



July 24, 2018

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:

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 2017, 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. No colonies were found on OEC-owned land. If colonies are found on private land, OEC is responsible for contacting the property owners and encouraging the owners to remove and destroy the plants.

On July 23, 2018, OEC employee Jacob Yatso, along with volunteers Al and Jan Stranz, 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. Their survey sheet is included as Exhibit II (a), their map is Exhibit II (b), and a zoomed in, more accurate map was also attached as Exhibit II (c). 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 the FERC.

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

Sincerely,

Kent Lyng
VP - Engineering

Enclosures: Exhibits

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

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.

Exhibit II (a)

Purple Loosestrife Survey Data Sheet

Time spent surveying: 2.5 hours Page __ of __

Survey date: 7-23-18	County: Oconto	Name(s) of waterbody(ies): Machikanee Flowage
Volunteer: Jacob Yatso	Address: Oconto Electric Cooperative P.O. Box 168 - Oconto Falls, WI 54154	Phone/e-mail: 920-671-4420 jyatso@ocontoelectric.com
Volunteer: Jan Stranz	Address: 7011 Burdosh Road Abrams, WI 54101	Phone/e-mail: 920-826-5360
Volunteer: Al Stranz	Address: 7011 Burdosh Road Abrams, WI 54101	Phone/e-mail: 920-826-5360

[illegible]

SAMPLE

Mail this data sheet and your map to

WWA, Purple Loosestrife Survey Data, 222 South Hamilton Street, Suite 1, Madison, Wisconsin 53703

Exhibit II(b)

dozen plants on edge of cattails

2

Lat: 44.85387° N
Lon: 88.08520° W

3

Lat: 44.85214° N
Lon: 88.08162° W

Next to mowed area

To the West of dock

1

Lat: 44.85253° N
Lon: 88.06184° W

Oconto County Land Information Systems makes every effort to produce the most current and accurate information possible. No warranties, expressed or implied, are provided for the data provided, its use, or its interpretation. Oconto County does not guarantee the accuracy of the material contained herein and is not responsible for any misuse or misrepresentation of this information or its derivatives. Oconto County parcel maps are for tax and real property listing purposes only and do NOT represent a survey. The tax parcel maps are compiled from official records, including survey plats and deeds, but only contain the information required for Oconto County business. You should always use the original recorded documents for legal or survey information.

