

**APPENDIX A**  
**COORDINATION**



DEPARTMENT OF THE ARMY  
US ARMY CORPS OF ENGINEERS  
NEW ENGLAND DISTRICT  
696 VIRGINIA ROAD  
CONCORD MA 01742-2751

March 10, 2025

Planning Division  
Environmental Branch

Mr. Timothy L. Timmermann, Director  
Office of Environmental Review  
EPA New England-Region 1  
5 Post Office Square, Suite 100  
Mail Code OEP 06-3  
Boston, MA 02109-3912

Dear Mr. Timmermann:

The U.S. Army Corps of Engineers (USACE), New England District, and the Engineer Research and Development Center (ERDC) plan to apply aquatic herbicides during summer 2025 to control the aquatic invasive plant, hydrilla (*Hydrilla verticillata*), which is present in the mainstem of the Connecticut River, tributaries, and other waterbodies that abut the river.

We will be preparing a supplemental Environmental Assessment (SEA) to address impacts to the environment. Five sites were treated in Connecticut with aquatic herbicides in the summer of 2024: Keeney Cove in Glastonbury; Portland Boat Works in Portland; Chapman Pond in Haddam; Chester Boat Basin in Chester; and Selden Cove in Lyme. Eleven additional sites in Connecticut are being considered for herbicide treatments in 2025: (1) Deep River in Deep River; (2) Hamburg Cove in Lyme; (3) Joshua Creek in Lyme; (4) Mattabesset River in Middletown; (5) Parker's Point in Chester; (6) an expanded Portland Boat Works in Portland; (7) Post and Pratt Coves in Deep River; (8) Salmon River in East Haddam; (9) Selden Creek in Lyme; (10) Lake Pocotopaug in East Hampton; (11) Pameacha Pond in Middletown.

We are planning an initial interagency coordination meeting with interested state and federal agencies and town officials. The purpose of the meeting is to explain the proposed study and to elicit agency input. Your agency's participation at this meeting would be appreciated. We will meet virtually on March 19, 2025, from 11:00-12:00 pm via Microsoft Teams at the link provided in the transmittal email for this letter.

We are requesting written preliminary comments on the proposed project from your agency within 30 days of the meeting. Comments should include any concerns that need to be addressed during the planning of the proposed project specifically with regards to all applicable EPA authorities.

We look forward to your contribution towards this project. If you or your staff have any questions or require additional information, please contact the project manager, Keith Hannon at [REDACTED] or by email at [Keith.W.Hannon@usace.army.mil](mailto:Keith.W.Hannon@usace.army.mil); or the project biologist, Kelsie Dakessian at [REDACTED] or by email at [Kelsie.Dakessian@Usace.army.mil](mailto:Kelsie.Dakessian@Usace.army.mil).

Sincerely,

A handwritten signature in black ink, appearing to read "Wendy Gendron". The signature is fluid and cursive, with a large loop at the end.

Wendy Gendron  
Chief, Planning Division

Enclosure

**Attachment 1. Research and Demonstration Treatment Sites, including Potential Sites, within the Lower Connecticut River Watershed**





DEPARTMENT OF THE ARMY  
US ARMY CORPS OF ENGINEERS  
NEW ENGLAND DISTRICT  
696 VIRGINIA ROAD  
CONCORD MA 01742-2751

March 10, 2025

Planning Division  
Environmental Branch

Audrey Mayer, Ph.D.  
Supervisor, New England Field Office  
U.S. Fish and Wildlife Service,  
70 Commercial Street, Suite 300  
Concord, New Hampshire 03301

Dear Dr. Mayer:

The U.S. Army Corps of Engineers (USACE), New England District, and the Engineer Research and Development Center (ERDC) plan to apply aquatic herbicides during summer 2025 to control the aquatic invasive plant, hydrilla (*Hydrilla verticillata*), which is present in the mainstem of the Connecticut River, tributaries, and other waterbodies that abut the river.

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We are requesting written preliminary comments on the proposed project from your agency within 30 days of the meeting. Comments should include any concerns that need to be addressed during the planning of the proposed project specifically with regards to the Endangered Species Act and the Fish and Wildlife Coordination Act.

We look forward to your contribution towards this project. If you or your staff have any questions or require additional information, please contact the project manager, Keith Hannon at [REDACTED] or by email at [Keith.W.Hannon@usace.army.mil](mailto:Keith.W.Hannon@usace.army.mil); or the project biologist, Kelsie Dakessian at [REDACTED] or by email at [Kelsie.Dakessian@Usace.army.mil](mailto:Kelsie.Dakessian@Usace.army.mil).

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Wendy Gendron  
Chief, Planning Division

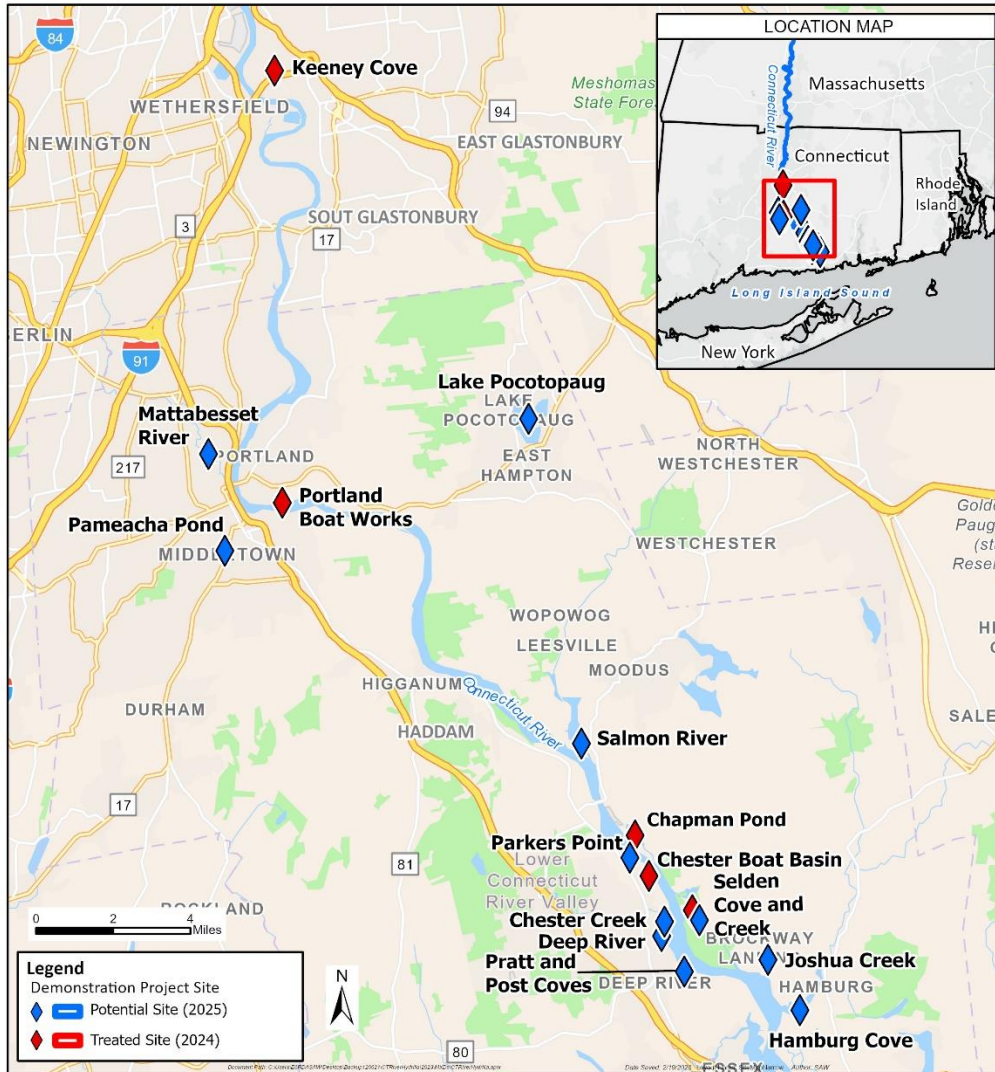
Enclosure

Copies Furnished:

New England Ecological Services Field Office – [newengland@fws.gov](mailto:newengland@fws.gov)

David Simmons – [david\\_simmons@fws.gov](mailto:david_simmons@fws.gov)

**Attachment 1. Research and Demonstration Treatment Sites, including Potential Sites, within the Lower Connecticut River Watershed**





DEPARTMENT OF THE ARMY  
US ARMY CORPS OF ENGINEERS  
NEW ENGLAND DISTRICT  
696 VIRGINIA ROAD  
CONCORD MA 01742-2751

March 10, 2025

Planning Division  
Environmental Branch

Ms. Jennifer Anderson  
NOAA Fisheries  
Greater Atlantic Regional Fisheries Office  
Protected Resources Division  
55 Great Republic Drive  
Gloucester, MA 01930

Dear Ms. Anderson:

The U.S. Army Corps of Engineers (USACE), New England District, and the Engineer Research and Development Center (ERDC) plan to apply aquatic herbicides during summer 2025 to control the aquatic invasive plant, hydrilla (*Hydrilla verticillata*), which is present in the mainstem of the Connecticut River, tributaries, and other waterbodies that abut the river.

We will be preparing a supplemental Environmental Assessment (SEA) to address impacts to the environment. Five sites were treated in Connecticut with aquatic herbicides in the summer of 2024: Keeney Cove in Glastonbury; Portland Boat Works in Portland; Chapman Pond in Haddam; Chester Boat Basin in Chester; and Selden Cove in Lyme. Eleven additional sites in Connecticut are being considered for herbicide treatments in 2025: (1) Deep River in Deep River; (2) Hamburg Cove in Lyme; (3) Joshua Creek in Lyme; (4) Mattabesset River in Middletown; (5) Parker's Point in Chester; (6) an expanded Portland Boat Works in Portland; (7) Post and Pratt Coves in Deep River; (8) Salmon River in East Haddam; (9) Selden Creek in Lyme; (10) Lake Pocotopaug in East Hampton; (11) Pameacha Pond in Middletown.

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We are requesting written preliminary comments on the proposed project from your agency within 30 days of the meeting. Comments should include any concerns that need to be addressed during the planning of the proposed project specifically with regards to any species listed under the Endangered Species Act (ESA).

We look forward to your contribution towards this project. If you or your staff have any questions or require additional information, please contact the project manager, Keith Hannon at [REDACTED] or by email at [Keith.W.Hannon@usace.army.mil](mailto:Keith.W.Hannon@usace.army.mil); or the project biologist, Kelsie Dakessian at [REDACTED] or by email at [Kelsie.Dakessian@Usace.army.mil](mailto:Kelsie.Dakessian@Usace.army.mil).

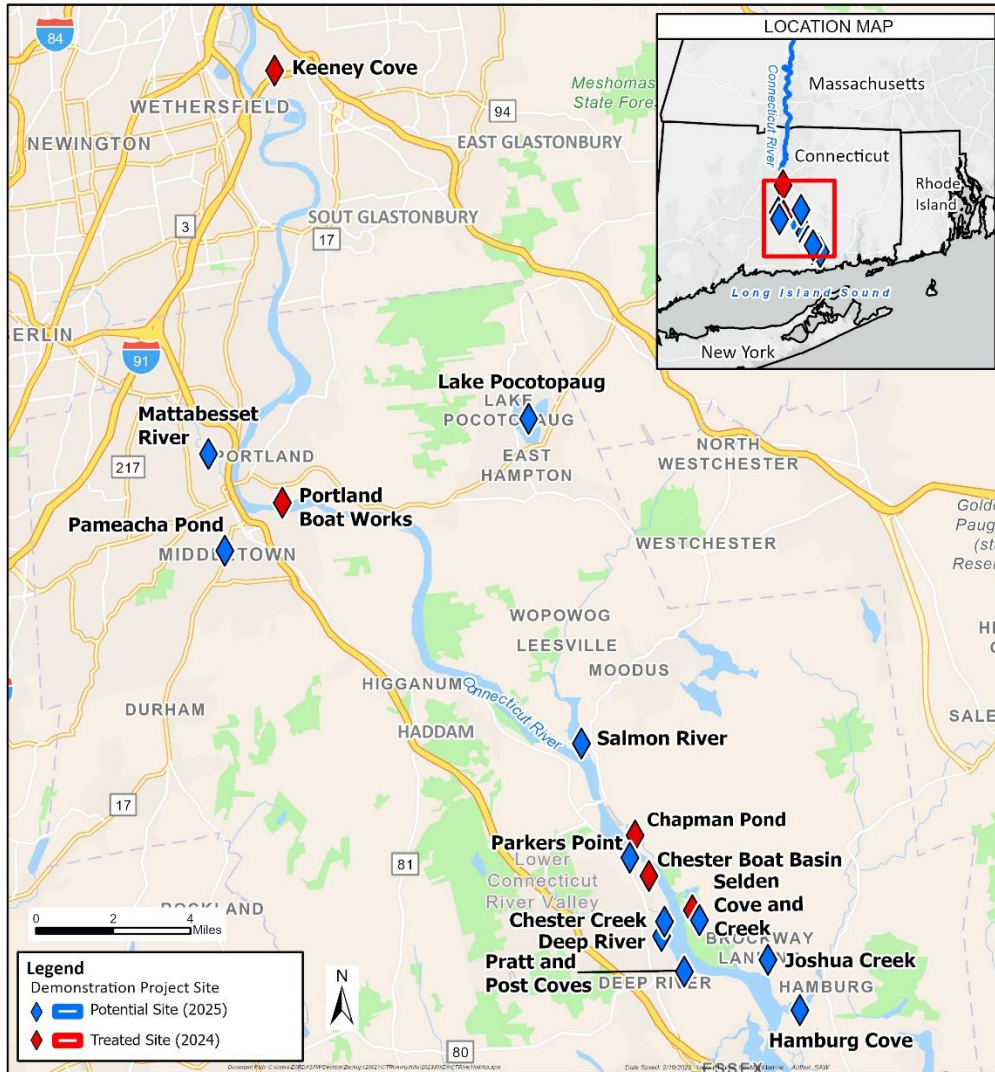
Sincerely,

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Wendy Gendron  
Chief, Planning Division

Enclosure

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NEW ENGLAND DISTRICT  
696 VIRGINIA ROAD  
CONCORD MA 01742-2751

March 10, 2025

Planning Division  
Environmental Branch

Mr. Louis A. Chiarella, Assistant Regional Administrator for Habitat Conservation  
NOAA Fisheries Service  
Northeast Regional Office  
Habitat Conservation Division  
55 Great Republic Drive  
Gloucester, MA 01930

Dear Mr. Chiarella:

The U.S. Army Corps of Engineers (USACE), New England District, and the Engineer Research and Development Center (ERDC) plan to apply aquatic herbicides during summer 2025 to control the aquatic invasive plant, hydrilla (*Hydrilla verticillata*), which is present in the mainstem of the Connecticut River, tributaries, and other waterbodies that abut the river.

We will be preparing a supplemental Environmental Assessment (SEA) to address impacts to the environment. Five sites were treated in Connecticut with aquatic herbicides in the summer of 2024: Keeney Cove in Glastonbury; Portland Boat Works in Portland; Chapman Pond in Haddam; Chester Boat Basin in Chester; and Selden Cove in Lyme. Eleven additional sites in Connecticut are being considered for herbicide treatments in 2025: (1) Deep River in Deep River; (2) Hamburg Cove in Lyme; (3) Joshua Creek in Lyme; (4) Mattabesset River in Middletown; (5) Parker's Point in Chester; (6) an expanded Portland Boat Works in Portland; (7) Post and Pratt Coves in Deep River; (8) Salmon River in East Haddam; (9) Selden Creek in Lyme; (10) Lake Pocotopaug in East Hampton; (11) Pameacha Pond in Middletown.

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We are requesting written preliminary comments on the proposed project from your agency within 30 days of the meeting. Comments should include any concerns that need to be addressed during the planning of the proposed project specifically with regards to EFH-managed species.

We look forward to your contribution towards this project. If you or your staff have any questions or require additional information, please contact the project manager, Keith Hannon at [REDACTED] or by email at [Keith.W.Hannon@usace.army.mil](mailto:Keith.W.Hannon@usace.army.mil); or the project biologist, Kelsie Dakessian at [REDACTED] or by email at [Kelsie.Dakessian@Usace.army.mil](mailto:Kelsie.Dakessian@Usace.army.mil).

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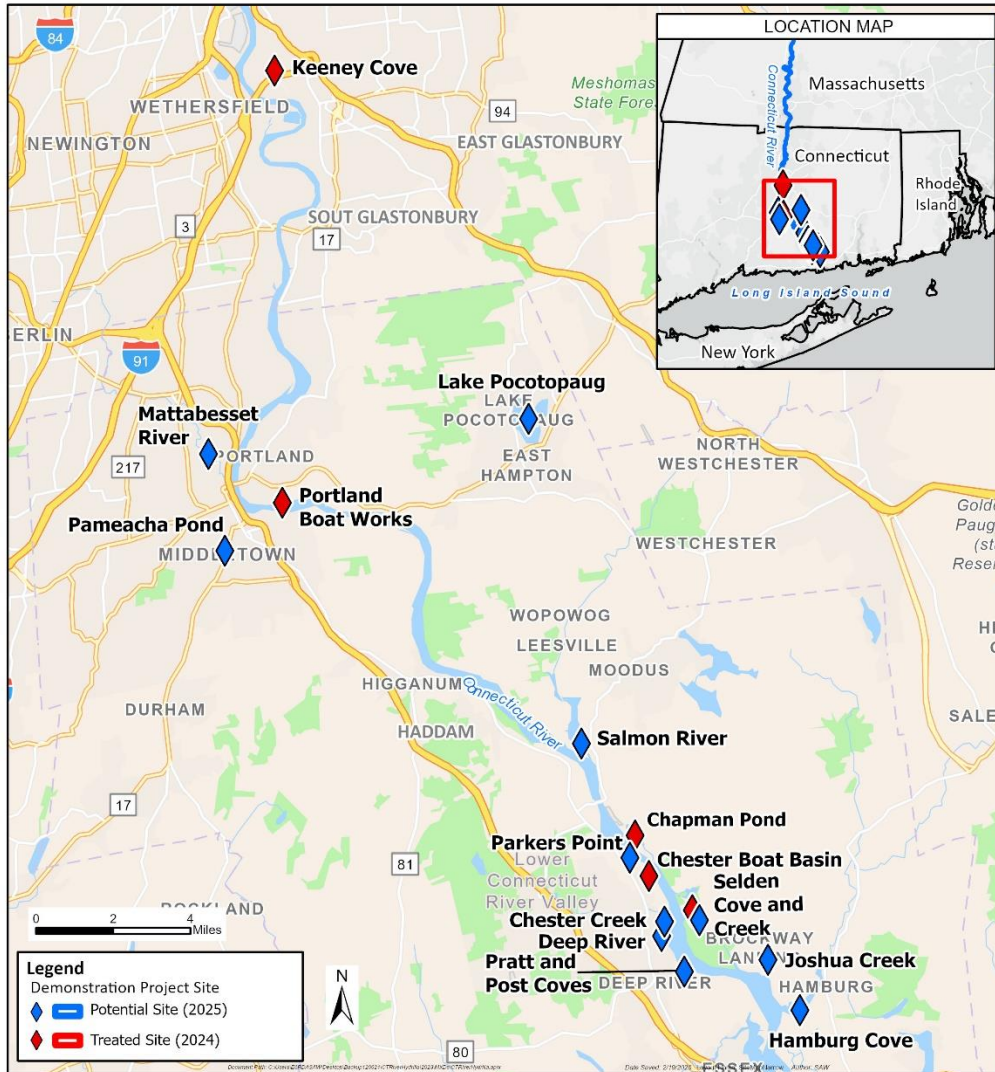
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Wendy Gendron  
Chief, Planning Division

Enclosure

Copy Furnished:  
Sabrina Pereira – [Sabrina.pereira@noaa.gov](mailto:Sabrina.pereira@noaa.gov)

**Attachment 1. Research and Demonstration Treatment Sites, including Potential Sites, within the Lower Connecticut River Watershed**





DEPARTMENT OF THE ARMY  
US ARMY CORPS OF ENGINEERS  
NEW ENGLAND DISTRICT  
696 VIRGINIA ROAD  
CONCORD MA 01742-2751

March 10, 2025

Planning Division  
Environmental Branch

Ms. Liz Lacy, Community Planner/River Manager  
Partnership Wild and Scenic Rivers Program  
NPS - Interior Region 1  
21 2<sup>nd</sup> Avenue  
Charlestown, MA 02109

Dear Ms. Lacy:

The U.S. Army Corps of Engineers (USACE), New England District, and the Engineer Research and Development Center (ERDC) plan to apply aquatic herbicides during summer 2025 to control the aquatic invasive plant, hydrilla (*Hydrilla verticillata*), which is present in the mainstem of the Connecticut River, tributaries, and other waterbodies that abut the river.

We will be preparing a supplemental Environmental Assessment (SEA) to address impacts to the environment. Five sites were treated in Connecticut with aquatic herbicides in the summer of 2024: Keeney Cove in Glastonbury; Portland Boat Works in Portland; Chapman Pond in Haddam; Chester Boat Basin in Chester; and Selden Cove in Lyme. Eleven additional sites in Connecticut are being considered for herbicide treatments in 2025: (1) Deep River in Deep River; (2) Hamburg Cove in Lyme; (3) Joshua Creek in Lyme; (4) Mattabesset River in Middletown; (5) Parker's Point in Chester; (6) an expanded Portland Boat Works in Portland; (7) Post and Pratt Coves in Deep River; (8) Salmon River in East Haddam; (9) Selden Creek in Lyme; (10) Lake Pocotopaug in East Hampton; (11) Pameacha Pond in Middletown.

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We look forward to your contribution towards this project. If you or your staff have any questions or require additional information, please contact the project manager, Keith Hannon at [REDACTED] or by email at [Keith.W.Hannon@usace.army.mil](mailto:Keith.W.Hannon@usace.army.mil); or the project biologist, Kelsie Dakessian at [REDACTED] or by email at [Kelsie.Dakessian@Usace.army.mil](mailto:Kelsie.Dakessian@Usace.army.mil).

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Wendy Gendron  
Chief, Planning Division

Enclosure





DEPARTMENT OF THE ARMY  
US ARMY CORPS OF ENGINEERS  
NEW ENGLAND DISTRICT  
696 VIRGINIA ROAD  
CONCORD MA 01742-2751

March 10, 2025

Planning Division  
Environmental Branch

Ms. Jenny Dickson, Director  
Connecticut Department of Energy and Environmental Protection  
Wildlife Division  
79 Elm Street  
Hartford, Connecticut 06106-5127

Dear Ms. Dickson:

The U.S. Army Corps of Engineers (USACE), New England District, and the Engineer Research and Development Center (ERDC) plan to apply aquatic herbicides during summer 2025 to control the aquatic invasive plant, hydrilla (*Hydrilla verticillata*), which is present in the mainstem of the Connecticut River, tributaries, and other waterbodies that abut the river.

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Wendy Gendron  
Chief, Planning Division

Enclosure

Copies Furnished:

Wildlife Division – [deep.wildlife@ct.gov](mailto:deep.wildlife@ct.gov)

Natural Diversity Database – [DEEP.nddbrequest@ct.gov](mailto:DEEP.nddbrequest@ct.gov)

**Attachment 1. Research and Demonstration Treatment Sites, including Potential Sites, within the Lower Connecticut River Watershed**





DEPARTMENT OF THE ARMY  
US ARMY CORPS OF ENGINEERS  
NEW ENGLAND DISTRICT  
696 VIRGINIA ROAD  
CONCORD MA 01742-2751

March 10, 2025

Planning Division  
Environmental Branch

Mr. Pete Aarrestad, Director  
Connecticut Department of Energy and Environmental Protection  
Fisheries Division  
79 Elm Street  
Hartford, Connecticut 06106-5127

Dear Mr. Aarrestad:

The U.S. Army Corps of Engineers (USACE), New England District, and the Engineer Research and Development Center (ERDC) plan to apply aquatic herbicides during summer 2025 to control the aquatic invasive plant, hydrilla (*Hydrilla verticillata*), which is present in the mainstem of the Connecticut River, tributaries, and other waterbodies that abut the river.

