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FEDERAL ENERGY
REGULATORY COMMISSION

Wisconsin Public Service Corporation
(a subsidiary of WPS Resources Corporation)
700 North Adams Street
P.O. Box 19002
Green Bay, WI 54307-9002

May 28, 2002

FERC Project No. 1984

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

ORIGINAL

Dear Secretary Salas:

Purple Loosestrife (*Lythrum salicaria*) and Eurasian watermilfoil (*Myriophyllum spicatum*)
Monitoring Plans for Project 1984

Per Article 408 of the order issuing new license dated December 7, 2001, Wisconsin Public Service Corporation (WPSC) on behalf of Wisconsin River Power Company (WRPCo) is pleased to submit the Purple Loosestrife (*Lythrum salicaria*) and Eurasian watermilfoil (*Myriophyllum spicatum*) Monitoring Plans for Project 1984. The plans are included under Appendix 1.

Both the U.S. Fish and Wildlife Service and the Wisconsin Department of Natural Resources were consulted with during the preparation of these plans. Documentation of Consultation is included in Appendix 2. During the consultation period, both agencies had comments on the plans. Their comments and WRPCo's responses can be viewed in Appendix 3.

If you have any questions, please do not hesitate to call Rick Moser at (920) 433-2290.

Sincerely,

David W. Harpole
Vice President - Energy Supply

Enclosures

- cc: Ms. Peggy Harding - FERC, Chicago
- Mr. Gil Snyder - WPSC, D2
- Mr. Bill Bloczynski - WPSC, MERH
- Mr. Dennis Maki - WES
- Ms. Joan Johaneck - WPSC, D2
- Mr. Gerry Ganther - WRPCO
- Mr. Rick Moser - WPSC, A2
- Mr. Greg Egtvedt - WPSC, A2

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Purple Loosestrife (*Lythrum salicaria*) and Eurasian watermilfoil (*Myriophyllum spicatum*) Monitoring Plans

Petenwell-Castle Rock Hydroelectric Project -- FERC License No. 1984

Article 408 Within 180 days of the license issuance, the licensee shall, in consultation with the Wisconsin Department of Natural Resources (WDNR) and the U.S. Fish and Wildlife Service (USFWS), develop a plan to monitor purple loosestrife (*Lythrum salicaria*) and Eurasian watermilfoil (*Myriophyllum spicatum*) in project waters. The plan shall include, but is not limited to: (a) the method and frequency of monitoring, (b) a provision to cooperate in the control/elimination of these vegetative species if deemed necessary by the agencies, and (c) documentation of transmission of monitoring data to the agencies.

Purple Loosestrife Monitoring Plan

Objective: To monitor the spread of Purple Loosestrife (*Lythrum salicaria*) on Petenwell-Castle Rock hydroelectric project lands. Purple Loosestrife is an invasive plant that exhibits aggressive characteristics. The plant is becoming increasingly common to wetland areas. Wisconsin River Power Company (WRPCo) agrees to annually monitor the species and cooperate with the agencies to implement measures to control/eliminate the plant if the results of the surveys warrant it.

I. Methods

A. The monitoring methods will include a shoreline survey of the Petenwell-Castle Rock impoundments. The surveys will be conducted by boat and/or on foot to determine a baseline of existing colonies and then continued monitoring to determine the increase of density and abundance of the species. The locations of small, isolated colonies will be documented using a Global Positioning System.

II. Frequency of Survey

A. Starting in 2003, the survey will be taken annually in July or August, depending upon when the plants are in bloom and the weather.

III. Documentation of Existing Colonies

A. The results of the survey will be displayed on a map of the total project area. A copy of the completed map will be provided to the WDNR and the USFWS no later than October 31st every year.

B. The map will indicate relative populations based on the following criteria:

- a. Small Colonies of 1-5 plants
- b. Medium Colonies of 6-50 plants

c. Dense Colonies of >50 plants

- C. Small, isolated purple loosestrife colonies will be documented using a Global Positioning System.