Oconto County GIS

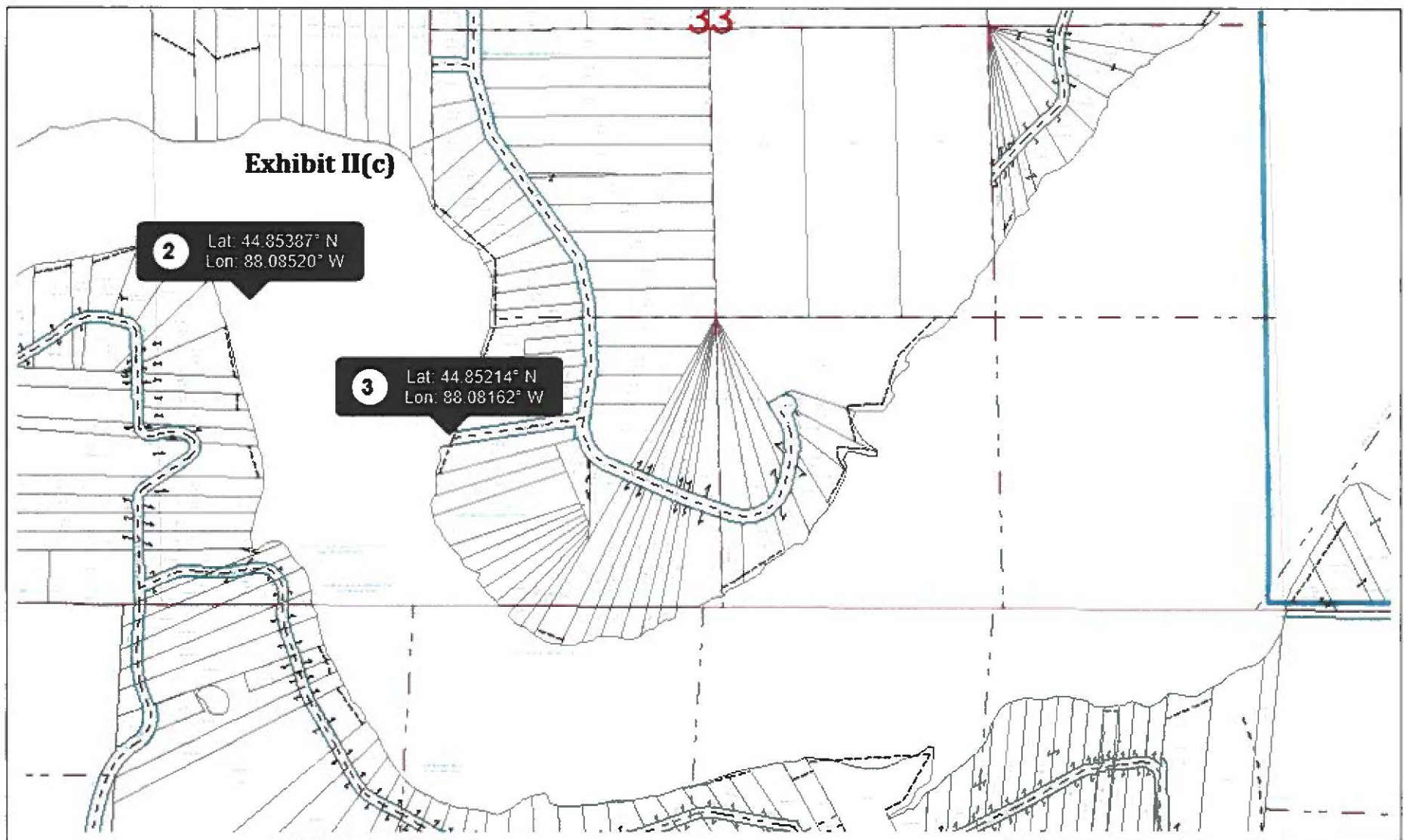
TextBox1



SCALE: 1" = 1296'



Print Date: 7/24/2018



Oconto County Land Information Systems makes every effort to produce the most current and accurate information possible. No warranties, expressed or implied, are provided for the data provided, its use, or its interpretation. Oconto County does not guarantee the accuracy of the material contained herein and is not responsible for any misuse or misrepresentation of this information or its derivatives. Oconto County parcel maps are for tax and real property listing purposes only and do NOT represent a survey. The tax parcel maps are compiled from official records, including survey plats and deeds, but only contain the information required for Oconto County business. You should always use the original recorded documents for legal or survey information

Oconto County GIS

TextBox1



SCALE: 1" = 648'



Print Date: 7/24/2018



July 24, 2018

Dear Machickanee Area Property Owner and OEC Member:

Annually since 2003, Oconto Electric Cooperative (OEC) has conducted a survey by water of the shoreline of the Machickanee Flowage. This survey is a requirement of OEC's 30-year operating license for the Stiles hydroelectric plant on the Machickanee Flowage and is part of a process to ensure that the environment around the hydro project is protected and enhanced for years to come. During the survey, we monitor and track the occurrence of a non-native plant known as purple loosestrife.

Though beautiful to view, purple loosestrife is an exotic, invasive plant species. Left unchecked, it will gradually overrun native vegetation and will cause deficiencies in the ecosystem. It especially likes moist soil, so it's commonly found near waterways and in roadside ditches. Wisconsin state law bans the sale, distribution and cultivation of purple loosestrife. This year's survey of the Machickanee Flowage shoreline was conducted on July 23, 2018 by an OEC employee and two volunteers. During the survey, occurrences of purple loosestrife were located and identified.

The purpose of this letter is to notify you, the approximate landowner, that purple loosestrife was found 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 is very important in reducing the plant's ability to spread. If you would like assistance in removing it, please contact OEC 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 black ink that reads "Kent A. Lyng".