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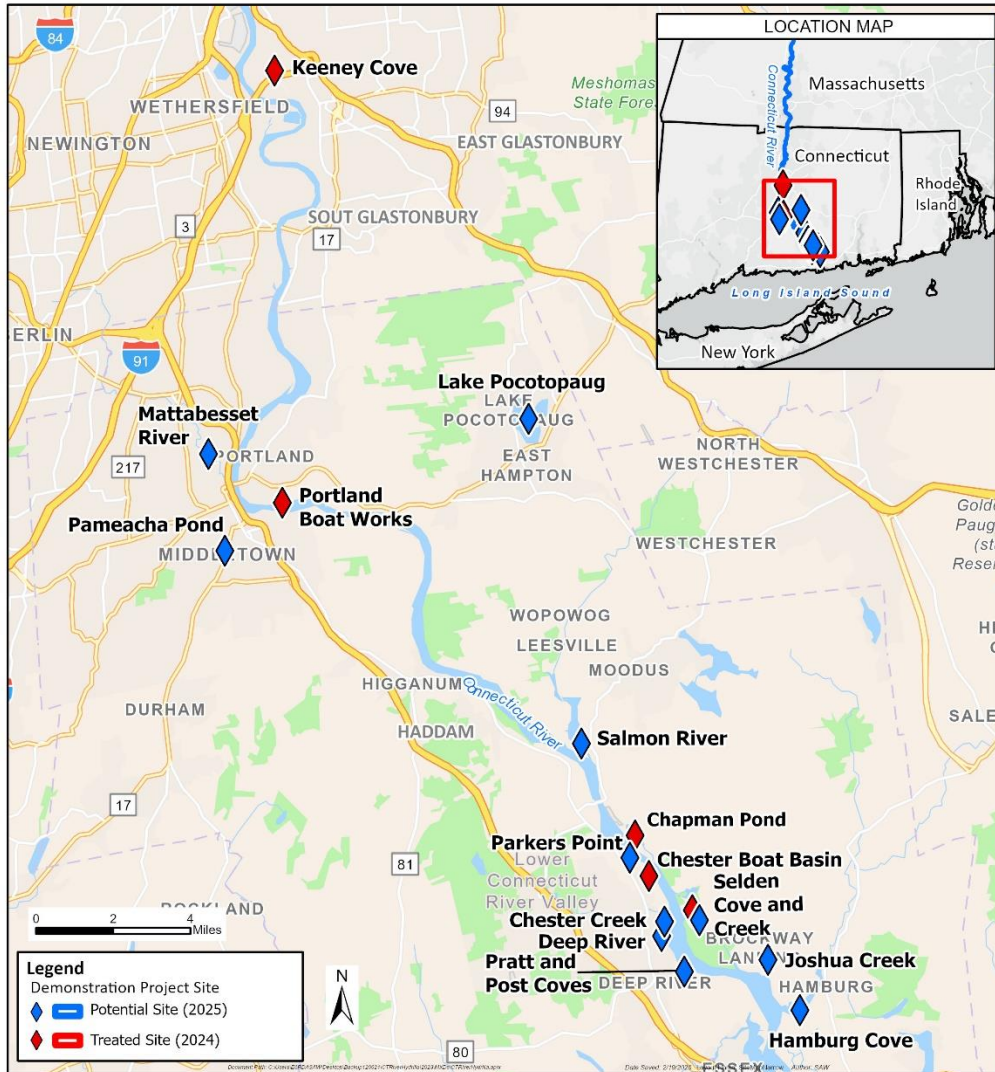
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Wendy Gendron  
Chief, Planning Division

Enclosure

Copy Furnished:  
Fisheries Division – [deep.inland.fisheries@ct.gov](mailto:deep.inland.fisheries@ct.gov)

**Attachment 1. Research and Demonstration Treatment Sites, including Potential Sites, within the Lower Connecticut River Watershed**





**DEPARTMENT OF THE ARMY**  
**US ARMY CORPS OF ENGINEERS**  
**NEW ENGLAND DISTRICT**  
**696 VIRGINIA ROAD**  
**CONCORD MA 01742-2751**

March 10, 2025

Planning Division  
Environmental Branch

Mr. Brian Thompson, Director  
Connecticut Department of Energy and Environmental Protection  
Office of Long Island Sound Programs  
79 Elm Street  
Hartford, Connecticut 06106-5127

Dear Mr. Thompson:

The U.S. Army Corps of Engineers (USACE), New England District, and the Engineer Research and Development Center (ERDC) plan to apply aquatic herbicides during summer 2025 to control the aquatic invasive plant, hydrilla (*Hydrilla verticillata*), which is present in the mainstem of the Connecticut River, tributaries, and other waterbodies that abut the river.

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We are requesting written preliminary comments on the proposed project from your agency within 30 days of the meeting. Comments should include any concerns that need to be addressed during the planning of the proposed project relative to the Connecticut Coastal Management Act (CCMA).

We look forward to your contribution towards this project. If you or your staff have any questions or require additional information, please contact the project manager, Keith Hannon at [REDACTED] or by email at [Keith.W.Hannon@usace.army.mil](mailto:Keith.W.Hannon@usace.army.mil); or the project biologist, Kelsie Dakessian at [REDACTED] or by email at [Kelsie.Dakessian@Usace.army.mil](mailto:Kelsie.Dakessian@Usace.army.mil).

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Wendy Gendron  
Chief, Planning Division

Enclosure

Copy Furnished:  
Harry Yamalis - [Harry.Yamalis@ct.gov](mailto:Harry.Yamalis@ct.gov)





**DEPARTMENT OF THE ARMY  
US ARMY CORPS OF ENGINEERS  
NEW ENGLAND DISTRICT  
696 VIRGINIA ROAD  
CONCORD MA 01742-2751**

June 10, 2025

Planning Division

Mr. Timothy L. Timmermann  
Director, Office of Environmental Review  
EPA New England-Region 1  
5 Post Office Square, Suite 100  
Mail Code OEP 06-3  
Boston, MA 02109-3912

Dear Mr. Timmermann:

The U.S. Army Corps of Engineers (USACE), New England District, and the Engineer Research and Development Center (ERDC) are proposing to modify the USACE's aquatic invasive plant control research demonstration project, the Connecticut River Hydrilla Control Research and Demonstration Project (Project), by adding an additional 12 treatment sites within the Lower Connecticut River Watershed and additional herbicides. The Project includes the application of herbicide to the waters of the Lower Connecticut River Watershed for the control of the invasive aquatic plant, hydrilla (*Hydrilla verticillata*) (Attachment 1). The Project is a part of ERDC's Aquatic Plant Control and Research Program. The program is authorized by Section 104 of the Rivers and Harbors Act of 1958, as amended, to support the "prevention, control, and progressive eradication of noxious aquatic plant growths and aquatic invasive species from the navigable waters, tributary streams, connecting channels, and other allied waters of the United States."

The USACE has prepared a draft supplemental environmental assessment to analyze potential impacts of the modified Project. The Project currently includes five treatment sites, with a field-scale demonstration of chemical technology to evaluate the effectiveness of an aquatic herbicide to manage hydrilla, including sites in high water exchange environments (e.g., tidal, riverine environment). The modified Project expands the Project by adding 12 additional treatment sites within the Lower Connecticut River Watershed: (1) Chester Creek in Chester; (2) Deep River in Deep River; (3) Hamburg Cove in Lyme; (4) Joshua Creek in Lyme; (5) Mattabesset River in Middletown; (6) Parker's Point in Chester; (7) an expanded Portland Boat Works in Portland; (8) Post and Pratt Coves in Deep River; (9) Salmon River in East Haddam;

(10) Selden Creek in Lyme; (11) Lake Pocotopaug in East Hampton; and (12) Pameacha Pond in Middletown.

The Project currently includes the use of diquat dibromide (diquat), dipotassium salt of endothall, and florpyrauxifen-benzyl at the five treatment sites. The modified Project proposes additional herbicides for use: bispyribac-sodium, imazamox, flumioxazin, fluridone, penoxsulam, or combinations thereof (Attachment 2). The proposed applications will occur in the summer after July 4th, 2025, with any subsequent treatments occurring after July 4th of future years. This timing was selected to avoid impacts to diadromous fishes and northern pike (*Esox lucius*) that may spawn in submerged aquatic vegetation at sites in or adjacent to the Connecticut River. During the field demonstration, herbicides will be selected based on site-specific environmental characteristics, such as water exchange rate, product retention, and the presence of native species, as well as the likelihood of the herbicide's effectiveness in controlling target plant species. The herbicide application will comply with the U.S. Environmental Protection Agency (EPA) herbicide label restrictions. Proposed maximum application rates are provided in Attachment 3.

Along with this letter, we are also transmitting a copy of the draft supplemental environmental assessment which includes maps of the proposed treatment areas, a project description, and resource characterizations of the project area. We are requesting that you review the draft supplemental environmental assessment relative to all applicable EPA authorities. We would appreciate your comments within 30 days of the date of this letter. If you or your staff have any questions or require additional information, please contact the project manager, Keith Hannon at [REDACTED] or by email at [Keith.W.Hannon@usace.army.mil](mailto:Keith.W.Hannon@usace.army.mil); or the project biologist, Kelsie Dakessian at [REDACTED] or by email at [Kelsie.Dakessian@usace.army.mil](mailto:Kelsie.Dakessian@usace.army.mil).

Sincerely,



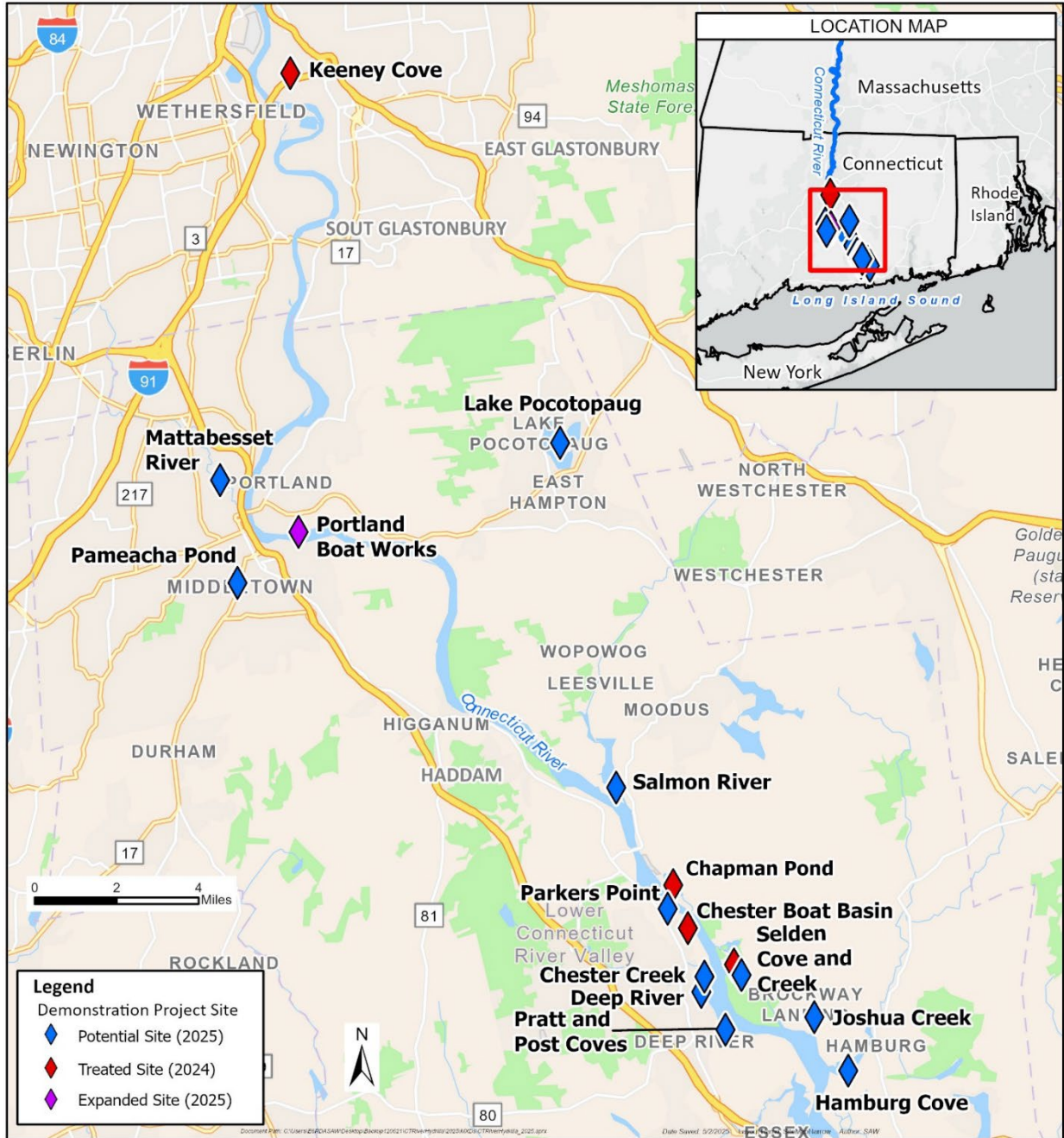
Wendy Gendron  
Chief, Planning Division

Enclosures

cc:

Alexander Dwyer - [Dwyer.Alexandra@epa.gov](mailto:Dwyer.Alexandra@epa.gov)  
Nathan Margason - [Margason.Nathan@epa.gov](mailto:Margason.Nathan@epa.gov)  
Edward Reiner - [reiner.ed@epa.gov](mailto:reiner.ed@epa.gov)  
Kimberly Lavoie - [Lavoie.Kimberly@epa.gov](mailto:Lavoie.Kimberly@epa.gov)

# Attachment 1. Prior research and demonstration treatment sites and proposed treatment sites within the Lower Connecticut River watershed



## Attachment 2. Proposed herbicides for consideration

<b>Site</b>	<b>Treatment Area (acres)</b>	<b>Potential Herbicide(s)<sup>1</sup></b>
Chester Creek	37.9	Diquat, Dipotassium salt of endothall, Florpyrauxifen-benzyl
Deep River	5.3	Diquat, Dipotassium salt of endothall, Florpyrauxifen-benzyl
Hamburg Cove	178.8	Diquat, Dipotassium salt of endothall, Florpyrauxifen-benzyl
Mattabesset River	65.6	Diquat, Dipotassium salt of endothall, Florpyrauxifen-benzyl, Fluridone
Parker's Point	3.0	Diquat, Dipotassium salt of endothall, Florpyrauxifen-benzyl
Portland Boat Works	16.1	Diquat, Dipotassium salt of endothall, Florpyrauxifen-benzyl
Post and Pratt Coves	35.5	Diquat, Dipotassium salt of endothall, Florpyrauxifen-benzyl
Salmon River	274.3	Diquat, Dipotassium salt of endothall, Florpyrauxifen-benzyl
Joshua Creek	20.7	Diquat, Dipotassium salt of endothall, Florpyrauxifen-benzyl
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Lake Pocotopaug	232	Diquat, Dipotassium salt of endothall, Imazamox, Florpyrauxifen-benzyl, Flumioxazin, Penoxsulam
Pameacha Pond	18.8	Fluridone, Bispyribac-sodium, Dipotassium salt of endothall, Florpyrauxifen-benzyl

<sup>1</sup> Herbicide(s) will be selected based on field-conditions during summer treatment period

### Attachment 3. Proposed herbicides use rates

<b>Potential Herbicide</b>	<b>Maximum Application Rate</b>
Bispyribac-sodium	40 ppb
Diquat	370 ppb
Dipotassium salt of endothall	5 ppm
Florpyrauxifen-benzyl	48 ppb
Imazamox	500 ppb
Flumioxazin	400 ppb
Fluridone	15 ppb
Penoxsulam	150 ppb



DEPARTMENT OF THE ARMY  
US ARMY CORPS OF ENGINEERS  
NEW ENGLAND DISTRICT  
696 VIRGINIA ROAD  
CONCORD MA 01742-2751

June 10, 2025

Planning Division

Audrey Mayer, Ph.D.  
Supervisor, New England Field Office  
U.S. Fish and Wildlife Service,  
70 Commercial Street, Suite 300  
Concord, New Hampshire 03301

Dear Dr. Mayer:

The U.S. Army Corps of Engineers (USACE), New England District, and the Engineer Research and Development Center (ERDC) are proposing to modify the USACE's aquatic invasive plant control research demonstration project, the Connecticut River Hydrilla Control Research and Demonstration Project (Project), by adding an additional 12 treatment sites within the Lower Connecticut River Watershed and additional herbicides. The Project includes the application of herbicide to the waters of the Lower Connecticut River Watershed for the control of the invasive aquatic plant, hydrilla (*Hydrilla verticillata*) (Attachment 1). The Project is a part of ERDC's Aquatic Plant Control and Research Program. The program is authorized by Section 104 of the Rivers and Harbors Act of 1958, as amended, to support the "prevention, control, and progressive eradication of noxious aquatic plant growths and aquatic invasive species from the navigable waters, tributary streams, connecting channels, and other allied waters of the United States."

The USACE has prepared a draft supplemental environmental assessment to analyze potential impacts of the modified Project. The Project currently includes five treatment sites, with a field-scale demonstration of chemical technology to evaluate the effectiveness of an aquatic herbicide to manage hydrilla, including sites in high water exchange environments (e.g., tidal, riverine environment). The modified Project expands the Project by adding 12 additional treatment sites within the Lower Connecticut River Watershed: (1) Chester Creek in Chester; (2) Deep River in Deep River; (3) Hamburg Cove in Lyme; (4) Joshua Creek in Lyme; (5) Mattabesset River in Middletown; (6) Parker's Point in Chester; (7) an expanded Portland Boat Works in Portland; (8) Post and Pratt Coves in Deep River; (9) Salmon River in East Haddam; (10) Selden Creek in Lyme; (11) Lake Pocotopaug in East Hampton; and (12) Pameacha Pond in Middletown.

The Project currently includes the use of diquat dibromide (diquat), dipotassium salt of endothall, and floryprauxifen-benzyl at the five treatment sites. The modified Project proposes additional herbicides for use: bispyribac-sodium, imazamox, flumioxazin, fluridone, penoxsulam, or combinations thereof (Attachment 2). The proposed applications will occur in the summer after July 4th, 2025, with any subsequent treatments occurring after July 4th of future years. This timing was selected to avoid impacts to diadromous fishes and northern pike (*Esox lucius*) that may spawn in submerged aquatic vegetation at sites in or adjacent to the Connecticut River. During the field demonstration, herbicides will be selected based on site-specific environmental characteristics, such as water exchange rate, product retention, and the presence of native species, as well as the likelihood of the herbicide's effectiveness in controlling target plant species. The herbicide application will comply with the U.S. Environmental Protection Agency (EPA) herbicide label restrictions. Proposed maximum application rates are provided in Attachment 3.

Along with this letter, we are also transmitting a copy of the draft supplemental environmental assessment which includes maps of the proposed treatment areas, a project description, and resource characterizations of the project area. We are requesting that you review this project information. We would appreciate your comments within 30 days of the date of this letter. If you or your staff have any questions or require additional information, please contact the project manager, Keith Hannon at [REDACTED] or by email at [Keith.W.Hannon@usace.army.mil](mailto:Keith.W.Hannon@usace.army.mil); or the project biologist, Kelsie Dakessian at [REDACTED] or by email at [Kelsie.Dakessian@usace.army.mil](mailto:Kelsie.Dakessian@usace.army.mil).

Sincerely,



Wendy Gendron  
Chief, Planning Division

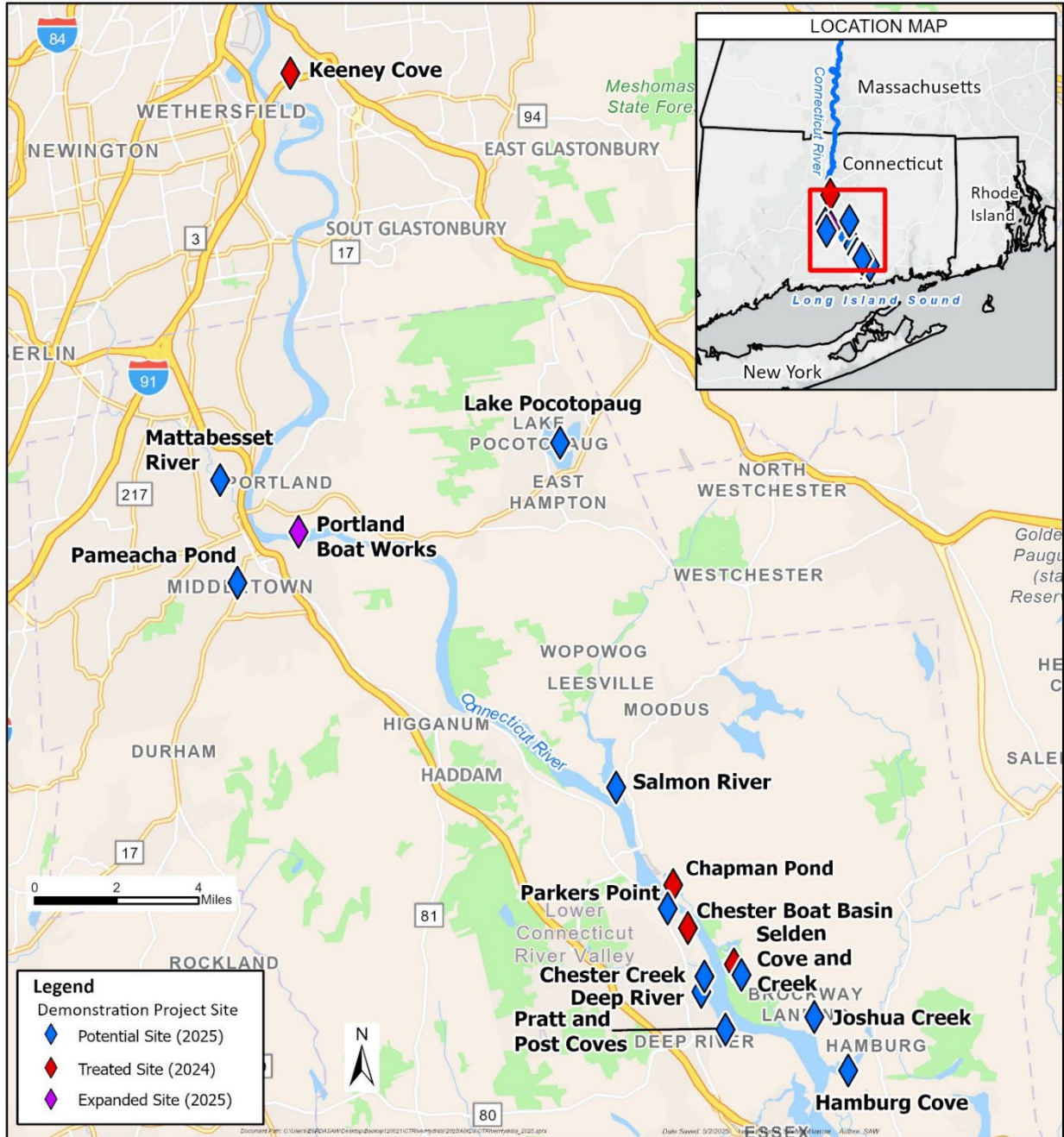
Enclosures

cc:

David Simmons - [david\\_simmons@fws.gov](mailto:david_simmons@fws.gov)

New England Ecological Services Field Office - [newengland@fws.gov](mailto:newengland@fws.gov)

### Attachment 1. Prior research and demonstration treatment sites and proposed treatment sites within the Lower Connecticut River watershed



## Attachment 2. Proposed herbicides for consideration

<b>Site</b>	<b>Treatment Area (acres)</b>	<b>Potential Herbicide(s)<sup>1</sup></b>
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<b>Potential Herbicide</b>	<b>Maximum Application Rate</b>
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DEPARTMENT OF THE ARMY  
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NEW ENGLAND DISTRICT  
696 VIRGINIA ROAD  
CONCORD MA 01742-2751

June 10, 2025

Planning Division

Mr. Louis A. Chiarella  
Assistant Regional Administrator for Habitat Conservation  
NOAA Fisheries  
55 Great Republic Drive  
Gloucester, MA 01930

Dear Mr. Chiarella:

The U.S. Army Corps of Engineers (USACE), New England District, and the Engineer Research and Development Center (ERDC) are proposing to modify the USACE's aquatic invasive plant control research demonstration project, the Connecticut River Hydrilla Control Research and Demonstration Project (Project), by adding an additional 12 treatment sites within the Lower Connecticut River Watershed and additional herbicides. The Project includes the application of herbicide to the waters of the Lower Connecticut River Watershed for the control of the invasive aquatic plant, hydrilla (*Hydrilla verticillata*) (Attachment 1). The Project is a part of ERDC's Aquatic Plant Control and Research Program. The program is authorized by Section 104 of the Rivers and Harbors Act of 1958, as amended, to support the "prevention, control, and progressive eradication of noxious aquatic plant growths and aquatic invasive species from the navigable waters, tributary streams, connecting channels, and other allied waters of the United States."

The USACE has prepared a draft supplemental environmental assessment to analyze potential impacts of the modified Project. The Project currently includes five treatment sites, with a field-scale demonstration of chemical technology to evaluate the effectiveness of an aquatic herbicide to manage hydrilla, including sites in high water exchange environments (e.g., tidal, riverine environment). The modified Project expands the Project by adding 12 additional treatment sites within the Lower Connecticut River Watershed: (1) Chester Creek in Chester; (2) Deep River in Deep River; (3) Hamburg Cove in Lyme; (4) Joshua Creek in Lyme; (5) Mattabesset River in Middletown; (6) Parker's Point in Chester; (7) an expanded Portland Boat Works in Portland; (8) Post and Pratt Coves in Deep River; (9) Salmon River in East Haddam; (10) Selden Creek in Lyme; (11) Lake Pocotopaug in East Hampton; and (12) Pameacha Pond in Middletown.

