

January 31, 2019

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

RE: Flambeau Pixley FERC Project Number 2395

Flambeau Hydro LLC

Final Report 2018 Purple Loosestrife Inventory Report

#### Dear Ms. Bose:

On behalf of Flambeau Hydro LLC, "Flambeau" (Licensee), Renewable World Energies, LLC (RWE) is submitting a copy of the *Final Report 2018 Purple Loosestrife Inventory Report* for the Flambeau Pixley Hydroelectric Project. The report is a requirement of Flambeau's Federal license pursuant to article 410. Monitoring was conducted on August 28 and August 29, 2017. No out of the ordinary issues were encountered and no Purple Loosestrife was observed. The draft report was sent to the agencies by an attachment to an e-mail on November 30, 2018 for review and comment. We did receive comments from Cheryl Laatsch of the DNR about standardizing the Purple Loosestrife reporting with a form created by the DNR, characterizing site conditions and observing for other AIS. A conference call was attempted to be set up, but schedules have not allowed time for it yet. No comments have been received from the USFWS. The next scheduled monitoring event will be conducted in 2019.

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



Sincerely,

Renewable World Energies, LLC

Agent for Licensee

Mr. Jason Kreuscher Vice President

Attachment: Flambeau Pixley Final Purple Loosestrife Inventory Report

Correspondence

Ms. Cheryl Laatsch, WDNR Cc:

Mr. Nick Utrup, USFWS

RWE, Corporate

for
Flambeau Pixley Hydroelectric Project
FERC Project #2395
Flambeau Hydro, LLC
Price County, Wisconsin

Submitted by:



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

# Summary of Purple Loosestrife Inventory for Flambeau Pixley Hydroelectric Project, FERC #2395

On August 21, 2018, White Water Associates, Inc. performed an inventory of purple loosestrife at the Flambeau Pixley Project. The method of inventory approved and modified by a Federal Energy Regulatory Commission (FERC) Order (June 18, 2003) was defined as follows:

While purple loosestrife is blooming in mid-July to early August, the inventory should be conducted using a boat to survey the impoundment above the dam within the Project Boundary and on foot or by boat below the dam within the Project Boundary. County wetland maps may be used to determine other areas where Purple Loosestrife could be found on lands owned by Flambeau Hydro, LLC (FHLLC) within the Project Boundary. Lands owned by FHLLC within the Project Boundary will be surveyed on foot. A pair of binoculars should be used to search for the purple flowered spikes of the plant. When plants are located, the person(s) inventorying should get close enough to make a positive identification without disturbing the plants or the immediate area around the plants as this could cause them to spread. A GPS will be used to establish a GPS coordinate for the location of the plants. If it is not possible to get close enough to establish an accurate location, an approximate location will be established with reference to an established GPS coordinate. The plants should be inventoried by marking and numbering the location on a project map along with notes approximating size of plants, stand area, percent cover, stem density, plant density, and location with reference to established GPS coordinates. Photos and/or videotape will be taken of the largest occurrences.

# **2017 Observations**

The Flambeau Lower Project boundary was divided into three different areas; *the impoundment* (from HWY 13 bridge in Park Falls to the dam), *FHLLC-owned property within the project boundary* (FHLLC-owned property adjacent to the dam and powerhouse), and *the tailrace* (from the dam and powerhouse to approximately 500 feet downstream of the dam).

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

The FHLLC-owned property within the project boundary was surveyed on foot and no purple loosestrife plants were observed.

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

Appendix A provides scans of field data sheets.

# Appendix A Scans of Datasheets

0	Purple Loosestrife Survey
Vixley	Hydroelectric Project – FERC # 2079 Page 1 of 2
Date 8-21-14 Co	nducted By 5tim Warmhor
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Time Survey Started	11.25 Time Survey Ended 1:35 Boat (14ft or Canoe) and/or Foot
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Information	
Site	
Time	
Photo ID	
Location	
Single or Multi-stem	
# of Plants	
Acreage est.	
Stand Area Density	
Size Colony	
S=0-5, M=6-50, L=>50~	
Plant Height ~ Ft	
Flowering %	
Beetle Feeding?	
Plant Vigor (Very poor to	
good)	
Plant Removed (explain)	
Information	
Site	
Time	
Photo ID	
Location	
Single or Multi-stem	
# of Plants	
Acreage est.	
Stand Area Density	
Size Colony	
S=0-5, M=6-50, L=>50~	
Plant Height ~ Ft	
Flowering %	
Beetle Feeding?	
Plant Vigor (Very poor to	
good)	
Plant Removed (explain)	
Other Species Obse	erved:

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Time Survey Started	Time	Survey Ended _	<u>1:50</u> Boa	t (14ft or Canoe) a	and/or(Foot)
Latitude Start		Longitude End	d		
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Site			·		
Time					
Photo ID			-		
Location					
Single or Multi-stem					
# of Plants					
Acreage est.					
Stand Area Density					
Size Colony					
S=0-5, M=6-50, L=>50~					
Plant Height ~ Ft	-				
Flowering %					
Beetle Feeding?					
Plant Vigor (Very poor to	}				
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Location	<u> </u>				
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# of Plants					
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es Obse	rved:				
			•		

# **Brian Kreuscher**

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

**Sent:** Monday, December 03, 2018 11:59 AM

**To:** Brian Kreuscher; Nick Utrup

**Cc:** Wirt, Alan W - DNR; Mushel, Joelle A - DNR

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

Reports

Hi Brian – Thanks for the AIS Reports. Staff have reviewed the reports and we offer the following comments. We would like to have a conf call with you and Whitewater to go over a few things in the report, and offer suggestions to streamline the reporting process/forms.