Kent A. Lyng
VP - Engineering

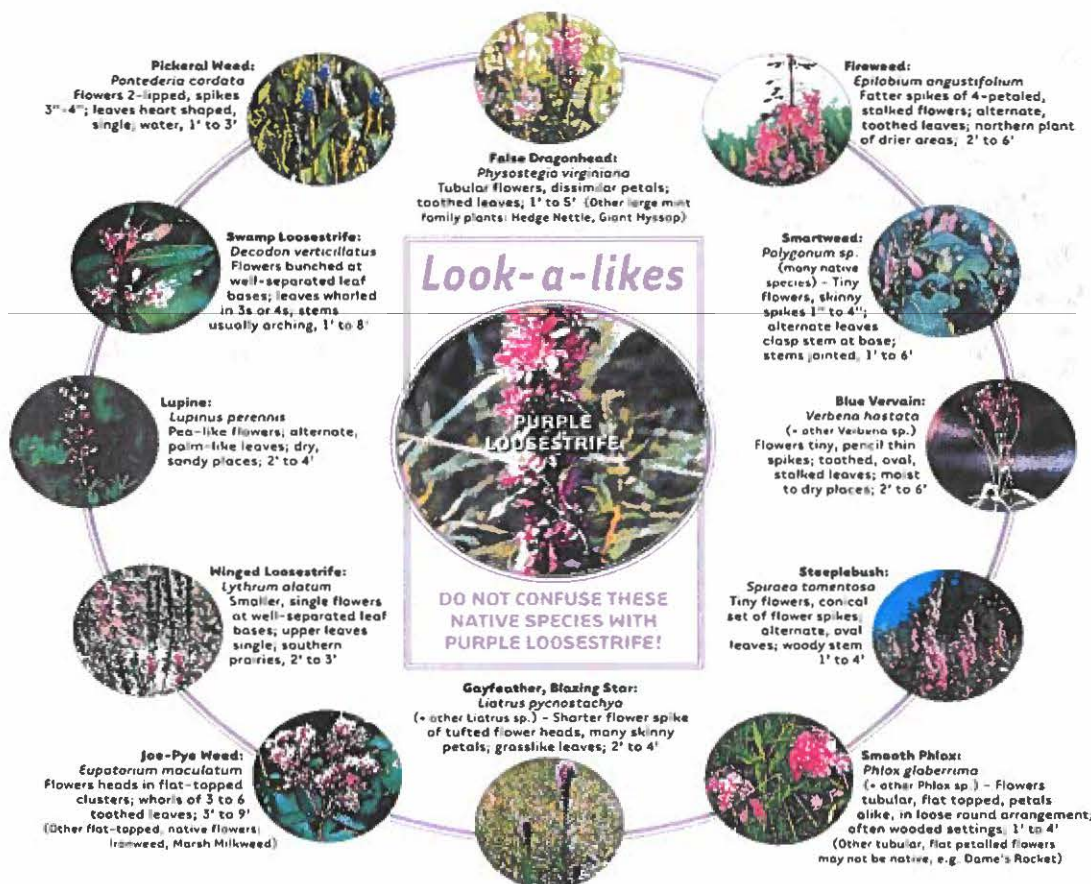
Enclosure

EXHIBIT III (b)

Why Should Purple Loosestrife Concern You?

- Plant diversity in wetlands declines dramatically and many rare and endangered plants found in our remaining wetlands are threatened.
- Most wetland animals that depend on native plants for food and shelter decline significantly. Some species, such as Baltimore butterflies, marsh wrens, and least bitterns may disappear entirely.
- Recreational uses of wetlands for hunting, trapping, fishing, bird watching and nature study decrease. Thick growth of purple loosestrife may impede boat travel.
- Wetlands may store and filter less water.
- Millions of dollars spent to preserve wetlands would be wasted.

Photo credits: Dennis Woodland, Ase Thorenson, Clifford Drake, Mary Welford, Kitty Kahout, Paul Berry, Meral Black, Dan Woodland, Robert Beilman and Emma Judreine



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 1/2" to 1" across, with 5 or 6 petals.

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

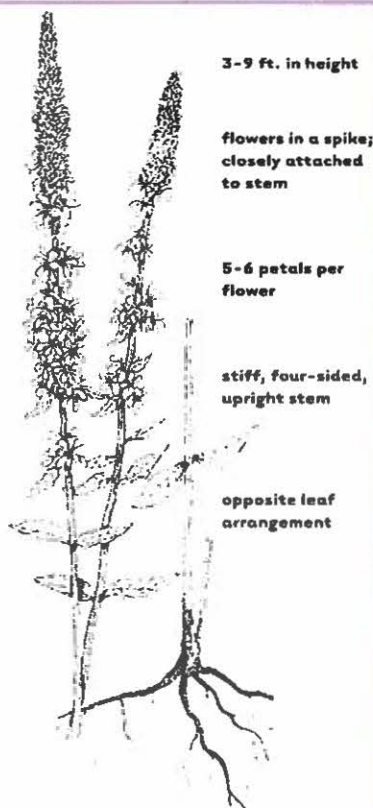
Leaves: Variable, usually opposite, but sometimes alternate or bunched in whorls. Linear shaped; smooth edged, sometimes hairy, attached directly (no stalks) to stems with each pair at 90 degrees to those above and below. No noticeable odor.