The Project currently includes the use of diquat dibromide (diquat), dipotassium salt of endothall, and floryprauxifen-benzyl at the five treatment sites. The modified Project proposes additional herbicides for use: bispyribac-sodium, imazamox, flumioxazin, fluridone, penoxsulam, or combinations thereof (Attachment 2). The proposed applications will occur in the summer after July 4th, 2025, with any subsequent treatments occurring after July 4th of future years. This timing was selected to avoid impacts to diadromous fishes and northern pike (*Esox lucius*) that may spawn in submerged aquatic vegetation at sites in or adjacent to the Connecticut River. During the field demonstration, herbicides will be selected based on site-specific environmental characteristics, such as water exchange rate, product retention, and the presence of native species, as well as the likelihood of the herbicide's effectiveness in controlling target plant species. The herbicide application will comply with the U.S. Environmental Protection Agency (EPA) herbicide label restrictions. Proposed maximum application rates are provided in Attachment 3.

Along with this letter, we are also transmitting a copy of the draft supplemental environmental assessment which includes maps of the proposed treatment areas, a project description, and resource characterizations of the project area. Appendix C of the draft supplemental environmental assessment describes Essential Fish Habitat (EFH) known to exist at proposed treatment sites. We are requesting that you review this project information, specifically Sections 3.5, 3.6, 4.4, and 4.5 within the draft supplemental environmental assessment, in accordance with the Magnuson-Stevens Fishery Conservation and Management Act and the Fish and Wildlife Coordination Act. These sections describe impacts to fish & wildlife and EFH-managed species. No significant impacts to submerged aquatic vegetation resources are anticipated as a result of the proposed project. We would appreciate your comments within 30 days of the date of this letter.

If you or your staff have any questions or require additional information, please contact the project manager, Keith Hannon at [REDACTED] or by email at [Keith.W.Hannon@usace.army.mil](mailto:Keith.W.Hannon@usace.army.mil); or the project biologist, Kelsie Dakessian at [REDACTED] or by email at [Kelsie.Dakessian@usace.army.mil](mailto:Kelsie.Dakessian@usace.army.mil).

Sincerely,



Wendy Gendron  
Chief, Planning Division

Enclosures

cc: Sabrina Pereira - [sabrina.pereira@noaa.gov](mailto:sabrina.pereira@noaa.gov)



## Attachment 2. Proposed herbicides for consideration

<b>Site</b>	<b>Treatment Area (acres)</b>	<b>Potential Herbicide(s)<sup>1</sup></b>
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Fluridone	15 ppb
Penoxsulam	150 ppb

## Federal Interagency Comment Form

**Date:** 07/09/2025

**Project:** CT River Hydrilla Treatment

**Appl No.:** n/a

**Commenting Agency:** NOAA/NMFS/GARFO/HESD

**Action Agency Project Manager:** Keith Hannon, U.S. Army Corps of Engineers

**Waterway:** Multiple sites in the lower CT River watershed. See below for specifics.

**Activity:** The Project currently includes five treatment sites to evaluate the effectiveness of an aquatic herbicide to manage invasive hydrilla. The project will use diquat dibromide (diquat), dipotassium salt of endothall, and florpyrauxifen-benzyl at the five treatment sites. The modified Project proposes additional herbicides for use: bispyribac-sodium, imazamox, flumioxazin, fluridone, penoxsulam, or combinations thereof. Herbicides will be selected based on site-specific environmental characteristics, such as water exchange rate, product retention, and the presence of native species, as well as the likelihood of the herbicide's effectiveness in controlling target plant species. The modified Project expands the Project by adding 12 additional treatment sites within the Lower Connecticut River Watershed: (1) Chester Creek in Chester; (2) Deep River in Deep River; (3) Hamburg Cove in Lyme; (4) Joshua Creek in Lyme; (5) Mattabeset River in Middletown; (6) Parker's Point in Chester; (7) expanding Portland Boat Works site in Portland; (8) Post and Pratt Coves in Deep River; (9) Salmon River in East Haddam; (10) Selden Creek in Lyme; (11) Lake Pocotopaug in East Hampton; and (12) Pameacha Pond in Middletown.

### ESSENTIAL FISH HABITAT (EFH)

Project may adversely affect EFH. Area is designated EFH for 14 federally managed species, and diadromous prey species like American shad, alewife, blueback herring, and sea lamprey (managed under the FWCA).

**ESSENTIAL FISH HABITAT CONSERVATION RECOMMENDATIONS:** (Note: EFH CRs require a response from the federal action agency within 30 days of receipt or 10 days before a permit is issued if CRs are not included as a special condition of the permit. In addition, a distinct and further EFH consultation must be reinitiated pursuant to 50 CFR 600.920 (j) if new information becomes available, or if the project is revised in such a manner that affects the basis for the above EFH determination or EFH conservation recommendations.)

None

### FISH AND WILDLIFE COORDINATION ACT (FWCA) COMMENTS

1. No in water work from April 1st to June 30th, the time of diadromous fish migration, to protect any migrating prey species, like American shad, alewife, blueback herring, and sea lamprey.

**ENDANGERED SPECIES** - Threatened or endangered species under the jurisdiction of NMFS may be present in the project area. The federal action agency will be responsible for determining whether the proposed action may affect listed species. If they determine that the proposed action may affect a listed species, they should submit their determination of effects, along with justification and a request for concurrence to the attention of the Section 7 Coordinator, NMFS, Greater Atlantic Regional Fisheries Office, Protected Resources Division, 55 Great Republic Drive, Gloucester, MA 01930 or [nmfs.gar.esa.section7@noaa.gov](mailto:nmfs.gar.esa.section7@noaa.gov). If you have any questions regarding these comments, please contact Roosevelt Mesa at [roosevelt.mesa@noaa.gov](mailto:roosevelt.mesa@noaa.gov).

### OTHER:

Provide a copy of the permit when issued.

**Prepared by:** Sabrina Pereira **date:** 07/09/2025



DEPARTMENT OF THE ARMY  
US ARMY CORPS OF ENGINEERS  
NEW ENGLAND DISTRICT  
696 VIRGINIA ROAD  
CONCORD MA 01742-2751

June 10, 2025

Planning Division

Ms. Jacqueline Dias  
Community Planner/River Manager  
Partnership Wild and Scenic Rivers Program  
NPS - Interior Region 1  
21 2<sup>nd</sup> Avenue  
Charlestown, MA 02109

Dear Ms. Dias:

The U.S. Army Corps of Engineers (USACE), New England District, and the Engineer Research and Development Center (ERDC) are proposing to modify the USACE's aquatic invasive plant control research demonstration project, the Connecticut River Hydrilla Control Research and Demonstration Project (Project), by adding an additional 12 treatment sites within the Lower Connecticut River Watershed and additional herbicides. The Project includes the application of herbicide to the waters of the Lower Connecticut River Watershed for the control of the invasive aquatic plant, hydrilla (*Hydrilla verticillata*) (Attachment 1). The project is a part of ERDC's Aquatic Plant Control and Research Program. The program is authorized by Section 104 of the Rivers and Harbors Act of 1958, as amended, to support the "prevention, control, and progressive eradication of noxious aquatic plant growths and aquatic invasive species from the navigable waters, tributary streams, connecting channels, and other allied waters of the United States."

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Along with this letter, we are also transmitting a copy of the draft supplemental environmental assessment which includes maps of the proposed treatment areas, a project description, and resource characterizations of the project area. We are requesting that you review this project information in accordance with the Wild and Scenic Rivers Act. We would appreciate your comments within 30 days of the date of this letter. If you or your staff have any questions or require additional information, please contact the project manager, Keith Hannon at [REDACTED] or by email at [Keith.W.Hannon@usace.army.mil](mailto:Keith.W.Hannon@usace.army.mil); or the project biologist, Kelsie Dakessian at [REDACTED] or by email at [Kelsie.Dakessian@usace.army.mil](mailto:Kelsie.Dakessian@usace.army.mil).

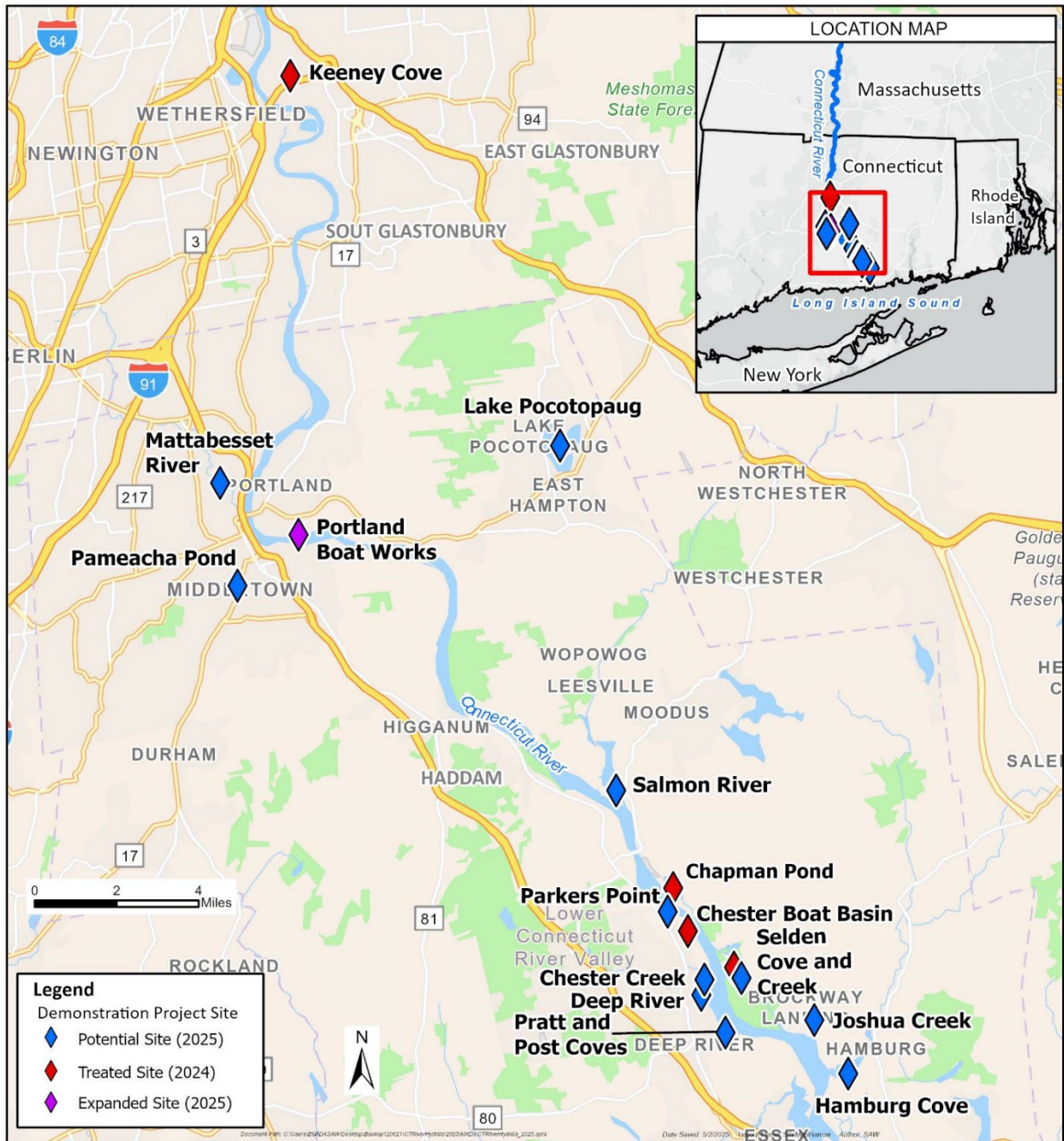
Sincerely,



Wendy Gendron  
Chief, Planning Division

Enclosures

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DEPARTMENT OF THE ARMY  
US ARMY CORPS OF ENGINEERS  
NEW ENGLAND DISTRICT  
696 VIRGINIA ROAD  
CONCORD MA 01742-2751

June 10, 2025

Planning Division

Ms. Jenny Dickson  
Director, Connecticut Department of Energy and Environmental Protection  
Wildlife Division  
79 Elm Street  
Hartford, Connecticut 06106-5127

Dear Ms. Dickson:

The U.S. Army Corps of Engineers (USACE), New England District, and the Engineer Research and Development Center (ERDC) are proposing to modify the USACE's aquatic invasive plant control research demonstration project, the Connecticut River Hydrilla Control Research and Demonstration Project (Project), by adding an additional 12 treatment sites within the Lower Connecticut River Watershed and additional herbicides. The Project includes the application of herbicide to the waters of the Lower Connecticut River Watershed for the control of the invasive aquatic plant, hydrilla (*Hydrilla verticillata*) (Attachment 1). The Project is a part of ERDC's Aquatic Plant Control and Research Program. The program is authorized by Section 104 of the Rivers and Harbors Act of 1958, as amended, to support the "prevention, control, and progressive eradication of noxious aquatic plant growths and aquatic invasive species from the navigable waters, tributary streams, connecting channels, and other allied waters of the United States."

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Sincerely,



Wendy Gendron  
Chief, Planning Division

Enclosures

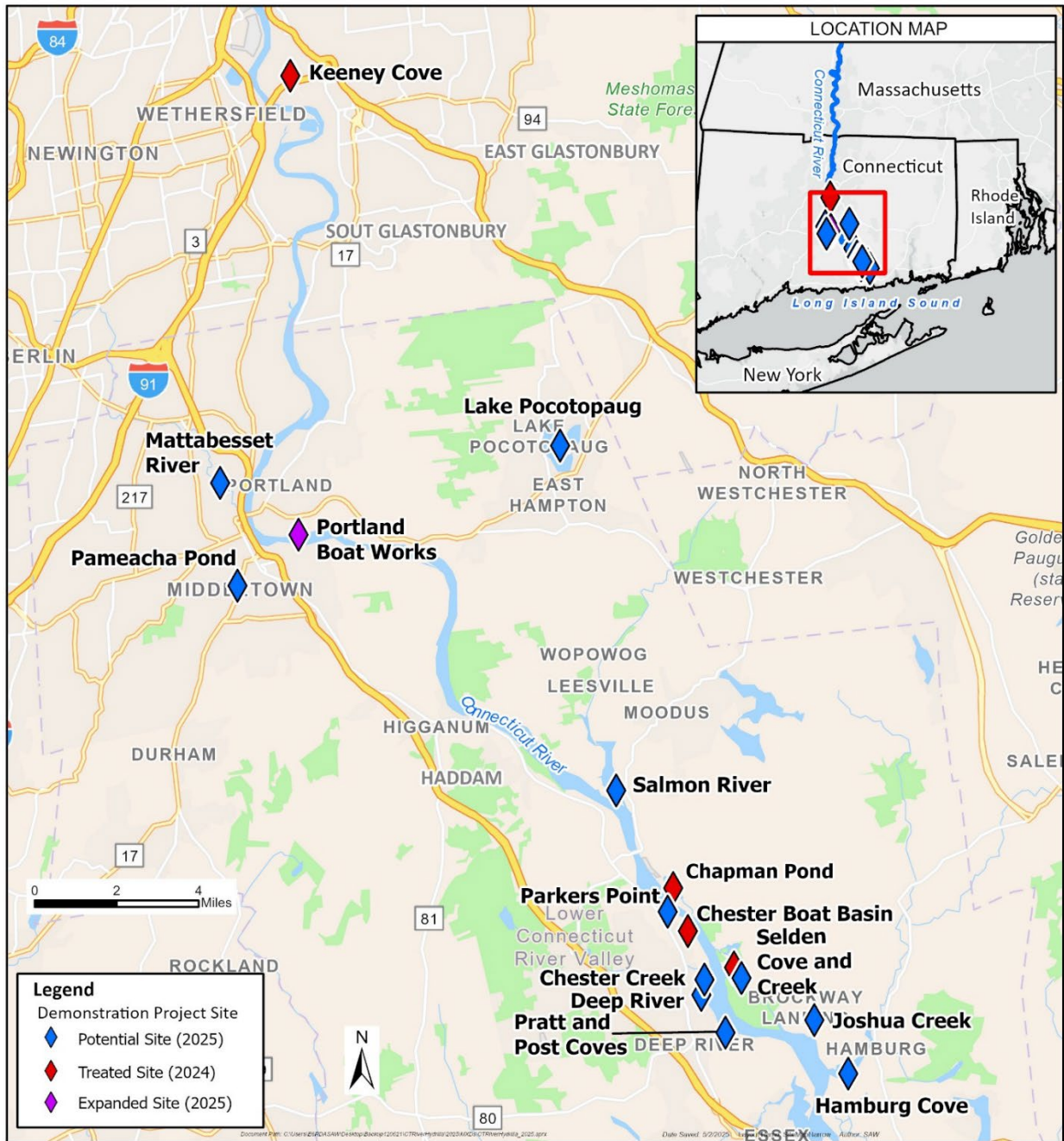
cc:

CT DEEP Wildlife Division - [deep.wildlife@ct.gov](mailto:deep.wildlife@ct.gov)

CT DEEP Natural Diversity Data Base - [deep.nddbrequest@ct.gov](mailto:deep.nddbrequest@ct.gov)

William Moorehead - [William.Moorhead@ct.gov](mailto:William.Moorhead@ct.gov)

**Attachment 1. Prior research and demonstration treatment sites and proposed treatment sites within the Lower Connecticut River watershed**



## Attachment 2. Proposed herbicides for consideration

Site	Treatment Area (acres)	Potential Herbicide(s) <sup>1</sup>
Chester Creek	37.9	Diquat, Dipotassium salt of endothall, Florpyrauxifen-benzyl
Deep River	5.3	Diquat, Dipotassium salt of endothall, Florpyrauxifen-benzyl
Hamburg Cove	178.8	Diquat, Dipotassium salt of endothall, Florpyrauxifen-benzyl
Mattabeset River	65.6	Diquat, Dipotassium salt of endothall, Florpyrauxifen-benzyl, Fluridone
Parker's Point	3.0	Diquat, Dipotassium salt of endothall, Florpyrauxifen-benzyl
Portland Boat Works	16.1	Diquat, Dipotassium salt of endothall, Florpyrauxifen-benzyl
Post and Pratt Coves	35.5	Diquat, Dipotassium salt of endothall, Florpyrauxifen-benzyl
Salmon River	274.3	Diquat, Dipotassium salt of endothall, Florpyrauxifen-benzyl
Joshua Creek	20.7	Diquat, Dipotassium salt of endothall, Florpyrauxifen-benzyl
Selden Creek	48.1	Diquat, Dipotassium salt of endothall, Florpyrauxifen-benzyl
Lake Pocotopaug	232	Diquat, Dipotassium salt of endothall, Imazamox, Florpyrauxifen-benzyl, Flumioxazin, Penoxsulam
Pameacha Pond	18.8	Fluridone, Bispyribac-sodium, Dipotassium salt of endothall, Florpyrauxifen-benzyl

<sup>1</sup> Herbicide(s) will be selected based on field-conditions during summer treatment period

### Attachment 3. Proposed herbicides use rates

<b>Potential Herbicide</b>	<b>Maximum Application Rate</b>
Bispyribac-sodium	40 ppb
Diquat	370 ppb
Dipotassium salt of endothall	5 ppm
Florpyrauxifen-benzyl	48 ppb
Imazamox	500 ppb
Flumioxazin	400 ppb
Fluridone	15 ppb
Penoxsulam	150 ppb



DEPARTMENT OF THE ARMY  
US ARMY CORPS OF ENGINEERS  
NEW ENGLAND DISTRICT  
696 VIRGINIA ROAD  
CONCORD MA 01742-2751

June 10, 2025

Planning Division

Mr. Pete Aarrestad  
Director, Connecticut Department of Energy and Environmental Protection  
Fisheries Division  
79 Elm Street  
Hartford, Connecticut 06106-5127

Dear Mr. Aarrestad:

The U.S. Army Corps of Engineers (USACE), New England District, and the Engineer Research and Development Center (ERDC) are proposing to modify the USACE's aquatic invasive plant control research demonstration project, the Connecticut River Hydrilla Control Research and Demonstration Project (Project), by adding an additional 12 treatment sites within the Lower Connecticut River Watershed and additional herbicides. The Project includes the application of herbicide to the waters of the Lower Connecticut River Watershed for the control of the invasive aquatic plant, hydrilla (*Hydrilla verticillata*) (Attachment 1). The Project is a part of ERDC's Aquatic Plant Control and Research Program. The program is authorized by Section 104 of the Rivers and Harbors Act of 1958, as amended, to support the "prevention, control, and progressive eradication of noxious aquatic plant growths and aquatic invasive species from the navigable waters, tributary streams, connecting channels, and other allied waters of the United States."

The USACE has prepared a draft supplemental environmental assessment to analyze potential impacts of the modified Project. The Project currently includes five treatment sites, with a field-scale demonstration of chemical technology to evaluate the effectiveness of an aquatic herbicide to manage hydrilla, including sites in high water exchange environments (e.g., tidal, riverine environment). The modified Project expands the Project by adding 12 additional treatment sites within the Lower Connecticut River Watershed: (1) Chester Creek in Chester; (2) Deep River in Deep River; (3) Hamburg Cove in Lyme; (4) Joshua Creek in Lyme; (5) Mattabesset River in Middletown; (6) Parker's Point in Chester; (7) an expanded Portland Boat Works in Portland; (8) Post and Pratt Coves in Deep River; (9) Salmon River in East Haddam; (10) Selden Creek in Lyme; (11) Lake Pocotopaug in East Hampton; and (12) Pameacha Pond in Middletown.

The Project currently includes the use of diquat dibromide (diquat), dipotassium salt of endothall, and floryprauxifen-benzyl at the five treatment sites. The modified Project proposes additional herbicides for use: bispyribac-sodium, imazamox, flumioxazin, fluridone, penoxsulam, or combinations thereof (Attachment 2). The proposed applications will occur in the summer after July 4th, 2025, with any subsequent treatments occurring after July 4th of future years. This timing was selected to avoid impacts to diadromous fishes and northern pike (*Esox lucius*) that may spawn in submerged aquatic vegetation at sites in or adjacent to the Connecticut River. During the field demonstration, herbicides will be selected based on site-specific environmental characteristics, such as water exchange rate, product retention, and the presence of native species, as well as the likelihood of the herbicide's effectiveness in controlling target plant species. The herbicide application will comply with the U.S. Environmental Protection Agency (EPA) herbicide label restrictions. Proposed maximum application rates are provided in Attachment 3.

Along with this letter, we are also transmitting a copy of the draft supplemental environmental assessment which includes maps of the proposed treatment areas, a project description, and resource characterizations of the project area. We are requesting that you review this project information, specifically Sections 3.5 and 4.4 of the draft supplemental environmental assessment. We would appreciate your comments within 30 days of the date of this letter. If you or your staff have any questions or require additional information, please contact the project manager, Keith Hannon at [REDACTED] or by email at [Keith.W.Hannon@usace.army.mil](mailto:Keith.W.Hannon@usace.army.mil); or the project biologist, Kelsie Dakessian at [REDACTED] or by email at [Kelsie.Dakessian@usace.army.mil](mailto:Kelsie.Dakessian@usace.army.mil).

