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ORIGINAL

2008 DEC -1 A 11:54

November 26, 2008

Certified Mail: 7007 2680 0001 0014 7243

Office of the Secretary
 Federal Energy Regulatory Commission
 888 First Street, NE
 Washington, D.C. 20426

RE: **WVIC Project 2113, Modified Purple Loosestrife Control Plan** ²⁰⁷

The purpose of this correspondence is to request an amendment to Wisconsin Valley Improvement Company's (WVIC Project 2113) FERC approved Fish and Wildlife Management Plan (1997), which was updated in 2001 and 2006. The Plan contains in Section 4.4.5 a Purple Loosestrife Control Plan. The Purple Loosestrife Control Plan included pilot studies initiated in 1996 to chemically control purple loosestrife on WVIC's man-made reservoirs.

WVIC is herewith requesting a modification to the Purple Loosestrife Control Plan. The modification would include terminating the chemical control aspect of the Plan and implementing biological control (*Galerucella sp.* beetles), as described in the enclosed Modified Purple Loosestrife Control Plan (Attachment 1).

WVIC sent a copy of the proposed Modified Purple Loosestrife Control Plan dated October 3, 2008 to the Wisconsin DNR (WDNR) and U.S. Fish and Wildlife Service (USFWS) for review and comment (Attachment 2). WVIC received comments from the WDNR on October 16 and November 4, 2008 (Attachment 3). No comments were received from the USFWS.

WDNR's comments and WVIC's responses (included in the Modified Purple Loosestrife Control Plan) are summarized below:

Comment 1. We agree that there needs to be continuous annual monitoring to track and map where and how quickly PL is spreading after chemical treatments are discontinued; however, to be able to effectively track PL, a detailed map of the current PL distribution and abundance should be included with the plan so there is sufficient baseline data to draw conclusions from in the future.

Response: WVIC has provided a detailed baseline map of each subject reservoir identifying the distribution and abundance of purple loosestrife.

Comment 2. With regard to the annual reporting procedure and the revisiting of management options, what levels of PL abundance trigger hand pulling versus chemical control versus releasing beetles? This is an important consideration and should be included in the plan.

Response: This is a relatively gray area due to the complexity and variability of purple loosestrife distribution and abundance within and between the three reservoirs and is responded to in greater detail in the enclosed Modified Purple Loosestrife Control Plan.

Comment 3. We also believe that the annual review process is necessary, but management recommendations also need to be made on an annual basis after the review, rather than after the three year period. This allows WVIC to be more responsive to a large population expansion if it were to occur.

Response: WVIC would agree to an annual review process.

Comment 4. Finally, if it is deemed necessary to begin raising and releasing beetles, who will be responsible for doing so?

Response: WVIC would assume the responsibility for introducing beetles, if necessary.

WVIC believes that biological controls today represent a more natural, economical and effective long-term control method versus chemical control. For these reasons, WVIC requests amending its Purple Loosestrife Control Plan in Section 4.4.5 of its Fish and Wildlife Management Plan (updated in 2006) with the enclosed "Modified Purple Loosestrife Control Plan". It is WVIC's opinion that with this amendment the continued control of purple loosestrife on the three Project man-made reservoirs will more effectively meet today's standards.

Thank you for your consideration.

Sincerely,



David M. Coon, Director
Environmental Affairs

ENCLOSURES

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Wisconsin Valley Improvement Company

Proposed

Modified Purple Loosestrife Control Plan

Current Chemical Control Program

Wisconsin Valley Improvement Company (WVIC), with approval from the Wisconsin DNR (WDNR), implemented a purple loosestrife (*Lythrum salicaria*) control program in 1996. The program involved development of minimal, yet effective application rates of the herbicide RODEO® at WVIC's man-made reservoirs. In compliance with WVIC's 1996 FERC license, the purple loosestrife control plan became a part of WVIC's FERC approved 1997 Fish and Wildlife Management Plan (updated in 2001 and 2006).

WVIC implemented pilot studies for controlling purple loosestrife at selected areas in Rice Reservoir in 1996. The purpose for the studies was to test the effectiveness of various spraying methods and RODEO® herbicide concentrations during the plants flowering stage. At that time, chemical treatment of large stands of loosestrife (several hundred plants) was the most effective control method. The pilot studies yielded positive results. It was learned that RODEO® concentration could be lower than recommendations by the manufacturer and still achieve control with less damage to non-target plants.

WVIC refined RODEO® application rates and expanded the program in 1997 to include Willow and Spirit reservoirs where greater than a hundred plants also occurred. WVIC learned that greater control could be achieved by spraying the plants twice during the growing season and initiated two sprayings in 2002 with the goal of eradicating the infestations (a late bloom in 2008 precluded two sprayings). The reason for spraying twice was based on field observations of a second crop of flowering loosestrife that would emerge and bloom three to four weeks after the initial spraying. This approach was effective in further reducing the abundance of loosestrife at Willow and Spirit, but has not resulted in eradication. Similarly, at Rice Reservoir where the greatest abundance of purple loosestrife occurred, abundance has been reduced over the past 13 years but the infestations have not been eradicated. Today, native plants have become reestablished in areas where the densest infestations of loosestrife have been reduced. (Small new colonies of less than 10 plants were treated at Rainbow and Eau Pleine reservoirs in 1997 and 1999, respectively, and eradicated those years).

Proposed Biological Control Plan Rationale

In spite of the success of reducing loosestrife abundance at Rice, Willow and Spirit reservoirs, the past 13 years of chemical treatment with RODEO® herbicide has not resulted in the eradication of loosestrife. One missed mature plant (i.e., in tall dense stands of shoreline vegetation) that produces over 2 million seeds a season (Wisconsin DNR Invasive Species web site, 2004), ensures the improbability of eradication. It appears that annual application of the herbicide would need to continue indefinitely in order to maintain control of loosestrife.

The Wisconsin DNR (Invasive Species web site, 2004) reported that conventional control methods like hand pulling, cutting, flooding, herbicides, and plant competition have only been moderately effective in controlling purple loosestrife; biocontrol is now considered the most viable option for more complete control for heavy infestations. The Illinois Natural History Survey (INHS web site, 1999) also reported that chemical control will not eliminate large loosestrife infestations (greater than 100 plants) and today is simply not appropriate and impractical.

