

February 4, 2019

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

**RE: Flambeau Lower FERC Project Number 2421  
Flambeau Hydro LLC  
Final Report 2019 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 2019 Purple Loosestrife Inventory Report* for the Flambeau Lower Hydroelectric Project. The report is a requirement of Flambeau's Federal license pursuant to article 410. Monitoring was conducted on August 14, 2019. No out of the ordinary issues were encountered. Purple Loosestrife was observed on the Impoundment at 1 site. One multi-stem Purple Loosestrife plant was observed, but the plant was too large to remove. The draft report was sent to the agencies by an attachment to an e-mail on November 26, 2019 for review and comment. We did receive comments from Cheryl Laatsch of the DNR, asking that we prepare to remove the lone Purple Loosestrife plant found in the impoundment that was too large to hand pull. No comments have been received from the USFWS. The next scheduled monitoring event will be conducted in 2020.

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

**Corporate Office**  
P.O. Box 264  
100 S. State Street  
Neshkoro, WI 54960  
Fax: 920-293-4100

Phone: 855-99HYDRO  
(855-994-9376)  
[www.renewableworldenergies.com](http://www.renewableworldenergies.com)

**Administrative Office**  
1001 Stephenson Street  
Norway, MI 49870  
Fax: 906-563-9344



Sincerely,  
**Renewable World Energies, LLC**  
**Agent for Licensee**

A handwritten signature in black ink, appearing to read "Rc/km".

*For* Mr. Jason Kreuzer  
Vice President

Attachment: Flambeau Lower Final Purple Loosestrife Inventory Report  
Correspondence

Cc: Ms. Cheryl Laatsch, WDNR  
Mr. Nick Utrup, USFWS

2019 Purple Loosetrife Inventory  
for  
Flambeau Lower Hydroelectric Project  
FERC Project #2421  
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 Lower Hydroelectric Project, FERC #2421

On July 24, 2019, White Water Associates, Inc. performed an inventory of purple loosestrife at the Flambeau Lower 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.

### 2019 Observations

The Flambeau Lower Project boundary was divided into three different areas; *the impoundment* (HWY 182 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 the HWY 13 bridge).

*The impoundment* was surveyed by boat. One multi-stem purple loosestrife plant was observed. The plant was too large to remove.

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

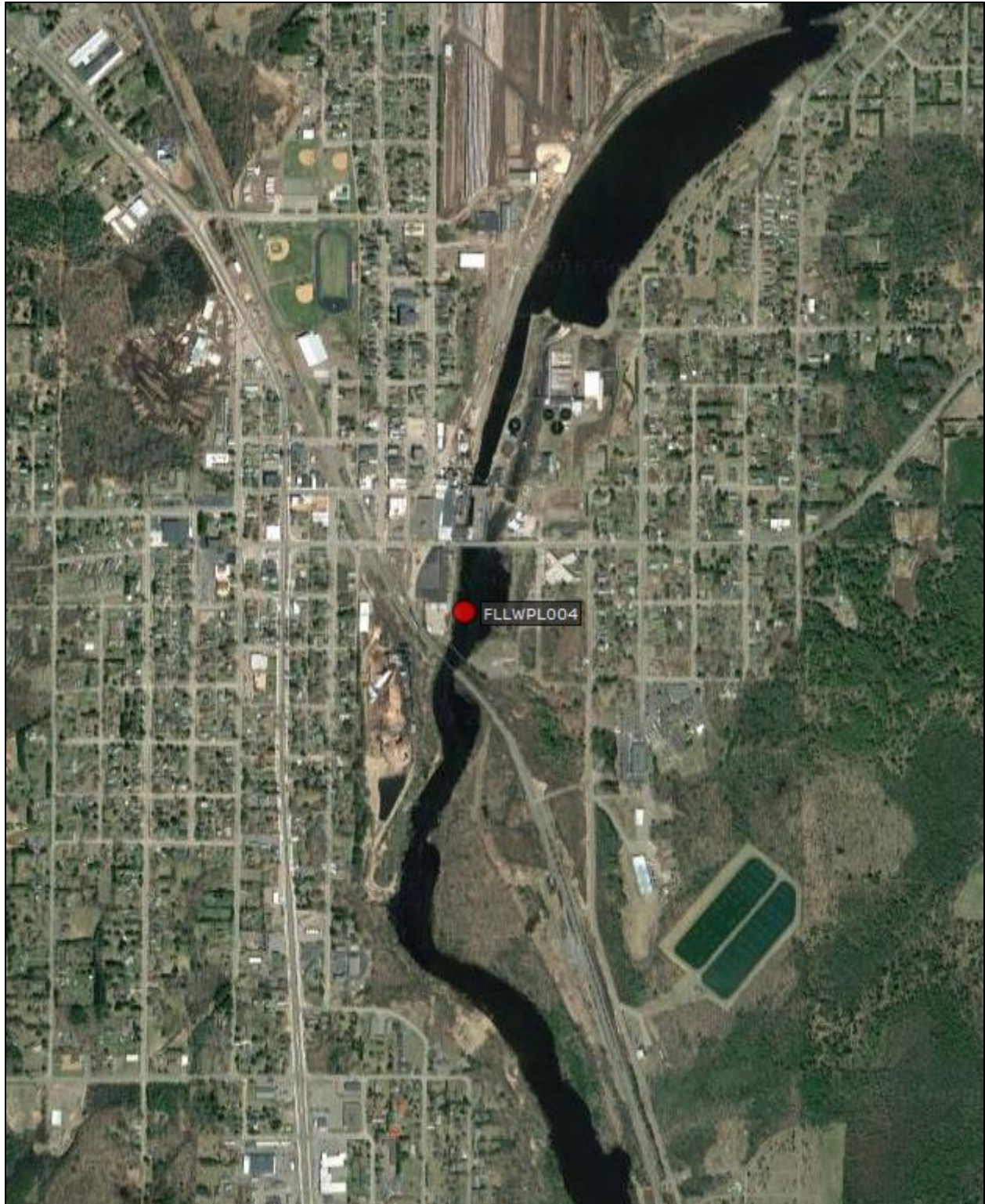
*The tailrace* was surveyed by boat and no purple loosestrife plants were observed.

