



2301 NORTH THIRD STREET WAUSAU, WISCONSIN 54403

715/848-2976 FAX: 715/842-0284

Web Site: www.wvic.com Email: staff@wvic.com

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FEDERAL ENERGY
REGULATORY COMMISSION

December 14, 2010

The Secretary
Federal Energy Regulatory Commission
888 First Street, NE
Washington, D.C. 20426

RE: WVIC Project 2113; Purple Loosetrife Control Plan – 2010 Annual Monitoring Report

In accordance with the Federal Energy Regulatory Commission (FERC) "Order Amending Purple Loosetrife Control Plan" (Order) issued June 16, 2009, Wisconsin Valley Improvement Company (WVIC) herewith submits an original and eight copies of the Purple Loosetrife Control Plan - 2010 Annual Monitoring Report (Report) (Attachment 1).

In compliance with the Order, page 5, (B), the Report includes: 1) annual monitoring results identifying locations and abundance of purple loosetrife..., 2) information and/or results identifying the distribution and effectiveness of *Galerucella sp.* beetles ..., and 4) the Proposed Purple Loosetrife and Beetle Monitoring Plan for 2011 (management options that will be used in 2011). Management options that were followed in 2010 were presented in the 2009 annual report (...Monitoring Plan for 2010). Documentation of comments or recommendations from the Wisconsin DNR (WDNR) is included in Attachment 2, as required in the Order, page 5, (B) 3) as discussed below.

WVIC submitted the 2010 annual monitoring report and the proposed monitoring plan for 2011 to the WDNR and U.S. Fish and Wildlife Service (USFWS) for review and comment via email on October 26, 2010. WVIC did not receive any comments from the USFWS by the end of the 30-day comment period. The WDNR submitted brief comments via email on November 23, 2010 and WVIC responded to the comments via email November 30, 2010. The WDNR then submitted a brief response via email on December 7, 2010. This email correspondence is included in Attachment 2. The 2010 Purple Loosetrife Annual Monitoring Report herewith submitted is unchanged from the Draft Report sent to the agencies.

Sincerely,

David M. Coon, Director
Environmental Affairs

Enclosures:

Attachment 1: WVIC Purple Loosetrife Annual Monitoring Report – 2010.

Attachment 2: Documentation of agency consultation and correspondence.

Cc: Pat Grant, Environmental Protection Specialist, FERC, Room 3130, 230 South Dearborn Street,
Chicago, IL 60604

Attachment 1

Wisconsin Valley Improvement Company

**Purple Loosestrife Annual Monitoring
Report – 2010**

October 26, 2010

Wisconsin Valley Improvement Company
Purple Loosestrife Annual Monitoring Report – 2010

October 26, 2010

Introduction

In compliance with Wisconsin Valley Improvement Company's (WVIC) 1996 FERC license (Project No. 2113), the purple loosestrife control program became a part of WVIC's FERC approved 1997 Fish and Wildlife Management Plan (Article 413). The Fish and Wildlife Management Plan was updated in 2001 and 2006 in accordance with a five-year update requirement in WVIC's FERC license. WVIC drafted a Modified Purple Loosestrife Control Plan in November 2008. The purpose of the Modified Plan was to terminate and/or phase out chemical control of loosestrife and implement biological control with *Galerucella sp.* beetles. The Plan was sent to Wisconsin DNR (WDNR) and US Fish and Wildlife Service (USFWS) for review and comment. Comments were received from the WDNR and incorporated into the Plan. The Plan was sent to FERC November 26, 2008 as an amendment request to WVIC's Fish and Wildlife Management Plan. FERC issued an Order Amending the Plan June 16, 2009 and approved the Plan with minor reporting modifications.

This report represents the second in a series of five annual Purple Loosestrife Monitoring Reports required in the FERC Order.

2010 Field Monitoring Results

Willow Reservoir - On July 29, 2010 WVIC monitored the area of Willow Reservoir where loosestrife has historically occurred. Reservoir elevation was 1525.98 ft. NGVD (3.37 ft. below full). The area was accessed by boat and then surveyed by walking the exposed shoreline and counting both immature and mature plants. GPS readings were taken every 100 ft where plants were observed. Loosestrife relative abundance was recorded as A (1-5 plants), B (6-50 plants), or C (50+ plants). Figure 1 is a distribution and relative abundance map of the recorded locations in 2010 and Table 1 lists the GPS coordinates for each observation.

Distribution of loosestrife in 2010 was generally limited to the area of small islands (Figure 1) compared to 2008 when loosestrife was observed on the small islands and the east shoreline. A survey was not completed in 2009 since low water level conditions (8.55 ft. below full), resulting from a severe drought, prevented access by boat. Relative abundance of loosestrife beds with 6-50 plants declined in 2010 with only two beds (6-50 plants) observed compared to six beds in 2008. No dense beds (50+ plants) were observed in 2010. The decline may have been related to unfavorable loosestrife growing conditions in the dry sand environment caused by the drought and low water level that prevailed throughout the entire 2009 growing season. Many of the plants observed in 2010 were small and immature. Following the July 29, 2010 survey, Willow Reservoir water level increased to within one foot of full by mid-August and then reached full in mid-September following above normal precipitation. All of the loosestrife plants observed in 2010 would have been flooded (over-topped) between mid-August and mid-September. Loosestrife was not observed outside of the historic range at Willow.