IV. Control of Existing Colonies

- A. Small colonies of 1 to 5 plants will be cut by hand and the remaining stems will be hand pulled or sprayed by an appropriate aquatic herbicide.
- B. The growth and size of the larger populations will be monitored each year and it will be determined at a later date if control measures are necessary. If they are deemed necessary, then WRPCo will consult with the WDNR.

V. Public Awareness

- A. Public Awareness about purple loosestrife will be increased by displaying fact sheets supplied by the WDNR at all WRPCo owned public access areas in the project boundary.

VI. Documentation of Submittal

- A. Documentation of submittal of monitoring reports to the WDNR and USFWS will be provided to FERC by December 31st for the first two years. The filing each year will include agency comments, if any.

Eurasian Watermilfoil Monitoring Plan

Objective: Eurasian Watermilfoil (*Myriophyllum spicatum*) is an exotic aquatic macrophyte that exhibits aggressive characteristics. This plant is becoming increasingly common to inland lakes and rivers. In consultation with the Wisconsin Department of Natural Resources (WDNR) and the U.S. Fish & Wildlife Service (USFWS), Wisconsin River Power Company (WRPCo) will periodically monitor the presence and abundance of this species.

I. Methods

- a. Monitoring methods will include a routine aquatic macrophyte reconnaissance survey utilizing a boat to take samples at five transects of approximately 36 feet in length. Transects will be selected based upon location of macrophyte colonies and areas of likely infestation. The

location of these transects will be documented using a Global Positioning System. The transect samples will be analyzed for presence and approximate abundance of Eurasian Watermilfoil.

Each transect will be sampled with a rake in three twelve-foot diameter sections. Each section will be sampled in quarters. The first quarter will be sampled at a depth of 0-0.5 meters below the surface, the second 0.5-1.5 meters below the surface, the third 1.5 – 3.0 meters below the surface and the fourth beyond 3.0 meters below the surface. Typically all of the samples occur in water less than 3 meters.

II. Frequency of Survey

- a. Starting in 2003, the survey will be taken every third year in July, August, or September.

III. Documentation of Existing Colonies

- a. The results of the survey at each transect will be displayed in table form indicating relative abundance (none, low, medium, and high) of Eurasian Watermilfoil in the aquatic macrophyte samples taken. All appreciable Eurasian watermilfoil beds will be documented on a map of the reservoir. The completed documentation will be provided to the WDNR and USFWS no later than October 31st every year in which the monitoring was completed.

IV. Control of Existing Colonies

- a. A natural eradication process will be used if Eurasian Watermilfoil becomes established. Studies have shown that a native weevil (*Euhrychiopsis lecontei*) can control the population of Eurasian Watermilfoil by feeding on it. This weevil is native to the area so it does not need to be introduced. If the monitoring reports support the need to further control this species, then WRPCo will cooperate with the WDNR in developing site-specific measures.

V. Public Awareness

- a. Public Awareness about Eurasian Watermilfoil will be increased by providing informational notices supplied by the WDNR at all WRPCo owned public access areas in the project boundary.

VI. Documentation of Submittal

- A. Documentation of submittal of monitoring reports to the WDNR and USFWS will be provided to FERC by December 31st for the first two monitoring periods. The filling each year will include agency comments.

Documentation of Consultation



Wisconsin Public Service Corporation
(a subsidiary of WPS Resources Corporation)
700 North Adams Street
P.O. Box 19002
Green Bay, WI 54307-9002

March 19, 2002

Mr. Jim Fossum
U. S. Fish & Wildlife Service
1015 Challenger Court
Green Bay, WI 54311

Dear Mr. Fossum:

Draft Invasive Species Monitoring Plan for Petenwell & Castle Rock - FERC Project 1884

Wisconsin Public Service Corporation (WPSC), on behalf of Wisconsin River Power Company (WRPCo), is pleased to submit this draft Invasive Species Monitoring Plan. Per Article 408 of the new license for the Petenwell and Castle Rock flowages, the licensee must, in consultation with the Wisconsin Department of Natural Resources and the U. S. Fish and Wildlife Service, develop a plan to monitor purple loosestrife (*Lythrum salicaria*) and Eurasian milfoil (*Myriophyllum spicatum*). Please review the enclosed plan and make any comments or suggestions within 60 days of this letter. If you have any questions or concerns, please call me. Thank you for your help with this project.

