



November 20, 2014

Ms. Kimberly D. Bose, Secretary Office of the Secretary Federal Energy Regulatory Commission 888 First Street, NE Washington, DC 20426

REF:

Oconto Falls Upper FERC Project P-2523

NEW Hydro, LLC

Article 407 – 2014 Purple Loosestrife – Eurasian Watermilfoil Inventory

Dear Secretary;

On behalf of NEW Hydro, LLC (Licensee), Eagle Creek Renewable Energy (ECRE) hereby submits the 2014 Annual Purple Loosestrife and Eurasian Watermilfoil Inventory in accordance with Article 407 (Purple Loosestrife-Eurasian Watermilfoil Monitoring Plan) of the Project License. Please find (1) original and (7) copies of the report including Agencies comments.

The Agency comments received by email on the November 18, 2014 are unrelated to the project License. However, the Licensee continues to be cooperative and plans to informally report as a courtesy, any observances of flowering rush into the DNR database.

The next Monitoring and inventory report will be provided in 2015. Should you have any questions regarding this submittal, please contact Mr. Jereme Klassy with ECRE at 920-293-4628 ext. 322 or email at Jereme.klassy@eaglecreekre.com.

Sincerely,

Eagle Creek Renewable Energy

gent for Licensee(s)

ML Scott Klabunde

**SVP of Operations** 

Attached: Oconto Falls Upper 2014 Final Purple Loosestrife-Eurasian Watermilfoil Inventory

Cc: Cheryl Laatsch, WDNR

Nick Utrup, US FWS

File: 14-11-20\_LC\_ECRE\_OFUP\_Final 2014 PL-EWM Inventory

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## **Purple Loosestrife:**

On August 15, 2014, NEW Hydro, LLC (*Licensee*) performed an inventory of purple loosestrife plants at the Oconto Falls Upper Project in Oconto County, Wisconsin. The inventory is a requirement of license article 407 for the project. The method of inventory as approved and modified by the Federal Energy Regulatory Commission (FERC) Order of November 19, 1999 was defined as follows:

After Purple Loosestrife has bloomed in mid-July to early August, the inventory should be conducted using a boat to survey the impoundment above the dam and on foot or by boat below the dam. County wetland maps will be used to determine other areas where Purple Loosestrife could be found on lands owned by NEW within the Project Boundary. These areas will be surveyed on foot. A pair of binoculars should be used to search for the purple flowered spikes of the plant. When plants are located, the person(s) inventorying should get close enough to make a positive identification without disturbing the plants or the immediate area around the plants as this could cause them to spread. A GPS receiver will be used to establish a GPS coordinate for the location of the plants. If it is not possible to get close enough to establish an accurate location, an approximate location will be established with reference to an established GPS coordinate. The plant should be inventoried by marking and numbering the location on a lake map along with notes approximating size of plants, stand area, percent cover, stem density, plant density, and location with reference to established GPS coordinates. Photos and/or videotape will be taken of the largest occurrences.

## Example:

#1 6' tall plants; 4' X 20'; 30% cover; 4 – 5 stems per plant; 4 plants; on shoreline N44 $^\circ$  52.9092' E88 $^\circ$  10.0000'; no photo

#2 5' - 7' tall plants; 10' X 10'; 25% cover; 4 – 5 stems per plant; in marsh 50 feet bearing 25° from N44° 52.5092' E88° 10.0000'; photo No. 1

The area to be inventoried shall be the shoreline and lands owned by NEW within the Project Boundary as indicated on the Project Boundary map included as Exhibit G of NEW Hydro, Inc. Application For New License for the Oconto Falls Hydroelectric Project FERC Project #2523. The Project Boundary is shown as the water and shoreline of the impoundment from approximately 6000' upstream of the State Highway 32 Bridge to approximately 500' downstream of the Project dam.



## General Observations - (PL):

On August 15 2014, a meandered survey for purple loosestrife (*Lythrum salicaria*), was performed at the Oconto Falls Upper Hydroelectric Project in Oconto County, Wisconsin. The purpose of the survey is to inventory all purple loosestrife growing within the project boundaries. The survey was conducted using a boat on project waters and by land on project owned property.

Weather conditions at the time of the survey were hazy and warm with a light wind creating fair conditions for the survey. During the survey no purple loosestrife (PL) was located within the project boundary. The 2014 findings are consistent with the 2013 findings.

