

February 4, 2019

Kimberly D. Bose, Secretary Federal Energy Regulatory Commission 888 First Street, N.E. Washington, DC 20426

RE: Flambeau Upper FERC Project Number 2640

Flambeau Hydro LLC

Final Report 2019 Purple Loosestrife Inventory Report

Dear Ms. Bose:

On behalf of Flambeau Hydro LLC, "Flambeau" (Licensee), Renewable World Energies, LLC (RWE) is submitting a copy of the *Final Report 2019 Purple Loosestrife Inventory Report* for the Flambeau Upper Hydroelectric Project. The report is a requirement of Flambeau's Federal license pursuant to article 412. Monitoring was conducted on August 14, 2019. No out of the ordinary issues were encountered and no Purple Loosestrife was observed. The draft report was sent to the agencies by an attachment to an e-mail on November 26, 2019 for review and comment. No comment was received pertaining to the Flambeau Upper report from the DNR, though a comment did reference the Flambeau Lower (P-2421) report. No comments have been received from the USFWS. The next scheduled monitoring event will be conducted in 2020.

If you have any questions concerning this submittal, please contact Brian Kreuscher at the Renewable World Energies, LLC offices @ 855-994-9376 Ext 230. He can also be reached by e-mail at bkreuscher@rwehydro.com.

Corporate Office P.O. Box 264 100 S. State Street Neshkoro, WI 54960 Fax: 920-293-4100

Phone: 855-99HYDRO (855-994-9376) www.renewableworldenergies.com Administrative Office 1001 Stephenson Street Norway, MI 49870 Fax: 906-563-9344



Sincerely,

Renewable World Energies, LLC Agent for Licensee

Gillow For Mr. Jason Kreuscher Vice President

Attachment:

Flambeau Upper Final Purple Loosestrife Inventory Report

Correspondence

Cc:

Ms. Cheryl Laatsch, WDNR

Mr. Nick Utrup, USFWS

for
Flambeau Upper Hydroelectric Project
FERC Project #2640
Flambeau Hydro, LLC
Price County, Wisconsin

Submitted by:



429 River Lane, P.O. Box 27 Amasa, Michigan 49903 Phone: 906-822-7889

Summary of Purple Loosestrife Inventory for Flambeau Upper Hydroelectric Project, FERC #2640

On July 24, 2019, White Water Associates, Inc. performed an inventory of purple loosestrife at the Flambeau Upper Project. The method of inventory approved and modified by a Federal Energy Regulatory Commission (FERC) Order (June 18, 2003) was defined as follows:

While purple loosestrife is blooming in mid-July to early August, the inventory should be conducted using a boat to survey the impoundment above the dam within the Project Boundary and on foot or by boat below the dam within the Project Boundary. County wetland maps may be used to determine other areas where Purple Loosestrife could be found on lands owned by Flambeau Hydro, LLC (FHLLC) within the Project Boundary. Lands owned by FHLLC within the Project Boundary 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 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 plants should be inventoried by marking and numbering the location on a project 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.

2019 Observations

The Flambeau Upper Project boundary was divided into three different areas; *the impoundment* (from just downstream to the last rapids before the impoundment to the dam), *the power canal/bypassed reach* (the power canal from the dam to the powerhouse, and the bypassed reach area from the dam to the single lane service bridge just upstream of the HWY 182 bridge), and *the tailrace* (from the single lane service bridge just upstream of the HYW 182 bridge to the HWY 182 bridge).

The impoundment was surveyed by boat and no purple loosestrife plants were found.

The power canal/bypassed reach was surveyed on foot no purple loosestrife plant was found.

The tailrace was surveyed by boat and no purple loosestrife plants were observed.

Appendix A provides tables of historical purple loosestrife data as well as observations made in 2019. Appendix B provides scans of field data sheets.