Galerucella sp. beetles have not been observed at Willow Reservoir to date although they are present in the Tripoli area to the southwest, Rice Reservoir to the southeast and the Minocqua Reservoir system to the northeast, all within 10-12 miles of Willow. It is unlikely that the low relative abundance of loosestrife would support a sustained beetle population.

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Rice Reservoir – On July 28, 2010 WWIC monitored the portions of Rice Reservoir where loosestrife has historically occurred. Reservoir elevation was 1461.50 ft. NGVD (1.75 ft. below full). The general areas were accessed by boat and by walking the exposed shoreline and counting both immature and mature plants. Relative abundance and distribution of loosestrife and *Galerucella sp.* beetle distribution was recorded with GPS. Figure 2 is a distribution map of recorded loosestrife and beetle activity locations in 2010 and Table 2 lists the GPS coordinates for each observation.

Distribution of loosestrife in 2010 was similar to 2009. Relative abundance of dense loosestrife beds (50+ plants) was also similar between years, however, the abundance of beds with 6-50 plants increased in 2010. This increase appeared to be related to the low reservoir water level in 2009 and early 2010 which allowed loosestrife plants to expand outward from the shoreline into the littoral area. Water level at Rice in 2009 ranged from 3 to 7 feet below full from early-July to mid-September due to drought conditions and was 4.48 ft below full at the time of the 2009 survey. The drought and related low water level conditions continued into the early and mid-part of the 2010 growing season when water levels ranged from 6.5 ft below full in early-May to 3 ft below full by mid-July. When the survey was conducted July 28, 2010 the water level was rising and was only 1.75 ft below full and many of the loosestrife plants that had migrated outward from shore were being inundated. Reservoir water level continued to rise following the 2010 survey due to above normal precipitation and by early-September the reservoir was full. Loosestrife plants that had expanded out from shore were flooded (over-topped). Loosestrife was not observed outside of the historic range at Rice.

Galerucella sp. beetle activity was observed at three locations in 2010 (Figure 2) and beetles have now inhabited Rice Reservoir for two consecutive years. Significant leaf and stem damage characteristic of *Galerucella sp.* beetles was observed at the northernmost beetle location in dense beds (50+ plants) and adult beetles were observed. Significant leaf and stem damage characteristic of *Galerucella sp.* beetles was also observed in dense beds in the Bridge Lake area and larval beetles were observed. Since this is only the second year that beetles have inhabited Rice Reservoir, their effectiveness in controlling loosestrife at this point has been limited pending further expansion/distribution of the beetle population. Continued monitoring will determine their ultimate effectiveness and ability to expand naturally and the need, if any, to introduce additional beetles.

Spirit Reservoir – On July 27 & 29, 2010 WWIC monitored the portion of Spirit Reservoir where loosestrife has historically occurred. Reservoir elevation was 1437.12 and 1437.42 ft., respectively NGVD or (0.76 and 0.47 ft. below full). The general areas were accessed by boat and by walking the exposed shoreline/causeway and counting both immature and mature plants. Relative abundance and distribution of loosestrife and *Galerucella sp.* beetle distribution was recorded with GPS. Figure 3 is a distribution map of the recorded loosestrife and beetle activity locations in 2010 and Table 3 lists the GPS coordinates for each observation.

Distribution of loosestrife in 2010 (Figure 3) remained confined to the Highway 86 bay, but new sightings of generally individual plants were observed to the south and southeast within the bay compared to 2009. Loosestrife was not observed outside of the historic range at Spirit. Relative abundance of dense loosestrife beds (50+ plants) was similar between years with one dense bed reported each year. The increased number of sightings (1-5 plants and 6-50 plants) appeared to be primarily related to low reservoir water level in 2009 and early 2010 which allowed loosestrife plants to expand outward from the shoreline into the littoral area, similar to Rice Reservoir. Spirit water level declined from one to eight ft below full over the 2009 growing season. The water level was two to three feet below full at the start of the 2010 growing season, but gradually increased to near full by early-July.

Galerucella sp. beetle activity was observed at two locations in 2010 (Figure 3) and beetles have now inhabited Spirit Reservoir for two of the last three years in generally the same areas (first observed in

WWIC Purple Loosestrife Annual Monitoring Report - 2010

2008). Significant leaf and stem damage characteristic of *Galerucella sp.* beetles was observed in the one dense bed (50+ plants) and another bed of 1-5 plants. Adult beetles were observed in both beds. Similar to Rice Reservoir, this is only the second year that beetles have inhabited Spirit Reservoir. Their effectiveness in controlling loosestrife at this point has been limited pending further expansion/distribution of the beetle population. Continued monitoring will determine their ultimate effectiveness and ability to expand naturally and the need, if any, to introduce additional beetles.

