CONSOLIDATED WATER POWER COMPANY

General Offices 610 High Street,, Wisconsin Rapids, WI 54495 A subsidiary of Verso Corporation

October 14, 2021

Secretary Federal Energy Regulatory Commission 888 1st Street, N.E. Washington, D.C. 20426 (VIA ELECTRONIC FILING)

Biron Hydroelectric Project, FERC No. 2192 – Article 405, Exotic Species Biennial Monitoring

Report - 2020/2021

Dear Secretary:

In accordance with the order approving the Exotic Species Control Plan, Consolidated Water Power Company (CWPCo) is filing the biennial monitoring report for 2021/2022.

CWPCo conducted monitoring during the summers of 2020 (vehicle during July 19-27 and boat July 27th) and 2021 (vehicle July 18th week and boat July 22nd) for the Project. Currently, there are nine sites monitored, of which purple loosestrife was observed at 2 sites in 2020 and 2019 (sites 1 and 5). No new sites have been identified since 2013.

Overall, the total purple loosestrive plant count trends indicate decreasing trend since since 2012/13 where beetles are present on all observed sites. The decreasing trend demonstrates there aren't significant negative purple loosestrife effects on the Project fish or wildlife populations and the beetle activity is assisting in the control of purple loosestrife within the project.

This report provides a Google Earth based coordinate system for reporting the purple loosestrife locations which was initiated in the 2014/15 biennial report. CWPCo feels the Google Earth coordinate system is more universal for tracking the purple loosestrife colonies.

Administered 2018/19 biennial purple loosestrife control methods were:

- 1. For smaller colonies (less than 5 plants) without observed beetle activity removed plants to best extent possible and disposed of plants in landfill.
- 2. For colonies ranging from 6 50 plants with observed beetle activity (none observed in 2018/19) either
 - a. removed flower tops as best as possible for landfill, leaving rest of plant for beetles to feed on and populate.

b. removed flower tops as best as possible for landfill, leaving rest of plant for beetles to feed on and populate. No raised beetle pots were applied in this biennial period for the Biron project.

No observances of curly-leaf pondweed were noted during the annual period. CWPCo operating and maintenance personnel informally monitor for the presence of zebra mussels during the course of their normal work duties. The infomal monitoring includes activities such as hydro turbine repairs, trashrack intake cleaning, gate operations (April – November), safety buoy usage and dry, exposed shoreline observations. No zebra mussel observations were reported within the annual period during duties involving hydro turbine repairs, trashrack intake cleaning, gate operations and riprap improvements. Additionally there was no observances along the dry, exposed shoreline at the dam or our recreation sites.

Eurasian water milfoil continued to be observed in 2018/19 during boat monitoring within Love Creek (Section 25, T23N, R7E and Google Earth coorinates 44.4478 degrees, -89.6419 degrees) at dispersed levels. Current milfoil levels do not demonstrate any significant negative effects towards fish or wildlife populations with the Project.

CWPCo continues to provide information about invasive species (PUBL-WM-250-95) with the distribution of our recreational brochrures. The brochures are free to the public.

If there are any questions, please feel to contact us at 715-422-3927 or email tom.witt@versoco.com.

Sincerely,

CONSOLIDATED WATER POWER COMPANY

Thomas J. Witt

Thomas J. Witt Resources Manager

Attachements: none

File: (Biron, LG-90-30, Article 405)

cc: Ms. Cheryl Laatsch, Wisconsin Department of Natural Resources (electronic copy) Mr. Nick Utrup, U.S. Fish & Wildlife Service, St. Paul, MN. (electronic copy)