Appendix A Tables

Table 1. GPS points for purple loosestrife inventory at Flambeau Upper, FERC#2640.						
GPS Point	Latitude	Longitude	Plant	Stand	Comments	
	Lamae		Height	Area	Comments	
FLUPPL001	45.94678	-90.43405	N/A	N/A	2002-first observed. 15-25 plants. 2003-discovered plants were not purple loosestrife but	
					winged loosestrife. 2004-plants removed.	
					2007-reoccurance of plants.	
					2008-2015- no plants observed.	
					2016-no plants observed.	
					2017-no plants observed.	
					2018-no plants observed	
					2019- no plant observed.	
	45.93593	-90.44344	N/A	N/A	2006-first observed.	
					2007-plants observed.	
					2008-2015-no plants observed.	
FLUPPL002					2016-no plants observed.	
					2017-no plants observed.	
					2018-no plants observed.	
					2019- no plant observed.	
	45.93397	-90.44525	3'	1'x1'	2016-first observed. 1 plant was observed and pulled	
FLUPPL003 (FLUP PLA)					2017-1 plant observed and removed.	
					2018- no plant observed.	
					2019- no plant observed.	

Appendix B Data Sheets

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FW: Crowley (P-2473) Pixley (P-2395) Upper (P-2640) Lower (P-2421) 2017 Purple Loosestrife Draft Reports

Laatsch, Cheryl - DNR < Cheryl. Laatsch@wisconsin.gov>

Thu 12/5/2019 11:23 AM

To: Brian Kreuscher < bkreuscher@rwehydro.com>

Cc: Mushel, Joelle A - DNR < Joelle. Mushel@wisconsin.gov>

Hi Brian -

FERC 2421 Flambeau Lower has a single location of PL (Data Point FLLWPL004.) This seems like this is the second year where it was too big to hand pull. We are asking that you go plan ahead of time to have proper tools and clippers to cut the plant and prevent the seeds from spreading. Small stands of plants should be removed.

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
Bureau of Environmental Analysis and Sustainability
Wisconsin Dept of Natural Resources
N7725 Hwy 28
Horicon WI 53032
(T) 920-387-7869 (Fax) 920-387-7888
Cheryl.laatsch@wisconsin.gov



From: Wirt, Alan W - DNR <Alan.Wirt@wisconsin.gov>

Sent: Monday, December 02, 2019 10:04 AM

To: Laatsch, Cheryl - DNR < Cheryl.Laatsch@wisconsin.gov>; Mushel, Joelle A - DNR

<Joelle.Mushel@wisconsin.gov>

Subject: RE: Crowley (P-2473) Pixley (P-2395) Upper (P-2640) Lower (P-2421) 2017 Purple Loosestrife

Draft Reports

Cheryl

Thank you for your time in this matter.

We are committed to service excellence.

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

Alan W. Wirt

Water Resource Management Specialist Wisconsin Department of Natural Resources

Rhinelander, Wisconsin 54501

Office: 715-365-8905 Cell Phone: 715-892-5413

Email: Alan.Wirt@wisconsin.gov



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

Sent: Friday, November 29, 2019 9:57 AM

To: Wirt, Alan W - DNR < Alan.Wirt@wisconsin.gov >; Mushel, Joelle A - DNR

<Joelle.Mushel@wisconsin.gov>

Subject: FW: Crowley (P-2473) Pixley (P-2395) Upper (P-2640) Lower (P-2421) 2017 Purple Loosestrife

Draft Reports

Hi Al – Please see the email below and the various attachments for the PL reports. Please let me know if you have any concerns or comments or changes. I can have Joelle work with RWE on using the forms to report PL. Comments due Dec 10^{th} .

We are committed to service excellence.

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

Cheryl Laatsch
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Cheryl.laatsch@wisconsin.gov



From: Brian Kreuscher < bkreuscher@rwehydro.com >

Sent: Tuesday, November 26, 2019 8:10 PM

To: Laatsch, Cheryl - DNR < Cheryl.Laatsch@wisconsin.gov; Nick Utrup < nick_utrup@fws.gov>

Subject: Crowley (P-2473) Pixley (P-2395) Upper (P-2640) Lower (P-2421) 2017 Purple Loosestrife Draft

Reports

Cheryl and Nick,

Attached are copies of the Purple Loosestrife Draft Reports for the surveys conducted at Flambeau Upper (P-2640), Flambeau Lower (P-2421), Flambeau Pixley (P-2395) and Flambeau Crowley (P-2473).

Last year there were comments about using a standard reporting form. We didn't get around to discussing using that going forward. This year there were no subjective comments regarding Purple Loosestrife that wasn't pulled. All instances that were found were pulled except a single observance at the Lower project which was too large to pull.

Please return any comments on the draft reports to me within 30 days.

Thanks

Brian Kreuscher

Renewable World Energies Regulatory & Compliance 855-994-9376 x230

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