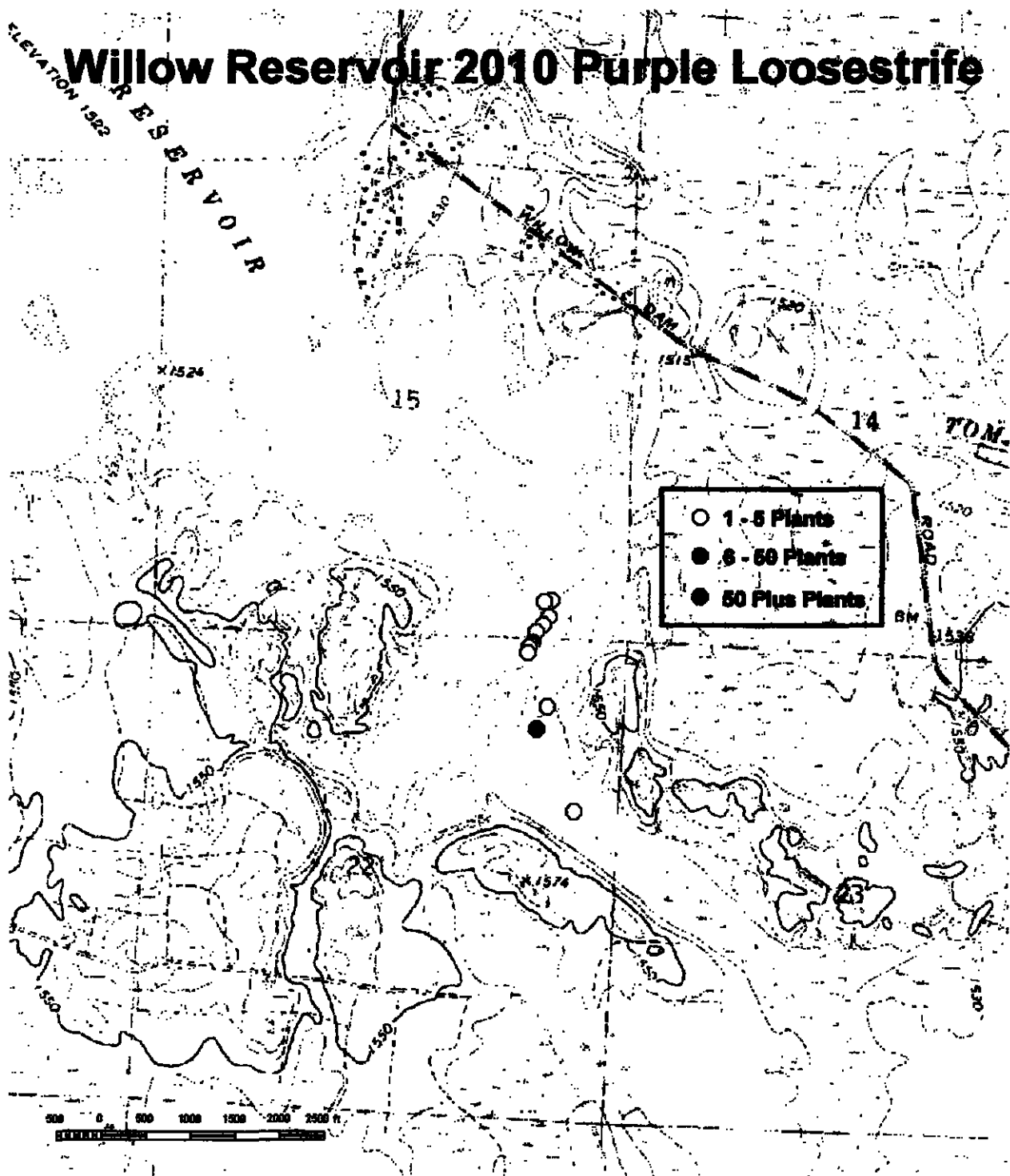
Proposed Purple Loosestrife and Beetle Monitoring Plan for 2011

Results from 2010 indicate an increase in relative abundance of purple loosestrife at Rice Reservoir and an increase in distribution and relative abundance at Spirit compared to 2009. The increases appeared to be related to abnormal low water level conditions which allowed loosestrife to expand outward from the shoreline into the littoral area during 2009 and the early part of the 2010 growing seasons. Distribution of loosestrife at Willow Reservoir was similar to 2008, however, relative abundance declined which appeared to be a function of the very low water level and severe drought conditions. Loosestrife expansion away from the shoreline did not occur at Willow as observed at Rice and Spirit. The moist organic sediments at Rice and Spirit were favorable for expanded distribution into the littoral area, unlike the dry sand environment at Willow.

WWIC proposes to repeat the same monitoring survey at the three reservoirs (Willow, Rice and Spirit) during late-July or early-August in 2011 to document loosestrife distribution and abundance along with documenting any continued immigration and distribution of *Galerucella sp.* beetles. Monitoring in 2011 will help determine what impact, if any, the flooding (over-topping) of loosestrife at all three reservoirs in 2010 may have had on its abundance and distribution and beetle distribution. If loosestrife relative abundance at Rice and the distribution and relative abundance at Spirit continues to increase in 2011, the introduction of additional beetles could be considered in 2012. In compliance with the June 16, 2009 FERC Order, WWIC will submit a 2011 purple loosestrife annual monitoring report in October 2011 to the WDNR and USFWS for review and comment and to confirm the monitoring approach for 2012.