Sincerely,

A handwritten signature in black ink, appearing to read "Rick Moser".

Rick J. Moser
Environmental Consultant
Telephone: (920) 433-2290

Enc.

Petenwell-Castle Rock Hydroelectric Project - FERC License No. 1984

Article 408 Within 180 days of the license issuance, the licensee shall, in consultation with the Wisconsin Department of Natural Resources (WDNR) and the U.S. Fish and Wildlife Service (USFWS), develop a plan to monitor purple loosestrife (*Lythrum salicaria*) and Eurasian watermilfoil (*Myriophyllum spicatum*) in project waters. The plan shall include, but is not limited to: (a) the method and frequency of monitoring, (b) a provision to cooperate in the control/elimination of these vegetative species if deemed necessary by the agencies, and (c) documentation of transmission of monitoring data to the agencies.

Purple Loosestrife Monitoring Plan

Objective: To monitor the spread of Purple Loosestrife (*Lythrum salicaria*) on Petenwell-Castle Rock hydroelectric project lands. Purple Loosestrife is an invasive plant that exhibits aggressive characteristics. The plant is becoming increasingly common to wetland areas. Wisconsin River Power Company (WRPCo) agrees to periodically monitor the species and cooperate with the agencies to implement measures to control/eliminate the plant if the results of the surveys warrant it.

I. Methods

A. The monitoring methods will include a shoreline survey of the Petenwell-Castle Rock impoundments. The surveys will be conducted by boat and/or on foot to determine a baseline of existing colonies and then continued monitoring to determine the increase of density and abundance of the species.

II. Frequency of Survey

A. Starting in 2003, the survey will be taken annually in July or August, depending upon when the plants are in bloom and the weather.

III. Documentation of Existing Colonies

A. The results of the survey will be displayed on a map of the total project area. A copy of the completed map will be provided to the WDNR and the USFWS no later than October 31st every year.

B. The map will indicate relative populations based on the following criteria:

- a. Small Colonies of 1-5 plants
- b. Medium Colonies of 6-50 plants
- c. Dense Colonies of >50 plants

IV. Control of Existing Colonies

- A. Small colonies of 1 to 5 plants will be cut by hand and the remaining stems will be hand pulled or sprayed by an appropriate aquatic herbicide.
- B. The need for further action will be discussed with the WDNR

V. Public Awareness

- A. Public Awareness about purple loosestrife will be increased by displaying fact sheets supplied by the WDNR at all WRPCo owned public access areas in the project boundary.

VI. Documentation of Submittal

- A. Documentation of submittal of monitoring reports to the WDNR and USFWS will be provided to FERC by December 31st for the first two years. The filing each year will include agency comments.

Eurasian Milfoil Monitoring Plan

Objective: Eurasian Milfoil (*Myriophyllum spicatum*) is an exotic aquatic macrophyte that exhibits aggressive characteristics. This plant is becoming increasingly common to inland lakes and rivers. In consultation with the Wisconsin Department of Natural Resources (WDNR) and the U.S. Fish & Wildlife Service (USFWS), Wisconsin River Power Company (WRPCo) will periodically monitor the presence and abundance of this species.

I. Methods

- A. Monitoring methods will include a routine aquatic macrophyte survey utilizing a boat to take samples at five transects of approximately 36 feet in length. Transects will be selected based upon location of macrophyte colonies and areas of likely infestation. The transect samples will be analyzed for presence and approximate abundance of Eurasian Milfoil.

Each transect will be sampled with a rake in three twelve-foot diameter sections. Each section will be sampled in quarters. The first quarter will be sampled at a depth of 0 - 0.5 meters below the surface, the second 0.5 - 1.5 meters below the surface, the third 1.5 - 3.0 meters below the surface and the fourth beyond 3.0 meters below the surface. Typically all of the samples occur in water less than 3 meters.