Sincerely,



Wendy Gendron  
Chief, Planning Division

Enclosures

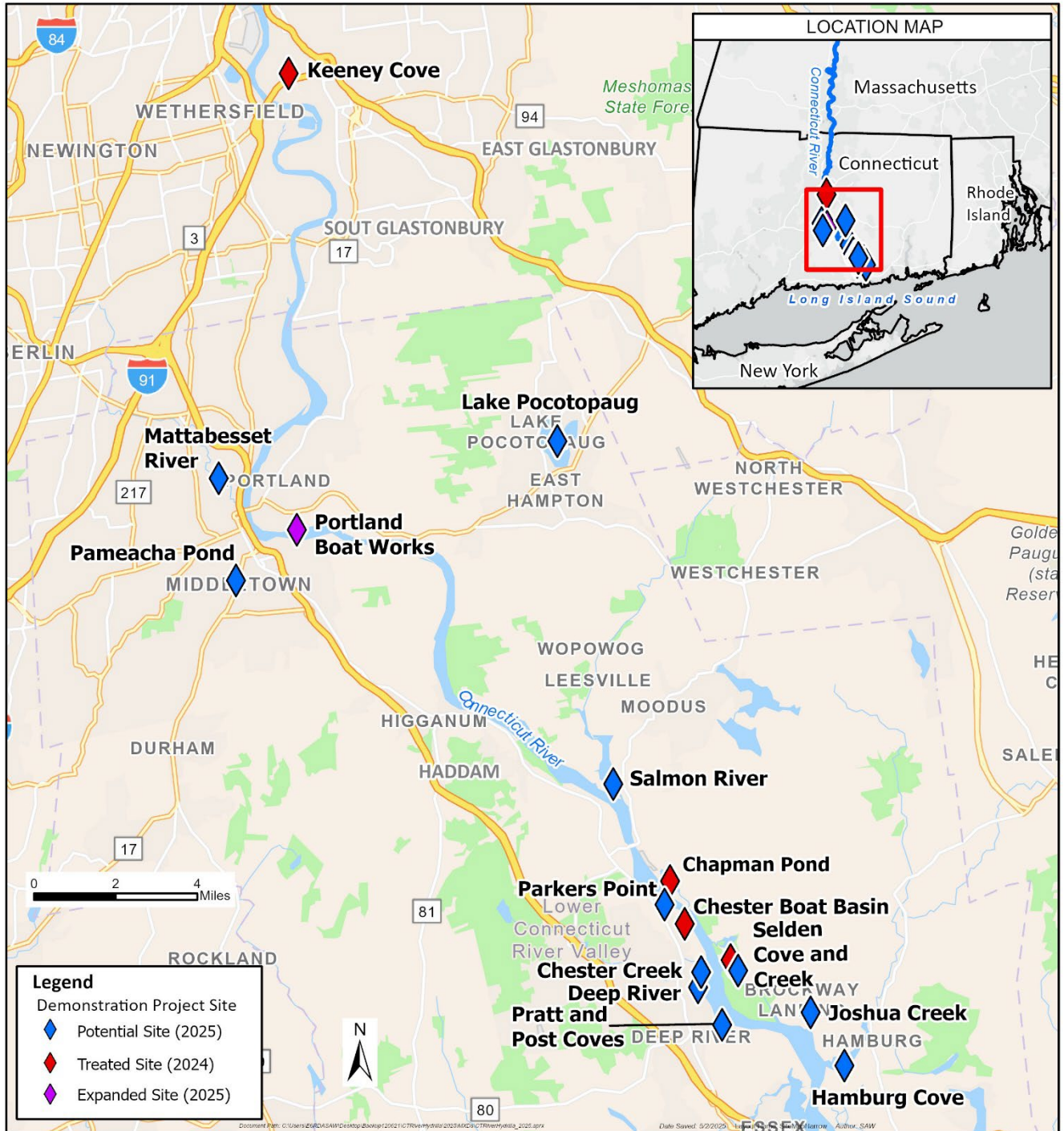
cc:

CT DEEP Inland Fisheries - [DEEP.Inland.Fisheries@ct.gov](mailto:DEEP.Inland.Fisheries@ct.gov)

Shalyn Zappulla - [shalyn.zappulla@ct.gov](mailto:shalyn.zappulla@ct.gov)

Bruce Williams - [Bruce.Williams@ct.gov](mailto:Bruce.Williams@ct.gov)

## Attachment 1. Prior research and demonstration treatment sites and proposed treatment sites within the Lower Connecticut River watershed



## Attachment 2. Proposed herbicides for consideration

<b>Site</b>	<b>Treatment Area (acres)</b>	<b>Potential Herbicide(s)<sup>1</sup></b>
Chester Creek	37.9	Diquat, Dipotassium salt of endothall, Florpyrauxifen-benzyl
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Hamburg Cove	178.8	Diquat, Dipotassium salt of endothall, Florpyrauxifen-benzyl
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Parker's Point	3.0	Diquat, Dipotassium salt of endothall, Florpyrauxifen-benzyl
Portland Boat Works	16.1	Diquat, Dipotassium salt of endothall, Florpyrauxifen-benzyl
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Salmon River	274.3	Diquat, Dipotassium salt of endothall, Florpyrauxifen-benzyl
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Selden Creek	48.1	Diquat, Dipotassium salt of endothall, Florpyrauxifen-benzyl
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Pameacha Pond	18.8	Fluridone, Bispyribac-sodium, Dipotassium salt of endothall, Florpyrauxifen-benzyl

<sup>1</sup> Herbicide(s) will be selected based on field-conditions during summer treatment period

### Attachment 3. Proposed herbicides use rates

<b>Potential Herbicide</b>	<b>Maximum Application Rate</b>
Bispyribac-sodium	40 ppb
Diquat	370 ppb
Dipotassium salt of endothall	5 ppm
Florpyrauxifen-benzyl	48 ppb
Imazamox	500 ppb
Flumioxazin	400 ppb
Fluridone	15 ppb
Penoxsulam	150 ppb



DEPARTMENT OF THE ARMY  
US ARMY CORPS OF ENGINEERS  
NEW ENGLAND DISTRICT  
696 VIRGINIA ROAD  
CONCORD MA 01742-2751

June 10, 2025

Planning Division

Mr. Brian Thompson  
Director, Connecticut Department of Energy and Environmental Protection  
Office of Long Island Sound Programs  
79 Elm Street  
Hartford, Connecticut 06106-5127

Dear Mr. Thompson:

The U.S. Army Corps of Engineers (USACE), New England District, and the Engineer Research and Development Center (ERDC) are proposing to modify the USACE's aquatic invasive plant control research demonstration project, the Connecticut River Hydrilla Control Research and Demonstration Project (Project), by adding an additional 12 treatment sites within the Lower Connecticut River Watershed and additional herbicides. The Project includes the application of herbicide to the waters of the Lower Connecticut River Watershed for the control of the invasive aquatic plant, hydrilla (*Hydrilla verticillata*) (Attachment 1). The Project is a part of ERDC's Aquatic Plant Control and Research Program. The program is authorized by Section 104 of the Rivers and Harbors Act of 1958, as amended, to support the "prevention, control, and progressive eradication of noxious aquatic plant growths and aquatic invasive species from the navigable waters, tributary streams, connecting channels, and other allied waters of the United States."

The USACE has prepared a draft supplemental environmental assessment to analyze potential impacts of the modified Project. The Project currently includes five treatment sites, with a field-scale demonstration of chemical technology to evaluate the effectiveness of an aquatic herbicide to manage hydrilla, including sites in high water exchange environments (e.g., tidal, riverine environment). The modified Project expands the Project by adding 12 additional treatment sites within the Lower Connecticut River Watershed: (1) Chester Creek in Chester; (2) Deep River in Deep River; (3) Hamburg Cove in Lyme; (4) Joshua Creek in Lyme; (5) Mattabesset River in Middletown; (6) Parker's Point in Chester; (7) an expanded Portland Boat Works in Portland; (8) Post and Pratt Coves in Deep River; (9) Salmon River in East Haddam; (10) Selden Creek in Lyme; (11) Lake Pocotopaug in East Hampton; and (12) Pameacha Pond in Middletown.

The Project currently includes the use of diquat dibromide (diquat), dipotassium salt of endothall, and florpyrauxifen-benzyl at the five treatment sites. The modified Project proposes additional herbicides for use: bispyribac-sodium, imazamox, flumioxazin, fluridone, penoxsulam, or combinations thereof (Attachment 2). The proposed applications will occur in the summer after July 4th, 2025, with any subsequent treatments occurring after July 4th of future years. This timing was selected to avoid impacts to diadromous fishes and northern pike (*Esox lucius*) that may spawn in submerged aquatic vegetation at sites in or adjacent to the Connecticut River. During the field demonstration, herbicides will be selected based on site-specific environmental characteristics, such as water exchange rate, product retention, and the presence of native species, as well as the likelihood of the herbicide's effectiveness in controlling target plant species. The herbicide application will comply with the U.S. Environmental Protection Agency (EPA) herbicide label restrictions. Proposed maximum application rates are provided in Attachment 3.

Along with this letter, we are also transmitting a copy of the draft supplemental environmental assessment which includes maps of the proposed treatment areas, a project description, and resource characterizations of the project area. In addition, copies of the Connecticut Coastal Management Consistency Review Form for Federal Activities will be transmitted through email for the following sites: (1) Chester Creek in Chester; (2) Deep River in Deep River; (3) Hamburg Cove in Lyme; (4) Joshua Creek in Lyme; (5) Parker's Point in Chester; (6) Post and Pratt Coves in Deep River; and (7) Selden Creek in Lyme.

We are requesting written preliminary comments on the proposed project from your agency within 30 days of this letter. Comments should include any concerns that need to be addressed during the planning of the proposed project relative to the Connecticut Coastal Management Act (CCMA). If you or your staff have any questions or require additional information, please contact the project manager, Keith Hannon at [REDACTED] or by email at [Keith.W.Hannon@usace.army.mil](mailto:Keith.W.Hannon@usace.army.mil); or the project biologist, Kelsie Dakessian at [REDACTED] or by email at [Kelsie.Dakessian@usace.army.mil](mailto:Kelsie.Dakessian@usace.army.mil).

Sincerely,



Wendy Gendron  
Chief, Planning Division

Enclosures

cc: Harry Yamalis - [harry.yamalis@ct.gov](mailto:harry.yamalis@ct.gov)



## Attachment 2. Proposed herbicides for consideration

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Fluridone	15 ppb
Penoxsulam	150 ppb

**From:** [Hart, Marybeth](#)  
**To:** [Dakessian, Kelsie E CIV USARMY CENAE \(USA\)](#)  
**Cc:** [Thompson, Brian](#); [Michaels, Karen](#)  
**Subject:** [Non-DoD Source] Federal Consistency Concurrence Review Extension Request: Connecticut River Hydrilla Control Research and Demonstration Project  
**Date:** Tuesday, July 8, 2025 4:16:43 PM  
**Attachments:** [image001.png](#)  
[image002.png](#)  
[image003.png](#)  
[image004.png](#)  
[image005.png](#)  
[image006.png](#)  
[image007.png](#)

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Dear Ms. Dakessian,

Pursuant to CFR § 930.41(b), we are writing to request a 15-day extension of time to review the Federal Consistency Concurrence for the Connecticut River Hydrilla Control Research and Demonstration Project, received by our office on June 11, 2025. As you may know, Federal agencies are required to approve one request for an extension period of 15 days or less, and State agency concurrence shall not be presumed in cases where the State agency, within the 60-day period, requests an extension of time to review the consistency determination.

In addition, please be advised that we might be required to request a longer or additional extension period as we anticipate significant public interest in this project and substantial public participation. We will submit any request for a longer or additional extension period as soon as our 30-day public notice period ends.

Please let me know if you have any questions, and we thank you for your cooperation and flexibility regarding this project review.

Sincerely,  
Mary-beth Hart

**Mary-beth G. Hart**

Supervising Environmental Analyst, Planning Section  
Bureau of Water Protection and Land Reuse/Land and Water Resources Division  
Connecticut Department of Energy & Environmental Protection  
79 Elm Street, Hartford, CT 06106-5127

**P:** [REDACTED] | [marybeth.hart@ct.gov](mailto:marybeth.hart@ct.gov)



*Conserving, improving, and protecting our natural resources and environment;  
Ensuring a clean, affordable, reliable, and sustainable energy supply.*



# Connecticut Department of Energy & Environmental Protection

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## LAND & WATER RESOURCES

August 13, 2025

Keith Hannon, Project Manager  
Department of the Army  
US Army Corps of Engineers, New England District  
696 Virginia Road  
Concord, MA 01742-2751

Subject: 202505164-FCC - Federal Consistency Determination for a Connecticut River Hydrilla Control Research and Demonstration Project – Inclusion of 12 Additional Sites for Research Demonstration Project

Dear Mr. Hannon:

This correspondence is in response to the United States Army Corps of Engineer's (USACE) consistency determination ("Determination") received on 6/11/25 for a site expansion request for an existing Hydrilla Control Research and Demonstration Project for the Lower Connecticut River Basin. This Determination was received pursuant to Section 307(c)(1) of the Coastal Zone Management Act of 1972, as amended, Subpart C in Title 15 of the Code of Federal Regulations (CFR) Part 930, Connecticut General Statutes ("CGS") §22a-96(c), and Section II, Part VII(c) of the State of Connecticut Coastal Management Program and Final Environmental Impact Statement.

As stated in your letter, the USACE proposes the inclusion of 12 additional Treatment Sites (TS) for the research demonstration project currently underway to conduct aquatic invasive plant research within the Lower Connecticut River Basin. The USACE - New England District and the USACE Engineer Research and Development Center (ERDC) plan to apply aquatic herbicides during summer 2025 to control the aquatic invasive plant, hydrilla (*Hydrilla verticillata*), which is present in the mainstem of the Connecticut River and tributaries, boat basins, and coves that abut the river. The twelve additional sites being considered for herbicide treatments in the summer of 2025 are: (1) Chester Creek TS, Chester; (2) Deep River TS, Deep river; (3) Hamburg Cove TS, Lyme; (4) Lake Pocotopaug TS, East Hampton; (5) Mattabeset River TS, Middletown; (6) Pameacha Pond TS, Middletown; (7) Parkers Point TS, Chester; (8) Portland Boat Works TS, Portland; (9) Pratt Cove and Post Cove TS, Deep River; (10) Salmon River TS, East Haddam; (11) Selden Creek TS, Lyme; and, (12) Joshua Creek TS, Lyme Connecticut (see Attachment). Investigations into herbicide application methods and techniques that address the conditions specific to the Connecticut River will allow for more effective hydrilla control to prevent further spread and impact to other parts of the river and watershed.

DEEP concurs with the USACE's determination that the proposed activity is consistent to the maximum extent practicable with Connecticut's approved Coastal Management Program in accordance with CGS §22a-97(b).

FCC : 202505164-FCC  
8/13/25 Concurrence Letter

Pursuant to 15 CFR §930.6(b) and §930.41(a), this response is provided subsequent to securing necessary review and comment from other applicable government agencies and after providing for public participation in our review of the consistency determination. Please be advised if any substantial changes are made or significant new circumstances are found relevant to the proposed activity that will affect any coastal use or resource substantially different than originally described, a supplemental consistency determination must be submitted for our review pursuant to 15 CFR §930.46.

Thank you for the opportunity to review this proposed activity for its consistency with our Coastal Management Program. If you have any questions concerning this matter, please contact Mary-beth Hart of my staff at [Marybeth.Hart@ct.gov](mailto:Marybeth.Hart@ct.gov) or by telephone at [REDACTED].

Sincerely,



Brian P. Thompson, Director  
Land & Water Resources Division  
Bureau of Water Protection & Land Reuse


BPT/MBH


Attachment: TS Location Maps

cc: NMFS: FCC # TBD  
Kelsie Dakessian, USACE New England District

**ATTACHMENT**  
**TREATMENT SITE MAPS**



 Treatment Site  
Area: 37.9 acres


 **CHESTER CREEK TREATMENT SITE**  
**CHESTER, CT**

US Army Corps  
of Engineers  
New England District

0 500 1,000 1,500 2,000 2,500 ft

0 200 400 600 800 m

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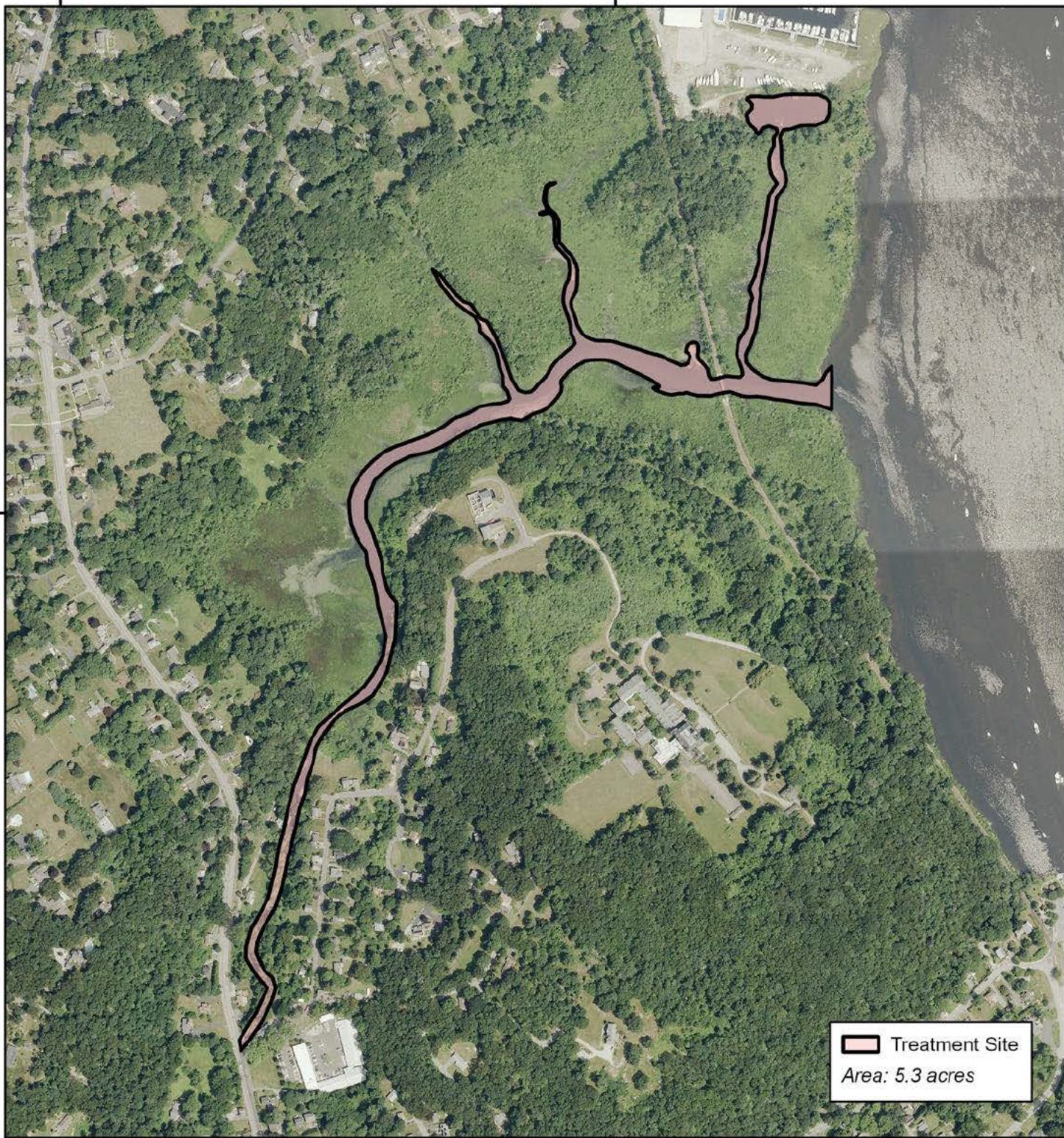



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72°26'0"W

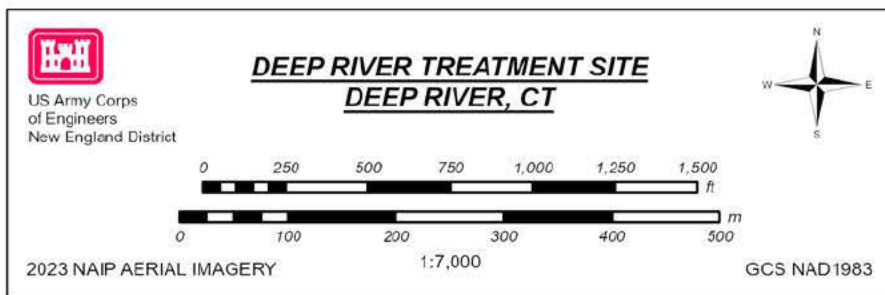
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41°24'0"N

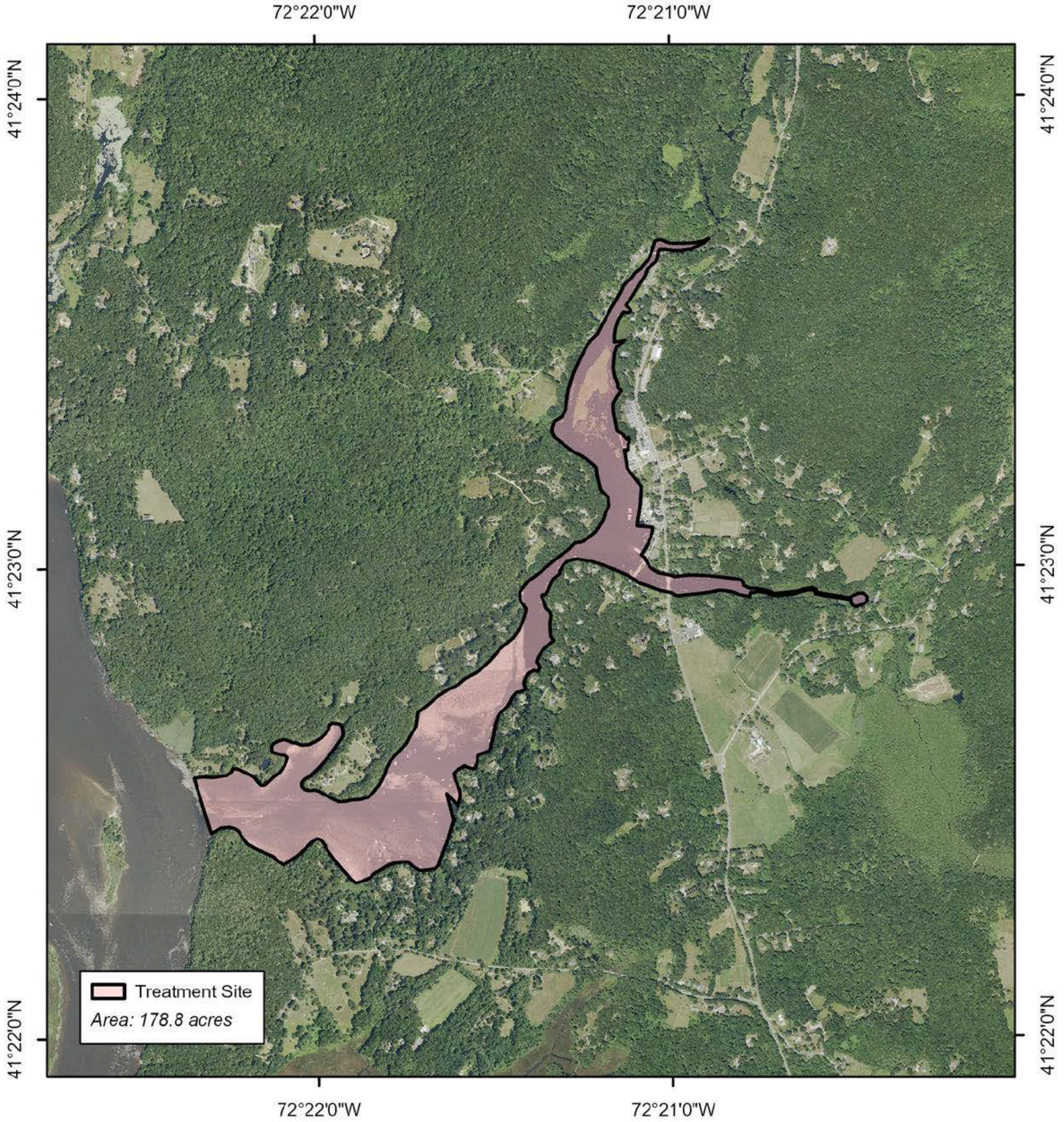



72°26'30"W


72°26'0"W



GCS NAD1983






 Treatment Site  
 Area: 178.8 acres



**HAMBURG COVE TREATMENT SITE**  
**LYME, CT**

US Army Corps  
 of Engineers  
 New England District



2023 NAIP AERIAL IMAGERY

1:20,000

GCS NAD1983



72°31'0"W

72°30'30"W

72°30'0"W

72°29'30"W

41°36'0"N


41°36'0"N

41°35'30"N

41°35'30"N

41°35'0"N

41°35'0"N

 Treatment Site  
Area: 232.0 acres

72°31'0"W

72°30'30"W

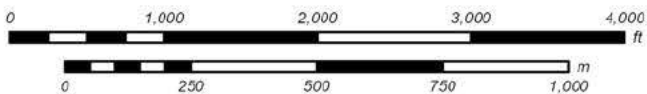
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72°29'30"W



