

ORIGINAL

## North American Hydro Holdings, Inc.

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November 19, 2010

The Secretary
Federal Energy Regulatory Commission
888 First Street, NE
Washington, DC 20426

Re: Flambeau Crowley, Project No. 2473, Flambeau Hydro LLC

Article 410, Purple Loosestrife Inventory

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Dear Secretary:

On behalf of Flambeau Hydro, LLC, and in accordance with the Purple Loosestrife Monitoring Plan per license article named above, North American Hydro Holdings, Inc. submits the annual Purple Loosestrife Inventory for 2010 for the above named project. Copies of the inventory have been sent to the Wisconsin Department of Natural Resources and the US Fish & Wildlife Service.

If you have any questions regarding this submission, please contact Mr. Cory Mirr at 920-293-4628 (ext.18).

Sincerely,

NORTH AMERICAN HYDRO HOLDINGS, INC.

Charles Alsberg
Chief Executive Officer

ory Min

Cc: FERC – CRO

10-10-12 ctm FLCR 2010 loosestrife survey to FERC (2).doc

Flambeau Crowley Project Purple Loosestrife Inventory August 6, 2010 FERC Project #2473 Article 410

Flambeau Hydro, LLC 116 State St. Neshkoro, WI 54960

Purple Loosestrife

On August 6, 2010, Flambeau Hydro, LLC (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 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 two occurrences of purple loosestrife were located.

The first site is FLCR PL001 - FLCR PL002. 2010 marks the 8<sup>th</sup> year of treatment at this location which is along the south side of the Highway 70 causeway at 6-mile Creek. Since 2003, this site has been treated with a glyphosate solution. In 2010, individual plants were sprayed with a 2% Aqua Neat (glyphosate)/1% surfactant solution during the survey. The number of plants and their size at this occurrence has declined since its peak in 2006 when over 50 plants were treated. The 2010 survey found 21 small plants ~2' to 3' in height. The amount of plants at this site has increased from 2009, but the overall plant size and height appears to be declining from previous years. Before spraying, a thorough check found no indication of the presence of Galerucella beetles.

The second site, FLCR PL003 – FLCR PL 004, was first observed in 2002. This site is located on the north side of the causeway of Hwy. 70 east of the pier and boat ramp at the 6-mile boat landing. In 2010 one multi stem plant was located and treated with a herbicide at this site. The plant was growing on the shoreline hidden in trees and brush. This site has not produced any occurrences for the previous three surveys.

These purple loosestrife plants were inventoried and have been noted on the survey sheet(s) and map(s) at the end of this report. 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.