The WDNR initiated and continues to support the raising and releasing of *Galerucella sp.* beetles that feed on purple loosestrife plants, which stresses the plants in multiple ways. Research has shown that these beetles are almost exclusively dependent upon purple loosestrife and do not threaten native plants. The beetles do not eradicate loosestrife, but significantly reduce loosestrife populations so cohabitation with native species becomes a possibility. In a WDNR test area, 90% of the treated area saw a 90% reduction in loosestrife. The INHS (INHS web site, 1999) recommended that for sites with large infestations, biological control with leaf-feeding *Galerucella sp.* beetles is preferred. For example, a minimum of 2,000 to 3,000 beetles per site and multiple releases at various locations within the site is recommended with sites greater than 5 acres of loosestrife (INHS web site, 1999; Ragsdale, et al. 2000). Accordingly, WVIC proposes to phase-out the chemical control program after 2008 and allow biological control (beetles) to become the primary control method.

Galerucella sp. beetles, in fact, are present at Spirit Reservoir (identified by WVIC during herbicide spraying in July 2008). Spraying was terminated at Spirit to allow the beetles to occupy and potentially expand within the site. These beetles may have migrated from Jersey City Flowage located four miles to the north, Alexander Flowage located 12 miles to the south or Tripoli, WI located 10 miles to the north, where well-established beetle populations occur. Wisconsin Public Service Corporation (WPSC) released 10,000 *Galerucella sp.* beetles in Jersey City Flowage in 2007 and over 50,000 beetles in 2008 (*J. Nuthals, WPSC, personal communication*). Beetles were introduced in Alexander Flowage in 2007 and are expanding northward based on WPSC 2008 survey results. Several thousand beetles are also present near the Town of Tripoli in dense loosestrife stands along Willow Road and Highway 8. These were introduced by the WDNR over two years ago. These beetle populations occur in close vicinity to Rice and Willow reservoirs. Jersey City Flowage abuts the Rice Reservoir dam (Rice tailwater) and Willow Reservoir is located approximately 10 miles north from Tripoli.

Based on the above findings, WVIC believes this is an opportune time to allow these well-established beetle populations to expand into Rice and Willow reservoirs. Since beetles have now been observed in Spirit Reservoir and are in close proximity to Rice and Willow reservoirs, it seems reasonable that beetles will migrate to these reservoirs within the next few years. All three reservoirs are located within a 17 mile radius of each other. *Galerucella sp.* beetles are very mobile and successful in seeking out new stands of loosestrife traveling 2 to 6 miles from their original release sites (Landis, et al. 2003; Weeden, et al. Cornell University web site; USDA Forest Service web site, 2005). *Galerucella sp.* beetle populations reach densities that kill loosestrife plants in 3 to 5 years (INHS web site, 1999; Ragsdale et al. 2000; Landis, et al. 2003).

Biological Control Monitoring Plan

Goal - The goal of this Plan is to control purple loosestrife on Willow, Rice and Spirit reservoirs with *Galerucella sp.* beetles by maintaining purple loosestrife distribution and abundance similar to or less than pre-biological control (baseline) levels.

Field Methods - To achieve the goal, WVIC proposes to ultimately terminate chemical control with RODEO® herbicide and allow the establishment of *Galerucella sp.* beetles from the surrounding area. Beginning in 2009 WVIC will survey the shorelines of each reservoir by boat in mid July where loosestrife has historically occurred. Purple loosestrife is currently distributed in varying abundance levels along an 18 mile area of shoreline at Rice, a 3 mile area of shoreline at Spirit and a 1 mile area of shoreline at Willow reservoirs. Where purple loosestrife has not historically occurred, WVIC will continue to rely on the agencies and public's assistance and cooperation. WVIC maintains purple loosestrife information posters at its boat landings asking the public to report any sightings of loosestrife.

During the shoreline survey, the locations and abundance of flowering purple loosestrife will be mapped and recorded with GPS. Loosestrife abundance will be defined as low (1-5 plants), moderate (6-50 plants) or high (51-100+ plants). The loosestrife maps will then be compared with baseline maps for monitoring changes in loosestrife distribution and abundance. The survey data from 2008 will be used as the baseline maps for Rice and Willow reservoirs and the 2007 survey data will be used for the Spirit Reservoir baseline map (enclosed for each of the three reservoirs, Attachment 1). Although loosestrife was sprayed with RODEO® at Rice and Willow reservoirs in 2008, the existing loosestrife seed bank will provide loosestrife plants in 2009 based on the results from previous years of spraying. Beetles may invade Willow and Rice reservoirs as early as 2009, based on their presence at Spirit Reservoir in 2008.

During the surveys, the locations of plants exhibiting signs of leaf and stem damage characteristic of *Galerucella sp.* beetles will also be recorded with GPS and inspected to verify beetle presence. This information will be compared between years to assess the distribution and effectiveness of the beetles in controlling loosestrife abundance.

Reporting, Agency Consultation & Management Strategies - As part of the annual review process, WVIC will file a report on the annual monitoring results to the FERC, WDNR and USFWS by October 31 each year for the first five years of this Control Plan (2009 - 2013). WVIC will then discuss the results and possible management options (discussed below) with the agencies in November each year. At the end of the five year period, WVIC will submit a five-year report to the agencies and FERC summarizing the results of bio-control and determine what future monitoring requirements and management options, if any, may be necessary.

The objective of the annual agency review process will be to determine what strategies (management options) could be implemented the following year based on the current year's results (observed increases or decreases in loosestrife abundance and distribution). The WDNR initially posed three potential options including hand pulling, chemical control or releasing beetles and inquired about what levels of loosestrife abundance would "trigger" each option (see Attachment 3: email from Kyle McLaughlin dated October 16, 2008 and letter from Byron Dale Simon dated November 4, 2008). Because of the highly variable nature of loosestrife distribution

and abundance at the three reservoirs, particularly Rice Reservoir, there is not a clear quantitative State directive to this query. Mr. Brock Woods, Wisconsin DNR Purple Loosestrife Control Coordinator, suggested however, that a fourth option for the Project reservoirs could initially be the integration of methods, which has shown promise (*Personal Communication, November 14, 2008*) (WDNR Invasive Species web site, 2004). This fourth management option could involve integration of traditional controls and bio-control for some sites, since some immediate loosestrife control could be maintained while bio-control beetles become common enough to exert meaningful control. As long as beetles have foliage to eat and are not exposed to pesticides, WDNR reports that various methods are compatible. For example, a strategy may include introducing beetles in the center of a large loosestrife infestation, but use traditional controls (i.e., chemical) to minimize the spread of plants at the periphery. Such integration of methods may prove more effective, especially at shortening the overall control process while keeping costs and chemical use to a minimum.

WVIC has not implemented hand pulling loosestrife plants in the past and would not propose this as a traditional or typically implemented method based on its general ineffectiveness in areas where large older stands of loosestrife occur and a large seed bank is already present. WDNR generally only recommends hand pulling in situations where a single new small plant is found in an area where loosestrife had never previously been observed.