US Army Corps  
of Engineers  
New England District

**LAKE POCOTOPAUG TREATMENT SITE**  
**EAST HAMPTON, CT**



2023 NAIP AERIAL IMAGERY

1:15,000

GCS NAD1983



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72°40'0"W

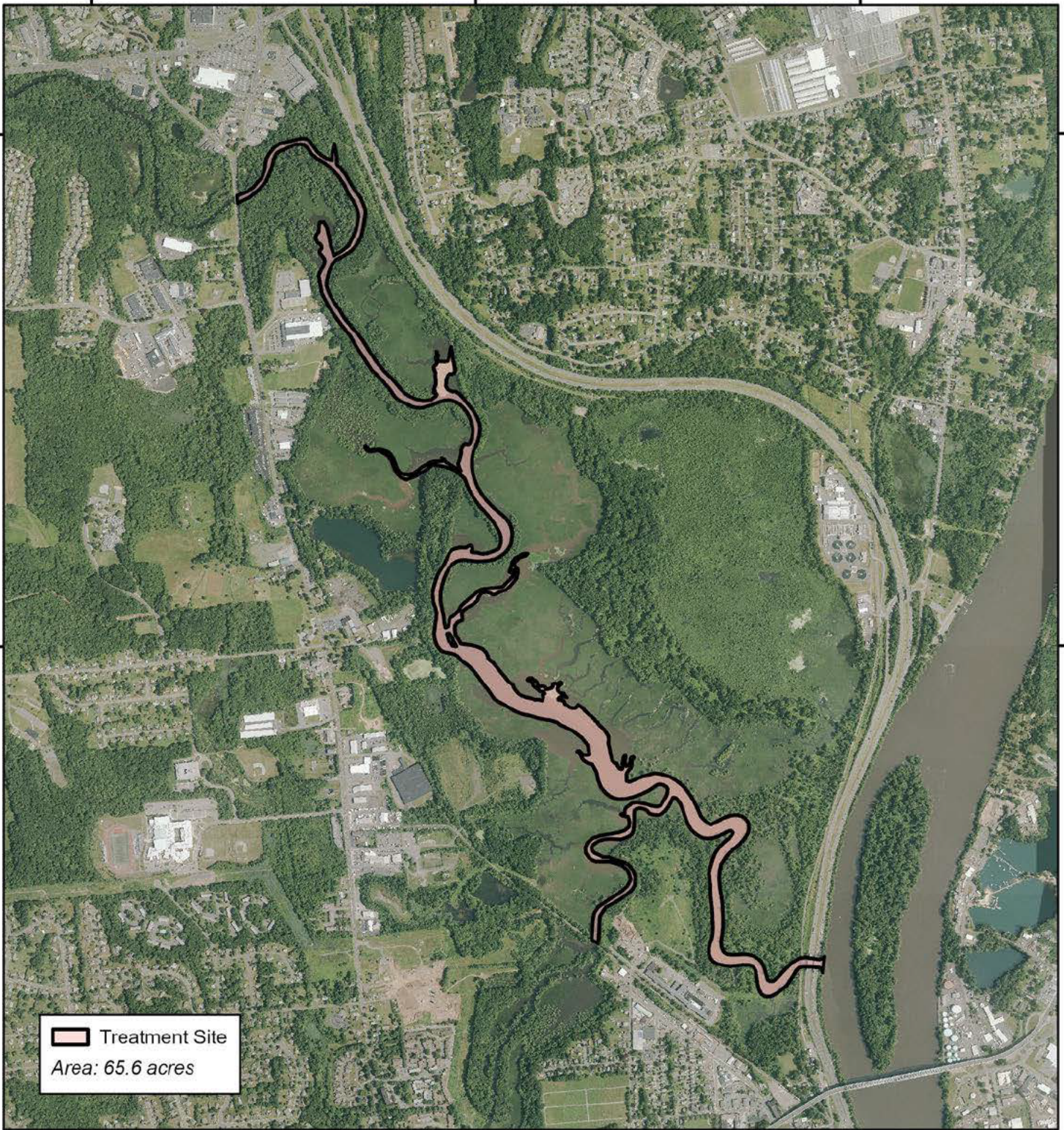
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41°36'0"N

41°35'0"N

41°35'0"N



72°41'0"W

72°40'0"W

72°39'0"W



US Army Corps  
of Engineers  
New England District

**MATTABESSET RIVER TREATMENT SITE**  
**MIDDLETOWN, CT**



2023 NAIP AERIAL IMAGERY

1:20,000

GCS NAD1983

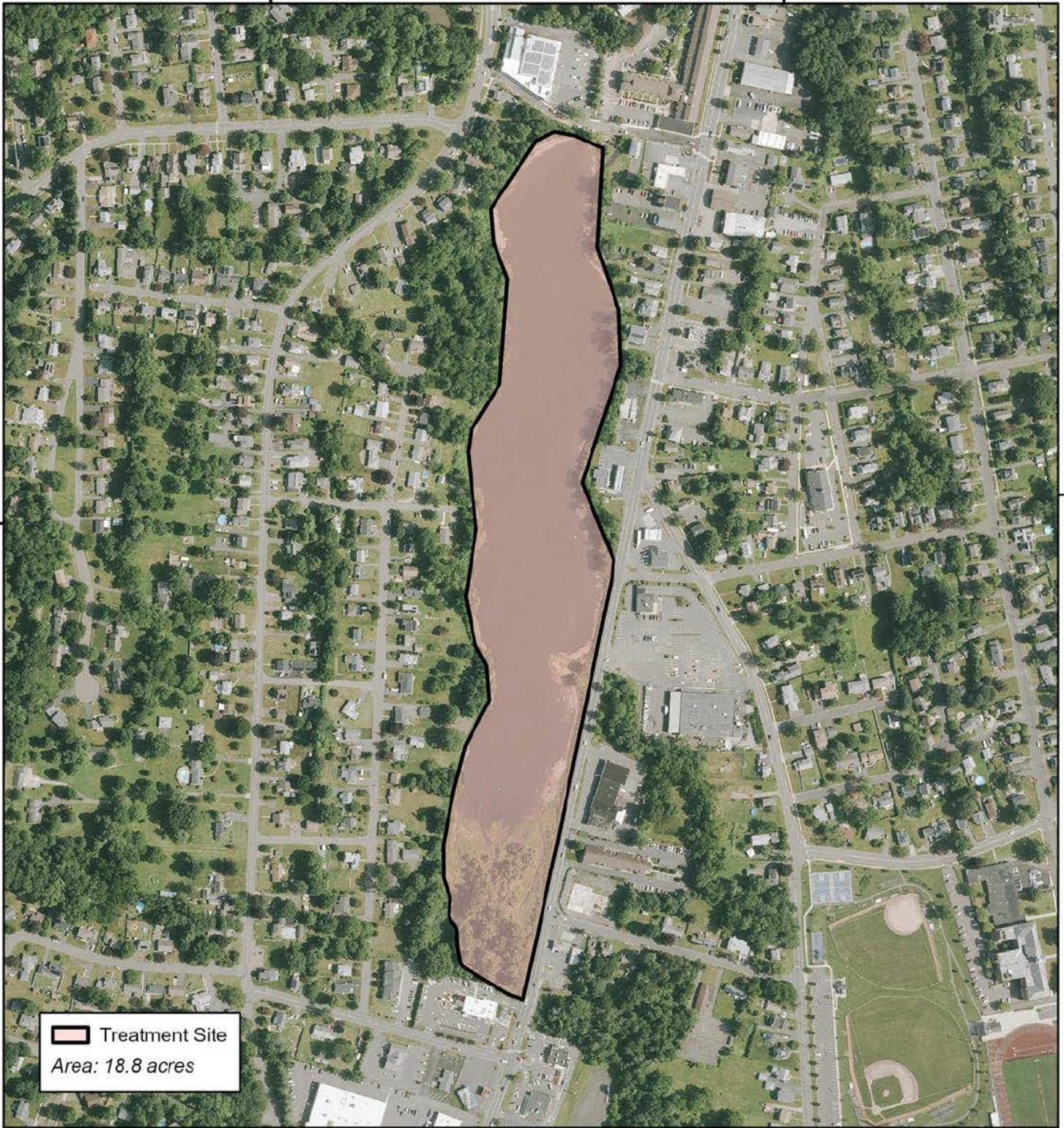



72°39'20"W

72°39'0"W

41°32'40"N


41°32'40"N



 Treatment Site  
Area: 18.8 acres

72°39'20"W

72°39'0"W


  
US Army Corps  
of Engineers  
New England District

**PAMEACHA POND TREATMENT SITE**  
**MIDDLETOWN, CT**

0 250 500 750 1,000  
ft

0 50 100 150 200 250 300  
m

2023 NAIP AERIAL IMAGERY 1:5,000

  
GCS NAD 1983



72°27'0"W

72°26'50"W

41°26'0"N

41°26'0"N

41°25'50"N

41°25'50"N



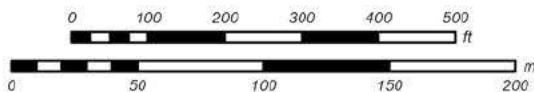
72°27'0"W

72°26'50"W



US Army Corps  
of Engineers  
New England District

**PARKERS POINT TREATMENT SITE**  
**CHESTER, CT**



2023 NAIP AERIAL IMAGERY

1:3,000

GCS NAD1983



72°37'45"W

72°37'30"W

72°37'15"W

41°34'0"N

41°34'0"N


41°33'45"N

41°33'45"N

41°33'30"N

41°33'30"N




 Treatment Site  
Area: 3.8 acres

72°37'45"W

72°37'30"W


72°37'15"W

  
US Army Corps  
of Engineers  
New England District

**PORTLAND BOAT WORKS  
TREATMENT SITE  
PORTLAND, CT**

0 250 500 750 1,000 ft  
0 100 200 300 m

2023 NAIP AERIAL IMAGERY 1:5,000 GCS NAD 1983




72°25'40"W

72°25'20"W

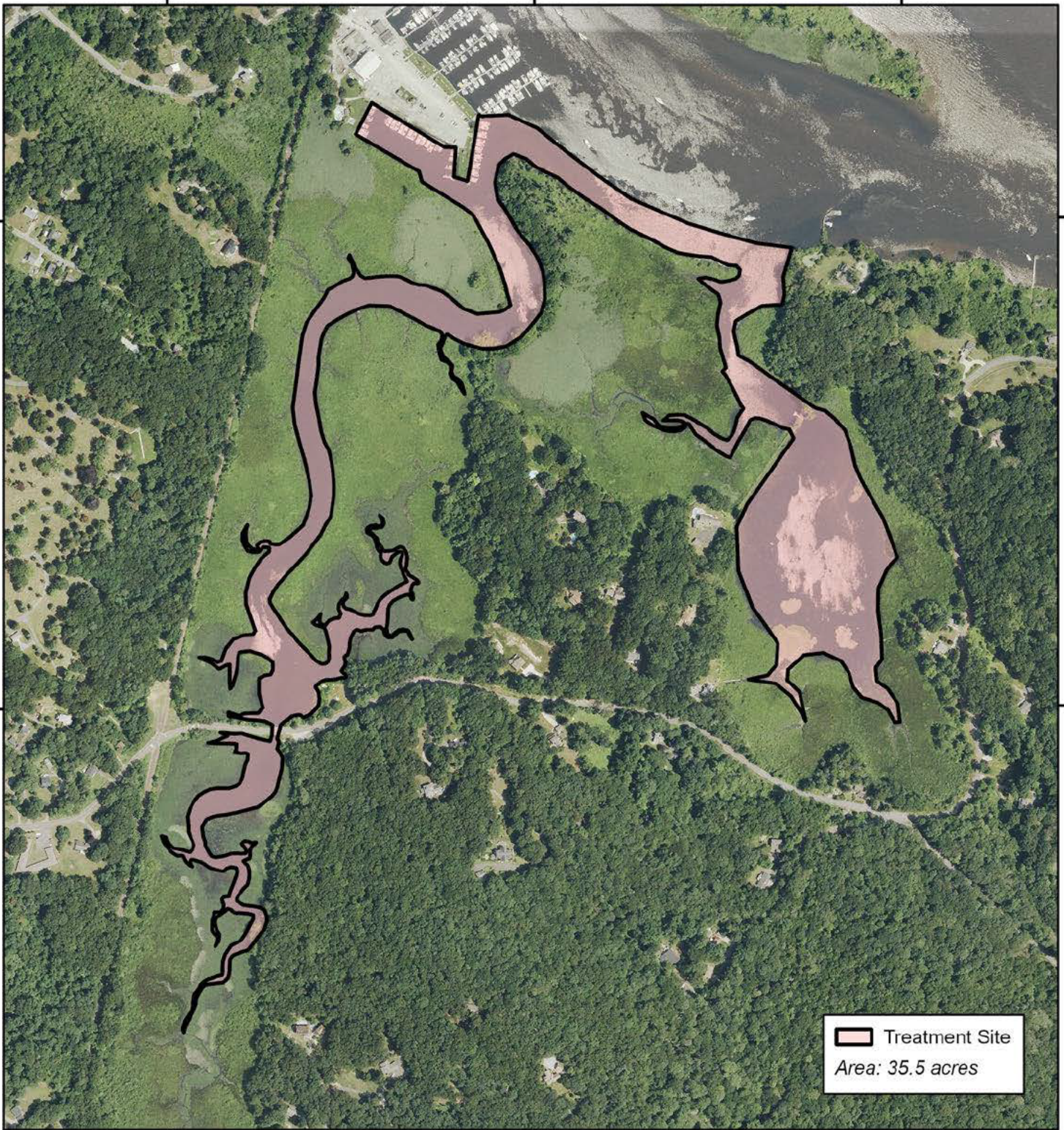
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41°23'20"N

41°23'0"N

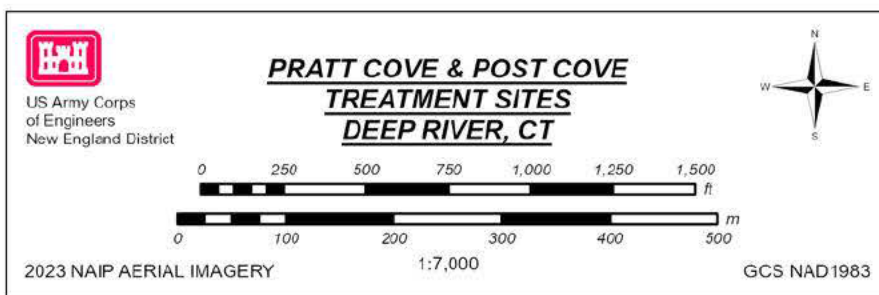
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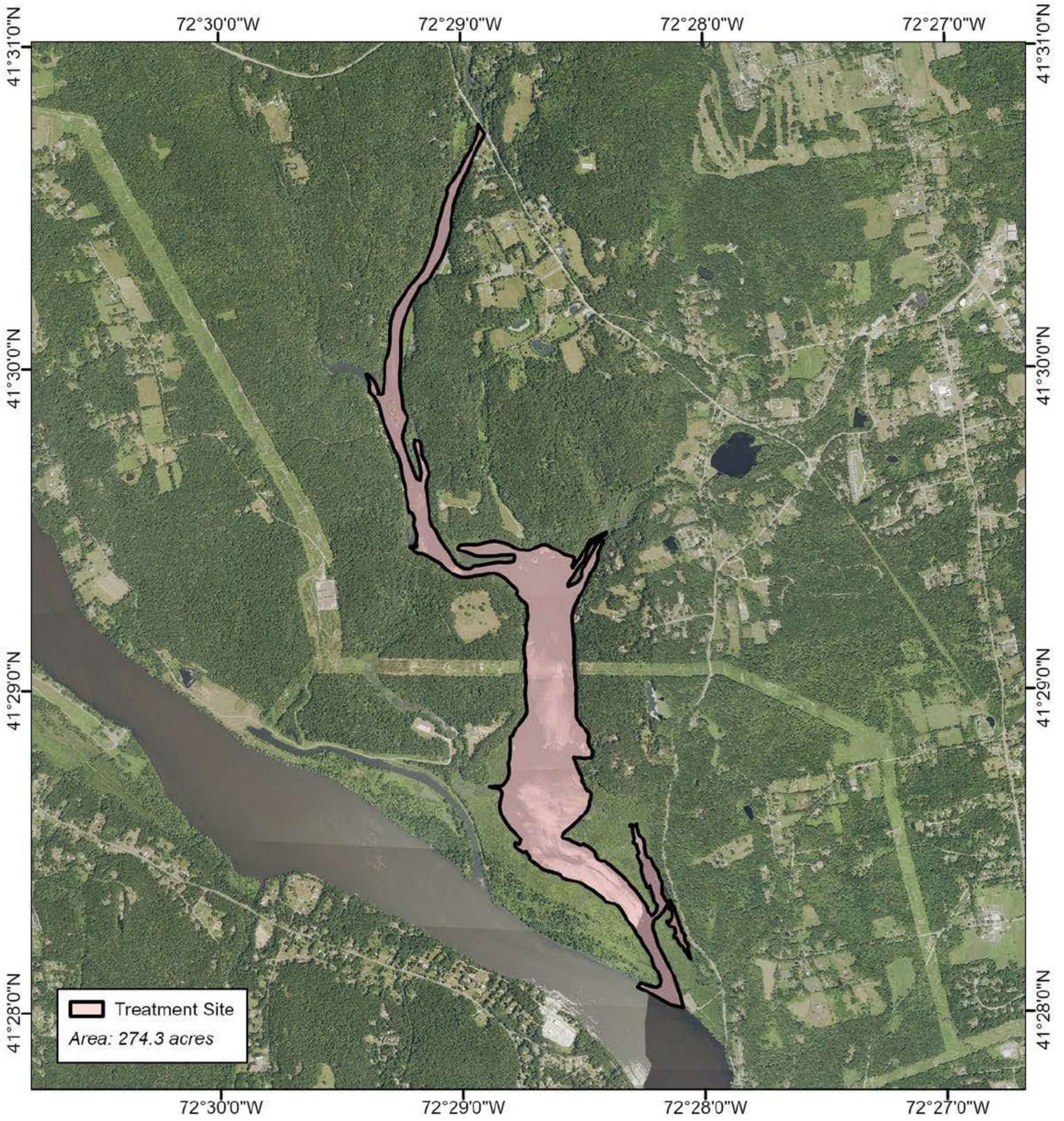



72°25'40"W

72°25'20"W



72°25'0"W



US Army Corps  
 of Engineers  
 New England District

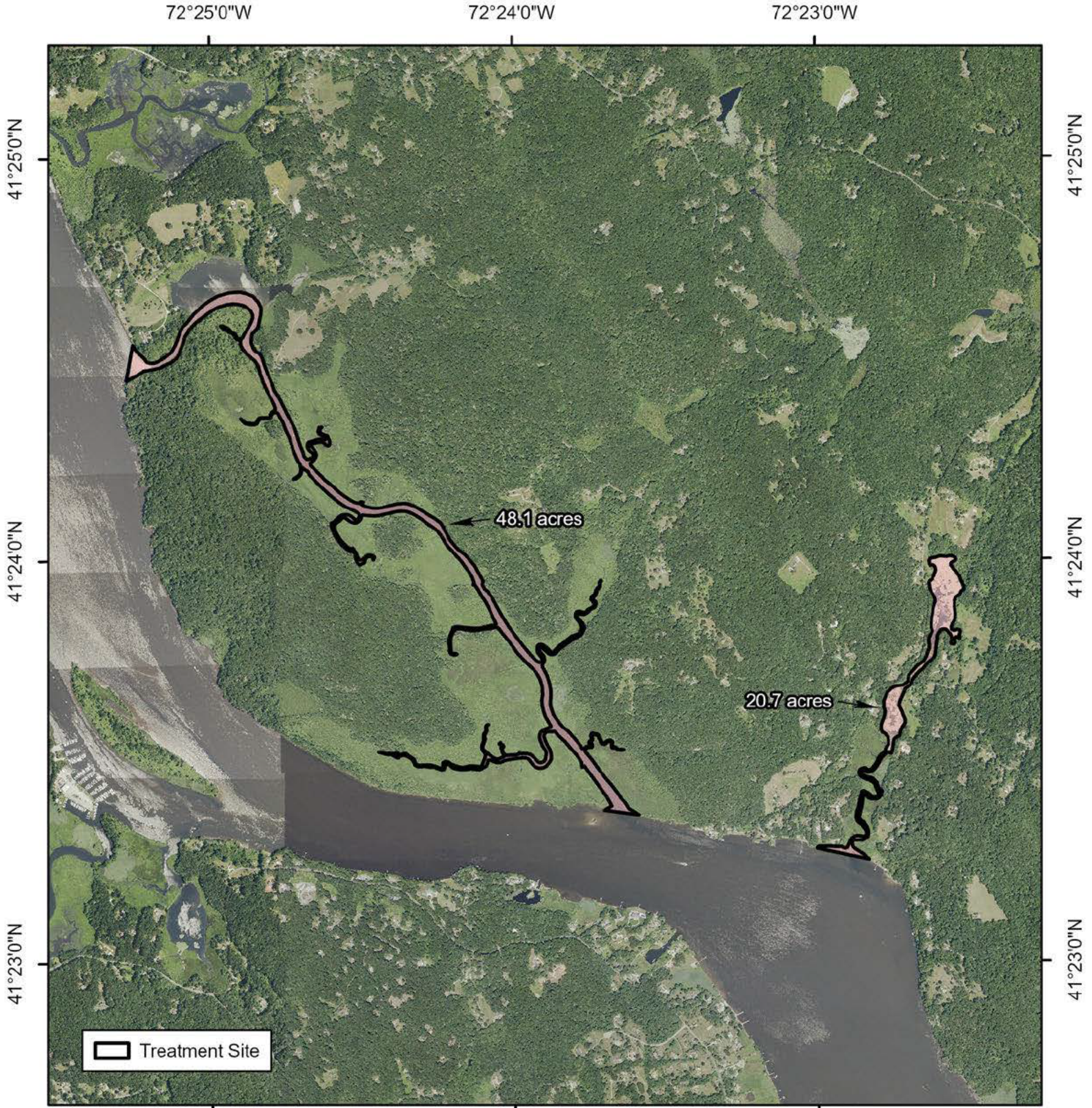
**SALMON RIVER TREATMENT SITE**  
**EAST HADDAM, CT**






0 0.5 1 1.5 2 2.5  
 0 0.5 1 1.5 2 2.5  
 1:30,000  
 GCS NAD 1983

2023 NAIP AERIAL IMAGERY






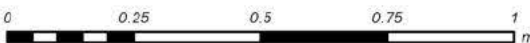
 Treatment Site




US Army Corps  
of Engineers  
New England District

**SELDEN CREEK & JOSHUA CREEK**  
**TREATMENT SITES**  
**LYME, CT**





0 0.25 0.5 0.75 1 mi



0 0.5 1 1.5 km

2023 NAIP AERIAL IMAGERY

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DEPARTMENT OF THE ARMY  
US ARMY CORPS OF ENGINEERS  
NEW ENGLAND DISTRICT  
696 VIRGINIA ROAD  
CONCORD MA 01742-2751

June 10, 2025

Planning Division

Jonathan Kinney  
State Historic Preservation Officer  
Connecticut State Historic Preservation Office  
450 Columbus Boulevard, Suite 5  
Hartford, CT 06103

Dear Mr. Kinney:

The U.S. Army Corps of Engineers (USACE), New England District, is preparing a Supplemental Environmental Assessment to analyze the effects of adding 12 additional treatment sites to the Connecticut River Hydrilla Control Research and Demonstration Project (Project) within the Lower Connecticut River Watershed, an existing aquatic invasive plant research and demonstration project. We have previously coordinated with you on the original Environmental Assessment for the Project by letter dated April 3, 2024. USACE requests your formal comments on the following undertaking in accordance with Section 106 of the National Historic Preservation Act (NHPA) of 1966, as amended.

The USACE, New England District and the Engineer Research and Development Center (ERDC), propose herbicide application to control the aquatic invasive plant, hydrilla (*Hydrilla verticillata*), in the Lower Connecticut River Watershed, which is present in the mainstem of the Connecticut River, its tributaries, and other waterbodies that abut the river (Attachment 1). The Project is a part of ERDC's Aquatic Plant Control and Research Program (APCRP). The APCRP is authorized by Section 104 of the Rivers and Harbors Act of 1958, as amended, to support the "prevention, control, and progressive eradication of noxious aquatic plant growths and aquatic invasive species from the navigable waters, tributary streams, connecting channels, and other allied waters of the United States."

The modified proposed action expands the 2024 Project to 12 additional treatment sites, including: (1) Chester Creek in Chester; (2) Deep River in Deep River; (3) Hamburg Cove in Lyme; (4) Joshua Creek in Lyme; (5) Mattabesset River in Middletown; (6) Parker's Point in Chester; (7) an expanded Portland Boat Works in Portland; (8) Post and Pratt Coves in Deep River; (9) Salmon River in East Haddam; (10) Selden Creek in Lyme; (11) Lake Pocotopaug in East Hampton; and (12) Pameacha Pond in Middletown.

The Connecticut Cultural Resources Information System (CRIS) was used to identify historic properties within or in the vicinity of these sites for potential NHPA impacts. The treatment sites are grouped by towns that abut each other. Attachment 2 lists the pre-contact archaeological sites and historic structure or districts within or proximal to the proposed treatment sites.

As previously determined for the 2024 Project and concurred with by the Connecticut State Historic Preservation Office, impacts to historic properties are not anticipated from herbicide application for hydrilla management at the additional 12 treatment sites. The herbicide will be evenly distributed across entire treatment areas using the industry-standard boat-based, subsurface injection application method consisting of a calibrated pump and trailing hoses.

The New England District has determined that the proposed herbicide application for the Project, at 12 additional treatment sites, will have “no effect” upon any historic properties in accordance with Section 106 of the NHPA and implementing regulations 36 CFR 800. We would appreciate your concurrence with this determination.

If you have any questions, please contact the Project manager, Keith Hannon at [REDACTED] or by email at [Keith.W.Hannon@usace.army.mil](mailto:Keith.W.Hannon@usace.army.mil); or the Project biologist, Kelsie Dakessian at [REDACTED] or by email at [Kelsie.Dakessian@usace.army.mil](mailto:Kelsie.Dakessian@usace.army.mil).