WWIC Purple Loosestrife Annual Monitoring Report - 2010

Figure 1



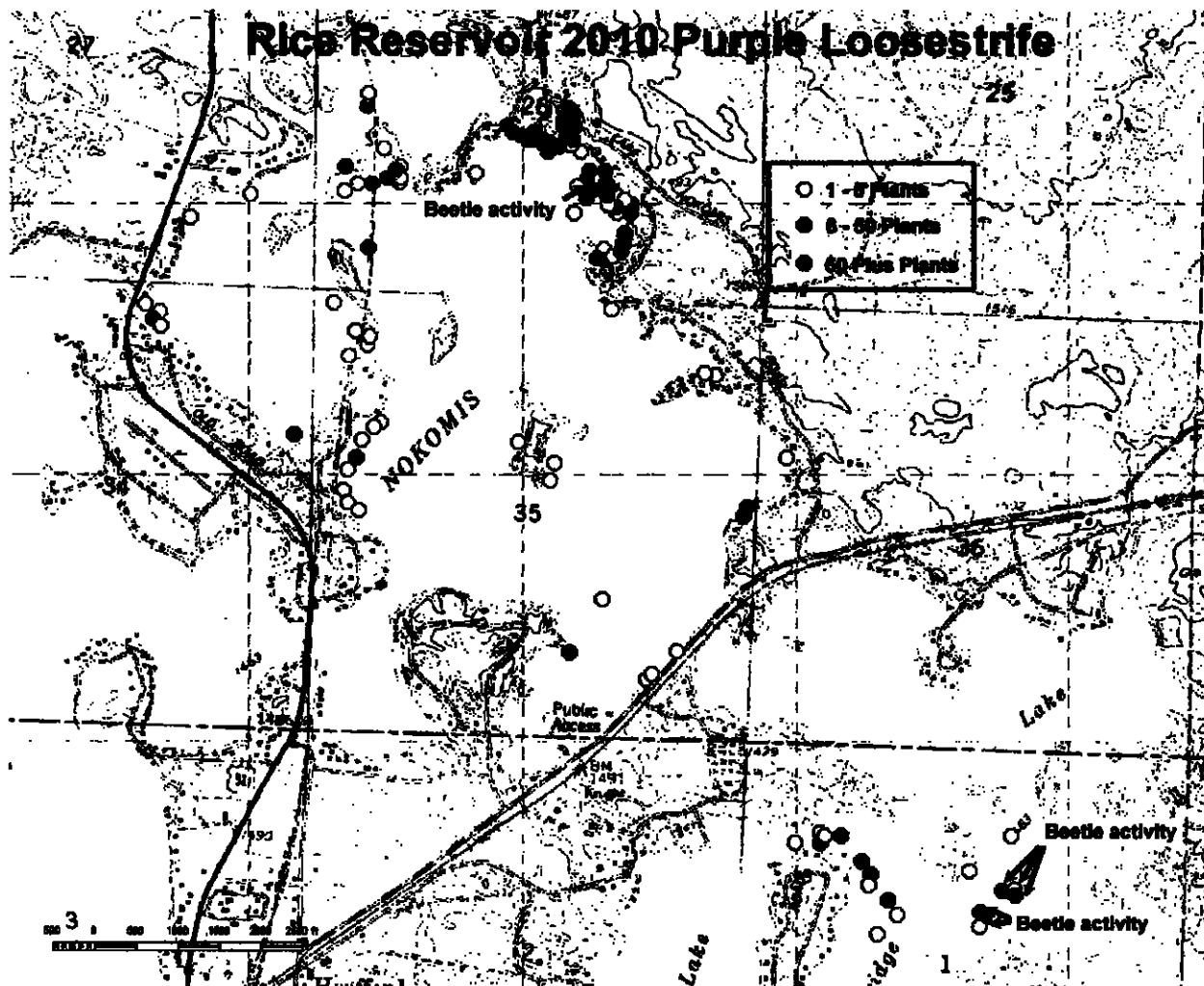
WWIC Purple Loosestrife Annual Monitoring Report - 2010

Table 1

Purple Loosestrife Survey - 2010				
Willow Reservoir				
Number	Latitude	Longitude	Amount	Beetle Activity
1	45° 41.40400	89° 50.41602	1-5 Plants	
2	45° 41.40141	89° 50.43221	1-5 Plants	
3	45° 41.37365	89° 50.41893	1-5 Plants	
4	45° 41.35696	89° 50.43415	1-5 Plants	
5	45° 41.34324	89° 50.45043	1-5 Plants	
6	45° 41.32391	89° 50.46020	6-50 Plants	
7	45° 41.31590	89° 50.46861	1-5 Plants	
8	45° 41.30489	89° 50.47116	1-5 Plants	
9	45° 41.16491	89° 50.44261	6-50 Plants	
10	45° 41.01712	89° 50.33755	1-5 Plants	
11	45° 41.20717	89° 50.41588	1-5 Plants	

