.7	8/4/2021	99.1	15.1	9/16/2021	-60%	~98%	Endo/Diquat
NOX-4	100.0	39.8	8/4/2021	50.6	11.2	9/16/2021	-72%	~80%	Endo/Diquat
NOX-8	100.0	53.0	8/4/2021	94.7	27.2	9/16/2021	-49%	~95%	Endo/Diquat
NOX-73	100.0	30.1	8/4/2021	57.6	10.9	9/16/2021	-64%	~100%	Endo/Diquat
NOX-79	100.0	33.0	8/4/2021	39.1	6.8	9/16/2021	-79%	~100%	Endo/Diquat

Note: Herbicides used Endo/Diquat = Combination of Aquathol K (Endothall) and Tribune (Diquat). Post Treatment Injury Rank of herbicide injury to EWM on September 16, 2021, 6 weeks post treatment, were estimated during a survey as outlined above.

The observations contained in this report (see below) are general six (6) week Post Treatment observations and should not be used for control efficacy evaluations. In addition, it should be noted that a Post Treatment change in Submerged Aquatic Vegetation (SAV) Percent Area Coverage, height in the water column, and bio-volume can result, and can be attributed to a recovery or increase in native vegetation in response to selectively controlling the target species.

TREATMENT AREA PLOT MAPS

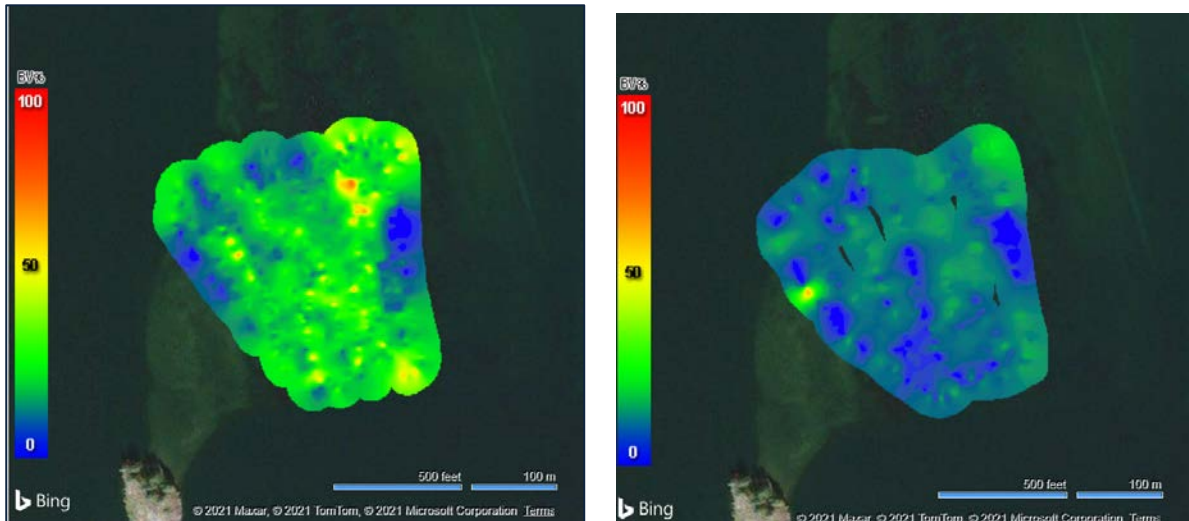
Overview of the 2021 Noxon Rapids Reservoir Treatment Plots (8/4/21)



PRE AND POST TREATMENT SUBMERSED AQUATIC VEGETATION (SAV) DATA,
SAV PERCENT COVER, AND BIO-VOLUME DATA SETS

NOXON RAPIDS RESERVOIR

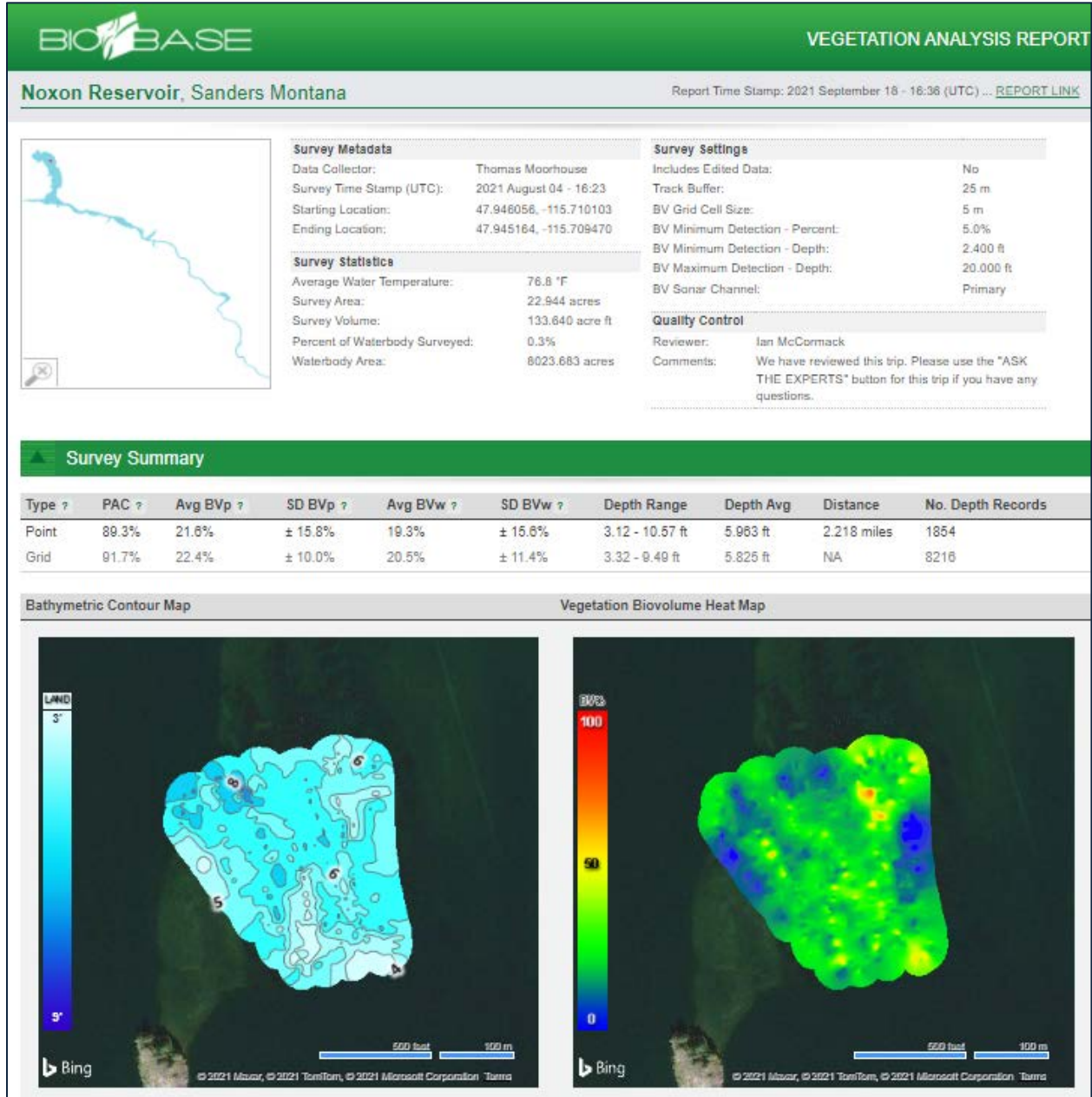
Plot NOX-1: At Time of Treatment (August 4, 2021 Left),
~ Six (6) Weeks Post (September 16, 2021 Right)



