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February 8, 2007

ORIGINAL

The Secretary Federal Energy Regulatory Commission 888 First Street, NE

Washington, DC 20426

P-2473-055

Flambeau Crowley, Project No. 2473, Flambeau Hydro LLC Re: Article 410, Purple Loosestrife Inventory

Dear Secretary:

Please find enclosed an original and 8 copies of the Flambeau Crowley, Project No. 2473 Purple Loosestrife Inventory for 2006. Copies of the inventory have been sent to the Wisconsin Department of Natural Resources (WIDNR) and the US Fish & Wildlife Service (USFWS) and no comments have been received.

If you have any questions regarding this submission, please contact Mr. Richard Loeffler at 920-293-4628.

Sincerely,

NORTH AMERICAN HYDRO, INC.

Charles Alsberg

Executive Vice President

FERC - CRO Cc:

Encl.: 1 original & 8 copies

07-02-06 RAL FLCR 2006 loosestrife survey to FERC.doc

Flambeau Crowley Project Purple Loosestrife Inventory August 31, 2006 FERC Project #2473 Article 410

Flambeau Hydro, L.L.C. 116 State St. Neshkoro, WI 54960

Purple Loosestrife

On August 31, 2006, Flambeau Hydro, L.L.C. (FHLLC) performed an inventory of purple loosestrife plants at the Flambeau Crowley Project in Price County, Wisconsin. The method of inventory as approved and modified by Federal Energy Regulatory Commission (FERC) Order of 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 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 receiver 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.

Example:

#1 6' tall plants; 4' X 20'; 30% cover; 4 – 5 stems per plant; 4 plants; on shoreline N45° 56.183' W90° 26.748'; no photo

#2 5' - 7' tall plants; 10' X 10'; 25% cover; 4 - 5 stems per plant; 10 plants; in marsh ~50 feet bearing 25° from N45° 56.256' W90° 26.710'; photo No. 1

The area to be inventoried shall be the shoreline of the impoundment to elevation 1428 feet NGVD and lands owned by FHLLC within the Project File: 08-10-01 RAL FLCR 2008 Loosestrife Inv.doc

Boundary as indicated on the Project Map 1, dated November 1991, included in Exhibit G of Flambeau Paper Corp. Application For A Subsequent License for the Crowley Hydroelectric Project FERC Project #2473.

General Observations:

The Flambeau Crowley Project Boundary was divided into three different areas; the impoundment (from approximately 500 feet downstream of the Pixley dam to the Crowley 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 tailrace was surveyed on foot 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 impoundment was surveyed by boat and no new occurrences were found. A single plant that had been found on a bog in a stump field in the river east of the 6-mile boat landing during the 2002 survey was not found in 2003, 2004, 2005, or 2006. This plant had the seed heads removed in 2002.

Purple loosestrife plants that had been found on the HWY 70 causeway just east of the 6-mile boat landing in 2002 still existed in 2003. In 2003, the plants were treated with an herbicide. In 2004, the amount of plants inventoried at this location was considerably reduced. Spraying permits had been acquired from the Wisconsin Department of Natural Resources and the Wisconsin Department of Transportation and these plants were sprayed with a 1% Aqua Neat (glyphosate)/1% surfactant solution during the survey. The causeway occurrence was revisited two days later and a few of the purple loosestrife plants showed visible signs of stress (leaves were turning brown). In 2005, it appeared that the purple loosestrife plants at this location had been chemically spot treated by other unknown person(s) before the licensee survey crew arrived. All purple loosestrife plants were brown and dead while surrounding vegetation was green and living. Only two immature single stem purple loosestrife plants were found to be untreated. These two plants were pulled and burned. No chemical treatment was preformed by the survey crew in 2005. In 2006, the number of plants seemed to be about the same as in 2005, but more spread out. Spraying permits were acquired and all plants were sprayed with a slightly stronger solution of 2% Aqua Neat (glyphosate)/1% surfactant during the survey. The causeway occurrence was revisited two days later and a few of the purple loosestrife plants showed visible signs of stress (leaves were turning brown).

These purple loosestrife plants were inventoried and have been noted on the survey sheet(s) and map(s) at the end of this report. It should also be noted that road construction had recently been completed along this section of HWY 70, and tree and File: 08-10-01 RAL FLCR 2006 Loosestrife Inv.doc

brush clearing and other non-project related ground disturbing activities had recently occurred along the shoreline area of the causeway previous to the licensee survey crew arrival. No other occurrences of purple loosestrife were observed.