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Figure 2



WWIC Purple Loosestrife Annual Monitoring Report - 2010

Table 2

Purple Loosestrife Survey - 2010				
Rice Reservoir				
Number	Latitude	Longitude	Amount	Beetle Activity
1	45° 33.46273	89° 41.86753	1-5 Plants	
2	45° 33.47602	89° 41.85279	1-5 Plants	
3	45° 33.52251	89° 41.78280	1-5 Plants	
4	45° 33.17703	89° 40.82581	1-5 Plants	
5	45° 33.10348	89° 40.94111	1-5 Plants	
6	45° 33.17098	89° 41.36074	1-5 Plants	
7	45° 33.14940	89° 41.43181	1-5 Plants	
8	45° 33.15061	89° 41.36168	6-50 Plants	
9	45° 33.16473	89° 41.34849	1-5 Plants	
10	45° 33.16483	89° 41.30336	50+ Plants	
11	45° 33.11763	89° 41.24353	6-50 Plants	
12	45° 33.09245	89° 41.21649	6-50 Plants	
13	45° 33.07071	89° 41.22137	1-5 Plants	
14	45° 32.97314	89° 41.19295	1-5 Plants	
15	45° 33.01406	89° 41.14012	1-5 Plants	
16	45° 33.04134	89° 41.16437	50+ Plants	
17	45° 33.02376	89° 40.90571	50+ Plants	Yes
18	45° 33.01116	89° 40.89650	6-50 Plants	Yes
19	45° 32.99545	89° 40.90574	1-5 Plants	
20	45° 33.06883	89° 40.84613	50+ Plants	Yes
21	45° 33.07103	89° 40.81209	1-5 Plants	Yes
22	45° 33.06043	89° 40.80805	6-50 Plants	Yes
23	45° 33.79825	89° 41.80835	6-50 Plants	
24	45° 33.81447	89° 41.60123	6-50 Plants	
25	45° 33.91758	89° 41.49318	1-5 Plants	
26	45° 34.07574	89° 41.70289	1-5 Plants	
27	45° 34.08013	89° 41.73527	1-5 Plants	
28	45° 34.20062	89° 42.00008	1-5 Plants	
29	45° 34.32008	89° 42.02841	1-5 Plants	
30	45° 34.30121	89° 42.04459	6-50 Plants	
31	45° 34.29930	89° 42.02582	6-50 Plants	
32	45° 34.30719	89° 42.00345	1-5 Plants	
33	45° 34.31683	89° 41.97854	6-50 Plants	
34	45° 34.33328	89° 41.97362	6-50 Plants	
35	45° 34.35202	89° 41.97214	6-50 Plants	
36	45° 34.39203	89° 41.99541	1-5 Plants	
37	45° 34.39384	89° 41.95830	6-50 Plants	
38	45° 34.41210	89° 41.95704	6-50 Plants	
39	45° 34.41946	89° 41.97539	1-5 Plants	
40	45° 34.40433	89° 41.99871	6-50 Plants	

WWIC Purple Loosestrife Annual Monitoring Report - 2010

Table 2 (cont.)

Purple Loosestrife Survey - 2010					
Rice Reservoir (cont.)					
Number	Latitude	Longitude	Amount	Beetle Activity	
41	45° 34.39024	89° 42.11425	1-5 Plants		
42	45° 34.42160	89° 42.08340	6-50 Plants		
43	45° 34.43592	89° 42.06518	50+ Plants		
44	45° 34.45631	89° 42.08404	50+ Plants	Yes	
45	45° 34.47588	89° 42.07553	50+ Plants		
46	45° 34.44354	89° 42.10901	1-5 Plants		
47	45° 34.40654	89° 42.01987	1-5 Plants		
48	45° 34.42603	89° 42.02428	6-50 Plants		
49	45° 34.45128	89° 42.02752	6-50 Plants		
50	45° 34.47635	89° 42.03195	6-50 Plants		
51	45° 34.51450	89° 42.10177	1-5 Plants		
52	45° 34.52580	89° 42.12968	1-5 Plants		
53	45° 34.53784	89° 42.12464	6-50 Plants		
54	45° 34.56382	89° 42.12430	50+ Plants		
55	45° 34.58110	89° 42.12705	50+ Plants		
56	45° 34.57746	89° 42.15235	50+ Plants		
57	45° 34.59864	89° 42.14164	50+ Plants		
58	45° 34.56276	89° 42.15145	50+ Plants		
59	45° 34.54022	89° 42.14292	6-50 Plants		
60	45° 34.52367	89° 42.16452	6-50 Plants		
61	45° 34.51149	89° 42.19310	50+ Plants		
62	45° 34.53002	89° 42.19089	6-50 Plants		
63	45° 34.52493	89° 42.20488	50+ Plants		
64	45° 34.53435	89° 42.21177	6-50 Plants		
65	45° 34.54988	89° 42.23505	6-50 Plants		
66	45° 34.53325	89° 42.23419	6-50 Plants		
67	45° 34.53446	89° 42.25402	6-50 Plants		
68	45° 34.54127	89° 42.27243	6-50 Plants		
69	45° 34.54746	89° 42.29378	6-50 Plants		
70	45° 34.46381	89° 42.39463	1-5 Plants		
71	45° 34.43803	89° 42.60813	1-5 Plants		
72	45° 34.44871	89° 42.60771	1-5 Plants		
73	45° 34.47214	89° 42.60904	1-5 Plants		
74	45° 34.46460	89° 42.61894	6-50 Plants		
75	45° 34.44676	89° 42.64254	6-50 Plants		
76	45° 34.43566	89° 42.68526	6-50 Plants		
77	45° 34.50643	89° 42.65446	1-5 Plants		
78	45° 34.58898	89° 42.70695	6-50 Plants		
79	45° 34.61659	89° 42.70397	1-5 Plants		
80	45° 34.43413	89° 42.72734	1-5 Plants		