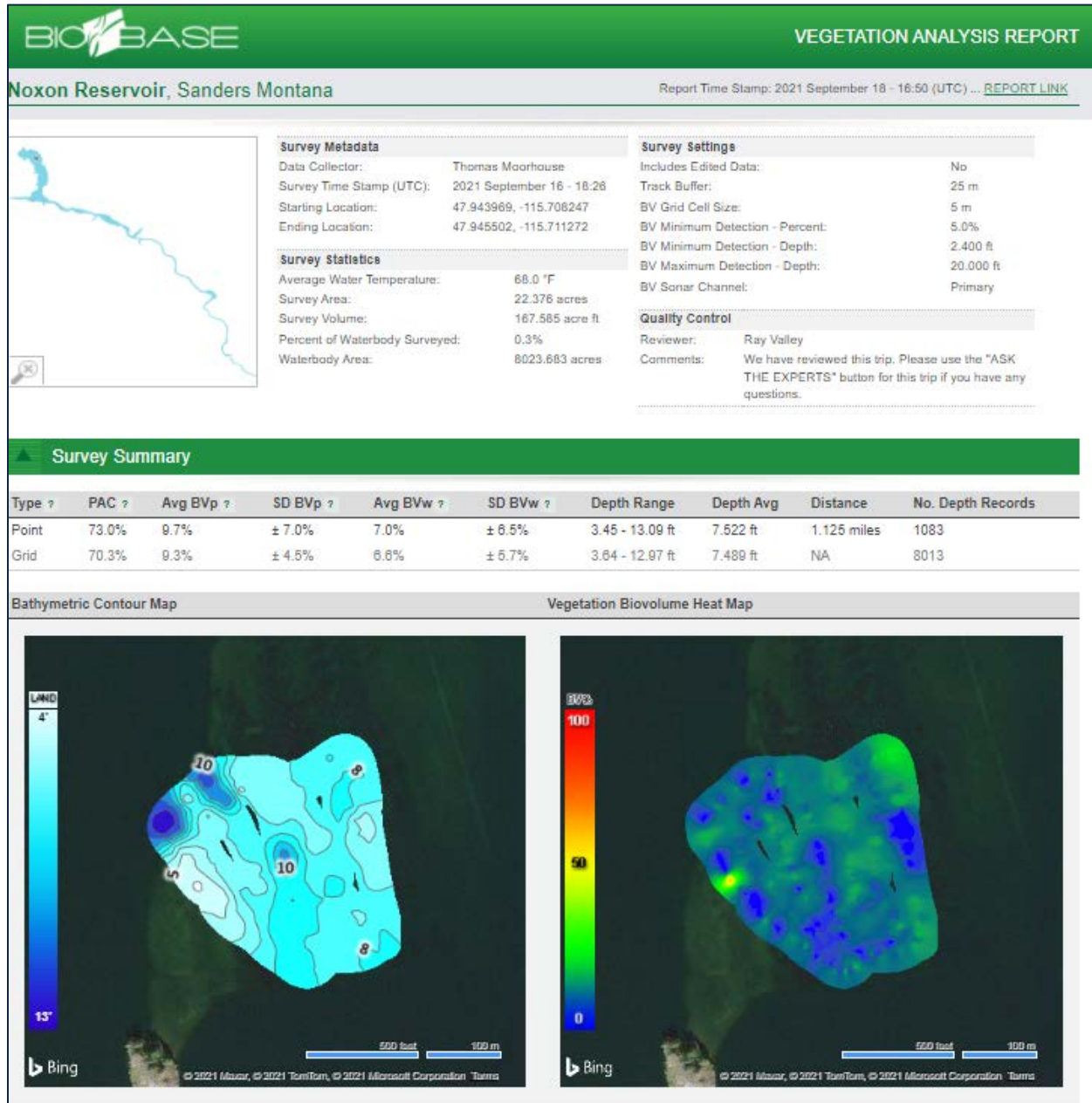
2021 Noxon Rapids Reservoir AIS Treatment Plots: At Time of and ~ Six (6) Week Post Plot SAV % Cover and SAV BioVolume Data (Grid Data)									
Plot Number	SAV % Cover	SAV % Bio-Volume	Date Data Collected Pre Treatment	SAV % Cover	SAV % Bio-Volume	Date Data Collected- Post Treatment	SAV % BV Change	Post Treatment EWM Injury Rank	Herbicides Used (Aquathol K/Tribune)
NOX-1	91.7	22.4	8/4/2021	70.3	9.3	9/16/2021	-58%	~100%	Endo/Diquat

Observations/Notes NOX-1: Treated with combination of endothall and diquat, control visually estimated at +/- 100%. Control excellent throughout plot. EWM and native vegetation observed on outside edges. Widespread Chara visible on bottom.

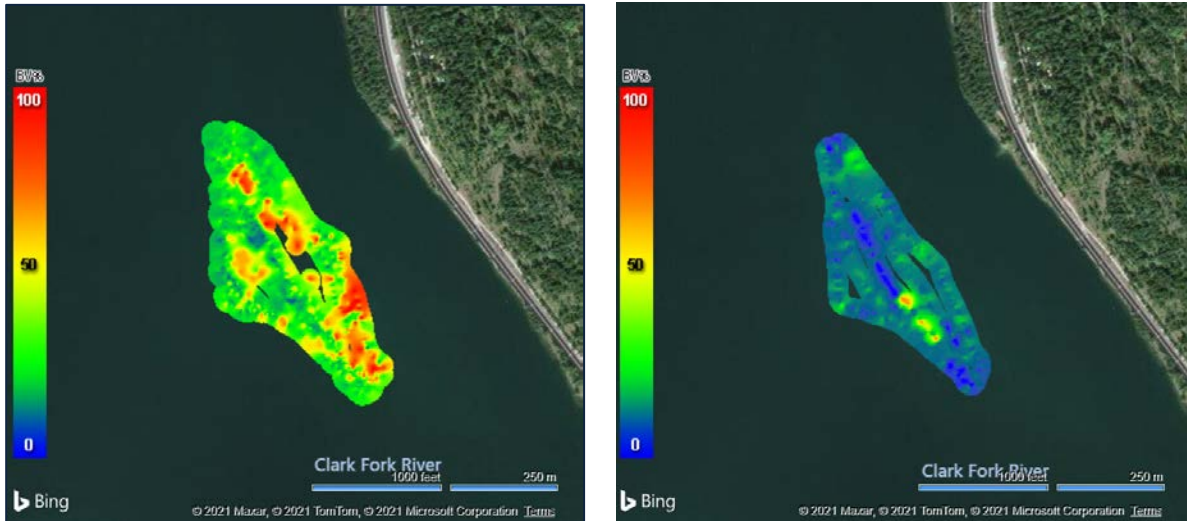
Plot NOX-1: At Time of Treatment (August 4, 2021)



Plot NOX-1: ~ Six (6) Weeks Post (September 16, 2021)



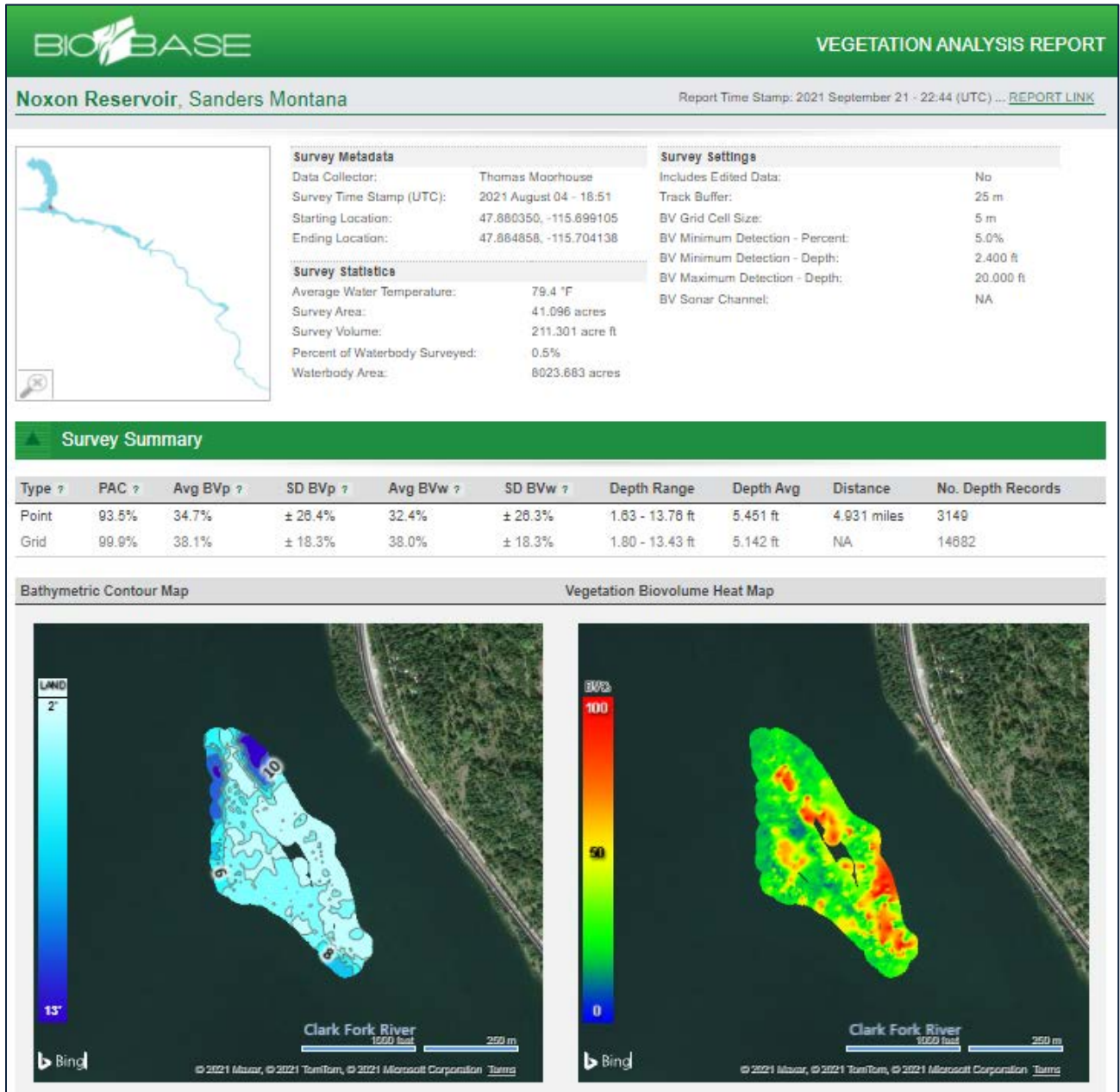
**Plot NOX-2: At Time of Treatment (August 4, 2021 Left),
~ Six (6) Weeks Post (September 16, 2021 Right)**