During the inventory, a digital camera was used to document occurrences of purple loosestrife as noted in the survey comments at the end of this report.

File: 08-10-01 RAL FLCR 2008 Loosestrife Inv.doc

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Purple Loosestrife Survey

Flambeau Crowley #2473

___ Datum:

WGS 84

Project: Date:

8/31/2006

Page:

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Crew: RAL & CTM

Sighting #	GPS point	Latitude	Longitude		Stand Area	Comments
1	209 - 215 FLCRPL001 - FLCRPL002	N45°51.816' - N45°51.850'	W90°32.859' - W90°32.786'	1' - 7'	~375' x 15'	Located between GPS points 209 and 215 on the south side of the causeway formed by HWY 70 just east of the 6-mile boat landing. There are 53 plants spread out over a 375 foot long area. The largest concentration is 8 plants and the rest are between 1 and 4 plants. Most plants appear to have 1-2 stems per plant although there are 3 or 4 plants that have 4 - 5 stems per plant. All seed heads at this occurrence were harvested in August 2002 to prevent propagation. This occurrence recorded on digital photos and video tape in 2002. All plants were treated with herbicide in 2003. This occurrence recorded on videotape in 2003. All plants were treated with herbicide in 2004. This occurrence recorded on digital photos in 2004. One immature single stem plant was pulled and the rest appeared to have been spot treated with an herbicide by other person(s) before the licensee survey crew arrived in 2005. This occurrence recorded on digital photos in 2005. All plants were treated with herbicide in 2006. This occurrence recorded on digital photos in 2005. All plants were treated with herbicide in 2006. This occurrence recorded on digital photos in 2006.
2	216 - 217 FLCRPL003 - FLCRPL004	N45°51.857' - N45°51.853'	W90°32.806' - W90°32.814'	2' - 4'	~150' x 8'	Located between GPS points 216 and 217 on the north side of the causeway formed by HWY 70 just east of the 6-mile boat landing. Four single stem plants found in 2006. All seed heads at this occurrence were harvested in August 2002 to prevent propagation. This occurrence recorded on digital photos in 2002. All plants were treated with herbicide in 2003. This occurrence recorded on videotape in 2003. No purple loosestrife plants were observed at this location in 2004. The only plant found in 2005 was pulled. This occurrence recorded on digital photo in 2005. All plants were treated with herbicide in 2006. This occurrence recorded on digital photos in 2006.

06-09-06 RAL FLCR 2006 Loosestrife Invuits

Purple Loosestrife Survey

Project: Flambeau Crowley #2473

Datum:

WGS 84

Date:

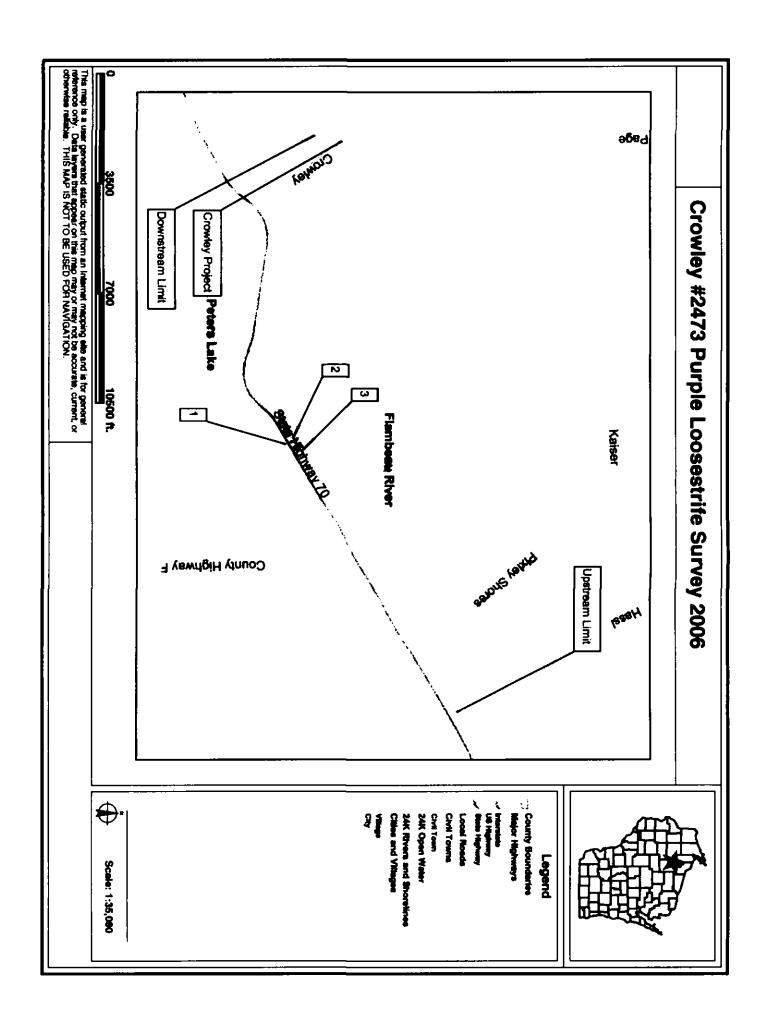
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Crew: RAL & CTM