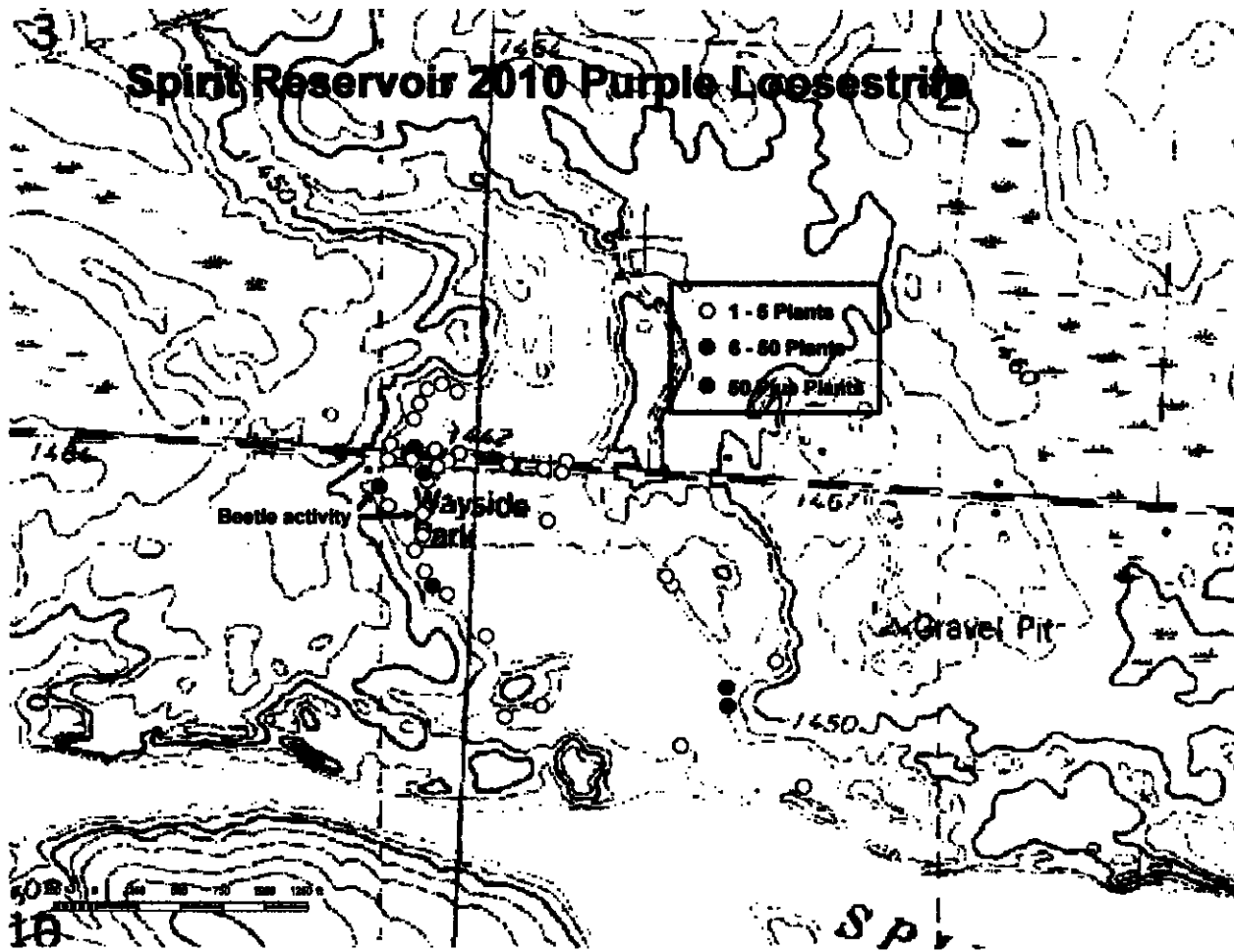
WWIC Purple Loosestrife Annual Monitoring Report - 2010

Table 2 (cont.)