For the purple loosestrife survey, the Oconto Falls Upper Project Boundary was divided into four distinctly different areas; **the tailrace** (from the dam to 500' immediately downstream of the dam on the east end of the impoundment), **the main basin** (from the dam to 2 miles upstream of the dam where the river narrows), **the headwaters** (from 2 miles upstream of the dam where the river narrows to the western point of the project boundary ~6,000 feet upstream of the Highway 32 bridge), and **outlying project owned lands**.

The tailrace was surveyed on foot and was found to contain no visible purple loosestrife plants.

The main basin was surveyed by boat and was found to contain no visible purple loosestrife plants.

**The headwaters** were surveyed by boat and was found to contain no visible purple loosestrife plants.

The outlying project owned lands were first researched using aerial wetland maps to determine the areas conducive to purple loosestrife growth. These areas were then surveyed on foot and were found to contain no visible purple loosestrife plants.

A comparison of PL quantities from all sites within the Oconto Falls project beginning in 2011 to 2012 resulted in the following;

In 2011 there were a total of six PL sites containing approximately 47 plants versus only four PL sites with only 22 plants in 2012. Of the four sites located in 2012, three contained damage from Galerucella beetles (Cella) and one was undetectable due to its location on private property. In 2013 No PL was located. In 2013 and 2014 no purple loosestrife plants were observed.

At the Oconto Falls project there are approximately eighteen sites where purple loosestrife once existed with the potential that PL has been eradicated.

#### **Eurasian Watermilfoil:**

On August 15, 2014, NEW Hydro, LLC (*Licensee*) performed an inventory of Eurasian Watermilfoil plants (EWM) at the Oconto Falls Upper Project in Oconto County, Wisconsin. The inventory is a requirement of license article 407 for the project. The method of inventory as approved and modified by FERC Order of November 19, 1999 was defined as follows:

"After Eurasian Watermilfoil has developed in mid-July to early August, the inventory should be conducted by boating transects in the impoundment above and below the dam. Number and locations of transects will be determined at the time of the first inventory and appropriately marked on the inventory lake map. A GPS receiver will be used to establish GPS coordinates for the beginning and endpoints of the transects. The person(s) inventorying should visually search areas with depths of 12 feet or less for the dense mats of the plants on and below the water surface. When plants are located, the person(s) inventorying should get close enough to make a positive identification without disturbing the plants or the immediate area around the plants as this could cause them to spread. If necessary, a sample may be taken for identification later. The plant should be inventoried by marking and numbering the location on a lake map along with notes approximating area that they cover, perimeter of bed, mat density, overall mat thickness, and location with reference to the GPS coordinates. Photos and/or videotape will be taken of the largest occurrences".

## Example:

#1 40' X 20'; 3' depth; perimeter N44 $^{\circ}$  52.8925' E88 $^{\circ}$  10.0000' N44 $^{\circ}$  52.8860' E88 $^{\circ}$  10.0000', N44 $^{\circ}$  52.8860' E88 $^{\circ}$  09.9953', N44 $^{\circ}$  52.8925' E88 $^{\circ}$  09.9953'; 50% density; 3' thick; no photo

#2 8' X 10'; 10' depth; N44º 52.9008' E88º 10.0000', N44º 52.8995' E88º 10.0000', N44º 52.8995' E88º 09.9980', N44º 52.9008' E88º 09.9980'; 25% density; 8' thick; photo No. 1

The area to be inventoried shall be that within the Project Boundary as indicated on the Project Boundary map included as Exhibit G of NEW Hydro, Inc. Application for New License for the Oconto Falls Hydroelectric Project FERC Project #2523. The project boundary is shown as the water and shoreline of the impoundment from approximately 6000' upstream of the State Highway 32 Bridge to approximately 500' downstream of the Project dam.



## General Observations - (EWM):

Monitoring for Eurasian Watermilfoil (EWM) at the Oconto Falls Project began in 2000. Data has been collected annually on EWM distribution throughout the project. Eight transects sites, established in 2000 have been sampled annually through 2014 along with annual inspections of project waters where EWM mats/beds are visually located. Details and locations are noted in Appendix A of this report.

