



Wisconsin River Power Company
(owners of the Petenwell & Castle Rock Hydroelectric Plants)
P.O. Box 19001
Green Bay, WI 54307-9001

January 13, 2009

FERC Project No. 1984

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

Dear Secretary Bose:

Supplement to the FERC Approved Invasive Species Monitoring Plan,
Purple Loosestrife Monitoring Plan for the Petenwell and Castle Rock Hydroelectric Project # 1984

As per the Federal Energy Regulatory Commission (FERC) Order Revising Order Approving Purple Loosestrife and Eurasian Watermilfoil Monitoring Plan, Article 408 for the Petenwell Castle Rock Hydroelectric Project (FERC Project #1984) issued on July 13, 2005, Wisconsin River Power Company (WRPCO) is submitting this supplement to the purple loosestrife monitoring plan for the Petenwell and Castle Rock Hydroelectric Project.

Under the approved plan, WRPCO has been documenting the locations and relative populations of purple loosestrife colonies at the Petenwell and Castle Rock Hydroelectric project since 2005. The surveys have indicated established purple loosestrife populations throughout much of the project boundary.

The approved method of control since 2005 has been to cut by hand small colonies of 1 to 5 plants and the remaining stems after cutting are hand pulled or sprayed 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.

Based on the varying success and a remaining established population of purple loosestrife at the Petenwell and Castle Rock Hydroelectric Project, WRPCO is proposing to discontinue the cut by hand and hand pull or spray method of control. WRPCO is proposing to control purple loosestrife at the project using biological control through the use of *Galerucella sp.* beetles (beetles). Beetles are already present on the north end of the Petenwell Flowage. These beetles likely have naturally dispersed from past beetle releases by other parties in the Nekoosa 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.

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

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 deace. 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.

WRPCO is managed by the Wisconsin Public Service Corporation (WPSC). WPSC submitted a purple loosestrife control plan similar to this proposal to the 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. WRPCO 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 Petenwell and Castle Rock Hydroelectric Project is located in Appendix A.

WRPCO 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. Tom Meinz, IBS - A2
Mr. Howard Geisler, WPSC - PUL
Mr. Bruce Crocker, WPSC - D2
Mr. Shawn Puzen, IBS - D2
Mr. Virgil Schlorke, WPSC - NEC
Ms. Pat Grant, FERC
Mr. Dave Harpole, WPSC - REG
Mr. Gil Snyder, WPSC - D2
Ms. Joan Johaneck, WPSC D2
Mr. Jamie Nuthals, IBS - D2
Ms. Carlisa Linton, FERC

APPENDIX A

**PETENWELL AND CASTLE ROCK
HYDROELECTRIC PROJECT**

**PROPOSED SUPPLEMENT TO THE INVASIVE
SPECIES MONITORING PLAN-PURPLE
LOOSESTRIFE MONITORING PLAN**



**Purple Loosestrife Control Plan for the Petenwell and Castle Rock
Hydroelectric Project, FERC Project # 1984**

Objective: To control the spread and reduce the population of purple loosestrife (*Lythrum salicaria*) on the Petenwell and Castle Rock Hydroelectric Project. Past surveys have indicated that purple loosestrife colonies are established in the project boundary.

I. Methods

- A. WRPCO 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 WRPCO can obtain property owner permission on locations not owned in fee.

II. Monitoring

- A. WRPCO 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 Petenwell and Castle Rock 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, WRPCO will reduce the frequency of the surveys to be completed once every three years in conjunction with the Eurasian water milfoil monitoring. 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, WRPCO 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. WRPCO will provide a report on purple loosestrife populations and on beetle release sites, if applicable, to the WDNR and USFWS no later than November 15 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 WRPCO 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 Petenwell and Castle Rock Hydroelectric Project will begin in 2009.

V. Public Awareness

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

APPENDIX B

**PETENWELL AND CASTLE ROCK
HYDROELECTRIC PROJECT**

DOCUMENTATION OF CONSULTATION

**LETTER TO WISCONSIN DEPARTMENT OF
NATURAL RESOURCES**



Wisconsin River Power Company
(owners of the Petenwell & Castle Rock Hydroelectric Plants)
P.O. Box 19001
Green Bay, WI 54307-9001

December 4, 2008

FERC Project No. 1984

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, Purple Loosestrife Monitoring Plan for the Petenwell and Castle Rock Hydroelectric Project # 1984

As per the Federal Energy Regulatory Commission (FERC) Order Revising Order Approving Purple Loosestrife and Eurasian Watermilfoil Monitoring Plan, Article 408 for the Petenwell Castle Rock Hydroelectric Project (FERC Project #1984) issued on July 13, 2005, Wisconsin River Power Company (WRPCO) is submitting this supplement to the purple loosestrife monitoring plan for the Petenwell and Castle Rock Hydroelectric Project.