II. Frequency of Survey

- A. Starting in 2003, the survey will be taken every third year in July, August, or September.

III. Documentation of Existing Colonies

- A. The results of the survey at each transect will be displayed in table form indicating relative abundance (none, low, medium, and high) of Eurasian Milfoil in the aquatic macrophyte samples taken. The completed table will be provided to the WDNR and USFWS no later than October 31st every year in which the monitoring was completed.

IV. Control of Existing Colonies

- A. A natural eradication process will be used if Eurasian Milfoil becomes established. Studies have shown that a native weevil (*Euhrychiopsis lecontei*) can control the population of Eurasian Milfoil by feeding on it. This weevil is native to the area so it does not need to be introduced. If the monitoring reports support the need to further control this species, then WRPCo will cooperate with the WDNR in developing site-specific measures.

V. Public Awareness

- A. Public Awareness about Eurasian Milfoil will be increased by providing informational notices supplied by the WDNR at all WRPCo owned public access areas in the project boundary.

VI. Documentation of Submittal

- A. Documentation of submittal of monitoring reports to the WDNR and USFWS will be provided to FERC by December 31st for the first two monitoring periods. The filing each year will include agency comments.



United States Department of the Interior

FISH AND WILDLIFE SERVICE

Green Bay ES Field Office
1015 Challenger Court
Green Bay, Wisconsin 54311-8331
Telephone 920/465-7440
FAX 920/465-7410

April 18, 2002

Mr. Rick J. Moser
Environmental Consultant
Wisconsin Public Service Corporation
700 North Adams Street
P.O. Box 19002
Green Bay, Wisconsin 54307-9002

re: Petenwell and Castle Rock Hydroelectric Project
FERC No. 1984, Wisconsin River
Draft Invasive Species Monitoring Plan

Dear Mr. Moser:

Your letter of March 19, 2002, requested U.S. Fish and Wildlife Service (FWS) review of the Wisconsin Public Service Corporation's (WPSCo) draft Invasive Species Monitoring Plan. In general, we concur with the plan but recommend some minor changes, as follows.

Page 1. Purple loosestrife monitoring plan, objective. It is stated, "WRPCo agrees to *periodically* monitor the species..." We recommend that *periodically* be replaced with the *annually*.

Page 2. Documentation of submittal. It is stated, "Documentation of submittal of monitoring reports to the Wisconsin Department of Natural Resources (DNR) and USFWS (Agencies) will be provided to Federal Energy Regulatory Commission (FERC) by December 31st for the *first two years*." We recommend that annual reports on the monitoring results be submitted to the FERC and the Agencies. The last sentence in this section states, "The filing each year will include agency comments." We recommend adding "if any" after agency comments because the Agencies may not need to comment on the results if the report is complete. This comment also applies to watermilfoil monitoring documentation (page 3).

Same page, Eurasian milfoil monitoring plan. Please replace milfoil with watermilfoil.

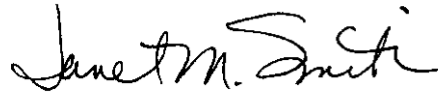
Page 3, Documentation of existing colonies. In this section, we recommend the following sentence be added: *All appreciable Eurasian watermilfoil beds found will be documented on a map of the reservoir.*

Same page. Documentation of submittal. We recommend that documentation of results be submitted to the FERC and the Agencies by December 31st of each survey year.

We also recommend that the WPSCo use Global Positioning System in documenting locations of purple loosestrife colonies and watermilfoil beds.

We appreciate the opportunity to comment on the draft plan. If you have questions on these comments, please contact Jim Fossum of my staff at 920 465-7421.

Sincerely,

A handwritten signature in black ink that reads "Janet M. Smith". The signature is written in a cursive style with a large, stylized "S" at the end.