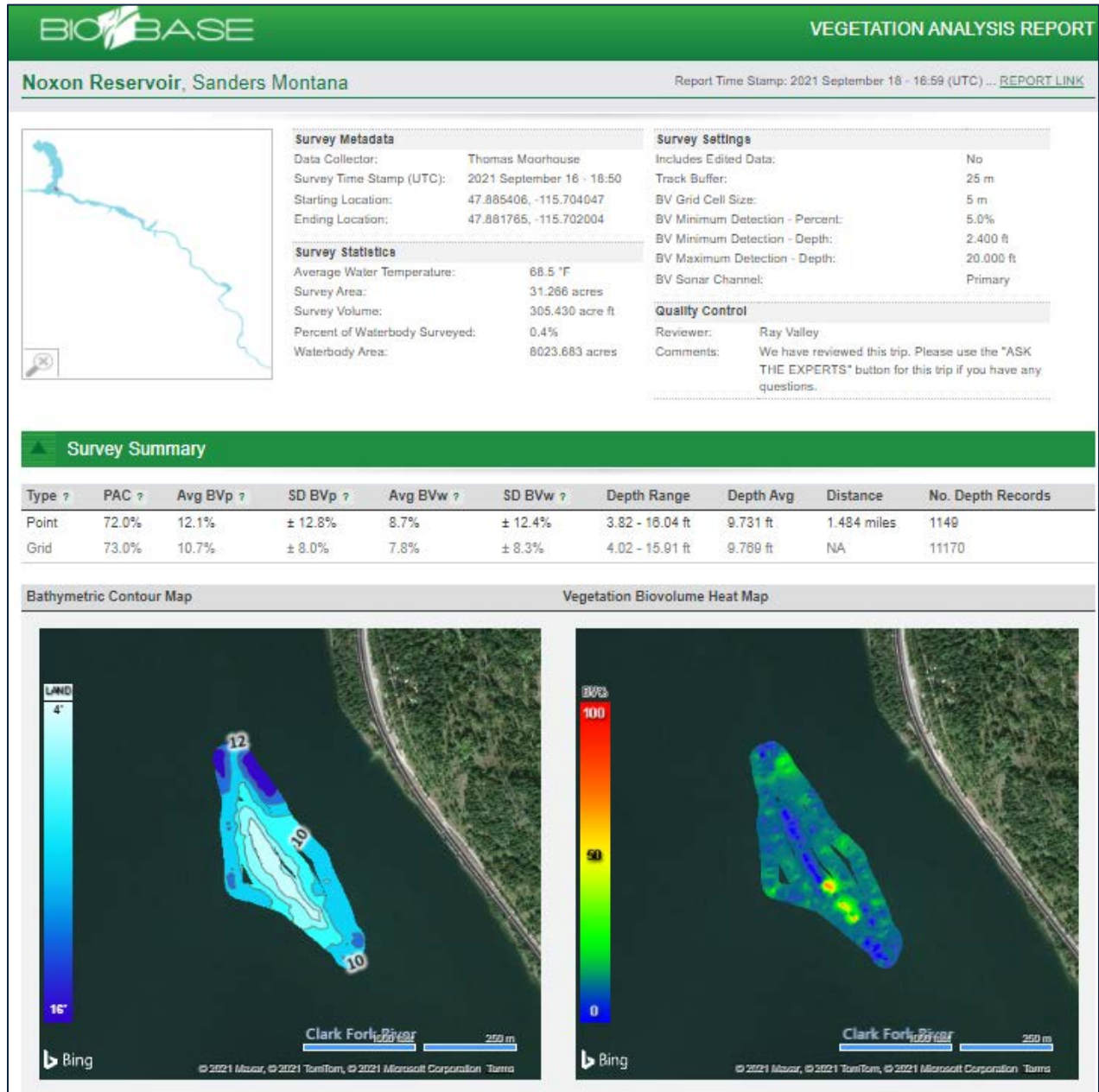
2021 Noxon Rapids Reservoir AIS Treatment Plots: At Time of and ~ Six (6) Week Post Plot SAV % Cover and SAV BioVolume Data (Grid Data)									
Plot Number	SAV % Cover	SAV % Bio-Volume	Date Data Collected Pre Treatment	SAV % Cover	SAV % Bio-Volume	Date Data Collected- Post Treatment	SAV % BV Change	Post Treatment EWM Injury Rank	Herbicides Used (Aquathol K/Tribune)
NOX-2	99.9	38.1	8/4/2021	73.0	10.7	9/16/2021	-72%	~100%	Endo/Diquat

Observations/Notes NOX-2: Treated with combination of endothall and diquat, control visually estimated at +/- 100%. Control excellent throughout plot. Widespread Chara visible on bottom.

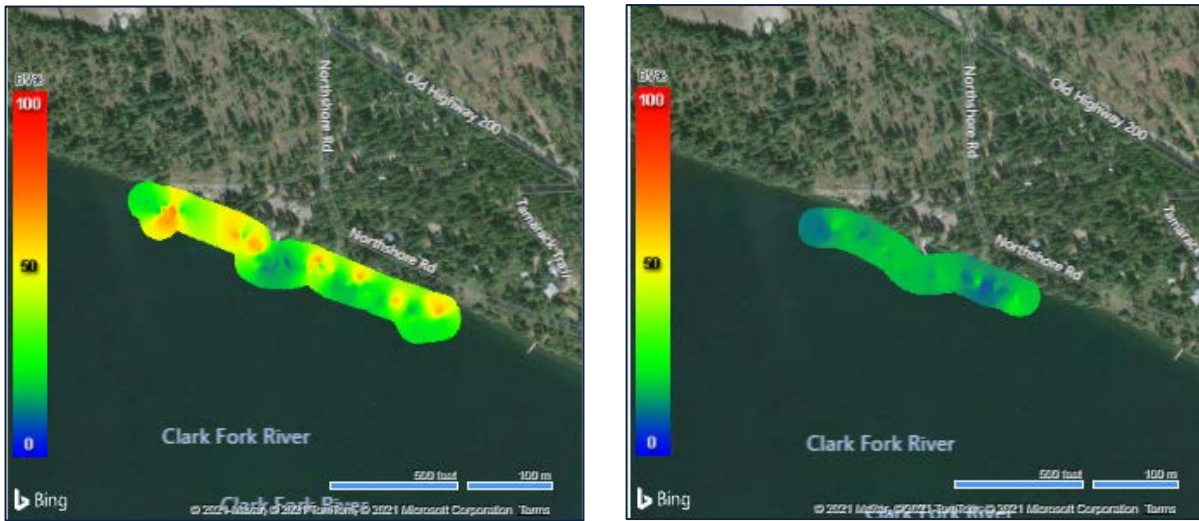
Plot NOX-2: At Time of Treatment (August 4, 2021)



Plot NOX-2: ~ Six (6) Weeks Post (September 16, 2021)



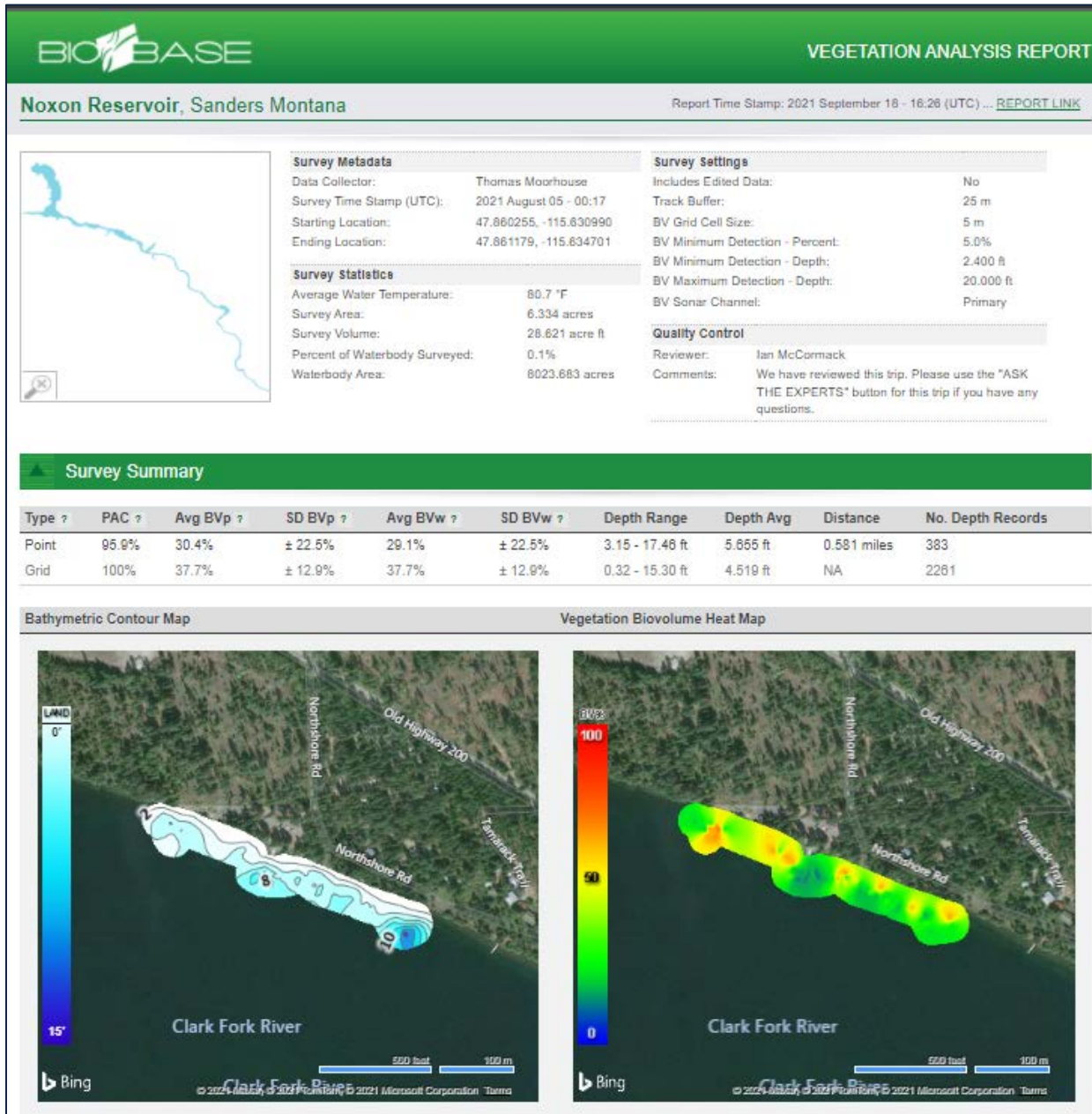
**Plot NOX-3: At Time of Treatment (August 4, 2021 Left),
~ Six (6) Weeks Post (September 16, 2021 Right)**



