



Wisconsin Public Service Corporation

700 North Adams Street

P.O. Box 19001

Green Bay, WI 54307-9001

January 13, 2009

FERC Project No. 1979

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

Dear Secretary Bose:

Supplement to the FERC Approved Invasive Species  
Monitoring Plan for the Alexander Hydroelectric Project # 1979

As per the order approving the Invasive Species Monitoring Plan for the Alexander Hydroelectric Project (FERC Project #1979) issued on March 4, 2005. Wisconsin Public Service Corporation (WPSC) is submitting this supplement to the purple loosestrife monitoring plan for the Alexander Hydroelectric Project.

Under the approved plan, WPSC has been documenting the locations and relative populations of purple loosestrife colonies at the Alexander Hydroelectric Project since 2005. The surveys have indicated established purple loosestrife populations throughout the project boundary.

The approved method of control since 2005 has been to cut by hand small colonies of 1 to 5 plants and spray the remaining stems with an appropriate aquatic herbicide. This method of control has shown varying success from year to year and overall has not been proven as an effective control method. The number of colonies noted during surveys has actually been increasing with 72 colonies noted in 2006, 80 colonies in 2007 and 89 colonies in 2008.

Based on the varying success and a remaining established population of purple loosestrife at the Alexander Hydroelectric Project, WPSC is proposing to discontinue the cut by hand and hand pull or spray method of control. WPSC is proposing to control purple loosestrife at the project using biological control through the use of *Galerucella sp.* beetles (beetles). Beetle feeding was observed on some purple loosestrife colonies during the 2008 survey. These beetles have naturally dispersed from other locations. WPSC has not conducted any beetle releases in the area.

The beetles have been proven to be an effective, viable control method for heavy infestations of purple loosestrife in many locations. The Wisconsin Department of Natural Resources (WDNR) has initiated and continues to support raising and releasing of beetles. In a conversation with the WDNR - Purple Loosestrife Control Coordinator, he is aware of 20,000,000 beetles that have been released in the state of Wisconsin, and estimates those beetles are helping to control about 25% of all the purple loosestrife colonies located in the state. And where beetles have been present, purple loosestrife populations have shown a decrease of flowering, seed production and percent coverage. Each study area is different; however, an overall decrease in purple loosestrife populations can be expected.

Studies completed have also shown that the beetles are dependent almost exclusively on purple loosestrife. If purple loosestrife has been controlled in an area, the beetles will either migrate to other purple loosestrife colonies or decrease. It has been the WDNR's experience that the beetle population fluctuates with the purple loosestrife population, thus periodic increases and declines in both populations may be expected over time.

Ms. Kimberly D. Bose  
January 13, 2009  
Page 2 of 2

WPSC submitted a purple loosestrife control plan similar to this proposal to FERC for the Jersey Hydroelectric Project (FERC Project #2476) and Wausau Hydroelectric Project (FERC Project #1999). FERC approved the control plan for these projects on October 23, 2008.

In 2007, approximately 8,000 beetles were released at the Jersey Hydroelectric Project. In July of 2008 WPSC completed a survey of purple loosestrife in the project. WPSC was pleasantly surprised to see how effective the beetles were in controlling the purple loosestrife and the distance beetles dispersed during the first year. When compared to the 2007 survey, loosestrife had been reduced in relative population at 29 of 38 colonies. An estimated 50,000 beetles were released in 2008 and it is anticipated that even greater control will be observed in 2009.

In 2008, approximately 4,000 beetles were released at the Wausau Hydroelectric Project. This was the first year of release completed by WPSC at this project. WPSC will monitor the success of this release in 2009, but anticipates good results.

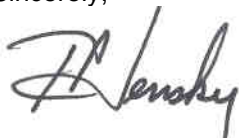
WPSC completed beetle release activities after consultation with the WDNR-Purple Loosestrife Control Coordinator and after obtaining necessary permits. WPSC will continue to work with the WDNR and other local and state organizations in implementation of the beetle release process.

The proposed supplement to the Invasive Species Monitoring Plan for the Alexander Hydroelectric Project is located in Appendix A.

WPSC has provided the information to the WDNR and United States Fish and Wildlife Service (USFWS) for their review. The documentation of consultation is included in Appendix B.

If you have any questions regarding this material, please contact Darrin Johnson at (608) 565-2500.