Janet M. Smith
Field Supervisor

cc: Bob Martini, Wisconsin DNR, Rhinelander, WI



Wisconsin Public Service Corporation
(a subsidiary of WPS Resources Corporation)
700 North Adams Street
P.O. Box 19002
Green Bay, WI 54307-9002

March 19, 2002

Mr. Tom Meronek
WI Department of Natural Resources
101 N. Ogden Road
Peshtigo, WI 54157

Dear Mr. Meronek:

Draft Invasive Species Monitoring Plan for Petenwell & Castle Rock - FERC Project 1884

Wisconsin Public Service Corporation (WPSC), on behalf of Wisconsin River Power Company (WRPCo), is pleased to submit this draft Invasive Species Monitoring Plan. Per Article 408 of the new license for the Petenwell and Castle Rock flowages, the licensee must, in consultation with the Wisconsin Department of Natural Resources and the US Fish and Wildlife Service, develop a plan to monitor purple loosestrife (*Lythrum salicaria*) and Eurasian milfoil (*Myriophyllum spicatum*). Please review the enclosed plan and make any comments or suggestions within 60 days of this letter. If you have any questions or concerns, please call me. Thank you for your help with this project.

Sincerely,

A handwritten signature in black ink, appearing to read "Rick Moser".

Rick J. Moser
Environmental Consultant
Telephone: (920) 433-2290

Enc.

Petenwell-Castle Rock Hydroelectric Project - FERC License No. 1984

Article 408 Within 180 days of the license issuance, the licensee shall, in consultation with the Wisconsin Department of Natural Resources (WDNR) and the U.S. Fish and Wildlife Service (USFWS), develop a plan to monitor purple loosestrife (*Lythrum salicaria*) and Eurasian watermilfoil (*Myriophyllum spicatum*) in project waters. The plan shall include, but is not limited to: (a) the method and frequency of monitoring, (b) a provision to cooperate in the control/elimination of these vegetative species if deemed necessary by the agencies, and (c) documentation of transmission of monitoring data to the agencies.

Purple Loosestrife Monitoring Plan

Objective: To monitor the spread of Purple Loosestrife (*Lythrum salicaria*) on Petenwell-Castle Rock hydroelectric project lands. Purple Loosestrife is an invasive plant that exhibits aggressive characteristics. The plant is becoming increasingly common to wetland areas. Wisconsin River Power Company (WRPCo) agrees to periodically monitor the species and cooperate with the agencies to implement measures to control/eliminate the plant if the results of the surveys warrant it.

I. Methods

A. The monitoring methods will include a shoreline survey of the Petenwell-Castle Rock impoundments. The surveys will be conducted by boat and/or on foot to determine a baseline of existing colonies and then continued monitoring to determine the increase of density and abundance of the species.

II. Frequency of Survey

A. Starting in 2003, the survey will be taken annually in July or August, depending upon when the plants are in bloom and the weather.

III. Documentation of Existing Colonies

A. The results of the survey will be displayed on a map of the total project area. A copy of the completed map will be provided to the WDNR and the USFWS no later than October 31st every year.

B. The map will indicate relative populations based on the following criteria:

- a. Small Colonies of 1-5 plants
- b. Medium Colonies of 6-50 plants
- c. Dense Colonies of >50 plants

IV. Control of Existing Colonies

A. Small colonies of 1 to 5 plants will be cut by hand and the remaining stems will be hand pulled or sprayed by an appropriate aquatic herbicide.

B. The need for further action will be discussed with the WDNR

V. Public Awareness

A. Public Awareness about purple loosestrife will be increased by displaying fact sheets supplied by the WDNR at all WRPCo owned public access areas in the project boundary.

VI. Documentation of Submittal

A. Documentation of submittal of monitoring reports to the WDNR and USFWS will be provided to FERC by December 31st for the first two years. The filing each year will include agency comments.

Eurasian Milfoil Monitoring Plan

Objective: Eurasian Milfoil (*Myriophyllum spicatum*) is an exotic aquatic macrophyte that exhibits aggressive characteristics. This plant is becoming increasingly common to inland lakes and rivers. In consultation with the Wisconsin Department of Natural Resources (WDNR) and the U.S. Fish & Wildlife Service (USFWS), Wisconsin River Power Company (WRPCo) will periodically monitor the presence and abundance of this species.