Annual reports have shown that EWM has been found growing in the waters of the Oconto Falls project in all survey years. Results of the 2014 survey indicate densities of EWM are slightly reduced but remain consistent with previous surveys.

For the Eurasian Water milfoil survey, the Oconto Falls Upper Project was divided into three areas: the **tailrace** (from the dam to 500' immediately downstream of the dam on the east end of the impoundment), the **main basin** (from the dam to 2 miles upstream of the dam where the river narrows), and the **headwaters** (from 2 miles upstream of the dam where the river narrows to the western point of the project boundary – 6,000 feet upstream of the Highway 32 bridge).

Eurasian Watermilfoil plants were found in the **tailrace** of the Oconto Falls project. An area of established plants was located below the County Highway CC Bridge. The plants were dispersed in a shallow area and were not considered a mat or bed of EWM.

Eight transects were established in the **main basin** in 2000 with sample points at 1.5', 5', and 10' depths. Each sample point of each transect was an 8' circle divided into quadrants. Each quadrant was sampled using a survey rake. If the teeth of the rake contained less than 50% Eurasian Watermilfoil, a rating of (1) was assigned, and if 50% or more, a rating of (2) was assigned. A (0) was used if no EWM was found. In addition, areas of weed growth were searched while skirting the perimeter of the weed beds and shoreline.

EWM was primarily detected at sampling locations with depths less than 5'. The occurrences at 5' depth and less were easily identified without the use of dredging techniques, as the plants had grown to the surface and most had reddish tops.

In past years, some sampling points did not yield any EWM plants, although there may have been some plants floating on the surface and/or growing from the bottom within 25' of the sampling point. In 2002, a column was added to the Survey Transects spreadsheet in "Appendix A" of this report to show these observations.

Since 2000, a total of fourteen mats/beds containing EWM have been identified within the project boundary. No new mats were found in 2013. Mats #1 through #4 were first identified in 2000. Mat #5 was found in 2001. Mats #6 and #7 were found in 2003. Mat #8 was found in 2005. Mats #9 through #11 were found in 2006. Mat #12 was found in 2008. Mats #13 and #14 were found in 2009. All fourteen mats/beds were discovered visually. All of these mats were interspersed with other types of aquatic plants and all of them had Eurasian Watermilfoil densities as noted in the survey comments in "Appendix A" of this



report. Mats #1 through #10 are located in the **main basin**. The **headwaters** contain mats #11, #12, #13, and #14.

Each year during the survey the furthest upstream infestation of EWM is noted in the annual report. Since the baseline was established in 2000, EWM has made a constant progression upstream. In 2013 and 2014, the furthest upstream infestation that could be located was at the upstream end of mat# 13.

The 2014 EWM weed densities, appear to have decreased slightly from 2013 but did not reduce the level observed in 2012. Mat size, in 2014, has shown a modest decrease with the most notable decrease observed with mat# 6 no longer being connected to mat #8.

Floating segments of EWM were found during the survey, so special attention was paid to each of the boat landings. All public boat landings located within the project boundaries were inspected for EWM and all were found to have individual strands or broken fragments of EWM on the launch ramp. The canoe takeout located near the Highway 32 Bridge was checked and no EWM was found at that location.

#### Miscellaneous:

Previous to initially launching into Oconto Falls Upper Hydroelectric Project waters, the survey boat and survey equipment were treated with a bleach solution to prevent the possible spread of invasive species from other locations. After the survey was completed and before launching into other waters, the survey boat and survey equipment were again treated with a bleach solution. Weeds were removed from boat and trailer after each recovery and before leaving the boat launch and any water remaining in the hull was drained.



## **APPENDIX A**

**EWM Survey Results and Maps** 

**Eurasian Watermilfoil Survey - Transects** 

Oconto Falls Upper #2523 9/10/2014 Project: Crew: Date:

**WGS 84** 1 of 1 Datum: Page:

# \*

Eurasian watermilfoil growing from bottom within 25' of sample point = Eurasian watermilfoil floating within 25' of sample point =