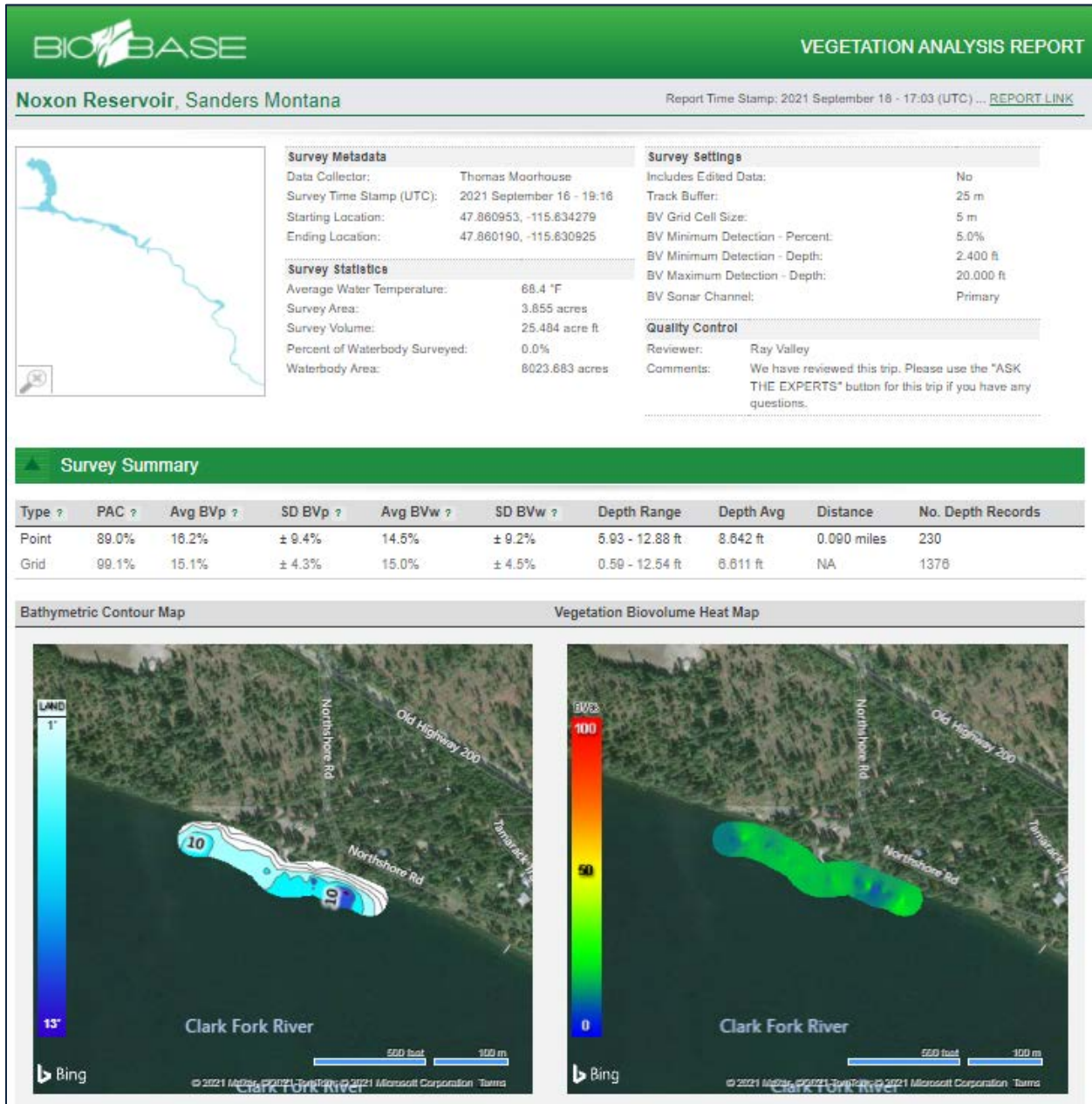
2021 Noxon Rapids Reservoir AIS Treatment Plots: At Time of and ~ Six (6) Week Post Plot SAV % Cover and SAV BioVolume Data (Grid Data)									
Plot Number	SAV % Cover	SAV % Bio-Volume	Date Data Collected Pre Treatment	SAV % Cover	SAV % Bio-Volume	Date Data Collected- Post Treatment	SAV % BV Change	Post Treatment EWM Injury Rank	Herbicides Used (Aquathol K/Tribune)
NOX-3	100.0	37.7	8/4/2021	99.1	15.1	9/16/2021	-60%	~98%	Endo/Diquat

Observations/Notes NOX-03: Treated with combination of endothall and diquat, control visually estimated at +/- 98%. Control excellent, Coontail present in plot, dead EWM stems on rake toss.

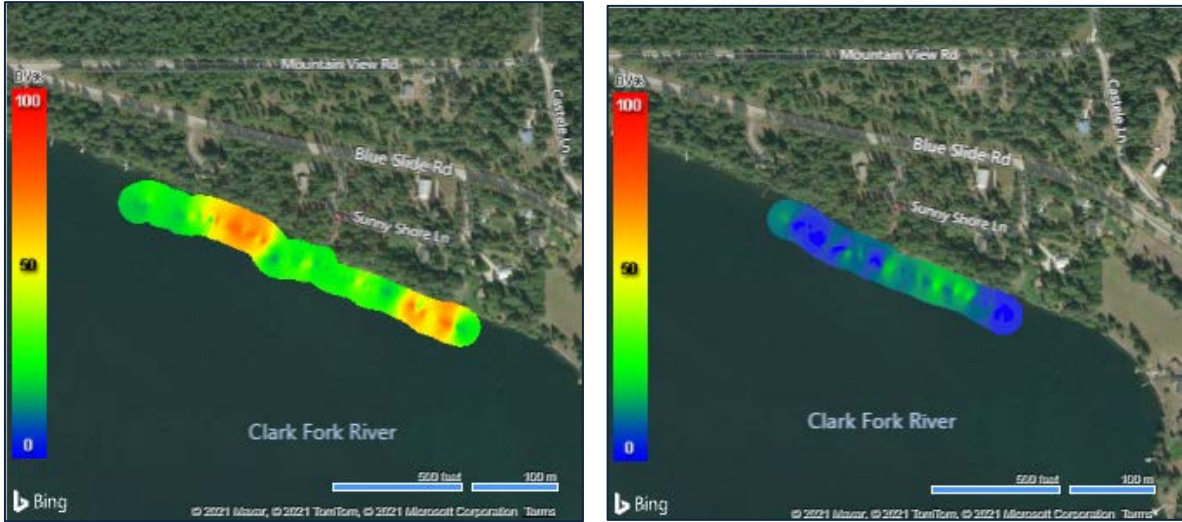
Plot NOX-3: At Time of Treatment (August 11, 2020)



Plot NOX-3: ~ Six (6) Weeks Post (September 16, 2021)



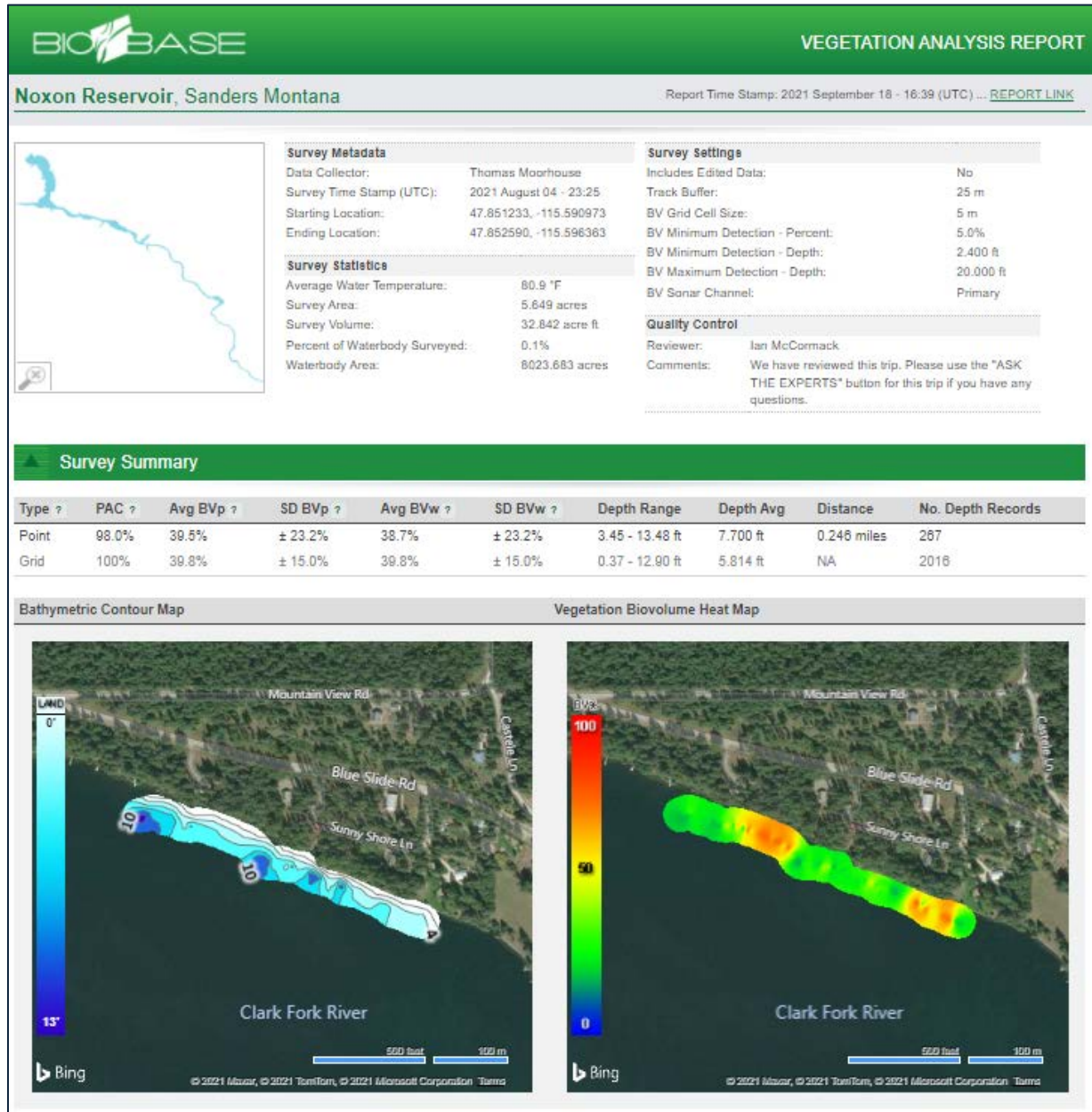
Plot NOX-4: At Time of Treatment (August 4, 2021 Left),
 ~ Six (6) Weeks Post (September 16, 2021 Right)