Sighting #	GPS point	Latitude	Longitude	Plant Height	Stand Area	Comments
3	208 FLCRPL005	N45*51.926*	W90*32.788'	N/A		Located on a bog in a stump field in the river east of the 6-mile boat landing. There is one plant. Plant appears to have ~2 - 3 stems per plant. All seed heads were harvested in August 2002 to prevent propagation. This occurrence recorded on digital photos in 2002. This occurrence was not found in 2003, 2004, 2005, and 2006.





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December 28, 2006

Mr. Jeffrey Scheirer
Northern Region FERC Manager
Wisconsin Department of Natural Resources
875 South 4th Avenue
Park Falls, WI 54552

Ms. Louise Clemency
Field Supervisor
U.S. Fish and Wildlife Service
2661 Scott Tower Drive
New Franken, WI 54229

Re: Flambeau Crowley Project, No. 2473, Flambeau Hydro, L.L.C. Article 410, Purple Loosestrife Inventory

Dear Mr. Scheirer and Ms. Clemency:

Attached is a copy of our "Purple Loosestrife Inventory" for 2006. This annual report has been prepared to comply with Article 410 of the project's federal hydropower license and is being filed with the Federal Energy Regulatory Commission.

In 2006, a purple loosestrife survey crew visited the 6-mile Creek HWY 70 causeway site (N45°51.850' W90°32.786' WGS84) at the Crowley Hydroelectric Project impoundment near Park Falls, Wisconsin on July 20, 2006 to help determine an effective survey period of purple loosestrife in this area. At that time, four plants were observed in the early blooming stage with flowers emerging at the bottom of the flower spikes (purple loosestrife blooms from bottom to top). An additional 16 plants were observed that were not blooming. All plants were between 1' - 3' tall.

On August 31, 2006, the survey crew revisited the site and performed the annual survey as prescribed in Article 410 of the Crowley license. At this time, 53 plants were observed in all blooming stages with flowers emerging at the bottom, middle, and top of the flower spikes of different plants. An additional four plants were observed that were not blooming at all. All plants were between 1' - 7' tall. All plants were sprayed with an herbicide, and, two days later on September 2, 2006, the site was revisited to observe treatment effectiveness. At this observation, plants were still blooming with a few showing the beginning signs of stress from the treatment (flowers beginning to wilt and reddish-brown leaf edges and leaf tips).

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Purple Loosestrife at 6-mile Creek on July 20, 2006



Purple Loosestrife at 6-mile Creek on August 31, 2006

File: 06-10-01 RAL FLCR 2006 Loosestrife Inv.doc



The licensee believes that the original survey window as prescribed in Article 410 of the Crowley license that reads "While purple loosestrife is blooming from mid July to early August" is too narrow and more appropriate wording would be "While purple loosestrife is blooming from mid-July to mid-September" to allow for a more flexible and effective inventory. The licensee has been inventorying purple loosestrife at the Crowley site since 2002, and previous observations support the need for a broader survey window.

We invite you to review and comment, but we respectfully request that any written response be provided to us within thirty (30) days from the date of this letter. Please contact me at 920-293-8514 if you wish to discuss or have any questions.

Sincerely,
NORTH AMERICAN HYDRO, Inc.

Richard Loeffler

Attachment