



August 26, 2011

Ms. Magalie Roman Salas, Secretary
Federal Energy Regulatory Commission
Mail Code: DTCA, HL 21.3
888 First Street, N.E.
Washington, D.C. 20426

FERC Project No. 1981

Dear Secretary Salas:

As per the Order Issuing New License for the Stiles Hydroelectric Project (FERC Project No. 1981) dated February 26, 2003, Oconto Electric Cooperative (OEC) is enclosing documentation of the recently completed Exotic Species Control Plan for 2011, required in Article 407 of the License.

The Exotic Species Control Plan specifically addresses purple loosestrife (*Lythrum salicaria*.) A copy of the plan, which requires an annual survey of the Machickanee Flowage, is attached as Exhibit I. The purpose of the survey is to identify and quantify possible colonies of purple loosestrife. If colonies of 1-5 plants are found on OEC owned land, removal or treatment is required. If colonies are found on private land, OEC is responsible for contacting the property owners and encouraging them to remove and destroy the plants.

On July 15, 2011 Jan Stranz of OEC and Al Stranz (volunteer) conducted a survey by water of the shoreline of the Machickanee Flowage, including shoreline owned by OEC. The surveyors noted locations on a map and indicated the GPS coordinates for the plants they discovered. The surveyors commented that they observed fewer and sparser colonies of purple loosestrife as compared to previous years. Their survey sheet is included as Exhibit II (a) and their map is Exhibit II (b). Letters were sent to the appropriate property owners, notifying them of the presence of purple loosestrife on their land. Included in the mailing was a brochure instructing them about proper removal of the plant. A copy of the letter sent to property owners is included as Exhibit III (a) and the brochure is Exhibit III (b). Results of the survey are sent to the Machickanee Advancement Association, Wisconsin DNR, U.S. Fish and Wildlife Service, and FERC.

If you have questions about this report, please contact me at (920) 846-2816.

Sincerely,

A handwritten signature in cursive script, appearing to read "Kent Lyng".

Kent Lyng
VP Operations/Engineering

Enclosures: Exhibits

CC: Coordinator-FERC Projects, Wisconsin Department of Natural Resources
U.S. Fish & Wildlife Service
Judie Gowaski, President-Machickanee Advancement Association

EXHIBIT I

Exotic Species Control Plan

General Guidelines

Oconto Electric Cooperative (OEC), along with appropriate local groups and resource agencies, will continually work to control/eliminate exotic species, such as purple loosestrife, Eurasian milfoil and zebra mussels, in the project area. The project area is defined as those lands owned by OEC and the shoreline observable from the flowage. Although OEC will be responsible for coordinating efforts to control and eliminate exotics occurring on its own property, it is limited to supplying information to neighboring property owners.

When exotics are classified and identified by local or state authorities, OEC will proceed with a plan to monitor the identified species. The plan elements include: 1) method of monitoring, 2) frequency of monitoring, 3) documentation of transmission of monitoring data to the Wisconsin Department of Natural Resources (WDNR), U. S. Fish & Wildlife Service (USFWS), and the Machickanee Flowage Advancement Association (MFAA), 4) procedures for obtaining technical assistance and input from the WDNR, or other appropriate agencies, and 5) specific information on how OEC will cooperate with the agencies to control/eliminate the exotic species.

Along with the plan, OEC will include documentation of consultation, copies of comments and recommendations on the completed plan after it has been provided to the agencies, and descriptions of how the agencies’ comments are accommodated by the plan. OEC will allow thirty (30) days for the agencies to comment and make recommendations before filing the plan with the Federal Energy Regulatory Commission (FERC). If OEC does not adopt a recommendation, the filing will include OEC’s reasons based on project-specific information.

Oconto Electric Cooperative will post signs at recreation facilities on its property describing identified exotic species and informing the public on the control of the species. OEC will distribute fact sheets provided by the WDNR, or other appropriate agencies, at the project.

Purple Loosestrife (Lythrum salicaria) Plan

OEC shall, in consultation with the MFAA, the WDNR, and the USFWS, monitor purple loosestrife (Lythrum salicaria) in specified project areas. The project lands, reservoir area, and ¼ mile downstream from the project will be surveyed by OEC during peak flowering stage, being mid July/mid August of each year. OEC will estimate and map the amount of infestation of purple loosestrife.