Sincerely,



Terry P. Jensky  
Vice President - Energy Supply Operations  
Telephone: (920) 433-2900

Enc.

cc: Mr. Howard Giesler, WPSC - PUL  
Mr. Bruce Crocker, WPSC - D2  
Mr. Shawn Puzen, IBS - D2  
Mr. Jamie Nuthals, IBS - D2  
Ms. Pat Grant, FERC

Mr. Gil Snyder, WPSC - D2  
Mr. Bill Bloczynski, WPSC - MERH  
Ms. Joan Johaneck, WPSC - D2  
Ms. Carlisa Linton, FERC

**APPENDIX A**

**ALEXANDER HYDROELECTRIC PROJECT**

**PROPOSED AMENDMENT TO THE INVASIVE  
SPECIES MONITORING PLAN – PURPLE  
LOOSESTRIFE MONITORING PLAN**



**Purple Loosestrife Control Plan for the Alexander Hydroelectric Project**  
**FERC Project # 1979**

**Objective:** To control the spread and reduce the population of purple loosestrife (*Lythrum salicaria*) on the Alexander Hydroelectric Project. Past surveys have indicated that purple loosestrife colonies are established throughout the hydroelectric project.

I. Methods

- A. WPSC will release *Gallerucella sp.* beetles (beetles) as a biological control measure for a period of five (5) years or until each purple loosestrife colony noted during shoreline surveys has an established beetle population. This is provided WPSC can obtain property owner permission on locations not owned in fee.

II. Monitoring

- A. WPSC will conduct annual purple loosestrife surveys of the entire project shoreline area while in bloom, between the months of June and August. Locations of colonies will be documented using a Global Positioning System.
- B. The annual survey will be completed at the Alexander Hydroelectric Project for a period of five years. If after five years, the annual surveys indicate that the spread of purple loosestrife is controlled or the population is reduced, WPSC will reduce the frequency of the surveys to be completed once every three years. The spread of purple loosestrife will be considered controlled if there is documented beetle feeding on all colonies, the colonies are contained or reduced in size or number, or the condition of the plants has deteriorated based on reduced plant size, reduced flowering, and reduced plant vigor.
- C. If the surveys do not demonstrate control of the spread of purple loosestrife, WPSC will consult with the Wisconsin Department of Natural Resources (WDNR) and the U.S. Fish & Wildlife Services (USFWS) on an appropriate monitoring schedule.



III. Documentation

- A. WPSC will provide a report on purple loosestrife populations and on beetle release sites, if applicable, to the WDNR and USFWS no later than October 31 of each year in which a survey or beetle release takes place. The report and any agency comments will be provided to the FERC no later than December 31 of each year in which a survey or beetle release takes place.
- B. The report will include a map of the total project area and informational sheet.
  - a. The map will include relative populations of each colony based on colony size: small colonies (1-5 plants), medium colonies (6-50 plants) and dense colonies (> 50 plants). Each colony observed will be issued a unique number and entered into the WPSC Global Information System.
  - b. Data from each colony will be recorded on an informational sheet. The informational sheet will contain information on documented beetle feeding, the size and number of colonies and general plant condition at each site.

IV. Implementation

Implementation of the amended Purple Loosestrife Control Plan for the Alexander Hydroelectric Project will begin in 2009.

V. Public Awareness

WPSC will ensure that invasive plant information signs are placed at all WPSC owned public access areas in the project boundary.

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**APPENDIX B**

**ALEXANDER HYDROELECTRIC PROJECT**

**DOCUMENTATION OF CONSULTATION**

**LETTER TO WISCONSIN DEPARTMENT OF  
NATURAL RESOURCES**



Wisconsin Public Service Corporation  
700 North Adams Street  
P.O. Box 19001  
Green Bay, WI 54307-9001

December 4, 2008

FERC Project No. 1979

Mr. Scott Watson  
WDNR-Division of Water  
5301 Rib Mountain Drive  
Wausau, WI 54401

Dear Mr. Watson:

**Supplement to the FERC approved Invasive Species Monitoring Plan for the Alexander Hydroelectric Project # 1979**

As per the order approving the Invasive Species Monitoring Plan for the Alexander Hydroelectric Project (FERC Project #1979) issued on March 4, 2005. Wisconsin Public Service Corporation (WPSC) is submitting this supplement to the purple loosestrife monitoring plan for the Alexander Hydroelectric Project.

Under the approved plan, WPSC has been documenting the locations and relative populations of purple loosestrife colonies at the Alexander Hydroelectric Project since 2005. The surveys have indicated established purple loosestrife populations throughout the project boundary.

The approved method of control since 2005 has been to cut by hand small colonies of 1 to 5 plants and spray the remaining stems with an appropriate aquatic herbicide. This method of control has shown varying success from year to year and overall has not been proven as an effective control method. The number of colonies noted during surveys has actually been increasing with 72 colonies noted in 2006, 80 colonies in 2007, and 89 colonies in 2008.