Purple Loosestrife Survey - 2010				
Rice Reservoir (cont.)				
Number	Latitude	Longitude	Amount	Beetle Activity
81	45° 34.41792	89° 42.76106	1-5 Plants	
82	45° 34.46804	89° 42.76060	6-50 Plants	
83	45° 34.40562	89° 43.02452	1-5 Plants	
84	45° 34.35617	89° 43.19362	1-5 Plants	
85	45° 34.16714	89° 43.27130	1-5 Plants	
86	45° 34.17935	89° 43.30996	1-5 Plants	
87	45° 34.14965	89° 43.28725	6-50 Plants	
88	45° 34.13746	89° 43.26598	1-5 Plants	
89	45° 33.92905	89° 42.87876	6-50 Plants	
90	45° 34.09070	89° 42.73477	1-5 Plants	
91	45° 34.14048	89° 42.71741	1-5 Plants	
92	45° 34.19549	89° 42.78284	1-5 Plants	
93	45° 34.30663	89° 42.68898	6-50 Plants	
94	45° 34.11309	89° 42.68272	1-5 Plants	
95	45° 34.13010	89° 42.67701	1-5 Plants	
96	45° 33.95881	89° 42.63850	1-5 Plants	
97	45° 33.95012	89° 42.65746	1-5 Plants	
98	45° 33.92217	89° 42.68774	1-5 Plants	
99	45° 33.88896	89° 42.70417	6-50 Plants	
100	45° 33.86319	89° 42.72503	1-5 Plants	
101	45° 33.82244	89° 42.73528	1-5 Plants	
102	45° 33.79705	89° 42.72145	1-5 Plants	
103	45° 33.78172	89° 42.69141	1-5 Plants	
104	45° 33.92909	89° 42.25066	1-5 Plants	
105	45° 33.88991	89° 42.14564	1-5 Plants	
106	45° 33.85583	89° 42.15560	1-5 Plants	
107	45° 33.62124	89° 41.99775	1-5 Plants	
108	45° 33.51358	89° 42.08478	6-50 Plants	

WWIC Purple Loosestrife Annual Monitoring Report - 2010

Figure 3



WWIC Purple Loosestrife Annual Monitoring Report - 2010

Table 3

Purple Loosestrife Survey - 2010				
Spirit Reservoir				
Number	Latitude	Longitude	Amount	Beetle Activity
1	45° 27.16539	89° 49.96170	1-5 Plants	
2	45° 27.15674	89° 49.95245	1-5 Plants	
3	45° 27.08541	89° 49.80721	1-5 Plants	
4	45° 27.05874	89° 49.87235	6-50 Plants	
5	45° 27.03963	89° 49.87080	6-50 Plants	
6	45° 26.96401	89° 49.76217	1-5 Plants	
7	45° 26.99938	89° 49.93349	1-5 Plants	
8	45° 27.02191	89° 50.17613	1-5 Plants	
9	45° 27.03318	89° 50.12718	1-5 Plants	
10	45° 27.09923	89° 50.20651	1-5 Plants	
11	45° 27.13915	89° 50.26287	1-5 Plants	
12	45° 27.14757	89° 50.28218	6-50 Plants	
13	45° 27.16070	89° 50.29382	1-5 Plants	
14	45° 27.21739	89° 50.29961	1-5 Plants	Yes
15	45° 27.19550	89° 50.29935	1-5 Plants	
16	45° 27.18100	89° 50.30819	1-5 Plants	
17	45° 27.22348	89° 50.34758	1-5 Plants	
18	45° 27.24291	89° 50.36076	50+ Plants	Yes
19	45° 27.26923	89° 50.35027	1-5 Plants	
20	45° 27.27005	89° 50.31719	1-5 Plants	
21	45° 27.25755	89° 50.30051	6-50 Plants	
22	45° 27.24995	89° 50.29504	1-5 Plants	
23	45° 27.26459	89° 50.28234	1-5 Plants	
24	45° 27.26944	89° 50.26654	1-5 Plants	
25	45° 27.26818	89° 50.18403	1-5 Plants	
26	45° 27.26587	89° 50.13557	1-5 Plants	
27	45° 27.26320	89° 50.10966	1-5 Plants	
28	45° 27.21536	89° 50.12860	1-5 Plants	
29	45° 27.27445	89° 50.10539	1-5 Plants	
30	45° 27.27802	89° 50.25255	1-5 Plants	
31	45° 27.27986	89° 50.28642	1-5 Plants	
32	45° 27.34517	89° 50.28051	1-5 Plants	
33	45° 27.33817	89° 50.25790	1-5 Plants	
34	45° 27.28216	89° 50.31324	6-50 Plants	
35	45° 27.31015	89° 50.31734	1-5 Plants	
36	45° 27.26428	89° 50.34789	1-5 Plants	
37	45° 27.33966	89° 50.29976	1-5 Plants	
38	45° 27.32534	89° 50.31055	1-5 Plants	

Attachment 2

**Consultation/Correspondence
with
Wisconsin DNR and USFWS**

Dave Coon

From: Gauthier Sr, Kevin J - DNR [Kevin.GauthierSr@wisconsin.gov]
Sent: Tuesday, December 07, 2010 8:21 PM
To: Dave Coon
Cc: Houston, Daniel L - DNR; McLaughlin, Kyle L - DNR
Subject: RE: 2010 Purple Loosestrife Annual Monitoring Report

Thanks Dave!