If small colonies of purple loosestrife consisting of 1-5 plants are found on OEC-owned land, OEC will remove it and all of its roots, or cut and then spray it with an appropriate aquatic herbicide. Larger colonies will be removed after consultation with the resource agencies. If purple loosestrife is found on lands NOT owned by OEC, then OEC, in conjunction with the MFAA, will contact the property owner and encourage the owner to remove the plants.

Oconto Electric Cooperative will post signs at recreation facilities on its property describing purple loosestrife and informing the public on the control of this plant. OEC will distribute fact sheets provided by the WDNR, or other appropriate agencies, at the project.

After survey results are compiled and any remedial actions are taken, a report detailing such results and actions will be submitted by OEC to the MFAA, WDNR, and USFWS, with a copy to FERC by October 31 of each year.

Eurasian Milfoil

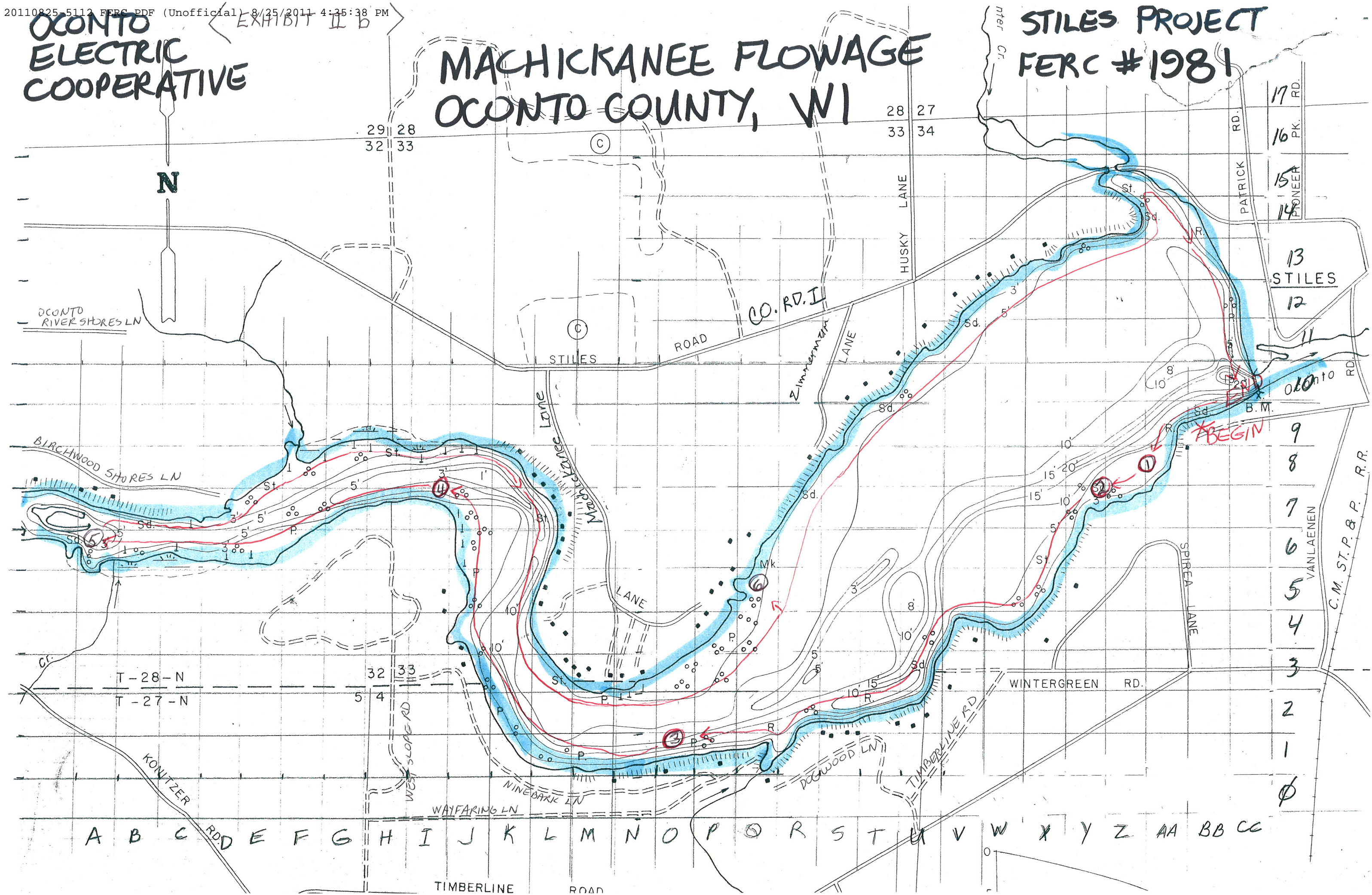
There is no plan to monitor or map Eurasian milfoil in the Machickanee Flowage because of its prolific presence throughout the flowage. The MFAA, in cooperation with the WDNR and other groups, has been attempting for years to eradicate this exotic species. OEC agrees that Eurasian milfoil is undesirable. If any agency or group devises a cost-effective plan to control/eradicate this species, OEC will cooperate with that plan.