I. Methods

A. Monitoring methods will include a routine aquatic macrophyte survey utilizing a boat to take samples at five transects of approximately 36 feet in length. Transects will be selected based upon location of macrophyte colonies and areas of likely infestation. The transect samples will be analyzed for presence and approximate abundance of Eurasian Milfoil.

Each transect will be sampled with a rake in three twelve-foot diameter sections. Each section will be sampled in quarters. The first quarter will be sampled at a depth of 0 - 0.5 meters below the surface, the second 0.5 - 1.5 meters below the surface, the third 1.5 - 3.0 meters below the surface and the fourth beyond 3.0 meters below the surface. Typically all of the samples occur in water less than 3 meters.

- II. Frequency of Survey
 - A. Starting in 2003, the survey will be taken every third year in July, August, or September.
- III. Documentation of Existing Colonies
 - A. The results of the survey at each transect will be displayed in table form indicating relative abundance (none, low, medium, and high) of Eurasian Milfoil in the aquatic macrophyte samples taken. The completed table will be provided to the WDNR and USFWS no later than October 31st every year in which the monitoring was completed.
- IV. Control of Existing Colonies
 - A. A natural eradication process will be used if Eurasian Milfoil becomes established. Studies have shown that a native weevil (*Euhrychiopsis lecontei*) can control the population of Eurasian Milfoil by feeding on it. This weevil is native to the area so it does not need to be introduced. If the monitoring reports support the need to further control this species, then WRPCo will cooperate with the WDNR in developing site-specific measures.
- V. Public Awareness
 - A. Public Awareness about Eurasian Milfoil will be increased by providing informational notices supplied by the WDNR at all WRPCo owned public access areas in the project boundary.
- VI. Documentation of Submittal
 - A. Documentation of submittal of monitoring reports to the WDNR and USFWS will be provided to FERC by December 31st for the first two monitoring periods. The filing each year will include agency comments.

→ RICK MOSER, WPS
FROM: BOB MARTINI, DNR, RHINELANDER

5/17/02

Rick - here are some comments from our invasive species dept on your
Petersville / Castle Rock plan.

Martini, Robert E

From: Herman, Laura J
Sent: Friday, May 17, 2002 9:42 AM
To: Martini, Robert E
Subject: ~~WRPCo~~ invasive species proposal
WPS

Deb Konkol or Patrick (Buzz) Gorge would be contacts if exotics are found.

DNR has general "prevent the spread of exotics" or the "warning this lake has ___XXX___ exotics" signs that WRPCo can put up at landings.

Purple Loosestrife

- Flower heads that are cut off should be burned or landfilled (do not compost or this will spread PL)
- DNR will help select control methods of medium to large PL beds.

Eurasian Water-milfoil

- For finding EWM, I have had better luck with reconnaissance surveys than transect surveys. For the reconns, we boat around the entire lake looking for beds of EWM. Make sure you check in areas that were not dewatered in the winter drawdown. I often find the first signs of EWM in waters 10 - 15 feet deep. I do not know just what depths to look for EWM on these large drawdown lakes, but it would do little good to look for beds on areas that were dewatered the past winter as the drawdown would kill the EWM here. We put most of our time into areas around boat landings and along shorelines where the wind blows the plants. Calm bays would also have more plants.
- If EWM is found, then go to the transect method to see where EWM has spread. Again, use reconns to search out new infestation areas.
- I do not think Euhrychiopsis will work to control EWM on this type of flowage. The weevils have to fly to the shoreline to overwinter in leaf litter. If the water is drawn down too much, the weevils will never be able to fly to the leaf litter shorelines (they are weak flyers). Then they have to get back to the milfoil beds in the spring. If the beetles overwinter in areas that will be flooded - they are now dead, and if they do make it to the leaf litter, they have to fly (or be blown) back out to the EWM bed. Very unlikely.
- Chemical or manual removal will have better results.
- I anticipate EWM will not be along the shorelines as drawdowns are one of the EWM control methods, and with these lakes having annual drawdowns, this should control nearshore EWM beds.