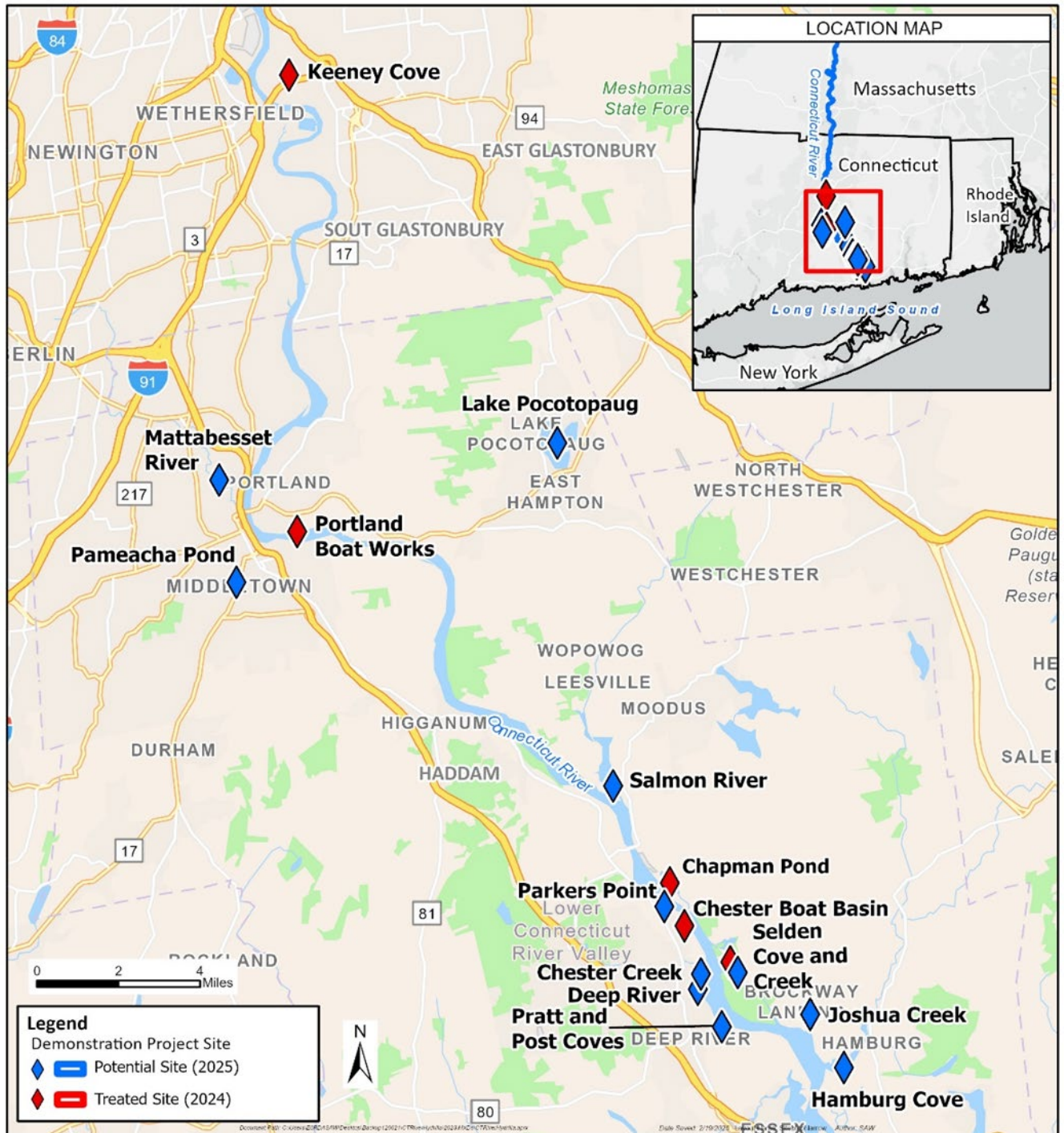
Sincerely,



Wendy C. Gendron  
Chief, Planning Division

Enclosures

**Attachment 1. Research and demonstration treatment sites, including potential sites, within the Lower Connecticut River Watershed**



**Attachment 2. Pre-contact archaeological sites and historic structures/districts within or near the proposed treatment sites**

<b>Treatment Site(s)</b>	<b>General Location</b>	<b>Pre-contact Archaeological Sites</b>	<b>Historic Structures/Districts</b>
Chester Creek; Deep River; Parker's Point; and Post & Pratts Coves	Chester and Deep River (western bank of CT River)	061-001 – Clark Creek;	Knollenberg House and Chester-Hadlyme Ferry in Chester;
		061-011 – Old County Rockshelter;	Deep River Depot;
		026-005 – Banning Shore;	Deep River Landing;
		026-006 – Cahill Site;	Deep River Freight Station;
		036-001 – Pratt Cove Sandpit;	Deep River Freight Station Railroad Switches;
		036-003 – River Street.	Doris Sailing Yacht; James Dennison House; 1797 Cape Cod Style House at 83 River Road; and the Lurana Arnold Homestead in Deep River
Hamburg Cove	Lyme	075-007 – Hamburg Cove Site;	Ely House (circa 1790) at Joshuatown Road at the mouth of Hamburg Cove.
		075-083 – Joshuatown Prehistoric Site;	
		075-100 – Cooper Bench Prehistoric Site;	
		075-101 – Cooper Hilltop Prehistoric Site;	
		075-056 – Coopers Boat House.	
Selden Creek and Joshua Creek	Lyme, bordering the Selden Neck State Park	075-001 – Selden Island;	Brockway Ferry Road along Joshua Creek
		075-002 – Selden Island South;	Captain William Brockway House-Barn (circa 1900);
		075-005 – Cold Spring Rockshelter;	Captain William Brockway House (circa 1740);
		075-006 – Coudert Ledge;	Brockway Cemetery;
		075-022 – Cold Spring;	Levi Luther House (1730);
		075-023 – Unnamed (Selden Neck State Park)	William Brockway House (circa 1779);
		075-024 – Unnamed Rockshelter (State Park);	53 Brockway Ferry Road, Building 1 (circa 1701);
		075-025 – Unnamed Selden Neck State Park;	53 Brockway Ferry Road, Building 2 (circa 1767);
		075-027 – Selden Neck Southwest Shore;	55 Brockway Ferry Road (1750);
		075-043 – Selden Neck Northwest Shore;	59 Brockway Ferry Road (1909);
		075-049 – Brockway Landing	68 Brockway Ferry Road (1854);
		075-065 – Coudert Ledge #2 Site;	70 Brockway Ferry Road (1838);
		075-066 - Selden Neck Quarry/Camp;	33 Joshua Lane (circa 1750).
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075-095 Joshuatown Road Prehistoric Site (L1-36).			

Treatment Site(s)	General Location	Pre-contact Archaeological Sites	Historic Structures/Districts
Mattabesset River	Middletown, south of State Highway 9	083-006 – Brick Yard Quarry.	Timothy Gilbert House (circa 1850).
Portland Boat Works (previously evaluated in USACE 2024 EA)	near Pecauset Pond outlet; Grove & Riverview Streets	113-027 – Cornwall (Post-Contact).	Joseph Kellop House (circa 1780); Henry McCleve House (circa 1875); and the John McCleve House (circa 1795).
Salmon River	East Haddam (east & west banks of CT River)	061-114 – Haddam Sand Pits; 061-115 – Peninsula 1 Site; 061-116 – Peninsula 2 Site; 061-117 – Midway Marina; 061-034 – Duffy Site; 061-035 – Unnamed; 061-040 – Lang and Butler Site; 061-055 – Brainard Homestead State Park.	Camp Bethel National Register District; and East Haddam Historic District
Lake Pocotopaug	East Hampton	042-027 – P. Derby Site; 042-028 – School Site.	Several historic homes and structures surround the lake on
Pameacha Pond	North end of pond		Pameacha Pond Dam; William Wilcox Manufacturing Company (Hartford Club Beverage Company, circa 1850).



DEPARTMENT OF THE ARMY  
US ARMY CORPS OF ENGINEERS  
NEW ENGLAND DISTRICT  
696 VIRGINIA ROAD  
CONCORD MA 01742-2751

June 10, 2025

Planning Division

Mr. James Quinn  
Tribal Historic Preservation Officer, Mohegan Tribe  
13 Crow Hill Road  
Uncasville, CT 06382

Dear Mr. Quinn:

The U.S. Army Corps of Engineers (USACE), New England District, is preparing a Supplemental Environmental Assessment to analyze the effects of adding 12 additional treatment sites to the Connecticut River Hydrilla Control Research and Demonstration Project (Project) within the Lower Connecticut River Watershed, an existing aquatic invasive plant research and demonstration project. We have previously coordinated with you on the original Environmental Assessment for the Project by letter dated April 3, 2024. USACE requests your formal comments on the following undertaking in accordance with Section 106 of the National Historic Preservation Act (NHPA) of 1966, as amended.

The USACE, New England District and the Engineer Research and Development Center (ERDC), propose herbicide application to control the aquatic invasive plant, hydrilla (*Hydrilla verticillata*), in the Lower Connecticut River Watershed, which is present in the mainstem of the Connecticut River, its tributaries, and other waterbodies that abut the river (Attachment 1). The Project is a part of ERDC's Aquatic Plant Control and Research Program (APCRP). The APCRP is authorized by Section 104 of the Rivers and Harbors Act of 1958, as amended, to support the "prevention, control, and progressive eradication of noxious aquatic plant growths and aquatic invasive species from the navigable waters, tributary streams, connecting channels, and other allied waters of the United States."

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The Connecticut Cultural Resources Information System (CRIS) was used to identify historic properties within or in the vicinity of these sites for potential NHPA impacts. The treatment sites are grouped by towns that abut each other. Attachment 2 lists the pre-contact archaeological sites and historic structure or districts within or proximal to the proposed treatment sites.

As previously determined for the 2024 Project and concurred with by the Connecticut State Historic Preservation Office, impacts to historic properties are not anticipated from herbicide application for hydrilla management at the additional 12 treatment sites. The herbicide will be evenly distributed across entire treatment areas using the industry-standard boat-based, subsurface injection application method consisting of a calibrated pump and trailing hoses.

The New England District has determined that the proposed herbicide application for the Project, at 12 additional treatment sites, will have “no effect” upon any historic properties in accordance with Section 106 of the NHPA and implementing regulations 36 CFR 800. We would appreciate your concurrence with this determination.

If you have any questions, please contact the Project manager, Keith Hannon at [REDACTED] or by email at [Keith.W.Hannon@usace.army.mil](mailto:Keith.W.Hannon@usace.army.mil); or the Project biologist, Kelsie Dakessian at [REDACTED] or by email at [Kelsie.Dakessian@usace.army.mil](mailto:Kelsie.Dakessian@usace.army.mil).

Sincerely,



Wendy C. Gendron  
Chief, Planning Division

Enclosures



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Chester Creek; Deep River; Parker's Point; and Post & Pratts Coves	Chester and Deep River (western bank of CT River)	061-001 – Clark Creek;	Knollenberg House and Chester-Hadlyme Ferry in Chester;
		061-011 – Old County Rockshelter;	Deep River Depot;
		026-005 – Banning Shore;	Deep River Landing;
		026-006 – Cahill Site;	Deep River Freight Station;
		036-001 – Pratt Cove Sandpit;	Deep River Freight Station Railroad Switches;
		036-003 – River Street.	Doris Sailing Yacht; James Dennison House; 1797 Cape Cod Style House at 83 River Road; and the Lurana Arnold Homestead in Deep River
Hamburg Cove	Lyme	075-007 – Hamburg Cove Site;	Ely House (circa 1790) at Joshuatown Road at the mouth of Hamburg Cove.
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Selden Creek and Joshua Creek	Lyme, bordering the Selden Neck State Park	075-001 – Selden Island;	Brockway Ferry Road along Joshua Creek
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Pameacha Pond	North end of pond		Pameacha Pond Dam; William Wilcox Manufacturing Company (Hartford Club Beverage Company, circa 1850).



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NEW ENGLAND DISTRICT  
696 VIRGINIA ROAD  
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June 10, 2025

Planning Division

Mr. Michael Johnson  
Tribal Historic Preservation Officer  
Mashantucket Pequot Tribe  
110 Pequot Trail  
Mashantucket, CT 06338-3202

Dear Mr. Johnson:

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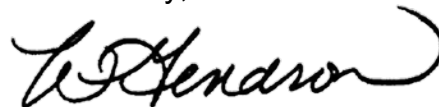
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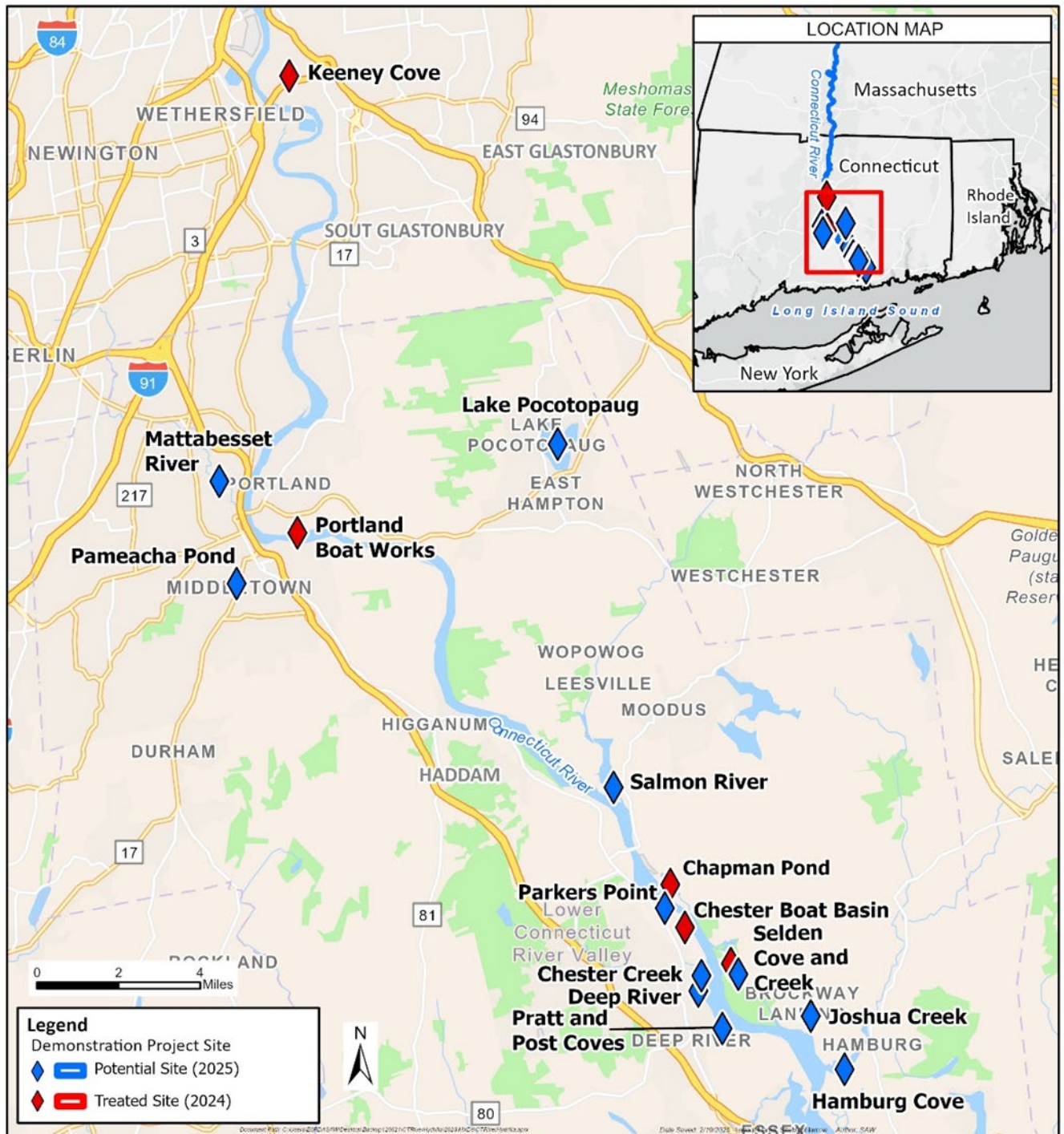
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Wendy C. Gendron  
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696 VIRGINIA ROAD  
CONCORD MA 01742-2751

June 10, 2025

Planning Division

Mr. Mark Andrew  
Deputy Tribal Historic Preservation Officer  
Narragansett Indian Tribe  
PO Box 268  
Charlestown, RI 02868

Dear Mr. Andrews:

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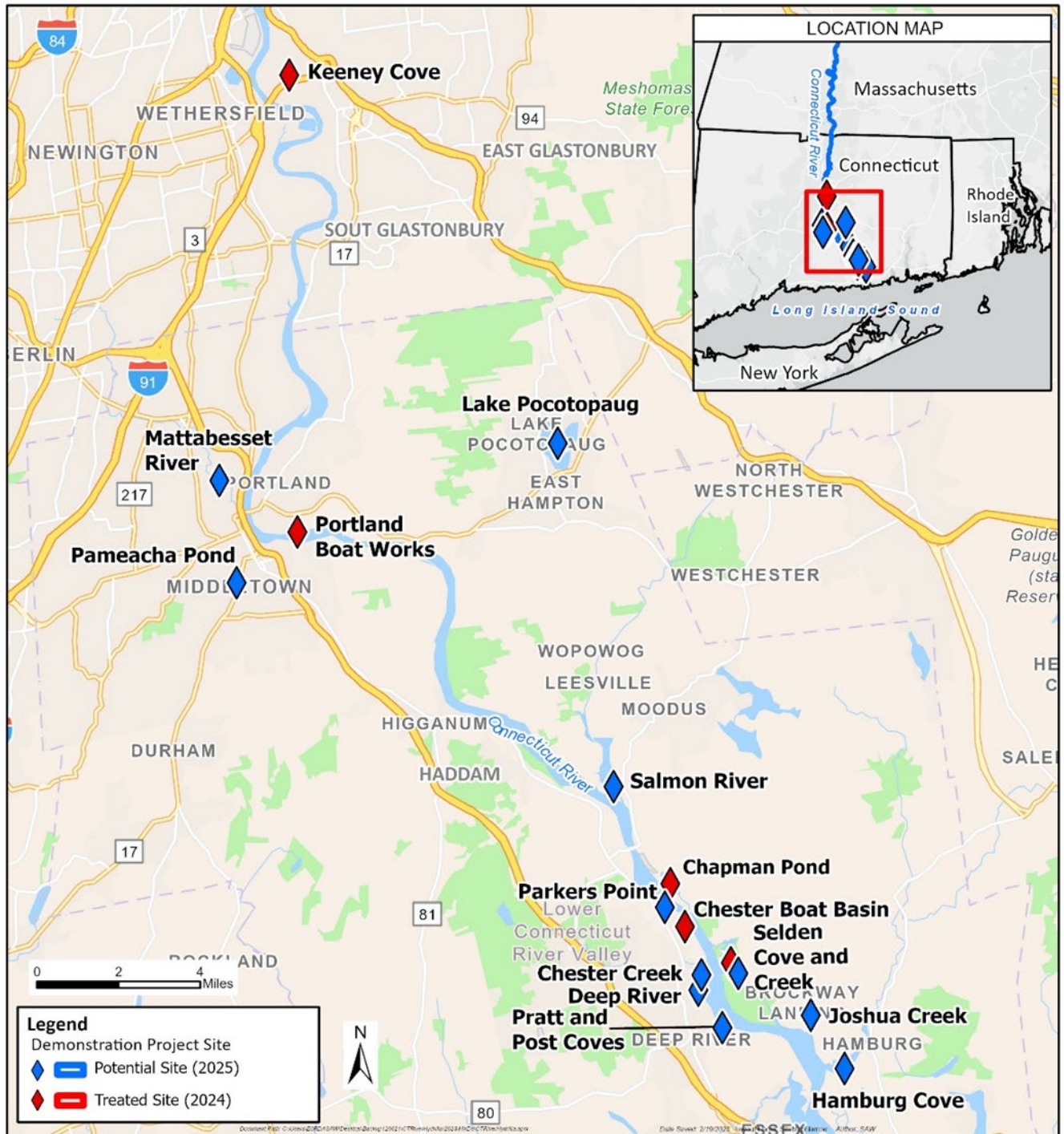
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075-095 Joshuatown Road Prehistoric Site (L1-36).			

Treatment Site(s)	General Location	Pre-contact Archaeological Sites	Historic Structures/Districts
Mattabesset River	Middletown, south of State Highway 9	083-006 – Brick Yard Quarry.	Timothy Gilbert House (circa 1850).
Portland Boat Works (previously evaluated in USACE 2024 EA)	near Pecauset Pond outlet; Grove & Riverview Streets	113-027 – Cornwall (Post-Contact).	Joseph Kellop House (circa 1780); Henry McCleve House (circa 1875); and the John McCleve House (circa 1795).
Salmon River	East Haddam (east & west banks of CT River)	061-114 – Haddam Sand Pits; 061-115 – Peninsula 1 Site; 061-116 – Peninsula 2 Site; 061-117 – Midway Marina; 061-034 – Duffy Site; 061-035 – Unnamed; 061-040 – Lang and Butler Site; 061-055 – Brainard Homestead State Park.	Camp Bethel National Register District; and East Haddam Historic District
Lake Pocotopaug	East Hampton	042-027 – P. Derby Site; 042-028 – School Site.	Several historic homes and structures surround the lake on
Pameacha Pond	North end of pond		Pameacha Pond Dam; William Wilcox Manufacturing Company (Hartford Club Beverage Company, circa 1850).



DEPARTMENT OF THE ARMY  
US ARMY CORPS OF ENGINEERS  
NEW ENGLAND DISTRICT  
696 VIRGINIA ROAD  
CONCORD MA 01742-2751

June 10, 2025

Planning Division

Ms. Cora Peirce  
Deputy Tribal Historic Preservation Officer  
Narragansett Indian Tribe  
PO Box 268  
Charlestown, RI 02868

Dear Ms. Peirce:

The U.S. Army Corps of Engineers (USACE), New England District, is preparing a Supplemental Environmental Assessment to analyze the effects of adding 12 additional treatment sites to the Connecticut River Hydrilla Control Research and Demonstration Project (Project), an existing aquatic invasive plant research and demonstration project within the Lower Connecticut River Watershed. We have previously coordinated with you on the original Environmental Assessment for the Project by letter dated April 3, 2024. USACE requests your formal comments on the following undertaking in accordance with Section 106 of the National Historic Preservation Act (NHPA) of 1966, as amended.

The USACE, New England District and the Engineer Research and Development Center (ERDC), propose herbicide application to control the aquatic invasive plant, hydrilla (*Hydrilla verticillata*), in the Lower Connecticut River Watershed, which is present in the mainstem of the Connecticut River, its tributaries, and other waterbodies that abut the river (Attachment 1). The Project is a part of ERDC's Aquatic Plant Control and Research Program (APCRP). The APCRP is authorized by Section 104 of the Rivers and Harbors Act of 1958, as amended, to support the "prevention, control, and progressive eradication of noxious aquatic plant growths and aquatic invasive species from the navigable waters, tributary streams, connecting channels, and other allied waters of the United States."

The modified proposed action expands the 2024 Project to 12 additional treatment sites, including: (1) Chester Creek in Chester; (2) Deep River in Deep River; (3) Hamburg Cove in Lyme; (4) Joshua Creek in Lyme; (5) Mattabesset River in Middletown; (6) Parker's Point in Chester; (7) an expanded Portland Boat Works in Portland; (8) Post and Pratt Coves in Deep River; (9) Salmon River in East Haddam; (10) Selden Creek in Lyme; (11) Lake Pocotopaug in East Hampton; and (12) Pameacha Pond in Middletown.

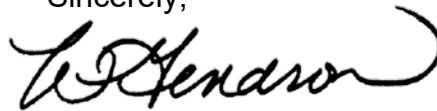
The Connecticut Cultural Resources Information System (CRIS) was used to identify historic properties within or in the vicinity of these sites for potential NHPA impacts. The treatment sites are grouped by towns that abut each other. Attachment 2 lists the pre-contact archaeological sites and historic structure or districts within or proximal to the proposed treatment sites.

As previously determined for the 2024 Project and concurred with by the Connecticut State Historic Preservation Office, impacts to historic properties are not anticipated from herbicide application for hydrilla management at the additional twelve treatment sites. The herbicide will be evenly distributed across entire treatment areas using the industry-standard boat-based, subsurface injection application method consisting of a calibrated pump and trailing hoses.

The New England District has determined that the proposed herbicide application for the Project, at twelve additional treatment sites, will have “no effect” upon any historic properties in accordance with Section 106 of the NHPA and implementing regulations 36 CFR 800. We would appreciate your concurrence with this determination.