Based on the varying success and a remaining established population of purple loosestrife at the Alexander Hydroelectric Project, WPSC is proposing to discontinue the cut by hand and hand pull or spray method of control. WPSC is proposing to control purple loosestrife at the project using biological control through the use of *Galerucella sp.* beetles (beetles). Beetle feeding was observed on some purple loosestrife colonies during the 2008 survey. These beetles have naturally dispersed from other locations. WPSC has not conducted any beetle releases in the area.

The beetles have been proven to be an effective, viable control method for heavy infestations of purple loosestrife in many locations. The Wisconsin Department of Natural Resources (WDNR) has initiated and continues to support raising and releasing of beetles. In a conversation with the WDNR - Purple Loosestrife Control Coordinator, he is aware of 20,000,000 beetles that have been released in the state of Wisconsin, and estimates those beetles are helping to control about 25% of all the purple loosestrife colonies located in the state. And where beetles have been present, purple loosestrife populations have shown a decrease of flowering, seed production and percent coverage. Each study area is different; however, an overall decrease in purple loosestrife populations can be expected.

Studies completed have also shown that the beetles are dependent almost exclusively on purple loosestrife. If purple loosestrife has been controlled in an area, the beetles will either migrate to other purple loosestrife colonies or decrease. It has been the WDNR's experience that the beetle population fluctuates with the purple loosestrife population, thus periodic increases and declines in both populations may be expected over time.



Mr. Scott Watson  
December 4, 2008  
Page 2 of 2

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In 2007, approximately 8,000 beetles were released at the Jersey Hydroelectric Project. In July of 2008 WPSC completed a survey of purple loosestrife in the project. WPSC was pleasantly surprised to see how effective the beetles were in controlling the purple loosestrife and the distance beetles dispersed during the first year. When compared to the 2007 survey, loosestrife had been reduced in relative population at 29 of 38 colonies. An estimated 50,000 beetles were released in 2008 and it is anticipated that even greater control will be observed in 2009.

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WPSC completed beetle release activities after consultation with the WDNR-Purple Loosestrife Control Coordinator and after obtaining necessary permits. WPSC will continue to work with the WDNR and other local and state organizations in implementation of the beetle release process.

Please review the proposed supplement and provide comment(s) within thirty (30) days of receiving the information. If comment(s) are not received, WPSC will submit the proposed amendment with a response of "no comment" from your agency.

If you have any questions or concerns regarding the above project, please contact me at (608) 565-2500.

Sincerely,



Darrin Johnson  
Environmental Consultant

syx

Enc.

cc: Mr. Bryon Simon - WDNR



**Purple Loosestrife Control Plan for the Alexander Hydroelectric Project**  
**FERC Project # 1979**

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IV. Implementation

Implementation of the amended Purple Loosestrife Control Plan for the Alexander Hydroelectric Project will begin in 2009.

V. Public Awareness

WPSC will ensure that invasive plant information signs are placed at all WPSC owned public access areas in the project boundary.

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**WISCONSIN DEPARTMENT OF NATURAL  
RESOURCES RESPONSE**



**Johnson, Darrin M**

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**From:** Seibel, David A - DNR [David.Seibel@Wisconsin.gov]  
**Sent:** Friday, December 05, 2008 11:33 AM  
**To:** Johnson, Darrin M; Watson, Scott M - DNR  
**Cc:** Avelallemant, Steven - DNR; Vogelsang, Michael T - DNR (FH)  
**Subject:** FW: Supplement to the FERC approved Invasive Species Monitoring Plan for the Alexander Hydroelectric Project # 1979  
**Attachments:** 20081204 Alexander PLS Control Plan WDNR Ltr.PDF

Darrin and Scott,

I have reviewed the following proposal from a fisheries perspective. It looks like a good control plan for PL on Lake Alexander to me.

Dave

 **Dave Seibel**

Fisheries Biologist - Langlade & Lincoln Counties  
Bureau of Fisheries Management  
Wisconsin Department of Natural Resources  
223 East Steinfest Road  
Antigo, WI 54409-2777

(☎) phone: (715) 623-4190 Ext. 3112

(☎) fax: (715) 623-6773

(✉) e-mail: david.seibel@wi.gov

---

**From:** Avelallemant, Steven - DNR  
**Sent:** Friday, December 05, 2008 11:04 AM  
**To:** Seibel, David A - DNR  
**Cc:** Vogelsang, Michael T - DNR (FH); Watson, Scott M - DNR  
**Subject:** FW: Supplement to the FERC approved Invasive Species Monitoring Plan for the Alexander Hydroelectric Project # 1979

Dave,

If you have any comments on this invasive species monitoring plan for Alexander Flowage send to Darrin Johnson at email address below with copy to Scott Watson and me for FYI.