The occurrence of purple loosestrife in the three WVIC reservoirs for 13+ years and the complexity and variability of loosestrife distribution and abundance within and between the three reservoirs may initially merit integration of chemical and bio-control methods. The selection of management strategies for each reservoir would be based on the annual survey results and determined during the annual agency review process. For example, if beetles have not migrated into the reservoirs and/or are not effectively controlling the spread of loosestrife, then integrating beetle introductions at levels of 2,000 – 3,000 individuals per site and multiple releases at various locations within the reservoir, with chemical control at peripheral sites, could be considered. WVIC would assume responsibility for introducing beetles, if necessary. The primary goal will ultimately be achieving bio-control as the sole method for controlling purple loosestrife.

References

Illinois Natural History Survey. 1999. Biological control of purple loosestrife in Illinois. Illinois Natural History Survey. Available: www.inhs.uiuc.edu/research/loosestrife/faq.html and www.inhs.uiuc.edu/research/loosestrife/leaffeed.html (accessed September 2008)

Landis, D. A., D. C. Sebolt, M. J. Haas, and M. Klepinger. 2003. Establishment and impact of *Galerucella calmariensis* L. (Coleoptera: Chrysomelidae) on *Lythrum salicaria* L. and associated plant communities in Michigan. *Biological Control*. Pages 1-14.

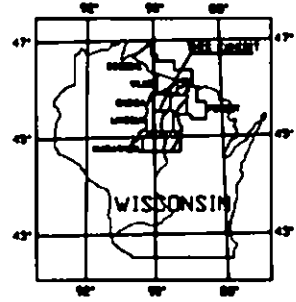
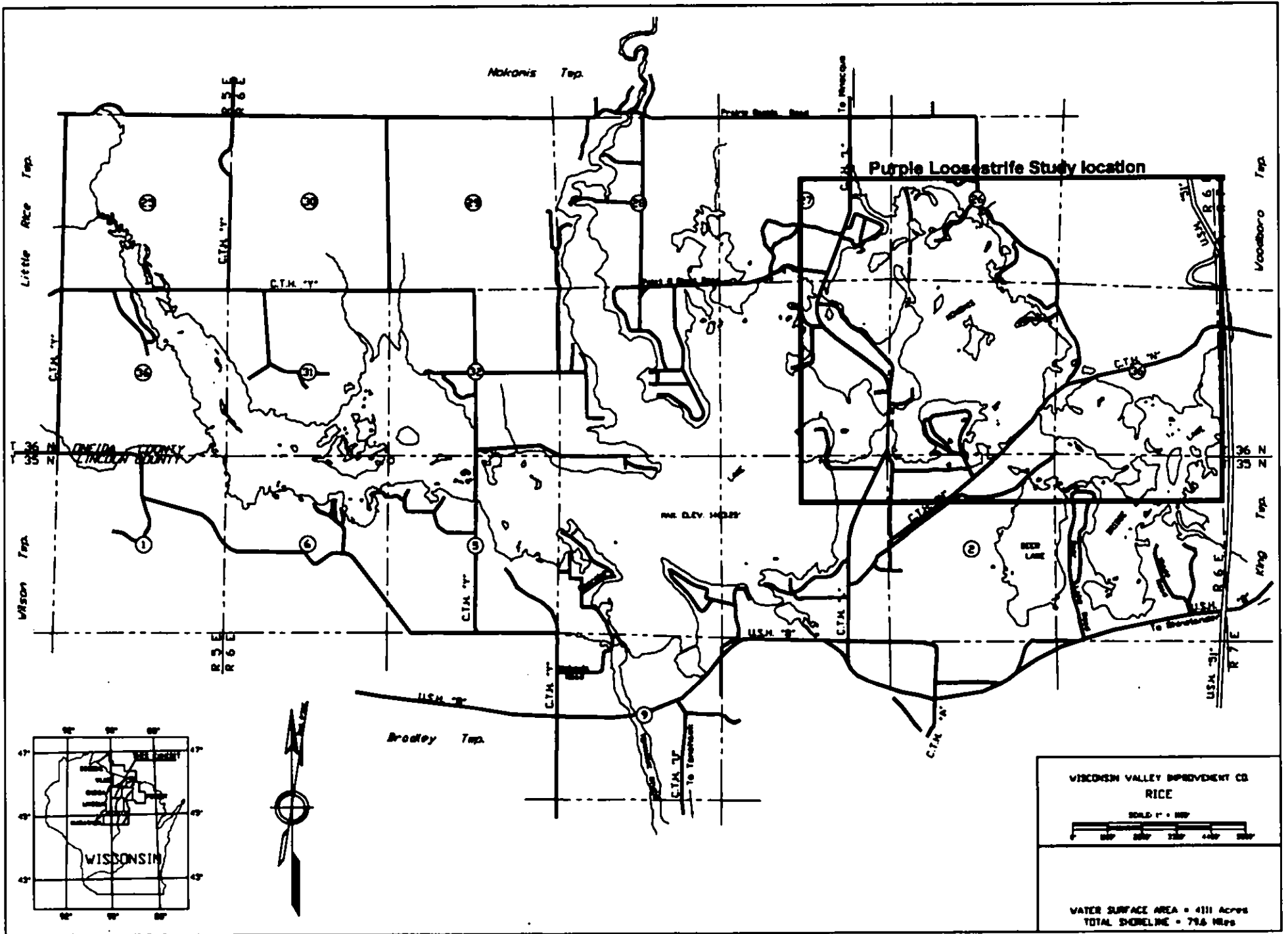
Ragsdale, D., R. Wiedenmann, and D. Landis. 2000. Biological control of purple loosestrife using leaf-feeding beetles. Michigan State University – Extension. Available: www.ncera125.ent.msu.edu/GuideGalerucella.htm (accessed September 2008)

USDA Forest Service. 2005. *Galerucella californiensis*, Common name: Black-margined loosestrife beetle and *Galerucella pusilla* Duftschmidt, Common name: Golden loosestrife beetle. Order: Coleoptera, Family: Chrysomelidae. The Bugwood Network – Joint Project. Available: www.invasive.org/weeds/loosestrife/ch2galcal.html (accessed September 2008)

Weeden, C.R., A.M. Shelton, and M.P. Hoffman. (No date). Biological Control: A guide to natural enemies in North America - *Galerucella californiensis* and *G. pusilla* (Coleoptera: Chrysomelidae). Cornell University. Available: www.nysaes.cornell.edu/ent/biocontrol/weedfeeders/galerucella.html (accessed: September 2008)