A map of purple loosestrife locations is available in Appendix A. Appendix B provides tables of historical purple loosestrife data as well as observations made in 2019. Appendix C provides scans of field data sheets. Appendix D provides photos of purple loosestrife found at the project area.

# **Appendix A**

## **Maps**





Map 1. Locations of purple loosestrife at Flambeau Lower observed in 2017-2019.

# **Appendix B**

## **Tables**

<b>Table 1. GPS points for purple loosestrife inventory at Flambeau Lower, FERC#2421.</b>					
<i>GPS Point</i>	<i>Latitude</i>	<i>Longitude</i>	<i>Plant Height</i>	<i>Stand Area</i>	<i>Comments</i>
FLLWPL004 (FLLW PLB)	45.93290	-90.44688	5'	4'x4'	2016-first observed. 40 plants observed. Flowering heads clipped. 2017- One large multi-stemmed plant. No treatment. 2018-One large multi-stemmed plant. Cut a few tops but it is too large to remove. 2019- One large multi-stemmed plant. No treatment. Too large to pull.



# **Appendix C**

## **Scans of Datasheets**

### Purple Loosestrife Survey

Lower Amazon Hydroelectric Project - FERC # 2421 Page \_\_\_ of \_\_\_

Date 4-24-19 Conducted By Anna Stone Ryan Wombal

HWL 1417.32 TWL 1418.6 CFS 690 Equipment Used: Binos, camera, GPS

Air Temp: 77°F Wind Speed W 5 mph Barometer: 30.11 Sky Conditions: Clear

Time Survey Started 11:08 Time Survey Ended 12:00pm Boat (14ft or Canoe) and/or Foot

Latitude Start BL/Dam Longitude End Boat Landing/Dam

Location of Survey Area: Tailrace \_\_\_ Bypass Reach \_\_\_ Impoundment  FHLLC Property \_\_\_

Description of Location \_\_\_\_\_

Historic Info: \_\_\_\_\_

Purple Loosestrife Found:  Yes or No

Information					
Site	<u>PLB004</u>				
Time	<u>11:33</u>				
Photo ID	<u>8549</u>				
Location					
Single or Multi-stem	<u>Multi</u>				
# of Plants	<u>20</u>				
Acreage est.	<u>3 x 3</u>				
Stand Area Density	<u>3 x 3'</u>				
Size Colony S=0-5, M=6-50, L=>50~	<u>M</u>				
Plant Height ~ Ft	<u>4'</u>				
Flowering %	<u>no</u>				
Beetle Feeding?	<u>no</u>				
Plant Vigor (Very poor to good)	<u>good</u>				
Plant Removed (explain)	<u>NO Tearing</u>				