- 1. In review of all 4 project areas, we noticed some inconsistent approaches to PL management. We would like to discuss a more consistent approach to PL mgt.
- 2. Some of the comments (ex. Out or reach) are very subjective and difficult to interpret. Lets discuss options to better characterize site conditions.
- 3. We would like to discuss using a standard DNR form for the PL reporting. It is very user friendly, and would simplify your reporting requirements.
- 4. Other AIS reporting we would like to ask that other obvious AIS observations be reported to the DNR, using the standard forms. We ask that this effort be outside of the FERC license process, as a partner on early detection of AIS species. We can discuss more during our conf call.

Please provide me with some dates and times that we can discuss your reports. Thanks

### We are committed to service excellence.

Visit our survey at <a href="http://dnr.wi.gov/customersurvey">http://dnr.wi.gov/customersurvey</a> to evaluate how I did.

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



From: Brian Kreuscher < bkreuscher@rwehydro.com>

Sent: Friday, November 30, 2018 6:06 PM

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

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

Cheryl and Nick,

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

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

Thanks

Brian Kreuscher

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

# **Brian Kreuscher**

**From:** Brian Kreuscher

**Sent:** Thursday, December 06, 2018 3:58 PM

**To:** Laatsch, Cheryl - DNR

Subject: Re: Flambeau Upper (P-2640) Flambeau Lower (P-2421) Pixley (P-2395) Crowley (P-2473) Water

**Quality Draft Reports** 

# Cheryl,

We are open next week Dec 12th 9AM to 2PM, or December 17th through the 20th 9AM to 3PM, December 18th only open until 2PM. Do any of these work?

**Thanks** 

Brian Kreuscher

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

Sent: Tuesday, December 4, 2018 11:34 AM

To: Brian Kreuscher

Subject: RE: Flambeau Upper (P-2640) Flambeau Lower (P-2421) Pixley (P-2395) Crowley (P-2473) Water Quality Draft

Reports

Yes. I think we can make things simpler and more effective for you and the DNR.

#### We are committed to service excellence.

Visit our survey at <a href="http://dnr.wi.gov/customersurvey">http://dnr.wi.gov/customersurvey</a> to evaluate how I did.

Cheryl Laatsch

Statewide FERC Coordinator

Bureau of Environmental Analysis and Sustainability

Wisconsin Dept of Natural Resources

N7725 Hwy 28

Horicon WI 53032

(T) 920-387-7869 (Fax) 920-387-7888

Cheryl.laatsch@wisconsin.gov



From: Brian Kreuscher < bkreuscher@rwehydro.com>

Sent: Tuesday, December 04, 2018 9:30 AM

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

Subject: Re: Flambeau Upper (P-2640) Flambeau Lower (P-2421) Pixley (P-2395) Crowley (P-2473) Water

**Quality Draft Reports** 

Cheryl,

Yes we can. I have asked Angie Stine of White Water Associates for her free time regarding the AIS. Is this something you want to cover during the same conference call? Personally I am free this whole month.

Thanks Brian Kreuscher

From: Laatsch, Cheryl - DNR < <a href="mailto:Cheryl.Laatsch@wisconsin.gov">Cheryl.Laatsch@wisconsin.gov</a>>

Sent: Tuesday, December 4, 2018 9:06 AM

To: Brian Kreuscher

Subject: RE: Flambeau Upper (P-2640) Flambeau Lower (P-2421) Pixley (P-2395) Crowley (P-2473) Water

**Quality Draft Reports** 

Can we get a date on the calendar to go over the report and help streamline a few things?

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Visit our survey at <a href="http://dnr.wi.gov/customersurvey">http://dnr.wi.gov/customersurvey</a> to evaluate how I did.

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(T) 920-387-7869 (Fax) 920-387-7888
Cheryl.laatsch@wisconsin.gov



From: Brian Kreuscher < bkreuscher@rwehydro.com>

Sent: Tuesday, December 04, 2018 9:00 AM

**To:** Laatsch, Cheryl - DNR < <a href="mailto:Cheryl.Laatsch@wisconsin.gov">Cheryl.Laatsch@wisconsin.gov</a> <a href="mailto:Cheryl.Laatsch@wisconsin.

Subject: Re: Flambeau Upper (P-2640) Flambeau Lower (P-2421) Pixley (P-2395) Crowley (P-2473) Water

**Quality Draft Reports** 

Cheryl,

Here you are.

Thanks

Brian Kreuscher

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

Sent: Monday, December 3, 2018 9:49 AM

To: Brian Kreuscher

Cc: Mushel, Joelle A - DNR

Subject: RE: Flambeau Upper (P-2640) Flambeau Lower (P-2421) Pixley (P-2395) Crowley (P-2473) Water

**Quality Draft Reports** 

May I please have the excel spreadsheets for this data?

#### We are committed to service excellence.

Visit our survey at <a href="http://dnr.wi.gov/customersurvey">http://dnr.wi.gov/customersurvey</a> to evaluate how I did.

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From: Brian Kreuscher < bkreuscher@rwehydro.com >

Sent: Friday, November 30, 2018 6:10 PM

To: Laatsch, Cheryl - DNR < <a href="mailto:Cheryl.Laatsch@wisconsin.gov">Cheryl.Laatsch@wisconsin.gov</a>; Nick Utrup < <a href="mailto:nick utrup@fws.gov">nick utrup@fws.gov</a>>

Subject: Flambeau Upper (P-2640) Flambeau Lower (P-2421) Pixley (P-2395) Crowley (P-2473) Water Quality

**Draft Reports** 

All,

Attached are the Draft Water Quality Reports. Please review and provide any comments you may have to me within 30 days for FERC submittal.

Thanks
Brian Kreuscher
Renewable World Energies
Regulatory & Compliance
855-994-9376 x230

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