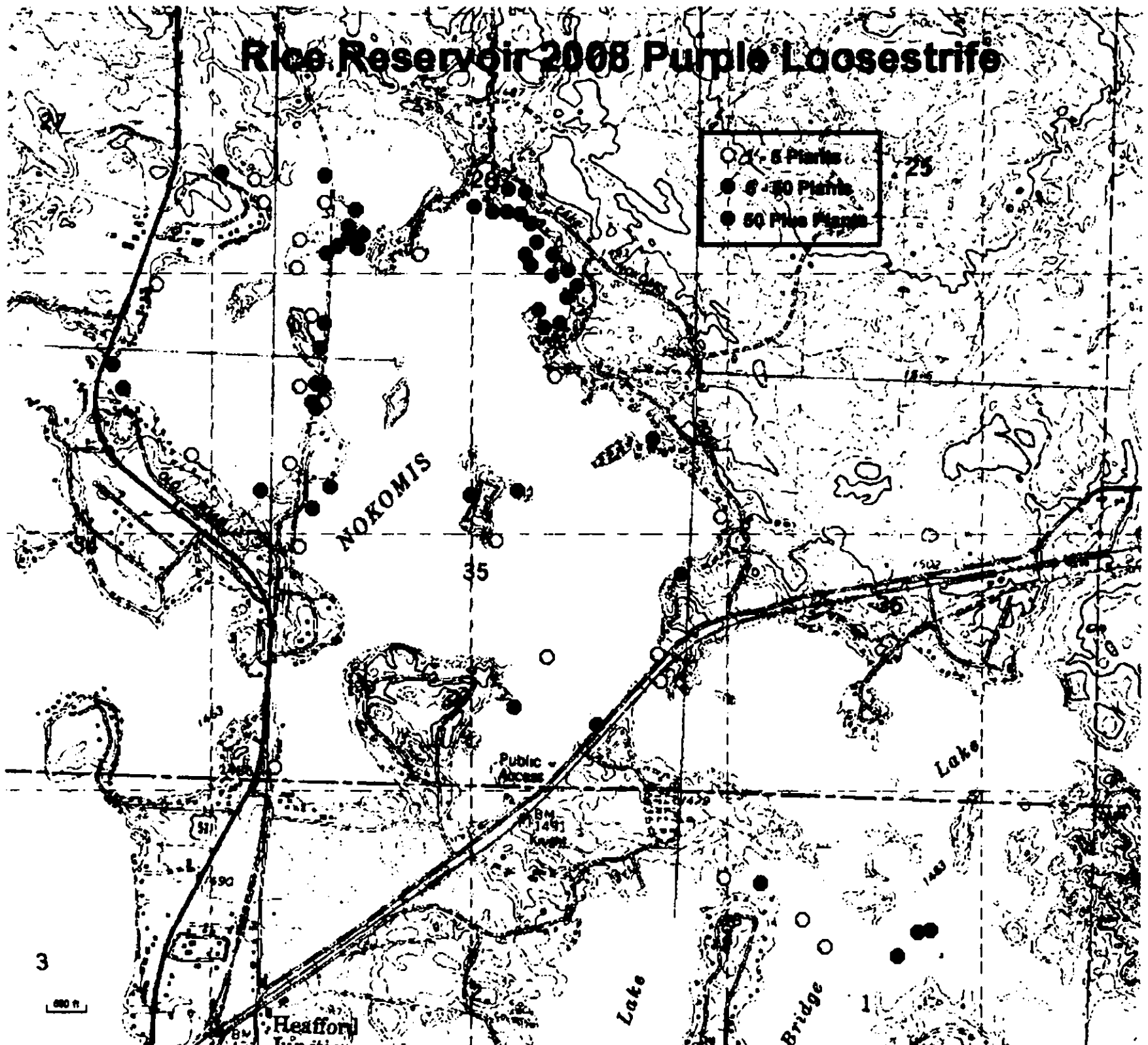
Wisconsin DNR. 2004. Controlling Purple loosestrife. Wisconsin DNR. Available: www.dnr.wi.gov/invasives/fact/loosecontrol.htm (accessed September 2008)

Wisconsin DNR. 2004. Purple loosestrife (*Lythrum salicaria*, *L. virgatum*, and their hybrids). Wisconsin DNR. Available: www.dnr.wi.gov/invasives/fact/loosestrife.htm (accessed September 2008)



WISCONSIN VALLEY IMPROVEMENT CO
RICE
 SCALE 1" = 100'
 0 100 200 300 400 500
 WATER SURFACE AREA = 4111 Acres
 TOTAL SHORELINE = 79.6 Miles