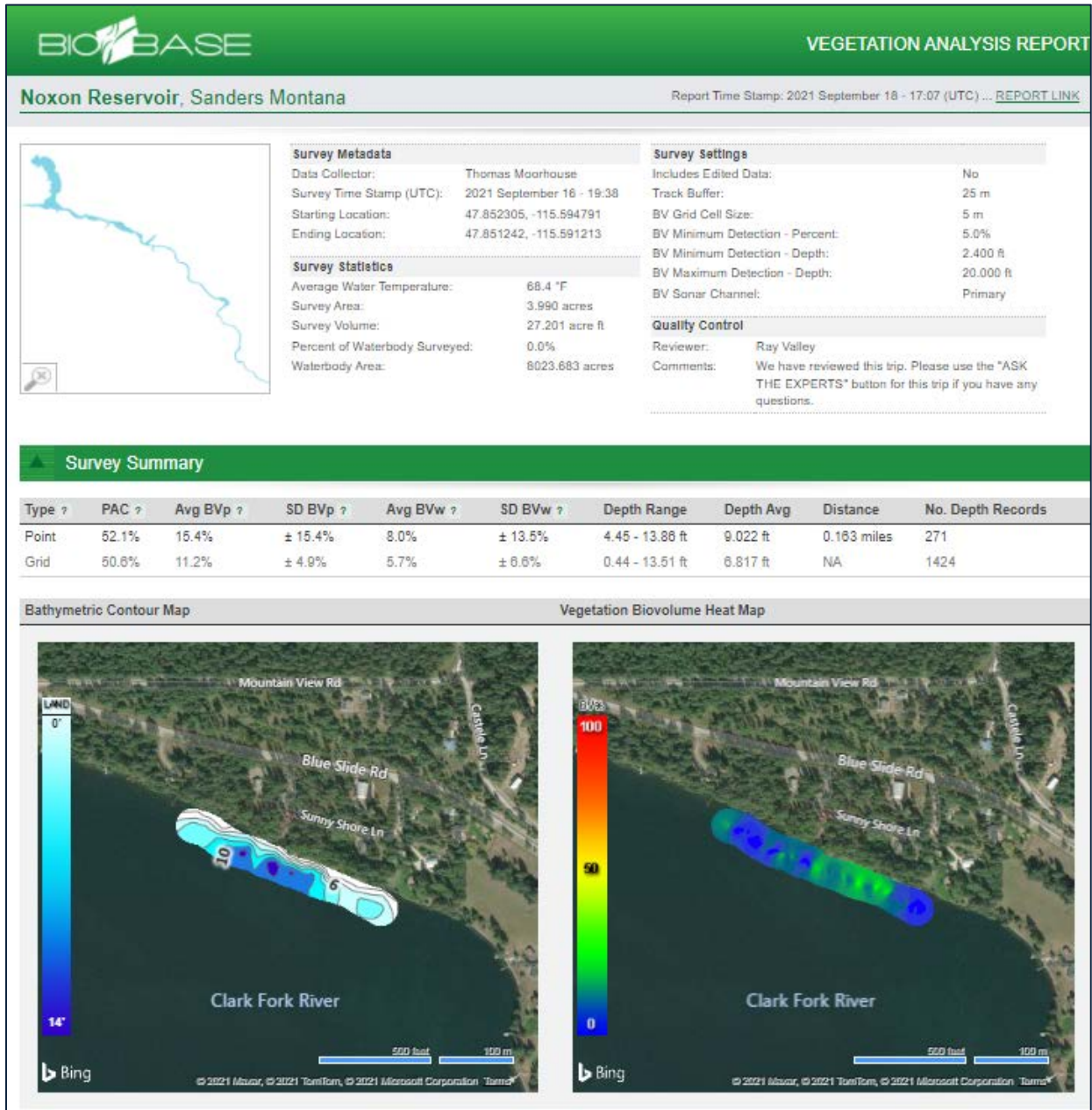
2021 Noxon Rapids Reservoir AIS Treatment Plots: At Time of and ~ Six (6) Week Post Plot SAV % Cover and SAV BioVolume Data (Grid Data)									
Plot Number	SAV % Cover	SAV % Bio-Volume	Date Data Collected Pre Treatment	SAV % Cover	SAV % Bio-Volume	Date Data Collected-Post Treatment	SAV % BV Change	Post Treatment EWM Injury Rank	Herbicides Used (Aquathol K/Tribune)
NOX-4	100.0	39.8	8/4/2021	50.6	11.2	9/16/2021	-72%	~80%	Endo/Diquat

Observations/Notes NOX-4: Treated with combination of endothall and diquat, control visually estimated at +/- 80%. Control good, Coontail present making visual estimation difficult do to similarities in appearance to EWM. Plot should be made wider in future.

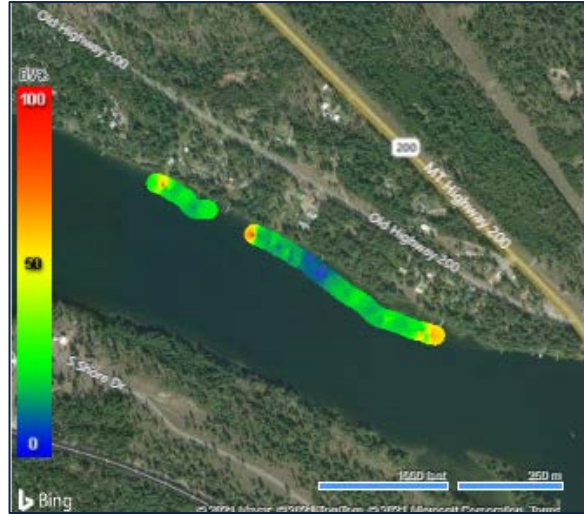
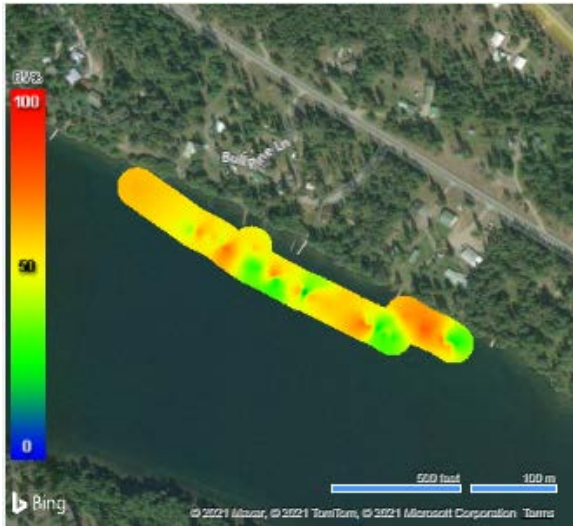
Plot NOX-4: At Time of Treatment (August 4, 2021)



Plot NOX-4: ~ Six (6) Weeks Post (September 16, 2021)



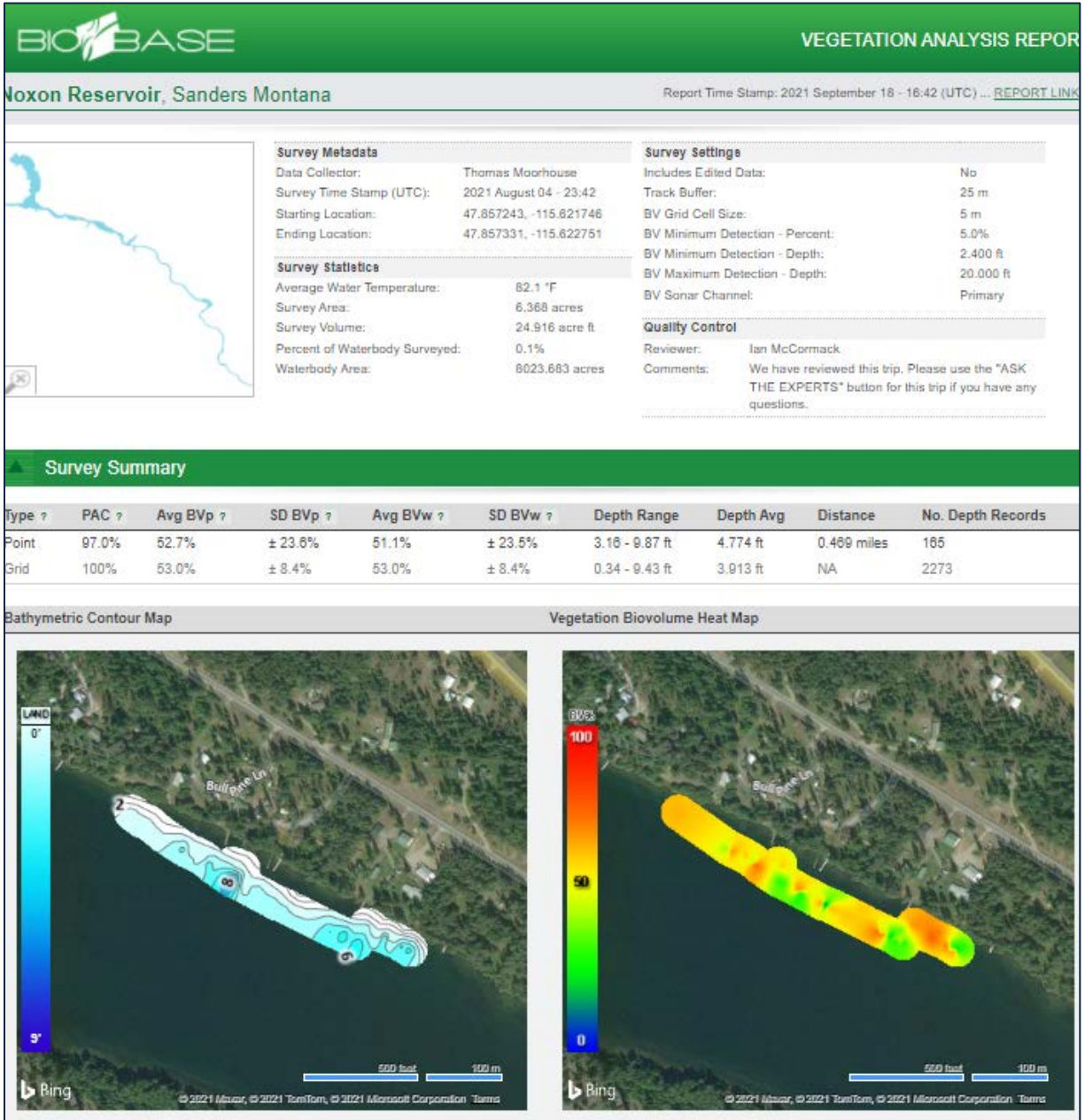
**Plot NOX-8: At Time of Treatment (August 4, 2021 Left),
~ Six (6) Weeks Post (September 16, 2021 Right)**