Thanks

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**From:** Johnson, Darrin M [mailto:DMJohnson@integrysgroup.com]  
**Sent:** Friday, December 05, 2008 10:15 AM  
**To:** Watson, Scott M - DNR; Avelallemant, Steven - DNR  
**Subject:** RE: Supplement to the FERC approved Invasive Species Monitoring Plan for the Alexander Hydroelectric Project # 1979

Here you go.

Darrin M Johnson

1/6/2009



Environmental Consultant  
IntegrYS Business Support LLC  
dmjohnson@integrYSgroup.com  
Phone 608-565-2500  
Cell 608-576-5970

*Providing support for IntegrYS Energy Group,  
IntegrYS Energy Services, Michigan Gas Utilities,  
Minnesota Energy Resources, North Shore Gas,  
Peoples Gas, Upper Peninsula Power Wisconsin Public Service, and Wisconsin River Power Company*

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**From:** Watson, Scott M - DNR [mailto:Scott.Watson@Wisconsin.gov]  
**Sent:** Friday, December 05, 2008 10:02 AM  
**To:** Avelallemant, Steven - DNR; Johnson, Darrin M  
**Subject:** RE: Supplement to the FERC approved Invasive Species Monitoring Plan for the Alexander Hydroelectric Project # 1979

Sorry folks - but I deleted the Alexander plan yesterday, so I can't any longer forward it to Steve.

Darrin, would you please send the pdf directly to Steve.

Thanks

---

**From:** Avelallemant, Steven - DNR  
**Sent:** Friday, December 05, 2008 9:30 AM  
**To:** Watson, Scott M - DNR  
**Subject:** RE: Supplement to the FERC approved Invasive Species Monitoring Plan for the Alexander Hydroelectric Project # 1979

Scott,  
attachment not in here. must have replied rather than forwarded.

---

**From:** Watson, Scott M - DNR  
**Sent:** Thursday, December 04, 2008 4:43 PM  
**To:** Johnson, Darrin M  
**Cc:** Avelallemant, Steven - DNR  
**Subject:** RE: Supplement to the FERC approved Invasive Species Monitoring Plan for the Alexander Hydroelectric Project # 1979

Provost and I will look at the Peterwell / Castle Rk plan you submitted and should be able to reply to you with in 30 days.

1/6/2009

I am forwarding the Alexander plan to Steve Avelallemant, Fisheries Supervisor Northern Region, so the local resource staff can review and if needed respond to the plan.

---

**From:** Johnson, Darrin M [mailto:DMJohnson@integrysgroup.com]  
**Sent:** Thursday, December 04, 2008 3:49 PM  
**To:** Watson, Scott M - DNR  
**Subject:** Supplement to the FERC approved Invasive Species Monitoring Plan for the Alexander Hydroelectric Project # 1979

<<20081204 Alexander PLS Control Plan WDNR Ltr.PDF>>  
Scott:

Please find attached a proposed supplement to the FERC approved Invasive Species Monitoring Plan for the Alexander Hydroelectric Project # 1979. Please provide any comments you may have to the plan within 30 days. If you have any questions regarding the proposed supplement please contact me at 608-565-2500 or via email @ dmjohnson@integrysgroup.com.

Thanks,

Darrin M Johnson  
Environmental Consultant  
Integrys Business Support LLC  
dmjohnson@integrysgroup.com  
Phone 608-565-2500  
Cell 608-576-5970

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Minnesota Energy Resources, North Shore Gas,  
Peoples Gas, Upper Peninsula Power Wisconsin Public Service, and Wisconsin River Power Company*

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## LETTER TO U.S. FISH AND WILDLIFE SERVICE





Wisconsin Public Service Corporation  
700 North Adams Street  
P.O. Box 19001  
Green Bay, WI 54307-9001

December 4, 2008

FERC Project No. 1979

Mr. Nicholas J. Utrup  
Fish and Wildlife Biologist-USFWS  
Wisconsin Ecological Services Office  
2661 Scott Tower Drive  
New Franken, WI 54229

Dear Mr. Utrup:

**Supplement to the FERC approved Invasive Species Monitoring Plan for the Alexander Hydroelectric Project # 1979**

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Purple Loosestrife Control Plan for the Alexander Hydroelectric Project FERC Project # 1979

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**U.S. FISH AND WILDLIFE SERVICE DID NOT  
COMMENT**

Document Content(s)

20090113 Alexander PLS Control Plan FERC Ltr.PDF.....1-2

20090113Alexander Appendix A.PDF.....3-20