Rice Reservoir 2008 Purple Loosestrife



Purple Loosestrife Survey - 2008

Rice Reservoir

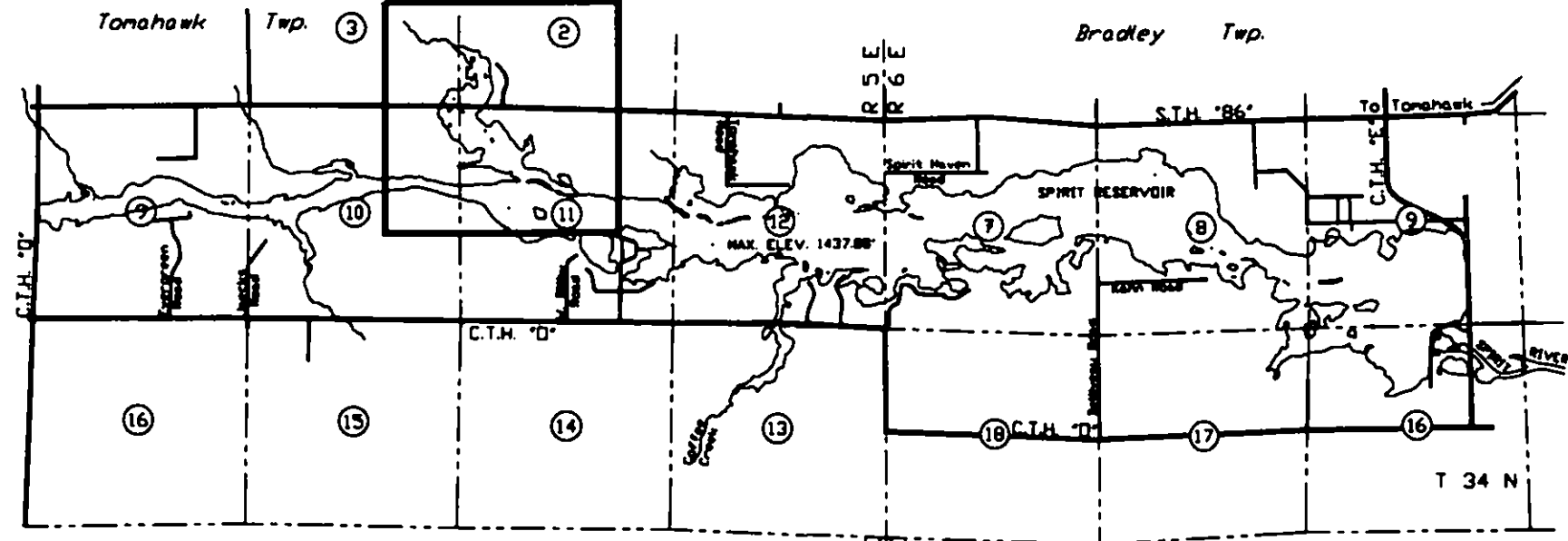
Number	Latitude	Longitude	Amount
1	45° 33.03330	89° 41.12581	1-5 Plants
2	45° 33.06670	89° 41.19757	1-5 Plants
3	45° 33.16814	89° 41.44148	1-5 Plants
4	45° 33.91774	89° 41.49029	1-5 Plants
5	45° 34.19736	89° 41.99932	1-5 Plants
6	45° 34.44148	89° 42.41901	1-5 Plants
7	45° 34.40311	89° 42.78011	1-5 Plants
8	45° 34.46271	89° 42.77187	1-5 Plants
9	45° 34.54154	89° 42.70454	1-5 Plants
10	45° 34.53848	89° 42.88522	1-5 Plants
11	45° 34.58342	89° 42.91431	1-5 Plants
12	45° 34.35952	89° 43.19135	1-5 Plants
13	45° 34.00808	89° 43.07176	1-5 Plants
14	45° 33.99721	89° 42.77947	1-5 Plants
15	45° 34.15900	89° 42.75810	1-5 Plants
16	45° 34.30504	89° 42.73311	1-5 Plants
17	45° 34.12771	89° 42.68253	1-5 Plants
18	45° 33.82517	89° 42.74357	1-5 Plants
19	45° 33.36549	89° 42.79218	1-5 Plants
20	45° 33.85198	89° 42.16057	1-5 Plants
21	45° 33.61499	89° 41.99548	1-5 Plants
22	45° 33.62801	89° 41.66168	1-5 Plants
23	45° 33.57342	89° 41.65215	1-5 Plants
24	45° 33.15935	89° 41.32729	6-50 Plants
25	45° 34.07498	89° 41.69836	6-50 Plants
26	45° 34.33407	89° 42.05618	6-50 Plants
27	45° 34.41916	89° 41.97237	6-50 Plants
28	45° 34.40645	89° 42.01869	6-50 Plants
29	45° 34.44714	89° 42.10237	6-50 Plants
30	45° 34.47383	89° 42.06982	6-50 Plants
31	45° 34.51333	89° 42.08961	6-50 Plants
32	45° 34.44827	89° 42.59950	6-50 Plants
33	45° 34.49450	89° 42.63115	6-50 Plants
34	45° 34.52887	89° 42.61108	6-50 Plants
35	45° 34.59601	89° 43.01239	6-50 Plants
36	45° 34.19108	89° 43.31318	6-50 Plants
37	45° 34.14190	89° 43.28082	6-50 Plants
38	45° 33.93858	89° 42.86044	6-50 Plants
39	45° 34.12668	89° 42.72056	6-50 Plants
40	45° 34.29238	89° 42.69216	6-50 Plants
41	45° 34.23988	89° 42.70234	6-50 Plants
42	45° 33.95296	89° 42.65550	6-50 Plants
43	45° 33.95874	89° 42.09680	6-50 Plants
44	45° 33.94564	89° 42.24119	6-50 Plants
45	45° 33.47681	89° 41.83820	6-50 Plants
46	45° 33.06945	89° 40.84909	50+ Plants
47	45° 33.01868	89° 40.90702	50+ Plants
48	45° 33.07386	89° 40.81086	50+ Plants
49	45° 34.29893	89° 42.04037	50+ Plants

Purple Loosestrife Survey - 2008

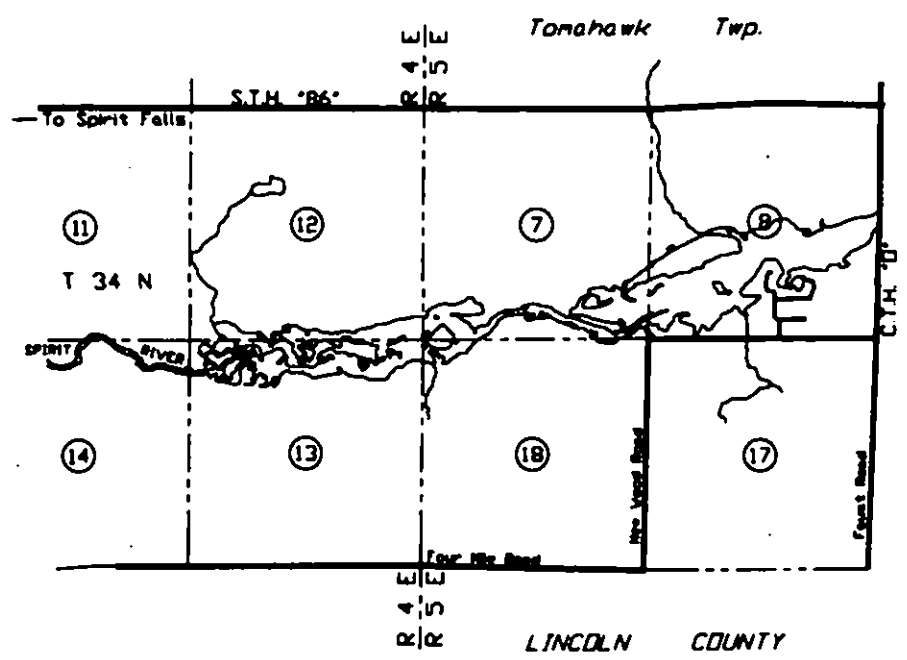
Rice Reservoir

Number	Latitude	Longitude	Amount
50	45° 34.30790	89° 41.96947	50+ Plants
51	45° 34.36260	89° 41.97157	50+ Plants
52	45° 34.38756	89° 41.94373	50+ Plants
53	45° 34.42756	89° 42.06528	50+ Plants
54	45° 34.45056	89° 42.02084	50+ Plants
55	45° 34.53258	89° 42.12153	50+ Plants
56	45° 34.57727	89° 42.10926	50+ Plants
57	45° 34.58331	89° 42.16184	50+ Plants
58	45° 34.53519	89° 42.16202	50+ Plants
59	45° 34.53431	89° 42.20505	50+ Plants
60	45° 34.54382	89° 42.26109	50+ Plants
61	45° 34.47774	89° 42.58631	50+ Plants
62	45° 34.46990	89° 42.62943	50+ Plants
63	45° 34.45175	89° 42.65777	50+ Plants
64	45° 34.43520	89° 42.69086	50+ Plants
65	45° 34.58716	89° 42.70510	50+ Plants
66	45° 34.16464	89° 42.71098	50+ Plants
67	45° 34.16147	89° 42.68421	50+ Plants
68	45° 34.11474	89° 42.70843	50+ Plants
69	45° 33.90679	89° 42.70656	50+ Plants
70	45° 33.50883	89° 42.06848	50+ Plants
71	45° 33.79591	89° 41.60044	50+ Plants