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Response to Agency Comments

U.S. Fish and Wildlife Service Comments

Comment: It is stated, "WRPCo agrees to periodically monitor the species..." We recommend that periodically be replaced with annually.

Response: Recommendation accepted.

Comment: We recommend that annual reports on the monitoring results be submitted to the FERC and the Agencies.

Response: In the past, FERC orders approving exotic species monitoring plans (FERC No. 2433 dated February 2, 1997) have mandated that the Agencies receive a report every year that a survey is conducted, with FERC receiving documentation of submittal for the first two years only.

Comment: We recommend adding "if any" after agency comments because the Agencies may not need to comment on the results if the report is complete. This comment also applies to the watermilfoil documentation (page 3).

Response: Recommendation accepted.

Comment: Please replace milfoil with watermilfoil.

Response: Recommendation accepted.

Comment: We recommend the following sentence be added: All appreciable Eurasian watermilfoil beds found will be documented on a map of the reservoir.

Response: Recommendation accepted.

Comment: We recommend that documentation of the result be submitted to the FERC and the Agencies by December 31st of each survey year.

Response: Once again, Past FERC orders approving exotic species monitoring plans have mandated that the Agencies receive a report every year that a survey is conducted, with FERC receiving documentation of submittal for the first two years only.

Comment: We also recommend that the WRPCo use Global Positioning System in documenting locations of purple loosestrife colonies and watermilfoil beds.

Response: A Global Positioning System (GPS) will only be used to document the locations in which transects occurred during Eurasian watermilfoil monitoring, and to document the locations of small, isolated colonies of purple loosestrife. WRPCo will then be able to monitor these locations closely and continue to prevent the growth and spread of the colonies.

WI Department of Natural Resources Comments

Comment: Deb Konkel or Patrick (Buzz) Sorge would be contacts if exotics are found.

Response: Comment noted.

Comment: DNR has general "prevent the spread of exotics" or the "warning this lake has XXX exotics" signs that WRPCo can put up at landings.

Response: Comment noted.

Comment: Purple Loosestrife flower heads that are cut off should be burned or landfilled.

Response: WRPCo feels that this action is not necessary. Surveys are completed while the purple loosestrife is flowering, so seeds are not yet formed. There has been success in the past on different FERC projects where small populations of purple loosestrife were eradicated without burning or landfilling the purple loosestrife heads. In 2000 small populations of purple loosestrife were found along FERC projects 10856 and 2506. The stems were cut and sprayed and the heads were left on site. During the 2001 purple loosestrife surveys, no purple loosestrife was found along those flowages.

Comment: DNR will help select control methods of medium to large purple loosestrife beds.

Response: WRPCo will only control the small populations at this time. The growth and size of the larger populations will be monitored each year and it will be determined at a later date if control measures are necessary. If they are deemed necessary, then WRPCo will consult with the WDNR.

Comment: For finding Eurasian watermilfoil, I have had better luck with reconnaissance surveys than transect surveys.

Response: Reconnaissance surveys will be used initially to locate populations of Eurasian watermilfoil or areas with high potential for infestation. Transect surveys will then be used to monitor the size of those populations.

Comment: I do not think Euhrychiopsis will work to control Eurasian watermilfoil on this type of flowage. Chemical or manual removal will have better results.

Response: The areas that have the highest potential of being infested with Eurasian milfoil are shallow backwater areas, and areas of the flowage that are close to shore. These are the same areas that provide suitable habitat for Euhrychiopsis. The possibility of Eurasian watermilfoil occurring in the middle of the flowages are unlikely. This is why WRPCo feels that Euhrychiopsis is a suitable control measure for Eurasian watermilfoil. FERC has agreed that this is a suitable measure of control for similar past projects such as FERC No. 2525, 2595, 2522, 2546, 2560, and 2433.