OCONTO
ELECTRIC
COOPERATIVE

EXHIBIT II B

MACHICKANEE FLOWAGE OCONTO COUNTY, WI

STILES PROJECT
FERC #1981





August 25, 2011

Dear Machickanee Area Property Owner:

As you may know, Oconto Electric Cooperative has a 30-year operating license for the Stiles hydroelectric plant on the Machickanee Flowage. Various federal, state and local agencies have made recommendations as part of the licensing process to ensure that the environment around the hydro project is protected and enhanced for years to come.

One of the requirements of the license calls for annually monitoring the flowage area to track the occurrences of a non-native plant known as purple loosestrife. Purple loosestrife, though beautiful to view, is an exotic, invasive plant species. Left unchecked, it will gradually overrun all native vegetation and will cause deficiencies in the ecosystem. It especially likes moist soil so it commonly is found near waterways and in roadside ditches. Wisconsin state law bans the sale, distribution or cultivation of purple loosestrife.

A survey of the Machickanee Flowage shoreline was recently conducted by an OEC employee and a volunteer. The purpose of the survey was to evaluate the colonies of purple loosestrife and report possible occurrences of this plant to property owners. While it appears that overall occurrences of purple loosestrife are not increasing at this time, the survey did identify this plant on or near your property. We ask that you review the enclosed brochure describing purple loosestrife and the methods of controlling it. We encourage you to remove it according to information in the brochure. Control of purple loosestrife at this point when it is not yet prolific will sure help to minimize its ability to spread. If you would like assistance in removing it, please contact Oconto Electric Cooperative for more details. Our contact information is listed below.

Thank you for your help in this very important effort to eliminate purple loosestrife and thus enhance a healthy plant environment around the Machickanee Flowage.

Sincerely,

A handwritten signature in cursive script, appearing to read "Kent A. Lyng".

Kent A. Lyng
VP – Operations & Engineering

Enclosure

IDENTIFICATION

Growth: Upright, semi-woody, hardy perennial with a dense bushy growth of 1 to 50 stems. The square to many sided, green to red stems grow 3' to 9' feet tall and die back each fall. Old stems may persist for several years. Often found in clumps of several plants.

Flowers: Purple to pink and on numerous long spikes. Individual flowers are $\frac{1}{2}$ " to $\frac{3}{4}$ " across, with 5 or 6 petals.

Seeds: Tiny, smaller than a pin head. 2 to 3 million produced annually on each healthy, mature plant.