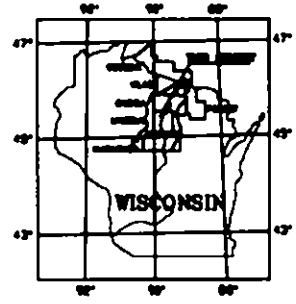
Purple Loosestrife Study Location



LINCOLN COUNTY



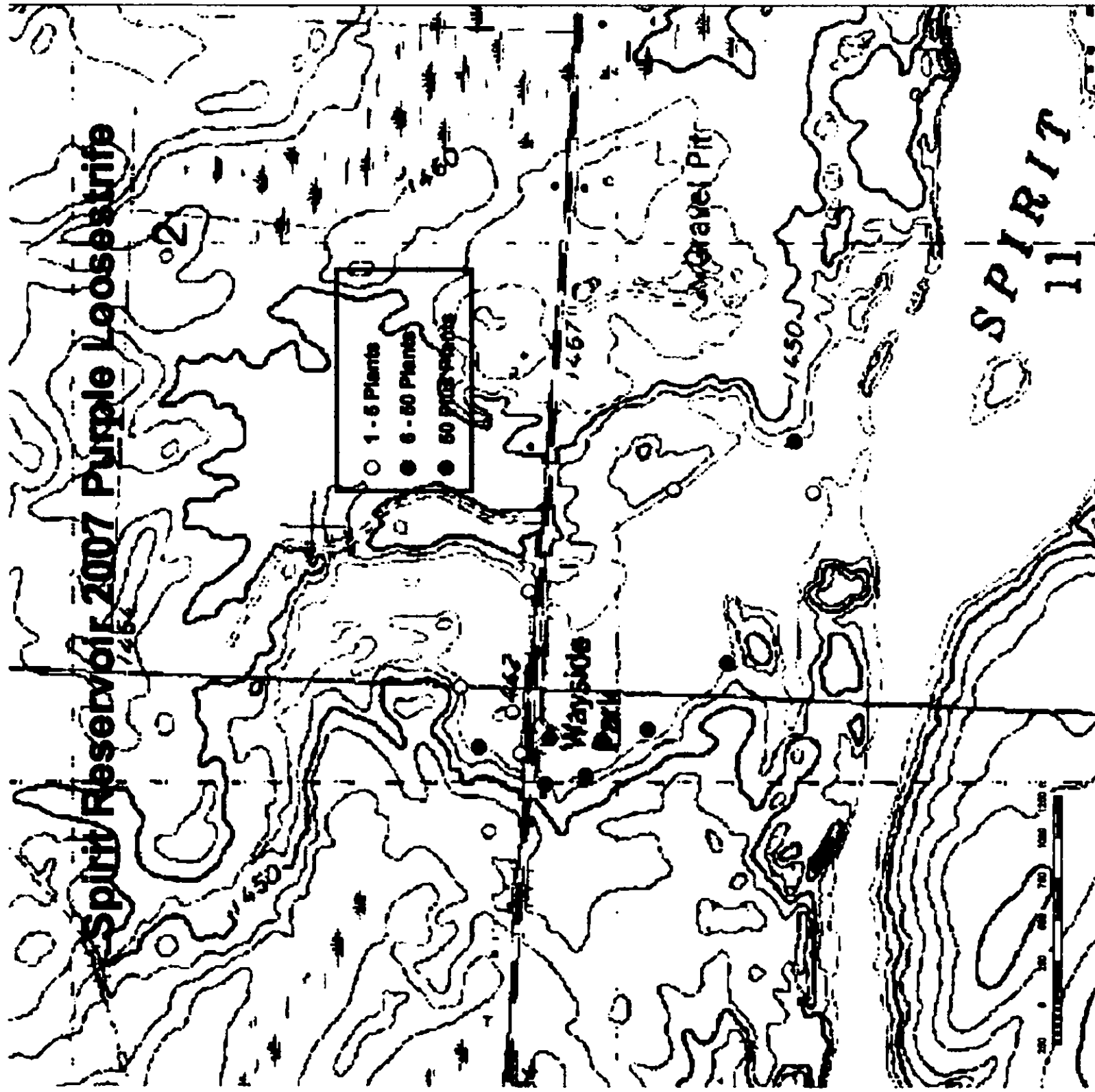
LINCOLN COUNTY



VISCONIN VALLEY IMPROVEMENT CO.
SPIRIT

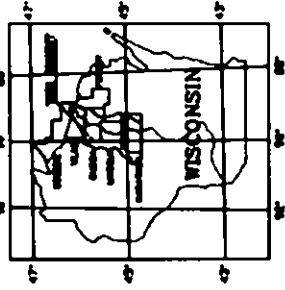
SCALE 1" = 100'

