

9.0 Unavoidable Environmental Impacts if Use of Renovate® 3 is Implemented

The use of Renovate® 3 has been evaluated during the federal registration process and in this SEIS for various impacts to target plants and non-target organisms in the aquatic setting. There are several unavoidable impacts that will occur when Renovate® 3 is used in the waters of NYS to manage unwanted invasive macrophytes such as Eurasian watermilfoil or purple loosestrife. It is important to note that the mitigation approaches described in Section 8.0 will lessen the magnitude and extent of those impacts. Those impacts are:

- **Impact to Habitat** - When Renovate® 3 is introduced into a waterbody, it will result in the death of the target macrophytes. Once these target macrophytes have dropped out of the water column, there may be a potential for decreased dissolved oxygen and impacts to aquatic wildlife. There will be a period of time before the native non-target macrophytes reestablish themselves in the vacant niches. During that period of time, before the non-target species reestablish themselves, the aquatic macrophyte community will be reduced in size and habitat function will be reduced.
- **Impacts to Non-target Species** - A review of the literature indicates that there are some native macrophytes (e.g., native *Myriophyllum* species) which would be impacted to some extent by the use of triclopyr in a waterbody. This has been detailed in Section 5.1. However, one of the most appealing features of triclopyr is that it does not adversely affect most of the important monocotyledonous native pond weeds (e.g., *Potamogeton* pondweeds, naiads, bladderworts). The literature indicates that a plant community composed of native plant species will initiate reestablishment during the season following Renovate® 3 use.
- **Possible Reinfestation** - In areas of significant water flow, such as lake inlets, Eurasian watermilfoil and other target plants may not be sufficiently controlled due to the dilution of applied Renovate® 3 with untreated water or rapid product biodegradation unless application rates take this into account. Even after a successful application, the reinfestation of Eurasian watermilfoil or purple loosestrife may occur within one to two growing seasons, dependent on the level of control reached in the original application). This may necessitate the re-application of Renovate® 3 in further seasons and/or utilization of alternative means of controlling Eurasian watermilfoil or purple loosestrife in those areas.