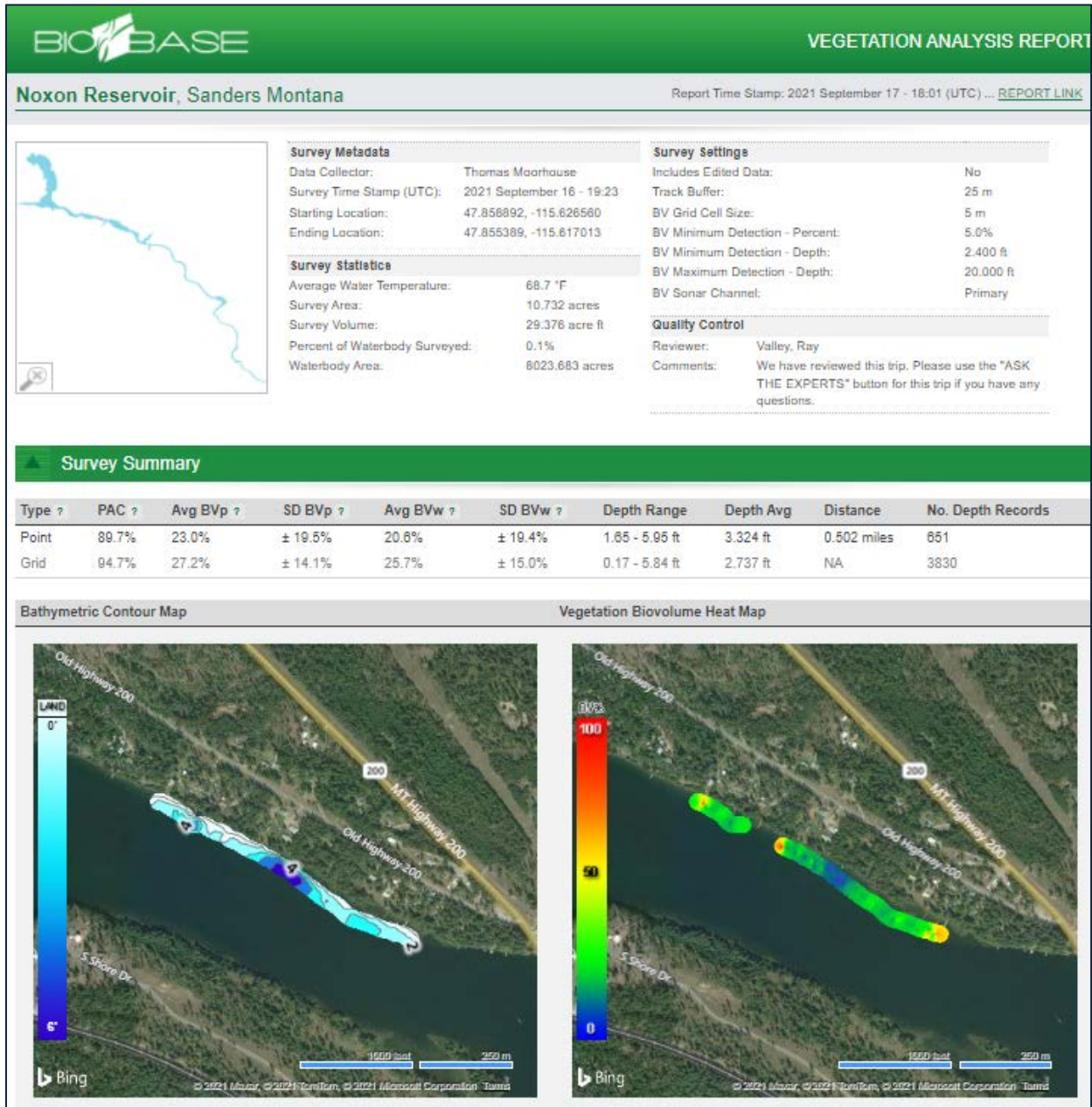
2021 Noxon Rapids Reservoir AIS Treatment Plots: At Time of and ~ Six (6) Week Post Plot SAV % Cover and SAV BioVolume Data (Grid Data)									
Plot Number	SAV % Cover	SAV % Bio-Volume	Date Data Collected Pre Treatment	SAV % Cover	SAV % Bio-Volume	Date Data Collected- Post Treatment	SAV % BV Change	Post Treatment EWM Injury Rank	Herbicides Used (Aquathol K/Tribune)
NOX-8	100.0	53.0	8/4/2021	94.7	27.2	9/16/2021	-49%	~95%	Endo/Diquat

Observations/Notes NOX-8: Treated with combination of endothall and diquat, control visually estimated at +/-95 % control. No plants visible at or near surface in plot. Rake toss consisted of Coontail and dead EWM. Some EWM observed outside the plot closer to the bank.

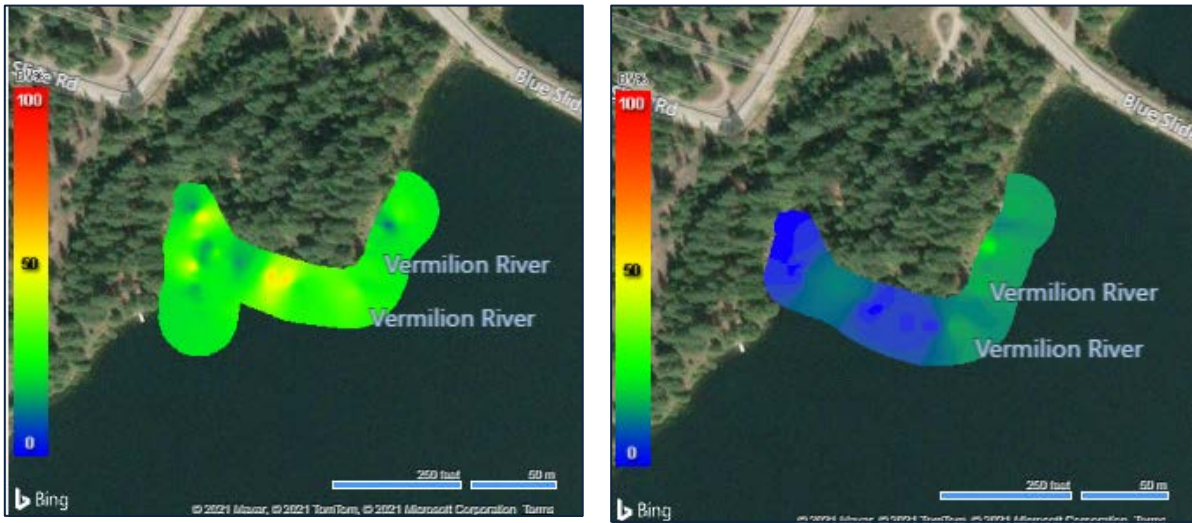
Plot NOX-8: At Time of Treatment (August 4, 2021)



Plot NOX-8: ~ Six (6) Weeks Post (September 16, 2021)