	_	_				_	_	_			_	_			_			_			_		_		,		_	
	Within 25'	#	#	*		*#	*	*#	*#	#	#			#	#	*#	#	#	#	#	#	#	#		#	#		
	Rating	4	4	0	4	5	0	0	9	1	9	0	2	3	0	0	9	0	2	3	0	0	0	0	0	0	0	
1<50% 2≥50%	Quad 4	1	1	0	1	1	0	0	1	0	1	0	1	1	0	0	2	0	0	1	0	0	0	0	0	0	0	
1<50% 2≥50%	Quad 3	1	1	0	1	1	0	0	1	1	2	0	1	0	0	0	1	0	1	1	0	0	0	0	0	0	0	
1<50% 2≥50%	Quad 2	1	1	0	1	2	0	0	2	0	2	0	0	1	0	0	1	1	1	0	0	0	0	0	0	0	0	
1<50% 2≥50%	Quad 1	1	1	0	1	1	0	0	2	0	1	0	0	1	0	0	2	0	0	1	0	0	0	0	0	0	0	
	Longitude	W088°09.4319'	W088°09.4323'	W088°09.4185'	W088°09.2612'	W088°09.2024'	W088°09.1844'	W088°09.1567	W088°09.1521'	W088°09.1324'	W088°09.1117'	W088°09.0910'	W088°09.0412'	W088°09.0244'	W088°08.9994'	W088°09.0258'	W088°09.0274'	W088°09.0359'	W088°09.2443'	W088°09.2434'	W088°09.2402'	W088°09.4100'	W088°09.4100'	W088°09.4083'	W088°09.6999'	W088°09.6999'	W088°09.6960'	
	Lattitude	N44°52.7195'	N44°52.7343'	N44°52.7684'	N44°52.6616'	N44°52.7357'	N44°52.7716'	N44°52.6085'	N44°52.6269'	N44°52.6540'	N44°52.6842'	N44°52.7166'	N44°52.5970'	N44°52.6102'	N44°52.6183'	N44°52.8430'	N44°52.8408'	N44°52.8383'	N44°52.8919'	N44°52.8890'	N44°52.8808'	N44°52.8467'	N44°52.8433'	N44°52.8400'	N44°52.7965'	N44°52.7952'	N44°52.7887'	
	GPS point	OFUP TS01A	OFUP TS01B	OFUP TS01C	OFUP TS02A	OFUP TS02B	OFUP TS02C	OFUP TS03A	OFUP TS03B	OFUP TS03C	OFUP TS03D	OFUP TS03E	OFUP TS04A	OFUP TS04B	OFUP TS04C	OFUP TS05A	OFUP TS05B	OFUP TS05C	OFUP TS06A	OFUP TS06B	OFUP TS06C	OFUP TS07A	OFUP TS07B	OFUP TS07C	OFUP TS08A	OFUP TS08B	OFUP TS08C	
	Depth	1.5	5	10	1.5	5	10	1.5	5	10	2	10	1.5	2	10	1.5	5	10	1.5	5	10	(a) 1.5	Ι.	(a) 10	1.5	5	10	
	Transect #	-			2				ю					4			2			9			7			ω		

 $14-11-26_0$  OFUP\_FINAL PURPLE LOOSETRIFE-EURASIAN WATERMILFOIL INVENTORY (a) = offset of ~75ft east from original transect due to willow tree fallen in water - lattitude and longitude reflect offset

## **APPENDIX B**

**Agency Correspondence** 

### Jane Manibusan

From:

Jane Manibusan

Sent:

Wednesday, October 01, 2014 2:50 PM

To:

cheryl.laatsch@wisconsin.gov

Cc:

Jereme Klassy

Subject:

Emailing: 14-09-25\_ECRE\_OFUP\_Draft 2014 PL&EWI Rept, 14-09-23\_ECRE\_APLT\_Draft

2014 Invasive Species Monitoring Rept

**Attachments:** 

14-09-25\_ECRE\_OFUP\_Draft 2014 PL&EWI Rept.pdf; 14-09-23\_ECRE\_APLT\_Draft 2014

Invasive Species Monitoring Rept.pdf

Dear Ms. Laatsch;

On behalf of North East Wisconsin (NEW) Hydro, LLC (Licensee), Eagle Creek Renewable Energy, is hereby submitting to your attention the following 2014 Draft License Article Reports for said projects as follows:

- 14-09-23\_ECRE\_APLT\_Draft 2014 Invasive Species Monitoring Rept Appleton Middle Dam FERC P-7264, License Article 405 Draft Invasive Species 2014 Monitoring Report
- 14-09-25\_ECRE\_OFUP\_Draft 2014 PL&EWI Rept
   Oconto Falls Upper FERC P-2523, License Article 407
   Draft 2014 Purple Loosestrife & Eurasian Watermilfoil Inventory

The report is requirement of the Federal License pursuant to Article 405 and Article 407. If you have any questions please feel free to contact Mr. Jereme Klassy in the Eagle Creek Renewable Energy Midwest office at (920) 293-4628 ext. 322 or by email at Jereme.klassy@eaglecreekre.com.