If you have any questions, please contact the Project manager, Keith Hannon at [REDACTED] or by email at [Keith.W.Hannon@usace.army.mil](mailto:Keith.W.Hannon@usace.army.mil); or the Project biologist, Kelsie Dakessian at [REDACTED] or by email at [Kelsie.Dakessian@usace.army.mil](mailto:Kelsie.Dakessian@usace.army.mil).

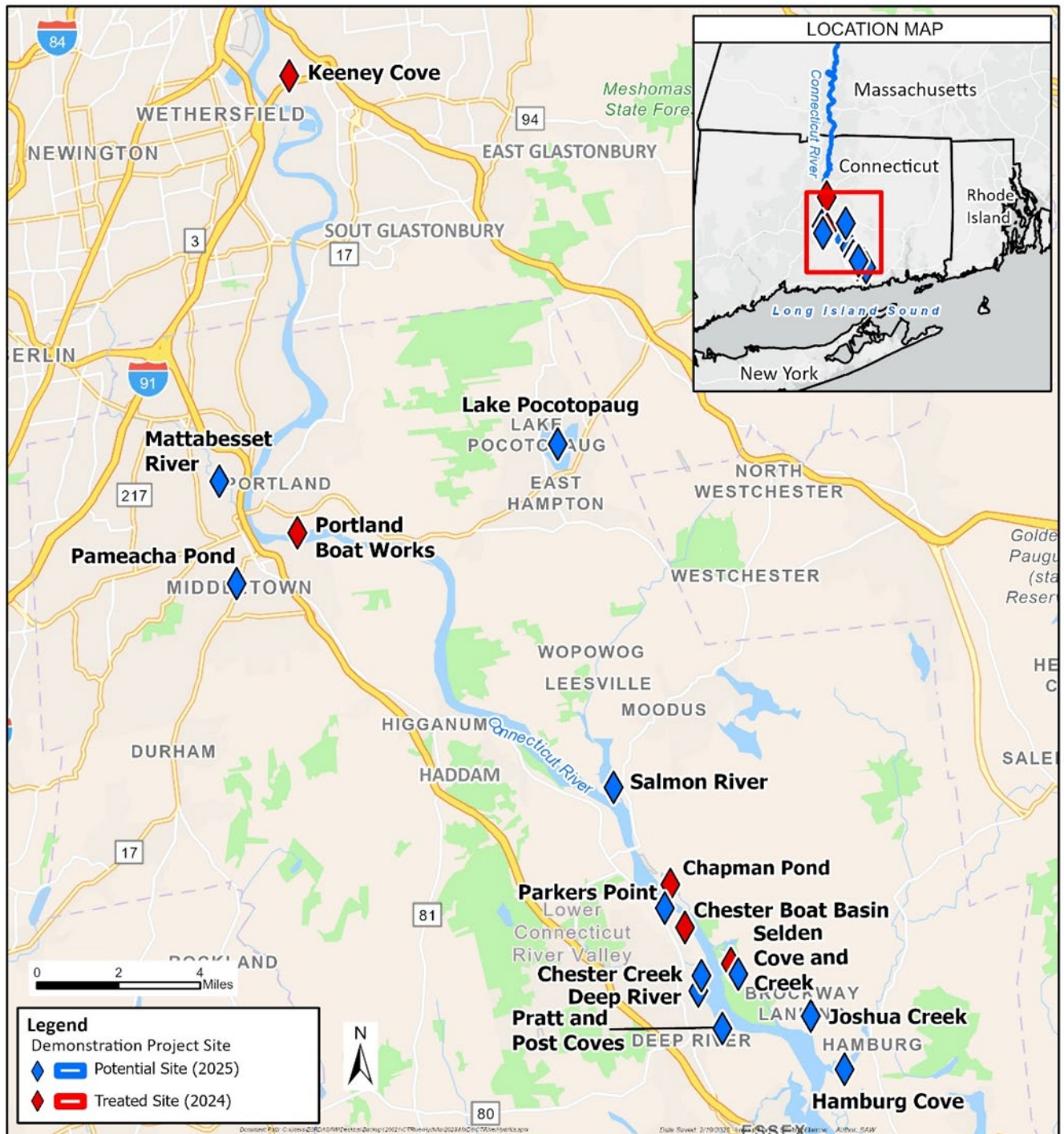
Sincerely,



Wendy C. Gendron  
Chief, Planning Division

Enclosures

# Attachment 1. Research and demonstration treatment sites, including potential sites, within the Lower Connecticut River Watershed



**Attachment 2. Pre-contact archaeological sites and historic structures/districts within or near the proposed treatment sites**

Treatment Site(s)	General Location	Pre-contact Archaeological Sites	Historic Structures/Districts
Chester Creek; Deep River; Parker's Point; and Post & Pratts Coves	Chester and Deep River (western bank of CT River)	061-001 – Clark Creek;	Knollenberg House and Chester-Hadlyme Ferry in Chester;
		061-011 – Old County Rockshelter;	Deep River Depot;
		026-005 – Banning Shore;	Deep River Landing;
		026-006 – Cahill Site;	Deep River Freight Station;
		036-001 – Pratt Cove Sandpit;	Deep River Freight Station Railroad Switches;
		036-003 – River Street.	Doris Sailing Yacht;
			James Dennison House; 1797 Cape Cod Style House at 83 River Road; and the Lurana Arnold Homestead in Deep River
Hamburg Cove	Lyme	075-007 – Hamburg Cove Site; 075-083 – Joshuatown Prehistoric Site; 075-100 – Cooper Bench Prehistoric Site; 075-101 – Cooper Hilltop Prehistoric Site; 075-056 – Coopers Boat House.	Ely House (circa 1790) at Joshuatown Road at the mouth of Hamburg Cove.
Selden Creek and Joshua Creek	Lyme, bordering the Selden Neck State Park	075-001 – Selden Island;	Brockway Ferry Road along Joshua Creek
		075-002 – Selden Island South;	Captain William Brockway House-Barn (circa 1900);
		075-005 – Cold Spring Rockshelter;	Captain William Brockway House (circa 1740);
		075-006 – Coudert Ledge;	Brockway Cemetery;
		075-022 – Cold Spring;	Levi Luther House (1730);
		075-023 – Unnamed (Selden Neck State Park)	William Brockway House (circa 1779);
		075-024 – Unnamed Rockshelter (State Park);	53 Brockway Ferry Road, Building 1 (circa 1701);
		075-025 – Unnamed Selden Neck State Park;	53 Brockway Ferry Road, Building 2 (circa 1767);
		075-027 – Selden Neck Southwest Shore;	55 Brockway Ferry Road (1750);
		075-043 – Selden Neck Northwest Shore;	59 Brockway Ferry Road (1909);
		075-049 – Brockway Landing	68 Brockway Ferry Road (1854);
		075-065 – Coudert Ledge #2 Site;	70 Brockway Ferry Road (1838);
		075-066 - Selden Neck Quarry/Camp;	33 Joshua Lane (circa 1750).
		075-067 – Island Quarry; 075-095 Joshuatown Road Prehistoric Site (L1-36).	

Treatment Site(s)	General Location	Pre-contact Archaeological Sites	Historic Structures/Districts
Mattabesset River	Middletown, south of State Highway 9	083-006 – Brick Yard Quarry.	Timothy Gilbert House (circa 1850).
Portland Boat Works (previously evaluated in USACE 2024 EA)	near Pecauset Pond outlet; Grove & Riverview Streets	113-027 – Cornwall (Post-Contact).	Joseph Kellop House (circa 1780); Henry McCleve House (circa 1875); and the John McCleve House (circa 1795).
Salmon River	East Haddam (east & west banks of CT River)	061-114 – Haddam Sand Pits; 061-115 – Peninsula 1 Site; 061-116 – Peninsula 2 Site; 061-117 – Midway Marina; 061-034 – Duffy Site; 061-035 – Unnamed; 061-040 – Lang and Butler Site; 061-055 – Brainard Homestead State Park.	Camp Bethel National Register District; and East Haddam Historic District
Lake Pocotopaug	East Hampton	042-027 – P. Derby Site; 042-028 – School Site.	Several historic homes and structures surround the lake on
Pameacha Pond	North end of pond		Pameacha Pond Dam; William Wilcox Manufacturing Company (Hartford Club Beverage Company, circa 1850).



DEPARTMENT OF THE ARMY  
US ARMY CORPS OF ENGINEERS  
NEW ENGLAND DISTRICT  
696 VIRGINIA ROAD  
CONCORD MA 01742-2751

June 10, 2025

Planning Division

Ms. Bettina Washington  
Tribal Historic Preservation Officer  
Aquinnah Wampanoag Tribe  
PO Box 268  
Charlestown, RI 02868

Dear Ms. Washington:

The U.S. Army Corps of Engineers (USACE), New England District, is preparing a Supplemental Environmental Assessment to analyze the effects of adding 12 additional treatment sites to the Connecticut River Hydrilla Control Research and Demonstration Project (Project), an existing aquatic invasive plant research and demonstration project within the Lower Connecticut River Watershed. We have previously coordinated with you on the original Environmental Assessment for the Project by letter dated April 3, 2024. USACE requests your formal comments on the following undertaking in accordance with Section 106 of the National Historic Preservation Act (NHPA) of 1966, as amended.

The USACE, New England District and the Engineer Research and Development Center (ERDC), propose herbicide application to control the aquatic invasive plant, hydrilla (*Hydrilla verticillata*), in the Lower Connecticut River Watershed, which is present in the mainstem of the Connecticut River, its tributaries, and other waterbodies that abut the river (Attachment 1). The Project is a part of ERDC's Aquatic Plant Control and Research Program (APCRP). The APCRP is authorized by Section 104 of the Rivers and Harbors Act of 1958, as amended, to support the "prevention, control, and progressive eradication of noxious aquatic plant growths and aquatic invasive species from the navigable waters, tributary streams, connecting channels, and other allied waters of the United States."

The modified proposed action expands the 2024 Project to 12 additional treatment sites, including: (1) Chester Creek in Chester; (2) Deep River in Deep River; (3) Hamburg Cove in Lyme; (4) Joshua Creek in Lyme; (5) Mattabesset River in Middletown; (6) Parker's Point in Chester; (7) an expanded Portland Boat Works in Portland; (8) Post and Pratt Coves in Deep River; (9) Salmon River in East Haddam; (10) Selden Creek in Lyme; (11) Lake Pocotopaug in East Hampton; and (12) Pameacha Pond in Middletown.

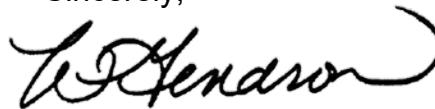
The Connecticut Cultural Resources Information System (CRIS) was used to identify historic properties within or in the vicinity of these sites for potential NHPA impacts. The treatment sites are grouped by towns that abut each other. Attachment 2 lists the pre-contact archaeological sites and historic structure or districts within or proximal to the proposed treatment sites.

As previously determined for the 2024 Project and concurred with by the Connecticut State Historic Preservation Office, impacts to historic properties are not anticipated from herbicide application for hydrilla management at the additional twelve treatment sites. The herbicide will be evenly distributed across entire treatment areas using the industry-standard boat-based, subsurface injection application method consisting of a calibrated pump and trailing hoses.

The New England District has determined that the proposed herbicide application for the Project, at twelve additional treatment sites, will have “no effect” upon any historic properties in accordance with Section 106 of the NHPA and implementing regulations 36 CFR 800. We would appreciate your concurrence with this determination.

If you have any questions, please contact the Project manager, Keith Hannon at [REDACTED] or by email at [Keith.W.Hannon@usace.army.mil](mailto:Keith.W.Hannon@usace.army.mil); or the Project biologist, Kelsie Dakessian at [REDACTED] or by email at [Kelsie.Dakessian@usace.army.mil](mailto:Kelsie.Dakessian@usace.army.mil).

Sincerely,



Wendy C. Gendron  
Chief, Planning Division

Enclosures



**Attachment 2. Pre-contact archaeological sites and historic structures/districts within or near the proposed treatment sites**

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		036-001 – Pratt Cove Sandpit;	Deep River Freight Station
		036-003 – River Street.	Railroad Switches;
			Doris Sailing Yacht; James Dennison House; 1797 Cape Cod Style House at 83 River Road; and the Lurana Arnold Homestead in Deep River
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		075-005 – Cold Spring Rockshelter;	Captain William Brockway House (circa 1740);
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		075-027 – Selden Neck Southwest Shore;	55 Brockway Ferry Road (1750);
		075-043 – Selden Neck Northwest Shore;	59 Brockway Ferry Road (1909);
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		075-066 - Selden Neck Quarry/Camp;	33 Joshua Lane (circa 1750).
075-067 – Island Quarry;			
075-095 Joshuatown Road Prehistoric Site (L1-36).			

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Portland Boat Works (previously evaluated in USACE 2024 EA)	near Pecauset Pond outlet; Grove & Riverview Streets	113-027 – Cornwall (Post-Contact).	Joseph Kellop House (circa 1780); Henry McCleve House (circa 1875); and the John McCleve House (circa 1795).
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Lake Pocotopaug	East Hampton	042-027 – P. Derby Site; 042-028 – School Site.	Several historic homes and structures surround the lake on
Pameacha Pond	North end of pond		Pameacha Pond Dam; William Wilcox Manufacturing Company (Hartford Club Beverage Company, circa 1850).



## PUBLIC NOTICE

In Reply Refer to: Keith Hannon  
Email: [CTRiver-Hydrilla@usace.army.mil](mailto:CTRiver-Hydrilla@usace.army.mil)  
Planning Division  
Date: 06/11/2025  
Comment Period Closes: 07/13/2025

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### 30 DAY PUBLIC NOTICE AQUATIC INVASIVE PLANT CONTROL RESEARCH DEMONSTRATION PROJECT

#### CONNECTICUT RIVER HYDRILLA CONTROL RESEARCH AND DEMONSTRATION PROJECT LOWER CONNECTICUT RIVER, CONNECTICUT

Interested parties are hereby notified that the U.S. Army Corps of Engineers (USACE), New England District, is proposing to modify its aquatic invasive plant control research demonstration project, the Connecticut River Hydrilla Control Research and Demonstration Project (Project), by adding an additional 12 treatment sites within the Lower Connecticut River Watershed (Attachment 1) and additional herbicides. The proposed modification to the Project is subject to the requirements of the National Environmental Policy Act (Public Law 91-190) and Executive Order 11988 – Floodplain Management along with additional pertinent laws, regulations, and directives provided in Attachment 2. Project activities involve the application of herbicide to the waters of the Lower Connecticut River Watershed for the control of the invasive aquatic plant, hydrilla (*Hydrilla verticillata*). The Project is a part of the USACE Engineering Research and Development Center's (ERDC) Aquatic Plant Control and Research Program (APCRP). The Project is being conducted under the authority provided by Section 104 of the Rivers and Harbors Act of 1958, as amended. This authority allows the APCRP to support the "prevention, control, and progressive eradication of noxious aquatic plant growths and aquatic invasive species from the navigable waters, tributary streams, connecting channels, and other allied waters of the United States."

#### **Project Description:**

The Project currently includes five treatment sites within the Lower Connecticut River Watershed, with a field-scale demonstration of chemical technology to evaluate the effectiveness of an aquatic herbicide to manage hydrilla, including sites in high water exchange environments (e.g., tidal, riverine environment). The proposed modification to the Project includes the addition of 12 treatment sites within the Lower Connecticut River Watershed: (1) Chester Creek in Chester; (2) Deep River in Deep River; (3) Hamburg Cove in Lyme; (4) Joshua Creek in Lyme; (5) Mattabesset River in Middletown; (6) Parker's Point in Chester; (7) an expanded Portland Boat Works in Portland; (8) Post and Pratt Coves in Deep River; (9) Salmon River in East Haddam; (10) Selden Creek in

Lyme; (11) Lake Pocotopaug in East Hampton; and (12) Pameacha Pond in Middletown. The Project currently includes the use of three herbicides: diquat dibromide (diquat), dipotassium salt of endothall, and florypyrauxifen-benzyl. The proposed modification to the Project includes the use of bispyribac-sodium, imazamox, flumioxazin, fluridone, penoxsulam, or combinations thereof for treatment of hydrilla (Attachment 3).

During the field demonstration, herbicides will be selected based on site-specific environmental characteristics, such as water exchange rate, product retention, and the presence of native species, as well as the likelihood of the herbicide's effectiveness in controlling target plant species within the application limits outlined on the product label. The herbicide will be evenly distributed across entire treatment areas using the industry-standard boat-based subsurface injection application methods consisting of a calibrated pump and trailing hoses. Herbicide will be applied by licensed applicators and in accordance with product labels. Proposed maximum application rates is provided in Attachment 4.

Proposed treatments will occur in the summer after July 4th, 2025, with any subsequent treatments occurring after July 4th of future years. This timing was selected to avoid impacts to diadromous fishes and northern pike (*Esox lucius*) that may spawn in submerged aquatic vegetation at sites in or adjacent to the Connecticut River. Pre- and post-application monitoring will occur at treatment sites to understand control efficacy for hydrilla and impacts to non-target species to inform the management of other hydrilla infestations. Post-application monitoring may occur for up to three years.

**Purpose of Work:** The purpose of the Project is to provide a field-scale demonstration of technology developed under the APCRP, which is evaluating the effectiveness of aquatic herbicides to manage monoecious hydrilla in high water exchange environments, such as the tidal, riverine environment of the lower Connecticut River. The Project will evaluate herbicide efficacy, optimal timing of treatment, non-target impacts, and herbicide concentration-exposure time requirements for effective control of hydrilla. The Project will also provide interim control of hydrilla at sites in the Lower Connecticut River Watershed for the duration of the research and demonstration project to demonstrate and understand effective management practices.

**Alternatives:** In addition to the modified Proposed Action analyzed in the modified Project's draft supplemental environmental assessment (SEA), the draft SEA also evaluated a No Action Alternative. Under the No Action Alternative, herbicide application to the proposed additional 12 treatment sites in the Lower Connecticut River Watershed would not occur.

**Additional Information:** Additional information may be obtained from the U.S. Army Corps of Engineers, New England District Project Team general email at [CTRiver-Hydrilla@usace.army.mil](mailto:CTRiver-Hydrilla@usace.army.mil). Information on the overall project, including the 2024 environmental assessment, that is not a part of the Proposed Action can be found at <https://www.nae.usace.army.mil/Missions/Projects-Topics/Connecticut-River-Hydrilla/>.

**Coordination:** Modifications to the Project are being coordinated with the following federal, state, and tribal entities.

**Federal**

U.S. Environmental Protection Agency  
U.S. Fish and Wildlife Service  
National Marine Fisheries Service  
National Parks Service

**State**

Connecticut Department of Energy and Environmental Protection (DEEP)  
Connecticut Pesticide Management Program  
Connecticut State Historic Preservation Office (CT SHPO)  
Connecticut Office of Aquatic Invasive Species

**Tribal Nations**

Mohegan  
Mashantucket Pequot  
Narragansett Indian Tribe  
Wampanoag Tribe of Gay Head (Aquinnah)

**Environmental Impacts:** A draft SEA and Finding of No Significant Impact (FONSI) has been prepared for the modified Project. These documents are available for public review at <https://www.nae.usace.army.mil/Missions/Projects-Topics/Connecticut-River-Hydrilla/>. The USACE has made a preliminary determination that an environmental impact statement for the modified Project is not required under the provisions of the National Environmental Policy Act of 1969. This determination will be reviewed in light of facts submitted in response to this notice.

**Other Information:**

- a. **Local Sponsor:** There is no local sponsor for the Project.
- b. **Floodplain Management:** In accordance with Executive Order 11988, the USACE has determined that the proposed work will not contribute to negative impacts or damages caused by floods.
- c. **Endangered Species:** The USACE determined that the Project may affect, but would not likely adversely affect, threatened or endangered species. Concurrence was obtained from the U.S. Fish and Wildlife Service on February 6, 2024, and from the National Marine Fisheries Services on July 11, 2024. The USACE determined that there would be no change in effect to listed species as a result of modifications to the Project. The USACE has coordinated the modified Project with the U.S. Fish and Wildlife Service and the National Marine Fisheries Service pursuant to the Endangered Species Act of 1973 (87 Stat. 844).

d. Cultural Resources: In accordance with National Historic Preservation Act of 1966, as amended, the USACE consulted with the Connecticut SHPO, Mohegan, Mashantucket Pequot, Narragansett Indian Tribe, and Wampanoag Tribe of Gay Head (Aquinnah) on the Project and its determination that the Project would have no effects to historic properties. Concurrence was obtained from Connecticut SHPO on April 3, 2024. The USACE is coordinating the modified Project with the Connecticut SHPO, Mohegan, Mashantucket Pequot, Narragansett Indian Tribe, and Wampanoag Tribe of Gay Head (Aquinnah).

Please bring this notice to the attention of anyone you know to be interested in this project. Comments are invited from all interested parties and should be directed to the U.S. Army Corps of Engineers, New England District, 696 Virginia Road, Concord, MA 01742-2751, ATTN: Keith Hannon; or emailed to [CTRiver-Hydrilla@usace.army.mil](mailto:CTRiver-Hydrilla@usace.army.mil) within 30 days of this notice.

10 JUNE 2025

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Date

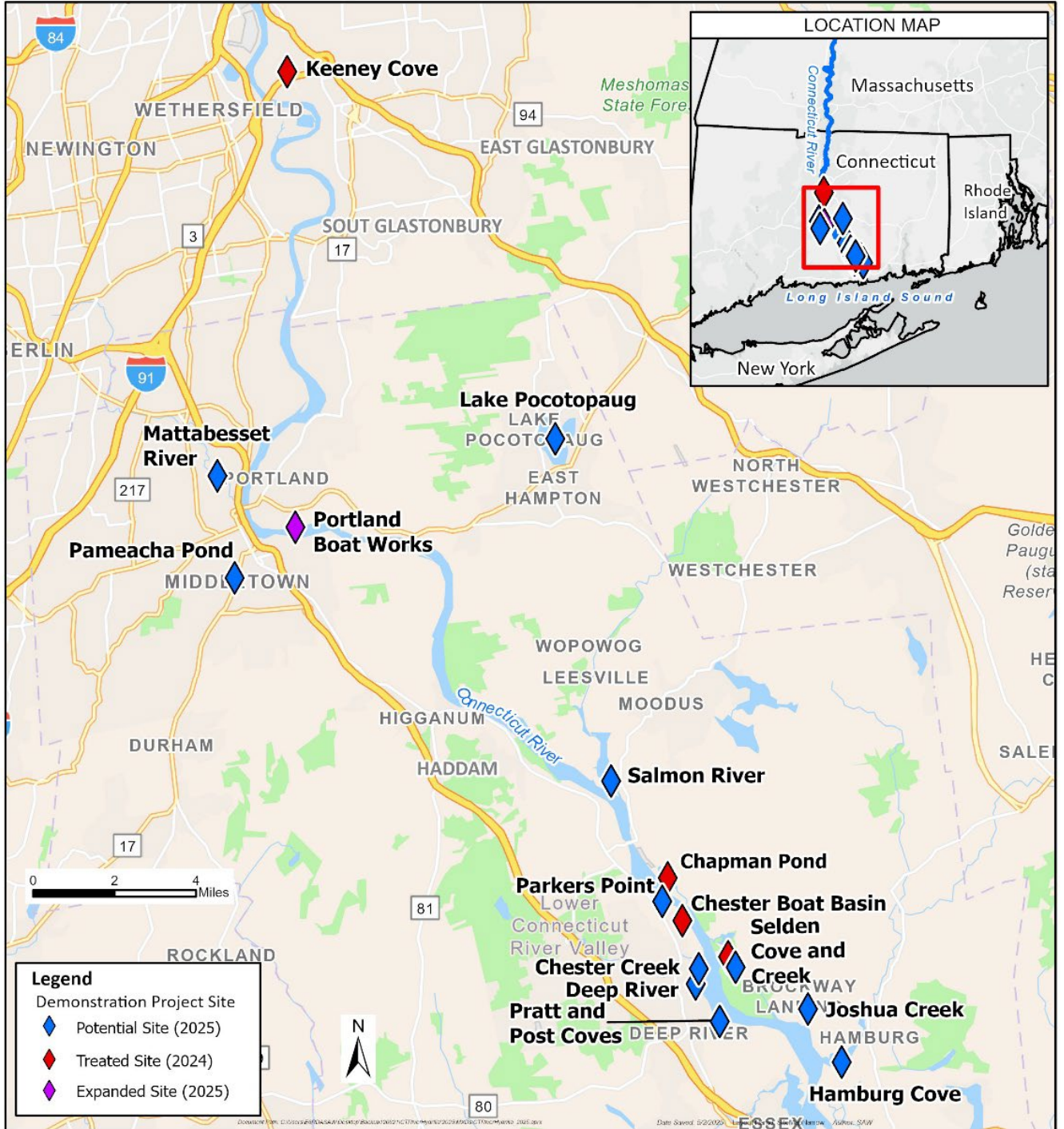


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Wendy Gendron  
Chief, Planning Division

# Attachment 1

Prior research and demonstration treatment sites and proposed treatment sites within the Lower Connecticut River watershed



## **Attachment 2**

### **PERTINENT LAWS, REGULATIONS, AND DIRECTIVES**

Clean Water Act, as amended (33 U.S.C. 1251 et seq.)