WATER SURFACE AREA = 1698 Acres
TOTAL SHORELINE = 54.8 Miles



Purple Loosestrife Survey - 2007**Spirit Reservoir**

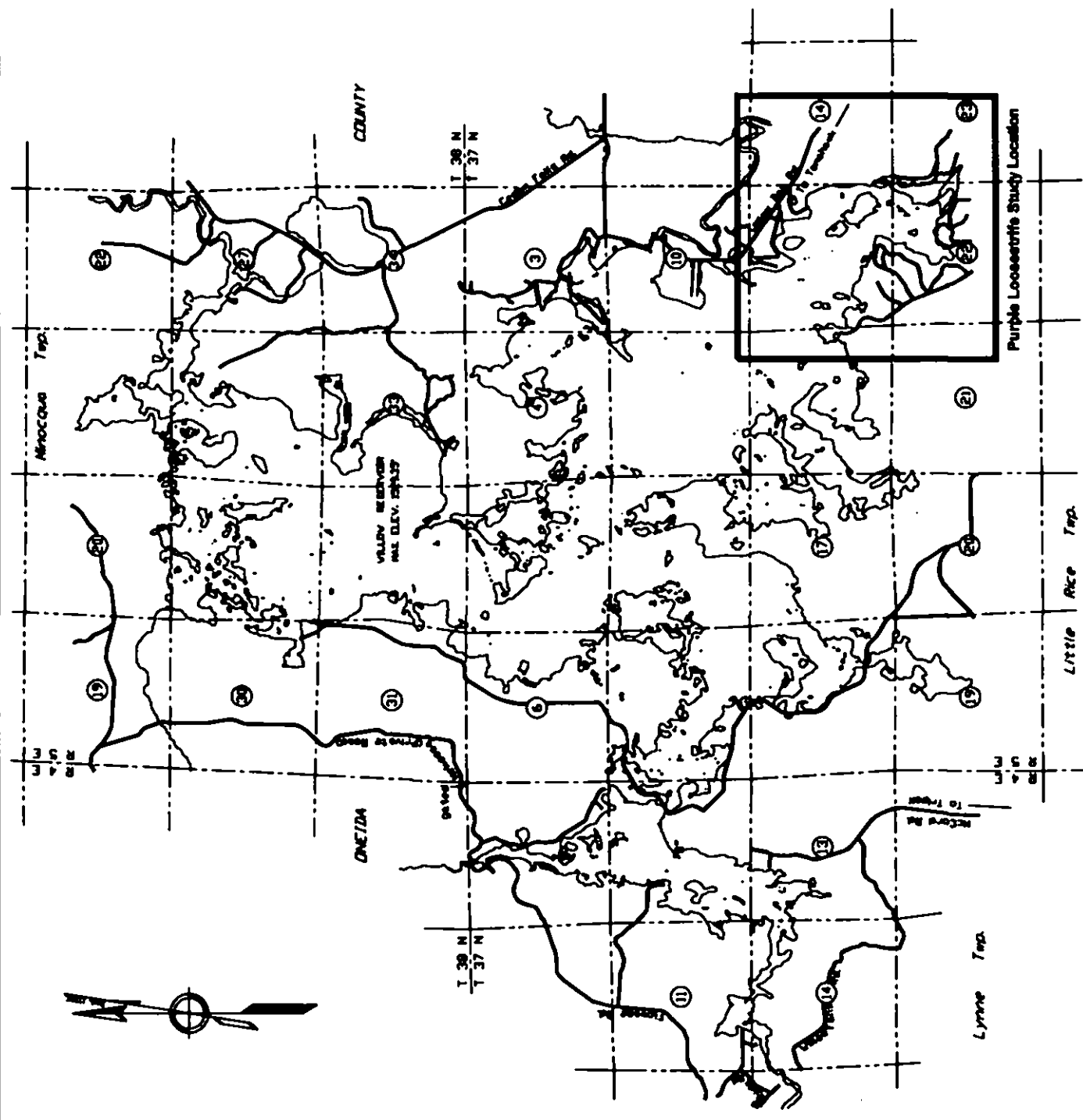
Number	Latitude	Longitude	Amount
1	45° 27.27970	89° 50.08852	1-5 Plants
2	45° 27.34483	89° 50.22781	1-5 Plants
3	45° 27.32449	89° 50.31120	6-50 Plants
4	45° 27.29202	89° 50.25988	1-5 Plants
5	45° 27.28307	89° 50.31812	1-5 Plants
6	45° 27.25736	89° 50.35939	50+ Plants
7	45° 27.21760	89° 50.34588	50+ Plants
8	45° 27.25498	89° 50.29480	50+ Plants
9	45° 27.20068	89° 50.29859	6-50 Plants
10	45° 27.15792	89° 50.27895	6-50 Plants
11	45° 27.08172	89° 50.18104	50+ Plants
12	45° 27.14018	89° 49.93648	1-5 Plants
13	45° 27.00171	89° 49.93415	1-5 Plants
14	45° 27.02241	89° 49.88152	6-50 Plants



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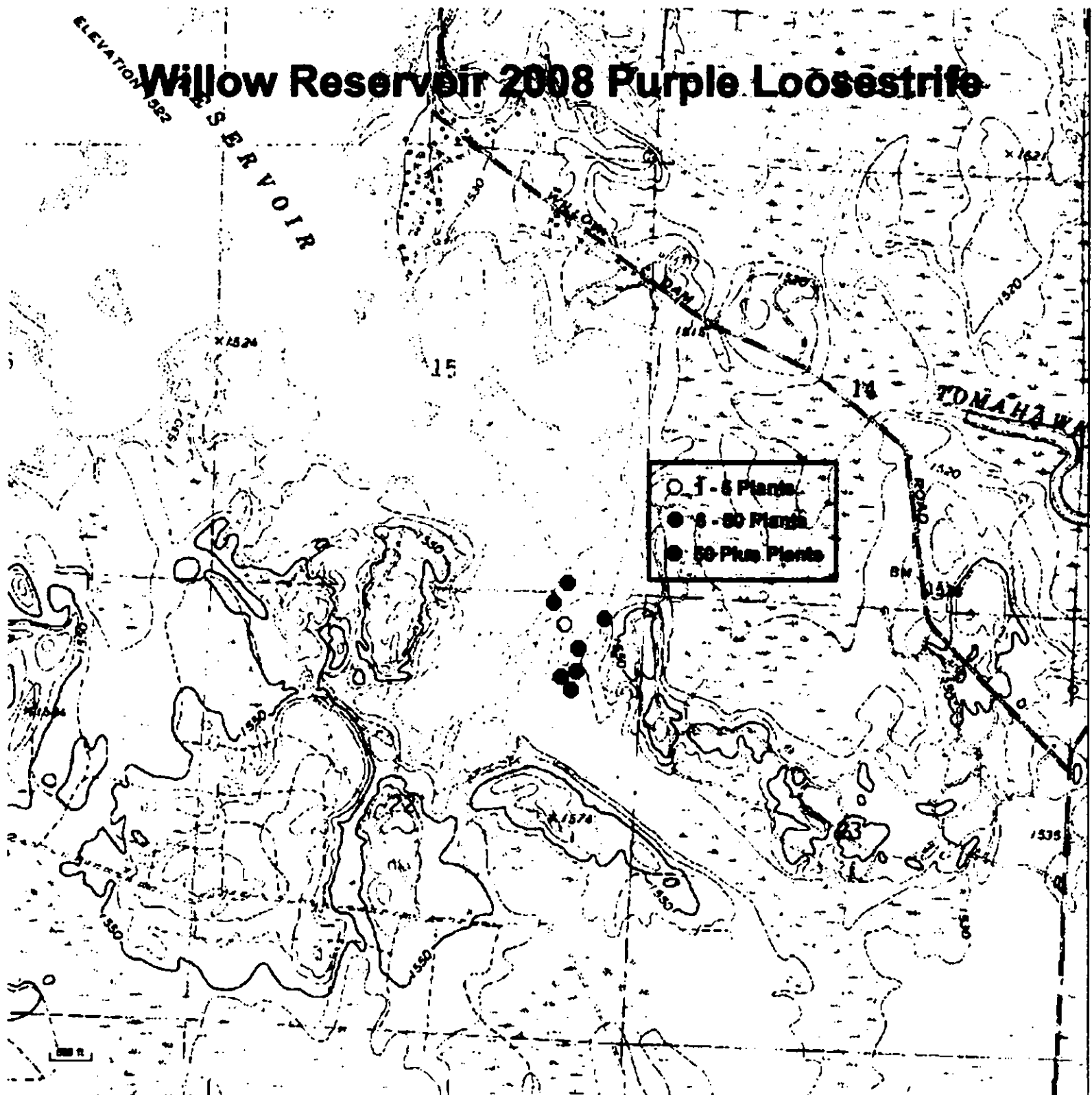