Note: To protect against computer viruses, e-mail programs may prevent sending or receiving certain types of file attachments. Check your e-mail security settings to determine how attachments are handled.

### Jane Manibusan

From: Jereme Klassy

Sent: Friday, November 14, 2014 1:43 PM

To: 'Laatsch, Cheryl - DNR (Cheryl.Laatsch@Wisconsin.gov)'; Nick\_Utrup@fws.gov

Cc: Jane Manibusan

Subject: FW: Emailing: 14-09-25\_ECRE\_OFUP\_Draft 2014 PL&EWI Rept, 14-09-23

\_ECRE\_APLT\_Draft 2014 Invasive Species Monitoring Rept

Attachments: 14-09-25\_ECRE\_OFUP\_Draft 2014 PL&EWI Rept.pdf; 14-09-23\_ECRE\_APLT\_Draft 2014

Invasive Species Monitoring Rept.pdf

I am forwarding this email as a reminder that we are awaiting comments regarding the attached Invasive species monitoring reports. My apologies to Nick as I see that his name was omitted by mistake from this original draft submittal by email. If you have any comments related to the attached draft reports please make them as soon as possible so we can prepare the final report and attach your comments. If you have no comments or do not wish to comment a simple email stating "no comments" will be sufficient. Thanks for your help.

Jereme Klassy Compliance Manager

116 State Street
Neshkoro, WI 54960 USA
(920) 293-4628 ext. 322
Jereme.klassy@eaglecreekre.com

----Original Message-----From: Jane Manibusan

Sent: Wednesday, October 01, 2014 2:48 PM

To: cheryl.laatsch@wisconsin.gov

Cc: Jereme Klassy

Subject: Emailing: 14-09-25\_ECRE\_OFUP\_Draft 2014 PL&EWI Rept, 14-09-23\_ECRE\_APLT\_Draft 2014 Invasive Species

**Monitoring Rept** 

Dear Ms. Laatsch;

On behalf of North East Wisconsin (NEW) Hydro, LLC (Licensee), Eagle Creek Renewable Energy, is hereby submitting to your attention the following 2014 Draft License Article Reports for said projects as follows:

- 14-09-23\_ECRE\_APLT\_Draft 2014 Invasive Species Monitoring Rept Appleton Middle Dam FERC P-7264, License Article 405 Draft Invasive Species 2014 Monitoring Report
- 14-09-25\_ECRE\_OFUP\_Draft 2014 PL&EWI Rept
   Oconto Falls Upper FERC P-2523, License Article 407
   Draft 2014 Purple Loosestrife & Eurasian Watermilfoil Inventory

### Jane Manibusan

From:

Utrup, Nick < nick\_utrup@fws.gov>

Sent:

Friday, November 14, 2014 2:02 PM

To:

Jereme Klassy

Cc: Subject: Laatsch, Cheryl - DNR (Cheryl.Laatsch@Wisconsin.gov); Jane Manibusan Re: FW: Emailing: 14-09-25\_ECRE\_OFUP\_Draft 2014 PL&EWI Rept, 14-09-23

ECRE APLT Draft 2014 Invasive Species Monitoring Rept

Thanks for providing the draft reports Jereme.

I will add these to my file but will not be providing comments.

Nick

Nick Utrup U.S. Fish and Wildlife Service Twin Cities Field Office 4101 American Boulevard East Bloomington, MN 55425

Office:

612-725-3548 Ext. 2204

Cell: FAX: 952-567-9616 612-725-3609

Email:

Nick Utrup@fws.gov

On Fri, Nov 14, 2014 at 1:42 PM, Jereme Klassy < jereme.klassy@eaglecreekre.com > wrote:

I am forwarding this email as a reminder that we are awaiting comments regarding the attached Invasive species monitoring reports. My apologies to Nick as I see that his name was omitted by mistake from this original draft submittal by email. If you have any comments related to the attached draft reports please make them as soon as possible so we can prepare the final report and attach your comments. If you have no comments or do not wish to comment a simple email stating "no comments" will be sufficient. Thanks for your

help.