Roots: 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 multi-sided stems and brilliant purple spikes that turn into candlesticks covered with many small, oval pods.



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 to the near total exclusion of most other vegetation. Once established, it literally shades everything else out. Loosestrife has spread rapidly in Wisconsin over the last 20 to 30 years.

FOR MORE INFORMATION:

On invasive species, including purple loosestrife, access the Department of Natural Resources web site (search for purple loosestrife) at:

www.dnr.wi.gov/org/caer/ce/invasives

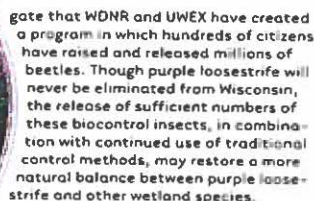
Contact your region's WDNR Aquatic Plant Management Coordinator for herbicide permits. For purple loosestrife biocontrol information contact the Wisconsin Purple Loosestrife Biocontrol Program at: 1350 Femrite Dr., Monona WI 53716, (608) 221-6349, or email: brock.woods@dnr.state.wi.us

PURPLE Loosestrife

(*Lythrum salicaria* & *Lythrum virgatum*)



A MAJOR THREAT TO WISCONSIN'S WETLANDS AND WATERWAYS



HOW DOES PURPLE LOOSESTRIFE SPREAD?

All sunny wetlands, including temporarily moist fields and roadside ditches, are susceptible to purple loosestrife invasion. A new infestation usually starts with a few transported seeds that grow into pioneering plants. These quickly build up a large seed bank in the soil. Disturbances such as water drawdowns accelerate the invasion by providing open substrate and sun for seed germination, and can quickly help fill the wetland with loosestrife.

BIOLOGICAL CONTROL: A LONG-TERM SOLUTION

Traditional control methods can provide up to 95% control of loosestrife on a site, but these methods are often labor intensive, expensive and disruptive. Biological control (biocontrol) is necessary for statewide control.

Biocontrol uses one organism to control another. A search of Europe in the late 1980s found insects that feed exclusively on and control the purple loosestrife there. After careful research to identify the best and safest species to use, four insect species were imported to help control the plant here. Purple loosestrife biocontrol in Wisconsin began in 1994 with the release of two beetle species that eat its leaves. Root and flower feeding weevils came a year later. Monitoring for almost 10 years has ensured that these insects pose no threat to either our crop plants or native flora. Field research has also shown that the insects reduce both the height and seed output of our purple loosestrife, often enabling other plants to regain control of a wetland in a few years. As a wetland's loosestrife diminishes, the control insects fly to find new loosestrife sites elsewhere.

The two foliage beetles give the best control effect and are so easy to propa-

1 LEARN TO IDENTIFY PURPLE LOOSESTRIFE. Distinguish it from native look-a-likes by using the photos, or get a good plant book. (Note that several valuable native yellow-flowered plants in the genus *Lysimachia* are also known as "loosestrife.")

2 REPORT PURPLE LOOSESTRIFE INFESTATIONS. Check the web site map to see if your sites were previously reported. If not, or if they have changed substantially, send the new site information to the WDNR using their Watch Form found online or send information to brock.woods@dnr.state.wi.us, the Wisconsin Purple Loosestrife Biocontrol Program.

③ **HELP PREVENT THE SPREAD OF PURPLE LOOSESTRIFE:**

- ✓ Clean off equipment, boats and trailers, clothing and footwear used in infested areas before moving into uninfested areas.
- ✓ Encourage your local highway department to stop mowing the plant. Cut-up stem pieces will root when spread to new moist ground, and mowing can spread its seeds along the roadway.
- ✓ Help curb local use of the plant. State law bans the sale, distribution or cultivation of purple loosestrife in Wisconsin: \$100 fine per violation [sec. 23.235, p. 3]. The law includes all cultivars, hybrids and varieties of *Lythrum salicaria* and *L. virgatum*. Report sales of the plant to the Wis. Dept. of Agriculture, Trade and Consumer Protection at (608) 224-4571. Work with local government to curb local cultivation or distribution. Help educate local gardeners about invasive plants and encourage them to use native plants (see photos).
- ✓ Watch for pioneering loosestrife plants and remove them immediately, especially from areas otherwise free of loosestrife.