WATER SURFACE AREA = 6398 AC/99
TOTAL SHORELINE = 187.3 MILES



ELEVATION 582
RESERVOIR

Willow Reservoir 2008 Purple Loosestrife



Purple Loosestrife Survey - 2008**Wilow Reservoir**

Number	Latitude	Longitude	Amount
1	45° 41.16447	89° 50.44426	50+ Plants
2	45° 41.14065	89° 50.41648	6-50 Plants
3	45° 41.17613	89° 50.40151	6-50 Plants
4	45° 41.22251	89° 50.39667	6-50 Plants
5	45° 41.28261	89° 50.32727	6-50 Plants
6	45° 41.26790	89° 50.44135	1-5 Plants
7	45° 41.31060	89° 50.47241	6-50 Plants
8	45° 41.35041	89° 50.43513	6-50 Plants

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October 3, 2008

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P.O. Box 7921
Madison, WI 53707-7921

Ms. Louise Clemency
U.S. Fish and Wildlife Service
2661 Scott Tower Road
New Franken, WI 54229-9565

RE: WVIC Project 2113; Purple Loosestrife Control Plan

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The purpose of this letter is to request a modification to the Purple Loosestrife Control Plan. The modification would include terminating the chemical control aspect of the Plan and implementing biological control (*Galerucella sp.* beetles), as discussed in the enclosed Attachment. WVIC believes that biological controls today represent a more natural, economical and effective long-term control method versus chemical control. Several resource agencies, municipalities and utilities have used *Galerucella sp.* beetles to successfully control purple loosestrife.

Attached is WVIC's proposed Modified Purple Loosestrife Control Plan for your review and comment. I would appreciate your comments sent to my attention via email coon@wvic.com or by letter at the above address by November 7, 2008.

Thank you for your consideration.

Sincerely,

A handwritten signature in black ink that reads 'David M. Coon'. The signature is written in a cursive style with a long horizontal stroke at the end.

David M. Coon, Director
Environmental Affairs

Copies to: Tom Jerow, Wisconsin DNR, 107 Sutliff Avenue, Rhinelander WI 54501
Lindsay Watch, Wisconsin DNR, 107 Sutliff Avenue, Rhinelander WI 54501
Jessica Mistak, Michigan DNR, 484 Cherry Creek Road, Marquette, MI 49855

**A
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3**

Dave Coon

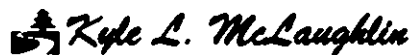
From: McLaughlin, Kyle L - DNR [Kyle.McLaughlin@wisconsin.gov]
Sent: Thursday, October 16, 2008 9:34 AM
To: Simon, Byron D - DNR; Dave Coon
Subject: WVIC Purple Loostripe Plan Amendment Comments

Dear Mr. Simon and Mr. Coon,

After further review of WVIC's modified purple loosestrife (PL) control plan recently submitted to us, we have a few more questions/comments. We agree that there needs to be continuous annual monitoring to track and map where and how quickly PL is spreading after chemical treatments are discontinued; however, to be able to effectively track PL, a detailed map of the current PL distribution and abundance should be included with the plan so there is sufficient baseline data to draw conclusions from in the future. Also, with regard to the annual reporting procedure and the revisiting of management options, what levels of PL abundance trigger hand pulling versus chemical control versus releasing beetles? This is an important consideration and should be included in the plan. We also believe that the annual review process is necessary, but management recommendations also need to be made on an annual basis after the review, rather than after the three year period. This allows WVIC to be more responsive to a large population expansion if it were to occur. Finally, if it is deemed necessary to begin raising and releasing beetles, who will be responsible for doing so?

Thank you for taking the time to review these comments. If you have any questions, please feel free to contact me.

Sincerely,

 Kyle L. McLaughlin

Water Resource Specialist

Lakes Program - Northern Region

Wisconsin Department of Natural Resources

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State of Wisconsin \ DEPARTMENT OF NATURAL RESOURCES

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November 4, 2008

Mr. David M. Coon, Director Environmental Affairs
Wisconsin Valley Improvement Company
2301 North Third Street
Wausau, WI 54403

Subject: WVIC Project 2113: Purple Loosestrife Control Plan

Mr. Coon:

Thank you for your letter dated October 3, 2008 concerning the request for modification of the above mentioned plan. I am aware that one of our staff, Kyle L. McLaughlin, Water Resources Specialist, contacted you on October 16, 2008, via email concerning your proposed modification to the plan. His suggestions are listed in the following paragraph.

After further review of WVIC's modified purple loosestrife (PL) control plan recently submitted to us, we have a few more questions/comments. We agree that there needs to be continuous annual monitoring to track and map where and how quickly PL is spreading after chemical treatments are discontinued; however, to be able to effectively track PL, a detailed map of the current PL distribution and abundance should be included with the plan so there is sufficient baseline data to draw conclusions from in the future. Also, with regard to the annual reporting procedure and the revisiting of management options, what levels of PL abundance trigger hand pulling versus chemical control versus releasing beetles? This is an important consideration and should be included in the plan. We also believe that the annual review process is necessary, but management recommendations also need to be made on an annual basis after the review, rather than after the three year period. This allows WVIC to be more responsive to a large population expansion if it were to occur. Finally, if it is deemed necessary to begin raising and releasing beetles, who will be responsible for doing so?

I concur with these comments and we are hereby requesting you submit a revised Biological Control Monitoring Plan that addresses the above mentioned concerns. If you have any further questions regarding these comments, please contact Mr. McLaughlin directly at (715)-365-8905, email: kyle.mclaughlin@wisconsin.gov. We also suggest contacting Brock Woods at (608)-221-6349, email: brock.woods@wisconsin.gov, who serves as the statewide purple loosestrife coordinator and whose comments would also be beneficial. Thank you for the opportunity to comment.

Sincerely,

Byron Dale Simon
Chief Biologist
Waterways Protection Section

Cc: Kimberly Bose-FERC
Tom Jerow-NOR/Rhineland, Kyle McLaughlin-NOR/Rhineland, Scott Provost-Wisconsin Rapids
Greg Sevener-Peshtigo, Brock Woods-SS/RC