Jereme Klassy Compliance Manager

116 State Street
Neshkoro, WI 54960 USA
(920) 293-4628 ext. 322
Jereme.klassy@eaglecreekre.com

----Original Message-----From: Jane Manibusan

Sent: Wednesday, October 01, 2014 2:48 PM

To: cheryl.laatsch@wisconsin.gov

Cc: Jereme Klassy

## Jereme Klassy

-aatsch, Cheryl - DNR <Cheryl.Laatsch@wisconsin.gov> From:

Tuesday, November 18, 2014 10:25 AM

Sent:

lereme Klassy

Hudak, Andrew J - DNR; McLennan, Robin - DNR

FW: Emailing: 14-09-25\_ECRE\_OFUP\_Draft 2014 PL&EWI Rept, 14-09-23\_ECRE\_APLT\_Draft 2014 Invasive Species Monitoring Rept

DRAFT DNR comments

Subject:

ö ë

Hi Jereme - Here are the comments that I received. Please let Andy and I know if you have any questions.

# Middle Appleton-

- 1. The methodology was not provided in the report. Please include this information in future reports. We assume it is in compliance with the license
- 2. During the conditions of the survey there were extremely poor conditions to visually inspect for EWM or Zebra mussels and provide any meaningful report on their density or distribution. Selecting a different day with hopefully better conditions or using a rake along various transects could provide more information about EWM and Zebra mussels' distributions.
- 3. This is a project that could easily use the DNR AIS reporting forms and upload information into SWIMS.
- 4. It would be helpful if the licensee could at minimum "informally" report other significant AIS species and report them into SWIMS even if the report is did not
- 5. For this location, there is no meaningful purpose to report on zebra mussels but it is important that the licensee monitor the mussels collected to watch for other AIS species such as quagga mussels or Asiatic Clams, etc... This should also be true for shore land PLS survey and EWM surveys. If no meaningful data significant AIS that could constitute a new occurrence. (This will help our all of our partners to address the AIS issues that encompass this impoundment.) analysis or management is slated to occur we continue to advocate for monitoring and reporting of AIS that encompass all potential new occurrences of

## Oconto Falls

- 1. The monitoring of EWM and PLS has yielded a good analysis of EWM expansion and growth.
- 2. We would like your informal participation with monitoring of Flowering Rush within the Oconto Falls project area as it reports on EWM and PLS.
- 3. We would like your informal participation with using the AIS observation and tracking sheet and uploading all monitoring data and reports into SWIMS. If you are interested in partnering with us on informal reporting of AIS, please let me know.

We are committed to service excellence.

Visit our survey at http://dnr.wi.gov/customersurvey to evaluate how I did.

Cheryl Laatsch

Statewide FERC Coordinator - Watershed Bureau/Water Division Wisconsin Department of Natural Resources

N7225 Highway 28, Horicon WI 53032

Phone: 920-387-7869

Fax: 920-387-7888

Cheryl.laatsch@wisconsin.gov

dnr.wi.gov

We are committed to service excellence.

Visit our survey at http://dnr.wi.gov/customersurvey to evaluate how I did.

Andrew Hudak

Phone: (920) 662-5117

Andrew.hudak@wisconsin.gov

----Original Message----

From: Laatsch, Cheryl - DNR

Sent: Monday, November 17, 2014 1:45 PM

To: Hudak, Andrew J - DNR

Subject: FW: Emailing: 14-09-25\_ECRE\_OFUP\_Draft 2014 PL&EWI Rept, 14-09-23\_ECRE\_APLT\_Draft 2014 Invasive Species Monitoring Rept

Hi Andy - I sent these reports over to you on Oct 9th. I am not able to locate your comments. Please send me comments you may have ASAP, as the timeline has expired. thanks

We are committed to service excellence.

Visit our survey at http://dnr.wi.gov/customersurvey to evaluate how I did.

Cheryl Laatsch

Phone: 920-387-7869