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 Observed: \_\_\_\_\_

### Purple Loosestrife Survey

Lower Flamborough

Hydroelectric Project - FERC # 2421

Page 2 of 2

Date 7-24-19 Conducted By Anna Stone Ryan Wernke

HWL 1467.3 TWL 1448.6 CFS 690 Equipment Used: Ubinocular camera 6.15

Air Temp: 77 °F Wind Speed: W 5 Barometer: 30.11 Sky Conditions: Clear

Time Survey Started 12:00 Time Survey Ended 12:15 Boat (14ft or Canoe) and/or Foot ( )

Latitude Start Dam Longitude End Dam

Location of Survey Area: Tailrace  Bypass Reach  Impoundment  FHLLC Property

Description of Location \_\_\_\_\_

Historic Info: \_\_\_\_\_

Purple Loosestrife Found: Yes or No (No)

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 Observed: \_\_\_\_\_

# **Appendix D**

## **Photos**



**Photo 1. Purple loosestrife growing in wetland area.**



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

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

Thu 12/5/2019 11:23 AM

To: Brian Kreuzscher <bkreuscher@rwehydro.com>

Cc: Mushel, Joelle A - DNR <Joelle.Mushel@wisconsin.gov>

Hi Brian -

FERC 2421 Flambeau Lower has a single location of PL (Data Point FLLWPL004.) This seems like this is the second year where it was too big to hand pull. We are asking that you go plan ahead of time to have proper tools and clippers to cut the plant and prevent the seeds from spreading. Small stands of plants should be removed.

**We are committed to service excellence.**

Visit our survey at <http://dnr.wi.gov/customersurvey> 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](mailto:Cheryl.laatsch@wisconsin.gov)



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**From:** Wirt, Alan W - DNR <Alan.Wirt@wisconsin.gov>

**Sent:** Monday, December 02, 2019 10:04 AM

**To:** Laatsch, Cheryl - DNR <Cheryl.Laatsch@wisconsin.gov>; Mushel, Joelle A - DNR <Joelle.Mushel@wisconsin.gov>

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

Cheryl

Thank you for your time in this matter.

**We are committed to service excellence.**

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

Alan W. Wirt  
Water Resource Management Specialist  
Wisconsin Department of Natural Resources

Rhineland, Wisconsin 54501  
Office: 715-365-8905  
Cell Phone: 715-892-5413  
Email: [Alan.Wirt@wisconsin.gov](mailto:Alan.Wirt@wisconsin.gov)



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**From:** Laatsch, Cheryl - DNR <[Cheryl.Laatsch@wisconsin.gov](mailto:Cheryl.Laatsch@wisconsin.gov)>  
**Sent:** Friday, November 29, 2019 9:57 AM  
**To:** Wirt, Alan W - DNR <[Alan.Wirt@wisconsin.gov](mailto:Alan.Wirt@wisconsin.gov)>; Mushel, Joelle A - DNR <[Joelle.Mushel@wisconsin.gov](mailto:Joelle.Mushel@wisconsin.gov)>  
**Subject:** FW: Crowley (P-2473) Pixley (P-2395) Upper (P-2640) Lower (P-2421) 2017 Purple Loosestrife Draft Reports

Hi Al – Please see the email below and the various attachments for the PL reports. Please let me know if you have any concerns or comments or changes. I can have Joelle work with RWE on using the forms to report PL. Comments due Dec 10<sup>th</sup>.

**We are committed to service excellence.**

Visit our survey at <http://dnr.wi.gov/customersurvey> 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](mailto:Cheryl.laatsch@wisconsin.gov)



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**From:** Brian Kreuzscher <[bkreuscher@rwehydro.com](mailto:bkreuscher@rwehydro.com)>  
**Sent:** Tuesday, November 26, 2019 8:10 PM  
**To:** Laatsch, Cheryl - DNR <[Cheryl.Laatsch@wisconsin.gov](mailto:Cheryl.Laatsch@wisconsin.gov)>; Nick Utrup <[nick\\_utrup@fws.gov](mailto: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).



Last year there were comments about using a standard reporting form. We didn't get around to discussing using that going forward. This year there were no subjective comments regarding Purple Loosestrife that wasn't pulled. All instances that were found were pulled except a single observance at the Lower project which was too large to pull.

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

Thanks

Brian Kreuzer

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

Document Content(s)

20-02-04 BRK FLLW Final P L Rpt To FERC ALL.PDF.....1-16