From: Dave Coon [mailto:Coon@wvic.com]
Sent: Tuesday, November 30, 2010 3:24 PM
To: Gauthier Sr, Kevin J - DNR
Cc: Houston, Daniel L - DNR; McLaughlin, Kyle L - DNR
Subject: RE: 2010 Purple Loosestrife Annual Monitoring Report

Kevin,

Thank you for your comments. I have addressed them below.

- We did not cut off the flower heads of purple loosestrife when the loosestrife beds were surveyed as explained below.

As discussed in the FERC approved 2008 *Modified Purple Loosestrife Control Plan*, purple loosestrife generally blooms at two different times on each of the three reservoirs. In the past, this staggered bloom required chemical treatment twice during the growing season prior to implementing the Modified Plan in 2009. The staggered bloom is primarily a function of mature plants blooming first followed approximately three weeks later by younger maturing plants. Even then the rate of maturation of the flower head and seed development between plants can vary over several days during each period. Seldom are all of the visible flower heads at the same stage of maturation making it very unlikely that seed production would be eliminated. Multiple survey trips would be required to cut off the flower heads before any seeds mature and drop to the ground. It is important to understand that the locations of loosestrife densities of 1-5 plants are numerous and collectively can represent several hundred plants over the area of the reservoir. Removal of flower heads under these circumstances would be ineffective and impractical.

In many instances, large dense loosestrife beds (6-50 plants or greater) and associated seed production are in the same general area as the smaller beds. Even if flower heads were removed from beds with 1-6 plants, the larger beds would likely serve as a seed source to re-populate the less dense areas.

Moreover, removing the flower head does not kill the plant or root system. Therefore the plant would bloom again the following year requiring removal of the flower heads again. Obviously, this would need to continue on an annual basis. The goal in the Modified Plan is to control purple loosestrife with *Galerucella* beetles which represents a more natural, effective and economical method regarding the moderate to large stands of loosestrife that occur on the WVIC reservoirs.

As stated in the Modified Plan, any pioneer plants that are observed outside the area of historical loosestrife occurrence will be treated with an herbicide to kill the plant.

- Although *Galerucella* beetles are now present at Spirit and Rice Reservoirs, WVIC will introduce additional beetles if such additions are deemed necessary to effectively control purple loosestrife as stated in the Modified Plan. In such an instance, WVIC would welcome consultation with the DNR regarding equipment, supplies and training.

Thank you again for taking the time to review the annual report.

12/14/2010

Please feel welcome to contact me if you have any additional questions.

Dave

David M. Coon
Director, Environmental Affairs

Wisconsin Valley Improvement Company
2301 North Third Street
Wausau, WI 54403

(715) 848-2976 ext. 311
coon@wvic.com

From: Gauthier Sr, Kevin J - DNR [mailto:Kevin.GauthierSr@wisconsin.gov]
Sent: Tuesday, November 23, 2010 9:32 AM
To: Dave Coon
Cc: Houston, Daniel L - DNR; McLaughlin, Kyle L - DNR; Gauthier Sr, Kevin J - DNR
Subject: FW: 2010 Purple Loosestrife Annual Monitoring Report

Hi Dave,

Kyle and I have looked at the annual summary and offer these comments:

- Were flower heads cut-off when surveyors were mapping beds - in particular, the beds marked with 1-5 plants? If not, perhaps this effort could be considered in combination with future bio-control efforts, particularly with concerns of water transport with fluctuating water levels.
- If bio-control efforts will be considered in the future - will WWIC need equipment/supplies/training?
- We appreciate the PL monitoring effort, the quality of the annual review and the opportunity to provide input.

Thanks.

Kevin

 *Kevin J. Gauthier*

Lakes Management Coordinator
Wisconsin Department of Natural Resources
107 Sutliff Ave
Rhinelander, WI 54501
(☎) phone: (715) 365-8937
(☎) fax: (715) 365-8932
(✉) e-mail: Kevin.GauthierSr@wisconsin.gov

From: Dave Coon [mailto:Coon@wvic.com]
Sent: Tuesday, October 26, 2010 3:13 PM
To: Houston, Daniel L - DNR; Gauthier Sr, Kevin J - DNR; Nick_Utrup@fws.gov
Subject: 2010 Purple Loosestrife Annual Monitoring Report

12/14/2010

Gentlemen,

In compliance with the FERC Order Amending WWIC's Purple Loosestrife Control Plan dated June 16, 2009, I am submitting WWIC's Purple Loosestrife Annual Monitoring Report – 2010 for your review and comment. The report also contains WWIC's proposed purple loosestrife monitoring plan for 2011.

Please provide any comments to my attention via email or at the mailing address below by November 25, 2010.

Thank you.

Dave

David M. Coon
Director, Environmental Affairs

Wisconsin Valley Improvement Company
2301 North Third Street
Wausau, WI 54403

(715) 848-2976 ext. 311
coon@wvic.com

12/14/2010