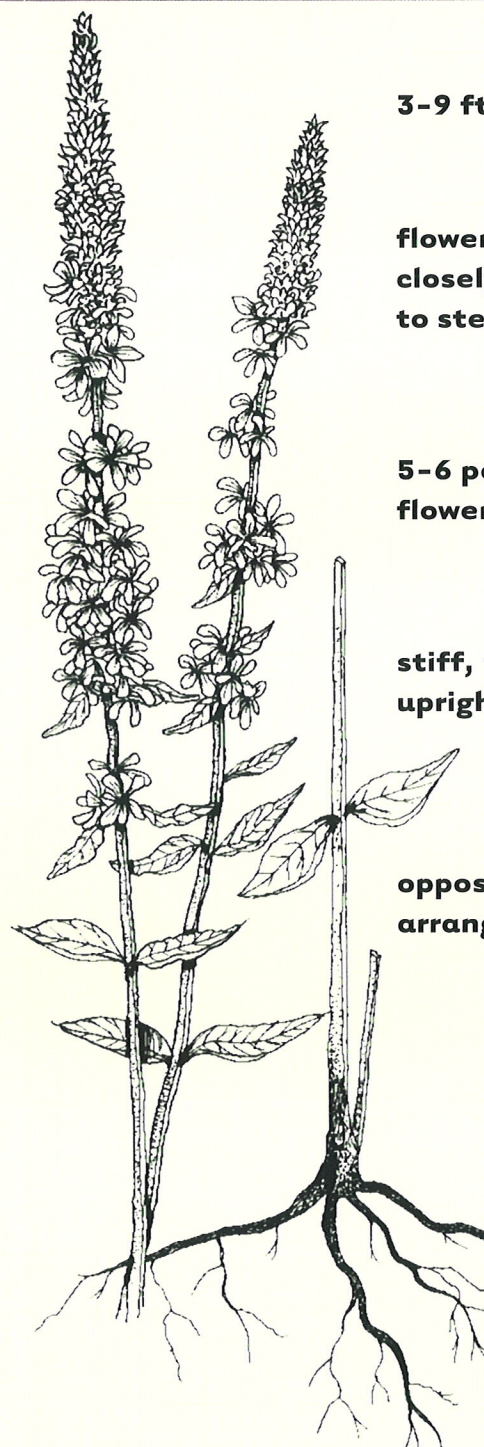
Leaves: Variable, usually opposite, but sometimes alternate or bunched in whorls. Linear shaped; smooth edged; sometimes hairy; attached directly (no stalks) to stems with each pair at 90 degrees to those above and below. No noticeable odor.

Root: Woody with many fibrous side roots forming a dense mat. Root masses may be several feet across in old clumps.

Blooming period: Late June through early September. Spike blooms from bottom up. Lower pods may drop seeds while upper blooms are still present.

Habitat: Moist-soil to shallow-water sites, such as wet meadows and pastures, marshes, stream and river banks, lake shores and ditches. Established plants tolerate dry conditions, such as gravel roadsides and abandoned fields. Still planted (illegally) in some gardens.

Distinguishing it from similar species: Few other wetland plants grow as tall with numerous square or multisided stems and brilliant purple spikes that turn into candelabras covered with many small, oval pods.



3-9 ft. in height

**flowers in a spike;
closely attached
to stem**

**5-6 petals per
flower**

**stiff, four-sided,
upright stem**

**opposite leaf
arrangement**

THE ECOLOGICAL PROBLEM

Purple loosestrife is an attractive wetland perennial plant from Europe and Asia that was introduced to North America without the specialized insects and diseases that keep it in check in its native lands. Freed from its natural controls, purple loosestrife grows taller and faster than our native wetland plants. These advantages and prolific seed production have allowed it to invade many Wisconsin wetlands, sometimes to the near total exclusion of most other vegetation. Once established, it can shade everything else out. Loosestrife has spread rapidly in Wisconsin over the last 20 to 30 years.

FOR MORE INFORMATION :

To learn more about purple loosestrife, visit the Department of Natural Resources web site at <http://dnr.wi.gov/invasives/fact/loosestrife.htm>. (Visit www.dnr.wi.gov/invasives for general invasive species information.)

Contact your region's WDNR Aquatic Plant Management Coordinator for herbicide permits. For purple loosestrife biocontrol information contact the Wisconsin Purple Loosestrife Biocontrol Program at: 2801 Progress Rd., Madison WI 53716, (608) 221-6349, or email: brock.woods@wisconsin.gov

This brochure is online at: <http://clean-water.uwex.edu/pubs/pdf/add.purple.pdf>

Exhibit III (b)

PURPLE Loosestrife

(*Lythrum salicaria* & *Lythrum virgatum*)



**A MAJOR THREAT TO
WISCONSIN'S WETLANDS
AND WATERWAYS**

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