Project: Flambeau Crowley #2473

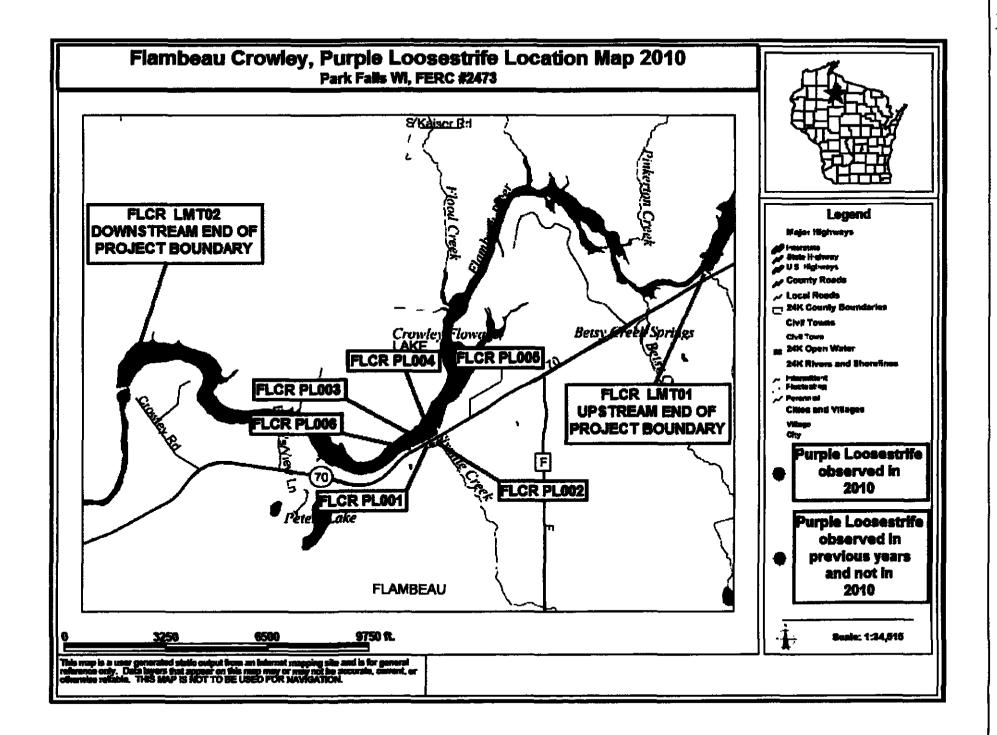
8/6/2010

Datum: Page: WGS 84 1 of 1

Date:

NAH Personel

Sighting #	GPS point	Latitude	Longitude	Plant Height	Stand Area	Comments
1	209 - 215 FLCR PL001 - FLCR PL002	N45°51.816' - N45°51.850'	W90°32.859' - W90°32.786'	1' - 3'	1	Located between GPS points 209 (FLCR PL001) and 215 (FLCR PL002) on the south side of the causeway formed by HWY 70 just east of the 6-mile boat landing. First located in 2002 when 11 plants were observed over a 375 foot long area. All plants have been treated yearly with herbicide starting in 2003 through 2010 with the exception of 2005, when 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. The stand area had declined in size by 50% in 2009. In 2010 the stand area remained the same but experienced an increase in the number of plants growing at this site. Plants were small in size and most without blooms. This occurrence recorded on digital photos and/or video tape from 2002-2008.
2	216 - 217 FLCR PL003 - FLCR PL004	N45°51.857' - N45°51.853'	W90°32.806' - W90°32.814'	7'	1 plant	Located between GPS points 218 (FLCR PL003) and 217 (FLCR PL004) on the north side of the causeway formed by HWY 70 just east of the 6-mile boat landing. First observed in 2002. All seed heads at this occurrence were harvested in August 2002 to prevent propagation. All plants were treated with herbicide in 2003. No purple loosestrife plants were observed at this location in 2004. The only plant found in 2005 was pulled. All plants were treated with herbicide in 2006. No plants found at this location in 2007, 2008 and 2009. In 2010 one large plant was located at this site and treated with a herbicide. This occurrence recorded on digital photos and/or video tape in 2002, 2003, 2005, & 2006.
3	208 FLCR PL005	N45°51.926′	W90°32.788'	N/A	N/A	Located at GPS point on a bog in a stump field in the river east of the 6-mile boat landing. All seed heads were harvested in August 2002 to prevent propagation. This site has not reoccurred since 2002.
4	FLCR PL006	N45° 51,814'	W90° 32,9445'	N/A	N/A	Located at GPS point on the east side of the 6-mile boat launch. First observed in 2008. All plants pulled in 2008 and 2009. No plants observed in 2010. Photos in 2008.





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October 12, 2010

Mr. Jeffrey Scheirer Northern Region FERC Manager Wisconsin Department of Natural Resources 875 South 4<sup>th</sup> 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, LLC
Article 410, Purple Loosestrife Inventory

Dear Mr. Scheirer and Ms. Clemency:

Attached is a copy of the Flambeau Hydro, LLC "Purple Loosestrife Inventory" for 2010. This annual report has been prepared to comply with the federal hydropower license of the project and article named above and is being filed with the Federal Energy Regulatory Commission.

Please contact me at 920-293-4628 (ext 18) if you wish to discuss or have any questions.

Sincerely,

NORTH AMERICAN HYDRO HOLDINGS, INC.

Cory Min

Attachment

File: 10-10-12 ctm FLCR 2010 Loosestrife Survey to Agencies (2).doc