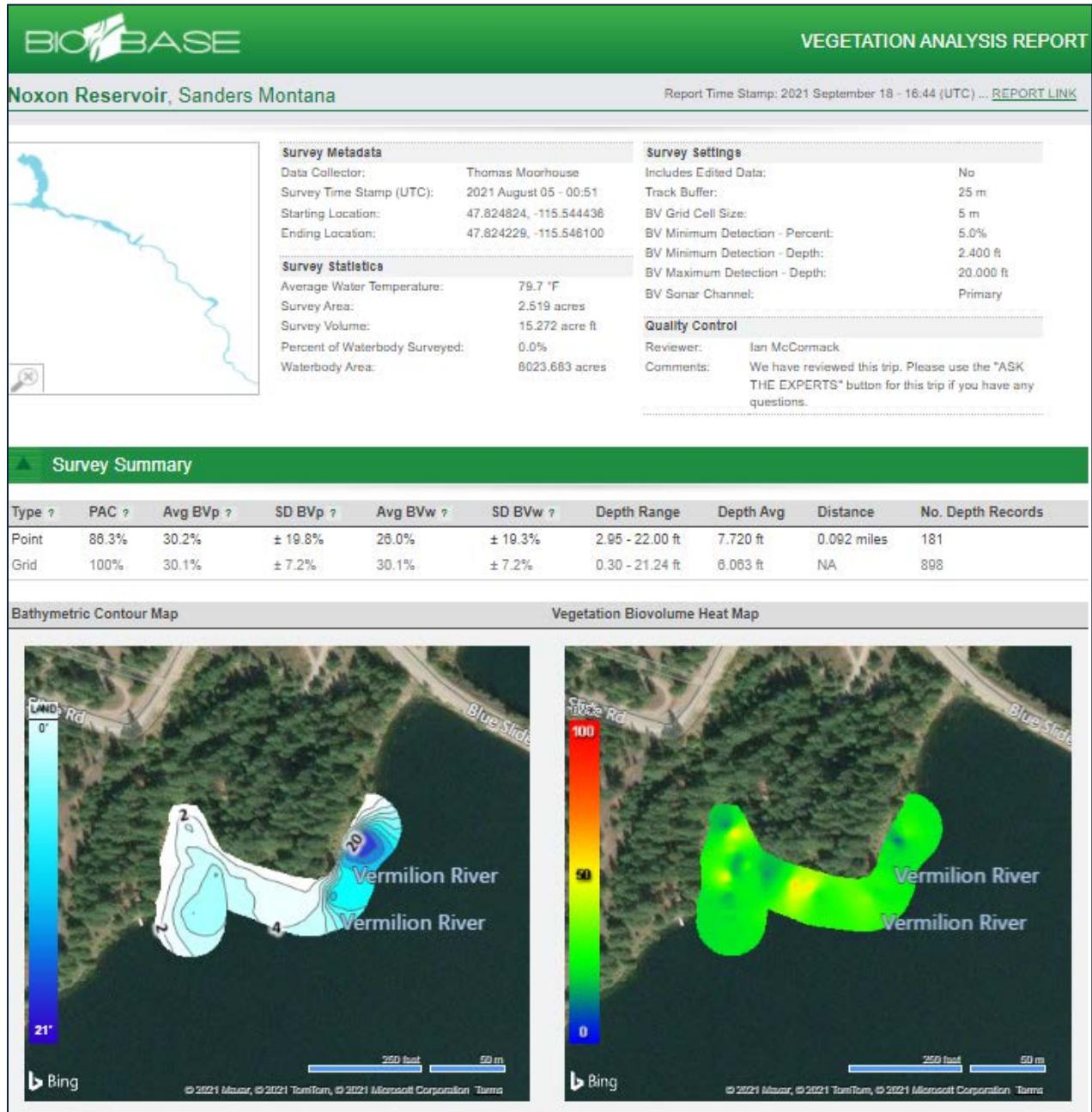
**Plot NOX-73: At Time of Treatment (August 4, 2021 Left),
 ~ Six (6) Weeks Post (September 16, 2021 Right)**



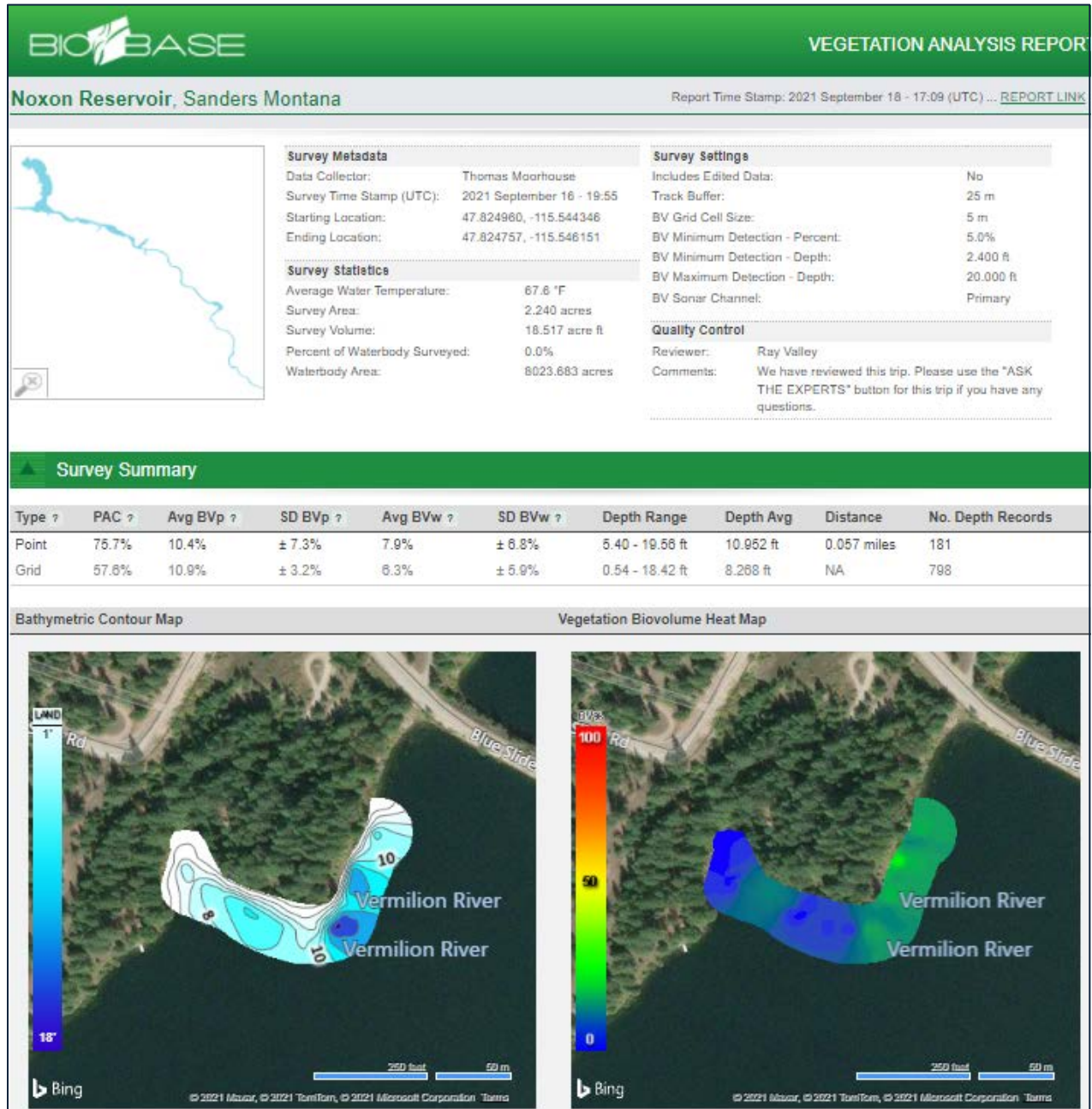
2021 Noxon Rapids Reservoir AIS Treatment Plots: At Time of and ~ Six (6) Week Post Plot SAV % Cover and SAV BioVolume Data (Grid Data)									
Plot Number	SAV % Cover	SAV % Bio-Volume	Date Data Collected Pre Treatment	SAV % Cover	SAV % Bio-Volume	Date Data Collected-Post Treatment	SAV % BV Change	Post Treatment EWM Injury Rank	Herbicides Used (Aquathol K/Tribune)
NOX-73	100.0	30.1	8/4/2021	57.6	10.9	9/16/2021	-64%	~100%	Endo/Diquat

Observations/Notes NOX-73: Treated with combination of endothall and diquat, control visually estimated at +/- 100 % control. No plants visible at or near surface in plot. Rake toss consisted of one Coontail plant.

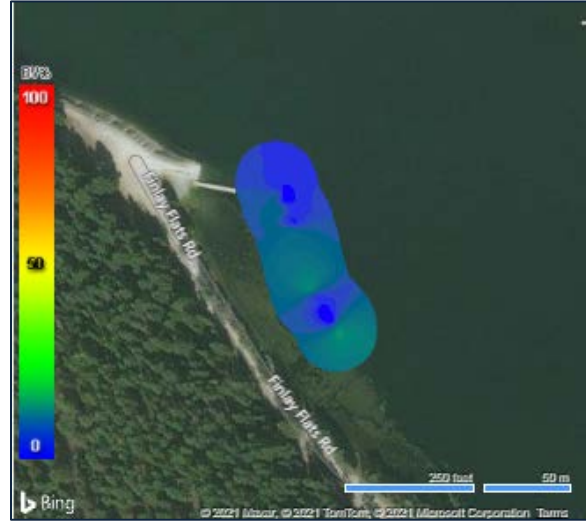
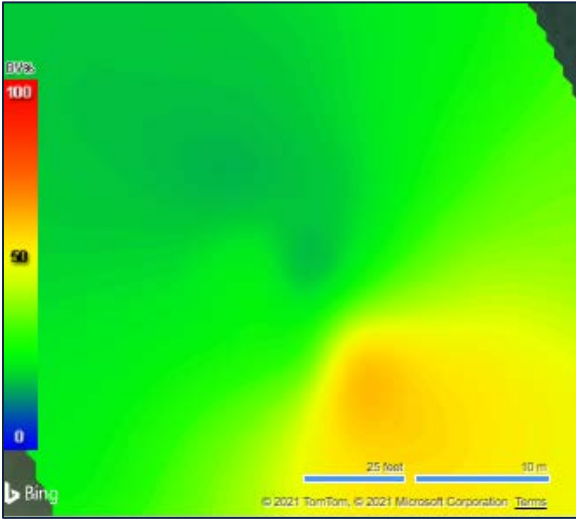
Plot NOX-73: At Time of Treatment (August 4, 2021)



Plot NOX-73 ~ Six (6) Weeks Post (September 16, 2021)