4 HELP ELIMINATE ESTABLISHED LOOSESTRIFE IN YOUR AREA
Citizen action is critical, as many infestations are on private property. Choose traditional or biological control methods or use them in combination.

5 TEACH ABOUT INVASIVE SPECIES AND CITIZEN ACTION

Use See Cella Chow: A Purple Loosestrife Biocontrol Manual for Educators, found at www.dnr.wi.gov/org/es/science/publications/ss981_2003.htm



As shown in the photos biological control can be highly effective in controlling purple loosestrife.

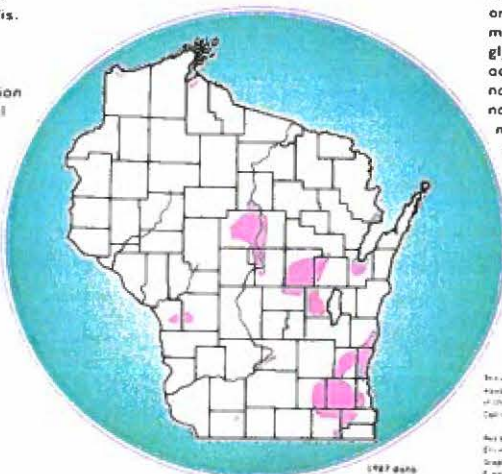
DISTRIBUTION OF PURPLE LOOSESTRIPE IN WISCONSIN

Purple loosestrife is most common in the Eastern U.S. where it first appeared in North America in the early 1800s. It is now found in all 50 states and most Canadian provinces.

It moved into Wisconsin after 1900, and is now in all 72 counties (see map). However, most infestations here are still small and it probably still occupies less than 10 percent of our total wetland acreage. Thus, there is still time to control purple loosestrife here.

A web site map with up-to-date information on purple loosestrife in Wisconsin is found at:

www.glifwc-maps.org



- ☐ Mild infestation
☐ Moderate infestation
☒ Heavy infestation

CONTROL METHODS:

BIOLOGICAL CONTROL is useful on any site, especially large ones, except where ill-suited to insect success (e.g., with summer flooding) or where loosestrife seeds can easily infest new areas. Combining it with traditional methods may give the best long-term control.

Acquire and distribute enough bio control beetles to control your local purple loosestrife infestation. Propagate beetles at home or school. It's easy and inexpensive. If you can't propagate, collect them from an established beetle site near you, or buy them. A free WDNR permit is required to cultivate loosestrife to raise control beetles.

TRADITIONAL METHODS offer quick control, but require follow-up to catch missed plants and new seedlings, and may be impractical or too expensive on large sites. Avoid site disturbances that expose the loosestrife seed bank. Follow all label instructions when using herbicides. Destroy any removed loosestrife by drying and burning it or placing it in a landfill. Do not compost it. Acquire a free WDNR permit for any herbicide work over water.

- 1 On small sites, gently pull or dig small, young plants, especially in loose, sandy or gravelly soil.
- 2 On small sites, cut loosestrife stems during active growth and immediately apply a glyphosate herbicide (20-40% active ingredient) to the stumps. Use Roundup® or equivalent product on drier sites. Use Rodeo® or equivalent product on plants over water. Cut and treat all stems in a clump if it might have more than one plant.
- 3 On large sites, carefully spray loosestrife foliage with glyphosate or triclopyr herbicides. For sites with mainly broad-leaved plants use glyphosate in a foliar solution (1% active ingredient). Avoid spraying native plants, since glyphosate is non-selective. On sites with many monocots, such as cattails, sedges or grasses, spray with triclopyr, such as Renovate®, in a foliar solution. Triclopyr kills only broad-leaved plants.

There is a growing consensus that the current financial crisis is a result of the failure of the financial system to properly allocate capital. The financial system has become increasingly complex and opaque, and the regulatory framework has failed to keep pace with the changes. This has led to a loss of confidence in the financial system, and a subsequent loss of capital. The financial system is now in a state of crisis, and the regulatory framework must be reformed to prevent a similar crisis in the future.

For an analysis of the sociological effects of the post-1945 boom, see the following: R. K. Rorty, *Capitalism, Community and the Future of the West* (Cambridge, Mass.: Harvard University Press, 1981); S. P. Marquardt, *The New Social Order* (New York: Basic Books, 1982); R. K. Rorty, *The New Social Order* (New York: Basic Books, 1982).



Document Content(s)

FERC Ltr 2018.PDF.....1-1

Exhibit I.PDF.....2-2

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Exhibit III a.PDF.....6-6

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