Under the approved plan, WRPCO has been documenting the locations and relative populations of purple loosestrife colonies at the Petenwell and Castle Rock Hydroelectric project since 2005. The surveys have indicated established purple loosestrife populations throughout much of the project boundary.

The approved method of control since 2005 has been to cut by hand small colonies of 1 to 5 plants and the remaining stems after cutting are hand pulled or sprayed 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.

Based on the varying success and a remaining established population of purple loosestrife at the Petenwell and Castle Rock Hydroelectric Project, WRPCO is proposing to discontinue the cut by hand and hand pull or spray method of control. WRPCO is proposing to control purple loosestrife at the project using biological control through the use of *Galerucella sp.* beetles (beetles). Beetles are already present on the north end of the Petenwell Flowage. These beetles likely have naturally dispersed from past beetle releases by other parties in the Nekoosa 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.

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

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.

WRPCO is managed by the Wisconsin Public Service Corporation (WPSC). WPSC submitted a purple loosestrife control plan similar to this proposal to the FERC for the Jersey Hydroelectric Project (FERC Project #2476) and Wausau Hydroelectric Project (FERC Project #2476). 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. WRPCO 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, WRPCO 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 M. Johnson
Environmental Consultant

syx

Enc.

cc: Mr. Dale Simon - WDNR



**Purple Loosestrife Control Plan for the Petenwell and Castle Rock
Hydroelectric Project, FERC Project # 1984**

Objective: To control the spread and reduce the population of purple loosestrife (*Lythrum salicaria*) on the Petenwell and Castle Rock Hydroelectric Project. Past surveys have indicated that purple loosestrife colonies are established in the project boundary.

- I. Methods
 - A. WRPCO 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 WRPCO can obtain property owner permission on locations not owned in fee.

- II. Monitoring
 - A. WRPCO 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 Petenwell and Castle Rock 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, WRPCO will reduce the frequency of the surveys to be completed once every three years in conjunction with the Eurasian water milfoil monitoring. 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, WRPCO 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. WRPCO will provide a report on purple loosestrife populations and on beetle release sites, if applicable, to the WDNR and USFWS no later than November 15 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 WRPCO 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 Petenwell and Castle Rock Hydroelectric Project will begin in 2009.

V. Public Awareness

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

**WISCONSIN DEPARTMENT OF NATURAL
RESOURCES RESPONSE**

Johnson, Darrin M

From: Watson, Scott M - DNR [Scott.Watson@Wisconsin.gov]
Sent: Friday, December 05, 2008 11:54 AM
To: Johnson, Darrin M
Subject: RE: Supplement to the FERC approved Invasive Species Monitoring Plan, Purple Loosestrife Monitoring Pan for the Petenwell and Castle Rock Hydroelectric Project # 1984

Scott Provost and I have reviewed and concur with the Invasive Species Monitoring Plan for Petenwell and Castle Rock Hydroelectric Project # 1984.

From: Johnson, Darrin M [mailto:DMJohnson@integrysgroup.com]
Sent: Thursday, December 04, 2008 3:56 PM
To: Watson, Scott M - DNR
Subject: Supplement to the FERC approved Invasive Species Monitoring Plan, Purple Loosestrife Monitoring Pan for the Petenwell and Castle Rock Hydroelectric Project # 1984

<<20081204 WRPCO PLS Control Plan WDNR Ltr.pdf>>
Scott:

Sorry, I forgot to attach the supplement in my last email.

Please find attached a proposed Supplement to the FERC approved Invasive Species Monitoring Plan, Purple Loosestrife Monitoring Pan for the Petenwell and Castle Rock Hydroelectric Project # 1984. 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
Integrays Business Support LLC
dmjohnson@integrysgroup.com
Phone 608-565-2500
Cell 608-576-5970

*Providing support for Integrays Energy Group,
Integrays 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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LETTER TO U.S. FISH AND WILDLIFE SERVICE



Wisconsin River Power Company
(owners of the Petenwell & Castle Rock Hydroelectric Plants)
P.O. Box 19001
Green Bay, WI 54307-9001

December 4, 2008

FERC Project No. 1984

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

Dear Mr. Utrup:

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Mr. Nicholas J. Utrup
December 4, 2008
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Sincerely,



Darrin M. Johnson
Environmental Consultant

syx

Enc.



**Purple Loosestrife Control Plan for the Petenwell and Castle Rock
Hydroelectric Project, FERC Project # 1984**

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V. Public Awareness

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

Document Content(s)

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

20090113WRPCO Appendix A.PDF.....3-19