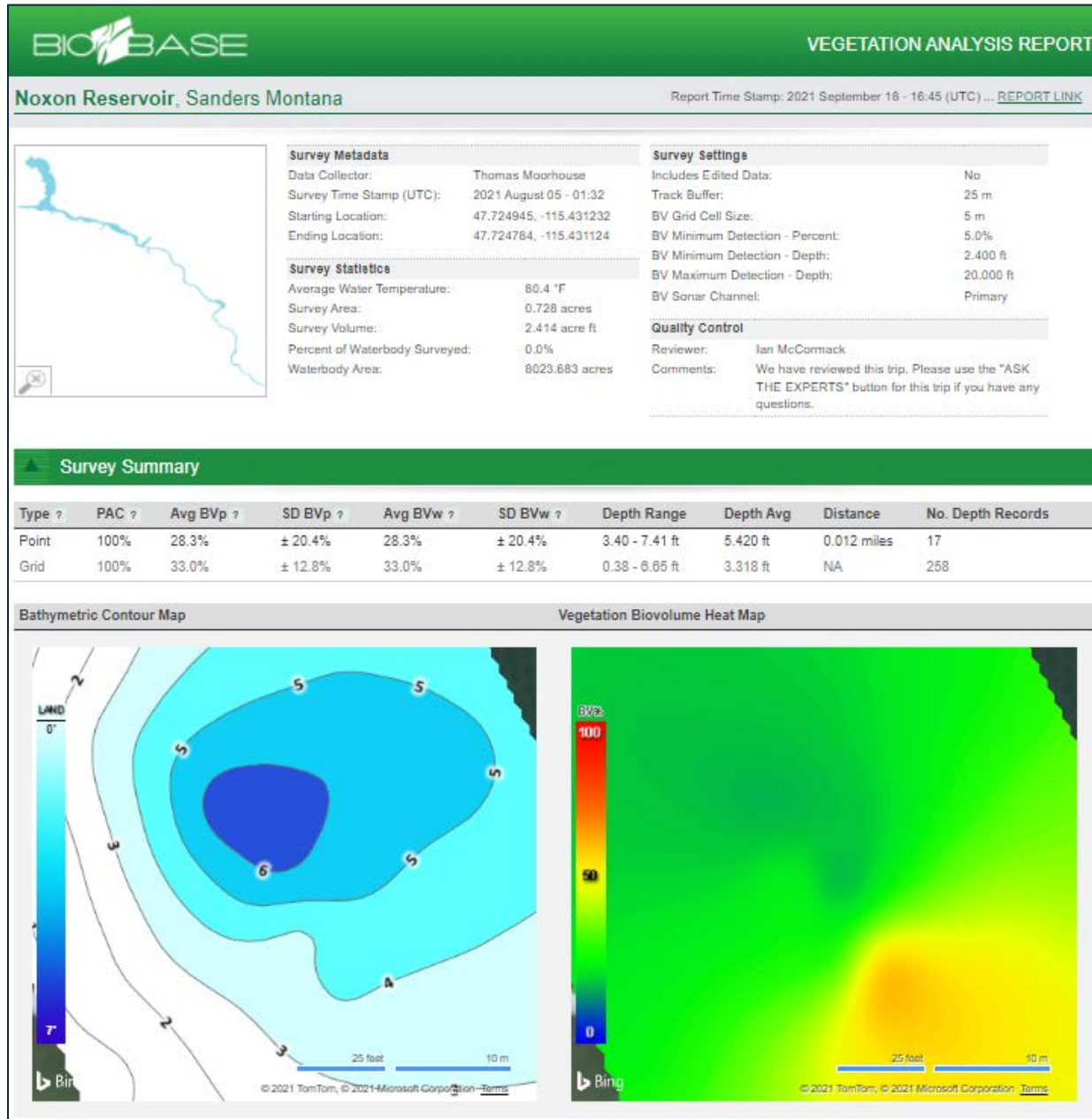
**Plot NOX-79: At Time of Treatment (August 4, 2021 Left),
~ Six (6) Weeks Post (September 16, 2021 Right)**



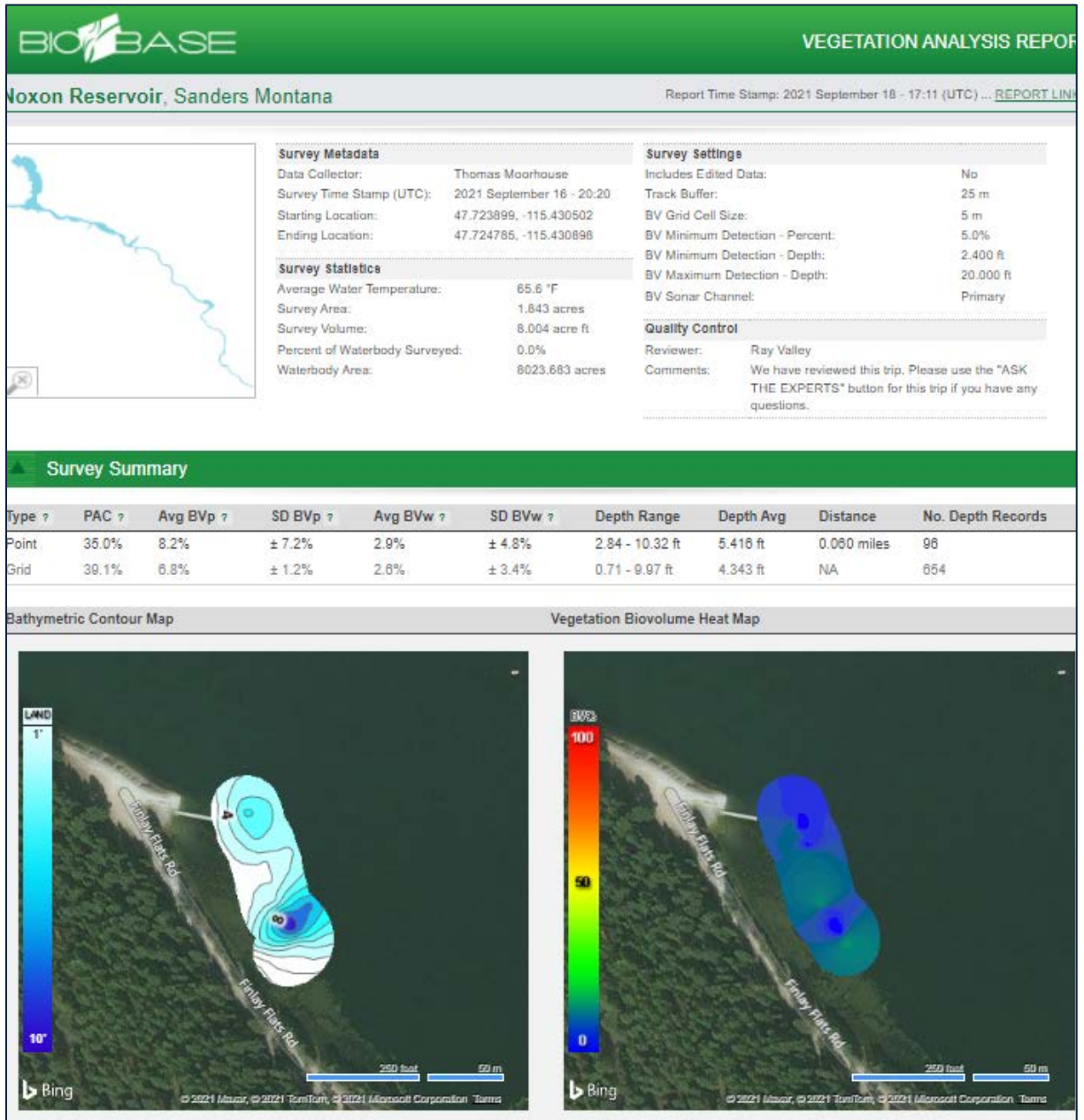
2021 Noxon Rapids Reservoir AIS Treatment Plots: At Time of and ~ Six (6) Week Post Plot SAV % Cover and SAV BioVolume Data (Grid Data)									
Plot Number	SAV % Cover	SAV % Bio-Volume	Date Data Collected Pre Treatment	SAV % Cover	SAV % Bio-Volume	Date Data Collected-Post Treatment	SAV % BV Change	Post Treatment EWM Injury Rank	Herbicides Used (Aquathol K/Tribune)
NOX-79	100.0	33.0	8/4/2021	39.1	6.8	9/16/2021	-79%	~100%	Endo/Diquat

Observations/Notes NOX-79: Treated with combination of endothall and diquat, control visually estimated at 100 % control. No plants visible in in plot. Chara visible on bottom.

Plot NOX-79: At Time of Treatment (August 4, 2021)



Plot NOX-79~ Six (6) Weeks Post (September 16, 2021)



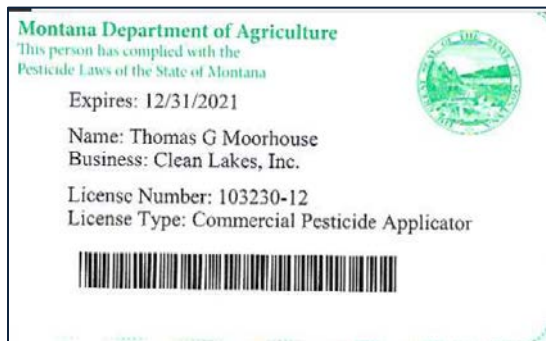
LIST OF PROJECT PERSONNEL

PROJECT DIRECTOR:



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Email: tmcnabb@cleanlake.com

PROJECT MANAGER



Thomas G. Moorhouse
Montana Licensed Applicator
Applicators License No. 103230-12
Cell Phone: 208-929-2757
Email: tmoorhouse@cleanlake.com

SITE SAFETY AND HEALTH OFFICER:

Thomas G. Moorhouse
Cell Phone: 208-929-2757

ALTERNATE SITE SAFETY OFFICER:

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END OF AQUATIC PESTICIDE APPLICATION REPORT