National Environmental Policy Act of 1969 (42 U.S.C. 4321 et seq.)

Fish and Wildlife Coordination Act (16 U.S.C. 661 et seq)

Fish and Wildlife Act of 1956 (16 U.S.C. 742a et seq.)

Coastal Zone Management Act of 1972 (16 U.S.C. 1451 et seq)

National Historic Preservation Act of 1966 (54 U.S.C. 300101 et seq.)

Endangered Species Act of 1973, as amended (16 U.S.C. 1531 et seq.)

Clean Air Act, as amended (42 U.S.C. 7401 et seq.)

Estuary Protection Act (16 U.S.C. 1221 et seq.)

Federal Water Project Recreation Act, as amended (16 U.S.C. 460I-12 et seq.)

Land and Water Conservation Fund Act of 1965, as amended (54 U.S.C. 200302 et seq.)

Magnuson-Stevens Fishery Conservation and Management Act, as amended by the Sustainable Fisheries Act of 1996 (16 U.S.C. 1801 et seq.)

Wild and Scenic Rivers Act, as amended (16 U.S.C. 1271 et seq.)

Executive Order 11988, Floodplain Management, 24 May 1977

Executive Order 11990, Protection of Wetlands, 24 May 1977

Executive Order 13045, Protection of Children from Environmental Health Risks and Safety Risks, 21 April 1997

### Attachment 3

#### Proposed herbicides for consideration

<b>Site</b>	<b>Treatment Area (acres)</b>	<b>Potential Herbicide(s)<sup>1</sup></b>
Chester Creek	37.9	Diquat, Dipotassium salt of endothall, Florpyrauxifen-benzyl
Deep River	5.3	Diquat, Dipotassium salt of endothall, Florpyrauxifen-benzyl
Hamburg Cove	178.8	Diquat, Dipotassium salt of endothall, Florpyrauxifen-benzyl
Mattabesset River	65.6	Diquat, Dipotassium salt of endothall, Florpyrauxifen-benzyl, Fluridone
Parker's Point	3.0	Diquat, Dipotassium salt of endothall, Florpyrauxifen-benzyl
Portland Boat Works	16.1	Diquat, Dipotassium salt of endothall, Florpyrauxifen-benzyl
Post and Pratt Coves	35.5	Diquat, Dipotassium salt of endothall, Florpyrauxifen-benzyl
Salmon River	274.3	Diquat, Dipotassium salt of endothall, Florpyrauxifen-benzyl
Joshua Creek	20.7	Diquat, Dipotassium salt of endothall, Florpyrauxifen-benzyl
Selden Creek	48.1	Diquat, Dipotassium salt of endothall, Florpyrauxifen-benzyl
Lake Pocotopaug	232	Diquat, Dipotassium salt of endothall, Imazamox, Florpyrauxifen-benzyl, Flumioxazin, Penoxsulam
Pameacha Pond	18.8	Fluridone, Bispyribac-sodium, Dipotassium salt of endothall, Florpyrauxifen-benzyl

<sup>1</sup> Herbicide(s) will be selected based on field-conditions during summer treatment period

**Attachment 4.**

Proposed Herbicides Use Rates

<b>Potential Herbicide</b>	<b>Maximum Application Rate</b>
Bispyribac-sodium	40 ppb
Diquat	370 ppb
Dipotassium salt of endothall	5 ppm
Florpyrauxifen-benzyl	48 ppb
Imazamox	500 ppb
Flumioxazin	400 ppb
Fluridone	15 ppb
Penoxsulam	150 ppb



**EIGHTMILE RIVER**  
WILD & SCENIC WATERSHED

**2 Dolbia Hill Road, East Haddam, CT 06423**

July 11, 2025

Keith Hannon  
U.S. Army Corps of Engineers  
New England District  
696 Virginia Road  
Concord, MA 01742-2751

RE: Aquatic Invasive Plant Control Research Demonstration Project

Dear Mr. Hannon,

On behalf of the Eightmile River Wild & Scenic Coordinating Committee (ERWSCC), this letter is submitted in response to the public notice regarding Aquatic Invasive Plan Control Research Demonstration Project.

The Eightmile River Watershed, which includes Hamburg Cove, is a designated Wild & Scenic Partnership River. Its Outstandingly Remarkable Values (ORVs) include cultural resources, geology, hydrology, an intact watershed system, high water quality and unique habitats with documented species of concern. It is these last two ORVs which concern the board the most, in terms of the presence of Northern hydrilla, a highly invasive non-native aquatic species.

In 2019, ERWSCC provided grant funds to Connecticut Resource & Conservation Development, Inc. as part of a larger regional effort to map the location and extent of Northern hydrilla in the lower Connecticut River, which included Hamburg Cove. In 2024, the cove was again surveyed, by the newly formed state Office of Aquatic Invasive Species (OAIS). As seen on the attached map (page 3) there is a significant expansion of Northern hydrilla in terms of both the area it had spread and increased plant densities. Please note that while the mapping shows no Northern hydrilla east of the Route 156 bridge, this is due to the inaccessibility by OAIS's boat. ERWSCC staff have observed Northern hydrilla throughout the upper Falls Brook Cove area as well.

ERWSCC staff and board members are on Hamburg Cove every summer as part of another project; the survey and removal of water chestnut, another non-native aquatic invasive species. This is a species that can be physically pulled in order to remove it. The latest surveys show that we have been successful as it is mostly eradicated in the cove. Over the last few years however, areas that were once "easy" paddles are now extremely difficult to navigate due to Northern hydrilla, making it even more difficult to effectively manage water chestnut.

Northern hydrilla forms dense beds which replace other native aquatic species such as eel grass. It can alter water flows, aggressively outcompete other native plants for carbon dioxide

resources, cause major swings in oxygen levels and increase water temperatures. It is also a host species for cyanobacteria, a neurotoxin which can affect both humans and animals. As native aquatic plant species are replaced by non-native invasive plant species, native animal species, which have adapted over centuries to the native plants present in the cove, are at risk of extirpation. Collectively these impacts raise significant concerns related to protecting both water quality and the unique habitats of Hamburg Cove and the Eightmile River Watershed. Northern hydrilla is no longer limited to the lower Connecticut River but has also spread to numerous ponds and lakes throughout Connecticut.

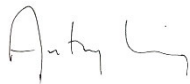
ERWSCC does not generally support using herbicides as a primary approach for aquatic invasive species control. And it has allocated its own limited resources to assisting in physical removal on non-native invasive plants, when viable. In the case of Northern hydrilla, mechanical or physical removal methods are a short-term fix at best, as the plant will rapidly regrow and can double in size within two weeks. And this method will result in broken fragments which can contribute to additional spread as they float off and take root elsewhere. Benthic barriers, another method used to control aquatic invasive species, are hard to install effectively and work best in small areas. As the vegetation should be cut before installation of the barrier, this also results in broken fragments.

The 2019-2024 map of Hamburg Cove demonstrates that the expansion of Northern hydrilla is happening at a rapid rate and there is grave concern that considerable damage to native species is already underway. Delaying treatment will result in further expansion.

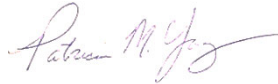
ERWSCC urges careful consideration of the treatment methodology, one that effectively targets Northern hydrilla at the least concentration, while at the same time is sensitive to the native species and habitats of the cove. As Eurasian watermilfoil, another widespread non-native invasive aquatic plant is also present in the cove, it would be beneficial if the proposed treatment would aid in that removal as well. And ERWSCC fully supports continued resources to develop methods such as safe bio-controls to minimize the need for chemical applications.

ERWSCC requests continued updates of proposed activities by the United States Army Corps of Engineers as it relates to this project and is available for further input or assistance.

Sincerely

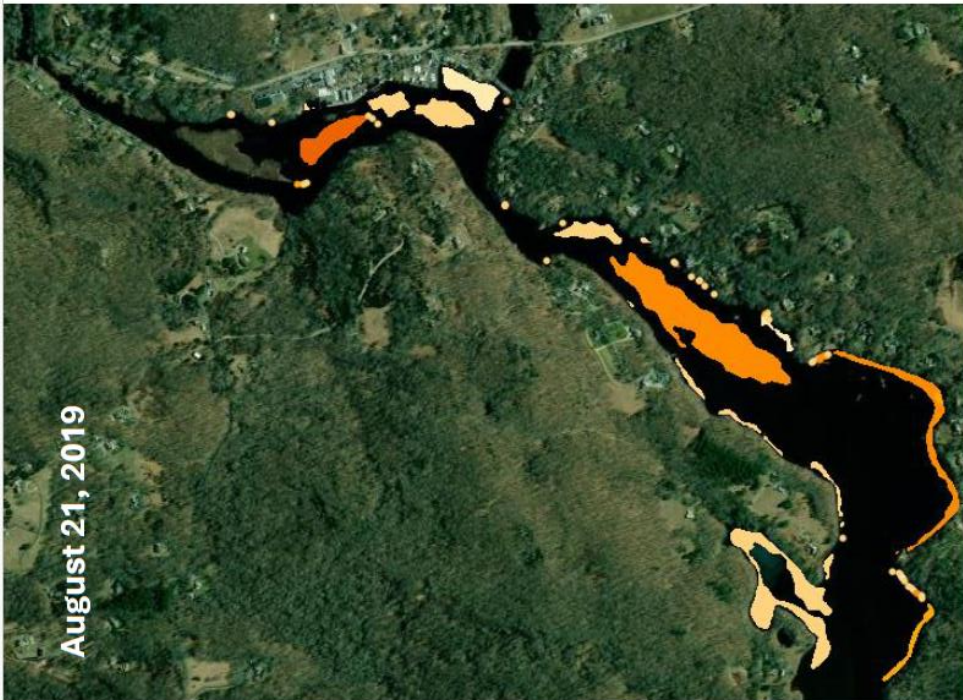
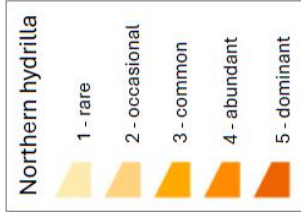
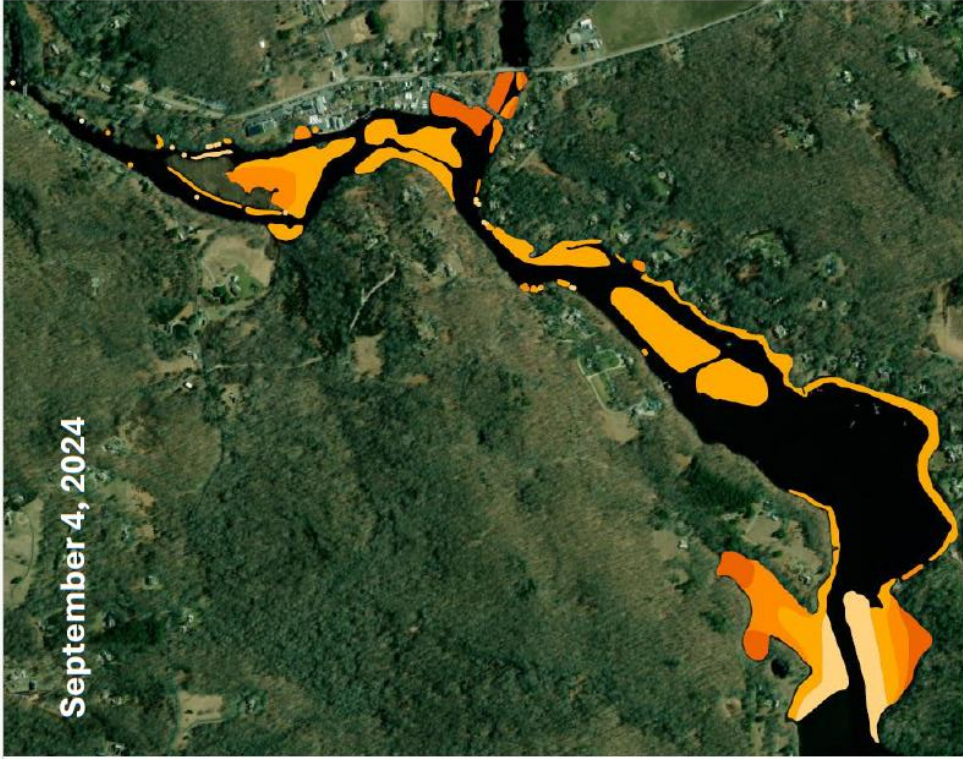


Anthony Irving  
Chairman



Patricia Young  
Program Director

Eightmile River Wild & Scenic Coordinating Committee  
National Wild & Scenic Partnership Rivers



*Hydrilla verticillata* Assessment  
Falls Brook Cove, Lyme, CT  
July 1, 2025

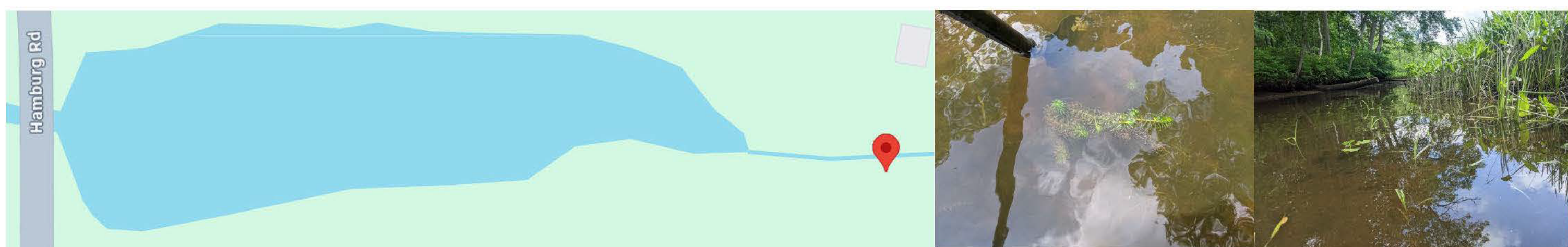
Prepared for the Eightmile River Wild & Scenic Watershed

Richard W. Sanders, Ph.D.



Hydrilla in Falls Brook Cove on July 1, 2025

As a follow-up to the hydrilla and Eurasian watermilfoil survey of Hamburg Cove in 2021,<sup>1</sup> Falls Brook Cove east of Route 156 was surveyed on July 1, 2025 by kayak from 12:45 pm to 1:20 pm during low water on the flood (1.0-1.3' above MLW). Abundant hydrilla was seen growing in patches as shown above in yellow. From Route 156, hydrilla extends about 950' eastward. Although not surveyed, it is assumed that hydrilla is also established in Falls Brook Cove west of this survey's boundary between Route 156 and Cove Rd where Falls Brook Cove empties into Hamburg Cove. No hydrilla was observed east of 72°20'44.8"W. At this point Falls Brook Cove narrows and its banks steepen.



Eastern limit of hydrilla in Falls Brook Cove as observed on July 1, 2025

Should the U.S. Army Corps of Engineers proceed with the "CONNECTICUT RIVER HYDRILLA CONTROL RESEARCH AND DEMONSTRATION PROJECT LOWER CONNECTICUT RIVER, CONNECTICUT",<sup>2</sup> it is proposed that Falls Brook Cove be included to improve data collection. Treatment of this connected watercourse may slow the reintroduction of hydrilla into Hamburg Cove. Efforts to attenuate this vector may aid in evaluating the effectiveness of hydrilla control herbicides employed.



References:

1. Eightmile River Wild & Scenic Watershed Newsletter (2021). <https://www.eightmileriver.org/wp-content/uploads/2021/12/2021-Newsletter.pdf> accessed on 7/1/2025.
2. Public Notice "30 DAY PUBLIC NOTICE AQUATIC INVASIVE PLANT CONTROL RESEARCH DEMONSTRATION PROJECT" dtd 6/11/2025. [https://www.nae.usace.army.mil/Portals/74/HydrillaControlRD\\_PublicNotice\\_2025\\_Signed.pdf](https://www.nae.usace.army.mil/Portals/74/HydrillaControlRD_PublicNotice_2025_Signed.pdf) accessed on 7/1/2025.

**From:** [Dakessian, Kelsie E CIV USARMY CENAE \(USA\)](#)  
**To:** [Mayer, Audrey](#)  
**Cc:** [Simmons, David](#); [newengland@fws.gov](mailto:newengland@fws.gov); [Chabot, Christopher L \(Chris\) CIV USARMY CENAE \(USA\)](#); [Hannon, Keith W CIV USARMY CENAE \(USA\)](#)  
**Subject:** Connecticut River Hydrilla Control Research and Demonstration Project - Informal Consultation/Conference Request  
**Date:** Friday, February 6, 2026 9:15:00 AM  
**Attachments:** [Hydrilla ESA InfConsultation 6Feb2026.pdf](#)

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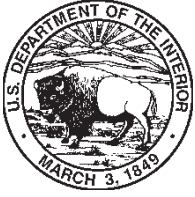
Good morning Dr. Mayer,

The U.S Army Corps of Engineers is requesting informal consultation and conference for the Connecticut River Hydrilla Control Research and Demonstration Project. Please find an attached letter to include our written request. Due to file size, the supporting analysis (Enclosures) has been transmitted through DoDSafe. A separate, automated email was sent containing the DoD Safe link and claim password.

Please contact me if any additional information is needed.

Thank you,  
Kelsie Dakessian

Kelsie Dakessian  
Biologist  
U.S. Army Corps of Engineers, New England District  

# United States Department of the Interior



## FISH AND WILDLIFE SERVICE

New England Field Office  
70 Commercial Street, Suite 300  
Concord, NH 03301-5087

<https://www.fws.gov/office/new-england-ecological-services>

June 9, 2026

Christopher Chabot  
U.S. Army Corps of Engineers  
696 Virginia Road  
Concord, MA 01742

RE: Connecticut River Hydrilla Control Research and Demonstration Project, CT  
In reply refer to Project Code 2026-0006615

Dear Christopher Chabot:

This responds to your request for our concurrence with the U.S. Army Corps of Engineers' (USACE) determination that the proposed Connecticut River Hydrilla Control Research and Demonstration Project in Hartford, Middlesex, and New London counties in Connecticut (Project), may affect, but is not likely to adversely affect, the federally endangered northern long-eared bat (*Myotis septentrionalis*) and the proposed endangered tricolored bat (*Perimyotis subflavus*). We received your initial consultation request on February 6, 2026, and your complete consultation request on May 20, 2026<sup>1</sup>. Your request and our response are made pursuant to section 7 of the Endangered Species Act of 1973, as amended (87 Stat. 884, as amended; 16 U.S.C 1531, et seq.) (ESA).

The USACE proposes to conduct herbicide applications at sixteen sites (Table 1) to the waters of the Lower Connecticut River watershed for the control of invasive Hydrilla (*Hydrilla verticillata*). Connecticut River Hydrilla was identified in 2020 as a unique variant found only in the Lower Connecticut River watershed and is genetically distinct from other Hydrilla variants. A core component of the Project is to identify whether established management practices for other invasive Hydrilla variants are effective against the Connecticut River variant.

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<sup>1</sup> The USACE concluded consultation for the northern long-eared bat and tricolored bat through the Northern Long-eared Bat and Tricolored Bat Range-Wide Determination Key within the U.S. Fish and Wildlife Service's Information for Planning and Consultation system on March 28, 2024, for five treatment sites in the Lower Connecticut River watershed. The USACE updated the project description to include additional treatment locations and potential herbicides.

Table 1. Proposed treatment sites and herbicide options. All sites would receive one application except Chester Boat Basin. All sites are in Connecticut.

<b>Site</b>	<b>Potential Herbicide(s)</b>
Chapman Pond	Florpyrauxifen-benzyl
Chester Boat Basin <sup>2</sup>	Dipotassium salt of endothall and Diquat
Keeney Cove	Florpyrauxifen-benzyl
Selden Cove	Dipotassium salt of endothall
Chester Creek <sup>1</sup>	Diquat, Dipotassium salt of endothall, Florpyrauxifen-benzyl
Deep River <sup>1</sup>	Diquat, Dipotassium salt of endothall, Florpyrauxifen-benzyl
Hamburg Cove <sup>1</sup>	Diquat, Dipotassium salt of endothall, Florpyrauxifen-benzyl
Mattabeset River <sup>1</sup>	Diquat, Dipotassium salt of endothall, Florpyrauxifen-benzyl, Fluridone
Parker's Point <sup>1</sup>	Diquat, Dipotassium salt of endothall, Florpyrauxifen-benzyl
Portland Boat Works <sup>1</sup>	Diquat, Dipotassium salt of endothall, Florpyrauxifen-benzyl
Pratt and Post Coves <sup>1</sup>	Diquat, Dipotassium salt of endothall, Florpyrauxifen-benzyl
Salmon River <sup>1</sup>	Diquat, Dipotassium salt of endothall, Florpyrauxifen-benzyl
Joshua Creek <sup>1</sup>	Diquat, Dipotassium salt of endothall, Florpyrauxifen-benzyl
Selden Creek <sup>1</sup>	Diquat, Dipotassium salt of endothall, Florpyrauxifen-benzyl
Lake Pocotopaug <sup>1</sup>	Diquat, Dipotassium salt of endothall, Imazamox, Florpyrauxifen-benzyl, Flumioxazin, Penoxsulam
Pameacha Pond <sup>1</sup>	Fluridone, Bispyribac-sodium, Dipotassium salt of endothall, Florpyrauxifen-benzyl

<sup>1</sup> Herbicides will be selected during field demonstration based on field characteristics

<sup>2</sup> Two treatments will occur that are 14-days apart

The Project will provide a field-scale demonstration to evaluate the effectiveness of aquatic herbicides to manage invasive Hydrilla in varied water exchange environments characterized by the tidal, riverine environment of the lower Connecticut River. Only one treatment site, Chester Boat Basin, will have two herbicide applications 14 days apart. This is also the only proposed treatment site to include a tank mix of two herbicides. All treatments will be conducted using subsurface injection method by boat. All applications will be completed in the summer starting in 2026 and going no later than 2030. Additional monitoring vessels may be present at treatment sites for up to a week following herbicide application to monitor residual herbicide levels, dissipation times, and effect to target plants. All boats will be launched at public boat launches and marinas.

Both northern long-eared bats and tricolored bats have been acoustically detected within the boundaries of most proposed treatment sites. We assume that these species actively forage and roost nearby. There are no known winter hibernacula within 5 miles of the Project. Bats are terrestrial but may drink from freshwater sources and come into contact with residual herbicide at proposed treatment sites. Some of the proposed herbicides can be toxic to aquatic invertebrates which may result in a post-treatment reduction of prey availability for bats. We do not expect diurnal activity from treatment or monitoring vessels to impact bats roosting nearby.

We concur with your determination that the proposed Project may affect, but is not likely to adversely affect, the northern long-eared bat and tricolored bat because:

- Post-treatment effects to available habitat would be discountable as targeted, subsurface injection conducted during daylight hours is unlikely to impact terrestrial roosting habitat or affect bats that are foraging during the night;
- The duration and frequency of direct contact from treated areas are unlikely to result in significant residual herbicide exposure from water within the scope of the proposed action due to dispersion and dilution;
- The Environmental Protection Agency approved the herbicides proposed for use for aquatic applications, and the available associated information indicates the herbicides would not adversely affect bats when used as directed by the label<sup>2</sup>; and
- While we do not have data on the potential reduction in prey availability for bats as a result of the proposed action, we expect it will be insignificant as these bat species do not rely exclusively on aquatic invertebrates. They eat both terrestrial and aquatic flying insects, such as moths, beetles, mosquitoes, and midges.


The USACE determined the proposed action would have no effect on the federally threatened Puritan tiger beetle (*Ellipsoptera puritana*).

Further consultation with us under section 7 of the ESA is not required at this time. If any of the criteria at 50 CFR 402.16(a)<sup>3</sup> are met, reinitiation of consultation is required, and the USACE should contact us immediately and suspend activities that may affect those species until the appropriate level of consultation is completed with our office. Thank you for your cooperation, and please contact Jessica Fletcher of this office at [REDACTED] or [jessica\\_fletcher@fws.gov](mailto:jessica_fletcher@fws.gov) if you have questions or need further assistance.

Sincerely,

**AUDREY  
MAYER**

Audrey Mayer  
Supervisor  
New England Field Office

 Digitally signed by  
AUDREY MAYER  
Date: 2026.06.09 16:25:13  
-04'00'

cc: Christopher.L.Chabot@usace.army.mil  
Kelsie.Dakessian@usace.army.mil  
Keith.W.Hannon@usace.army.mil

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<sup>2</sup> Labels for products with the proposed active ingredients were accessed on June 9, 2026, at <https://ordspub.epa.gov/ords/pesticides/>

<sup>3</sup> <https://www.ecfr.gov/current/title-50/chapter-IV/subchapter-A/part-402/subpart-B/section-402.16>