Purple Loosestrife Monitoring Data – 2010 through 2019

Table 1 – Purple Loosestrife Monitoring Site Data

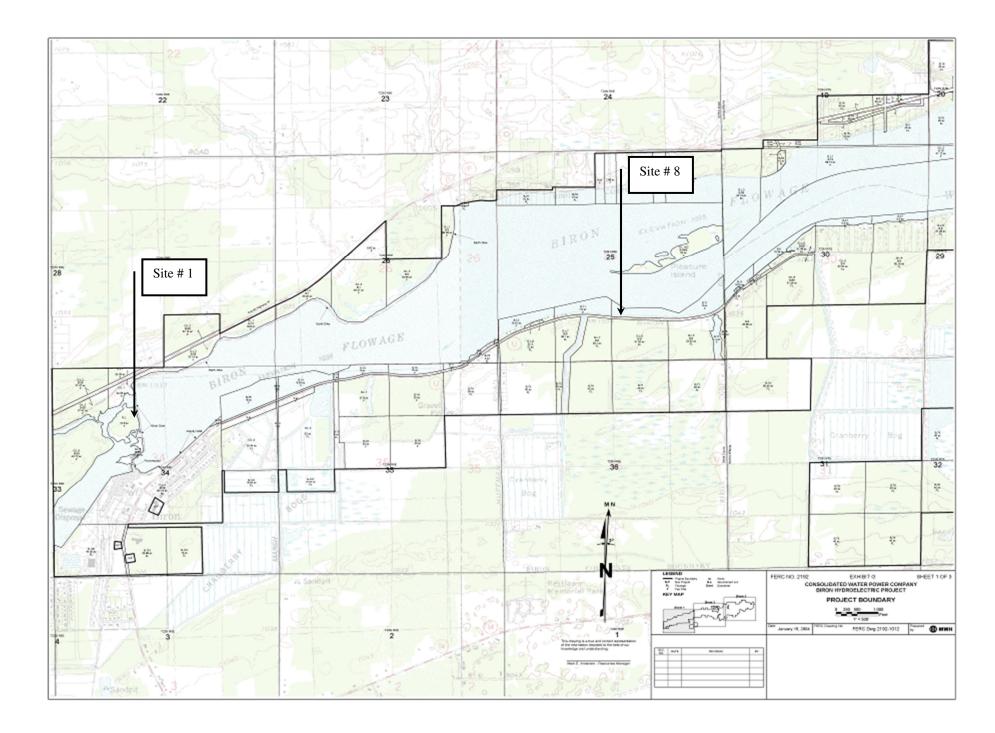
Site	Description	Google Earth GPS	Plt Density	Beetle	Chem	Action Taken
No		Coordinates (degrees)		Activity	Applied	
1	Small island Immediately downstream of dam	Lat 44.4331, Long -89.7799	35 plts	Medium	No	2010 – removed flower tops, rest for beetles 2011 - removed flower tops, rest for beetles
			25 plts	Medium	No	2012 - removed flower tops, rest for beetles 2013/14 - removed flower tops, rest for beetles
			8 plts	Medium	No	2015 - removed flower tops, rest for beetles 2016 - removed flower tops, rest for beetles, in
			4 plts	Medium	No	bedrock 2017- removed flower tops, rest for beetles, in
			3 plts	Heavy	No	bedrock 2018/19 – removed flower tops, rest for beetles,
			4 plts	Heavy	No	in bedrock 2020/21 – removed flower tops, rest for beetles,
			3 plts	Heavy	No	in bedrock
			3 plts	Heavy	No	
			3 plts	Heavy	No	
			2 plts	Heavy	No	
2	Small sandy island N. of main channel (private ownership)	Lat 44.4542, Long - 89.6964	5 plts 2 plts	None None	No	2010 – dug out and removed 2011 – dug out and removed
			10 plts None	Light	No	2012 – dug out and removed 2013 – no plants 2014/15 – no plants
			None None		No	2016 – no plants 2017 – dug out and removed

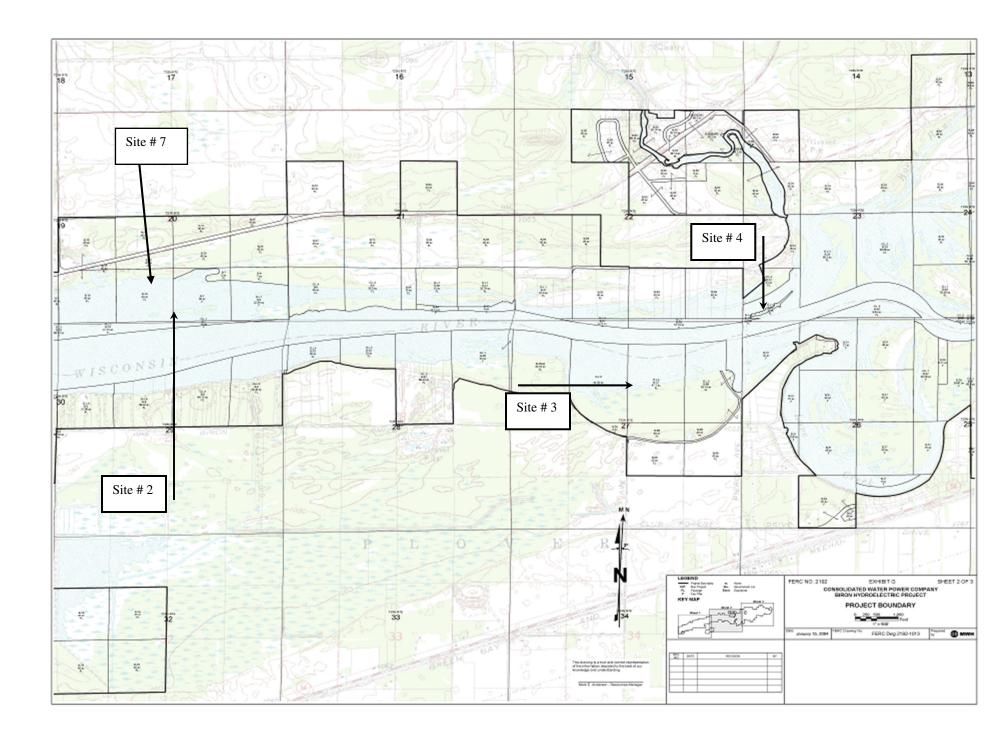
Biron Hydroelectric Project – Purple Loosestrife Sites 2010-2019

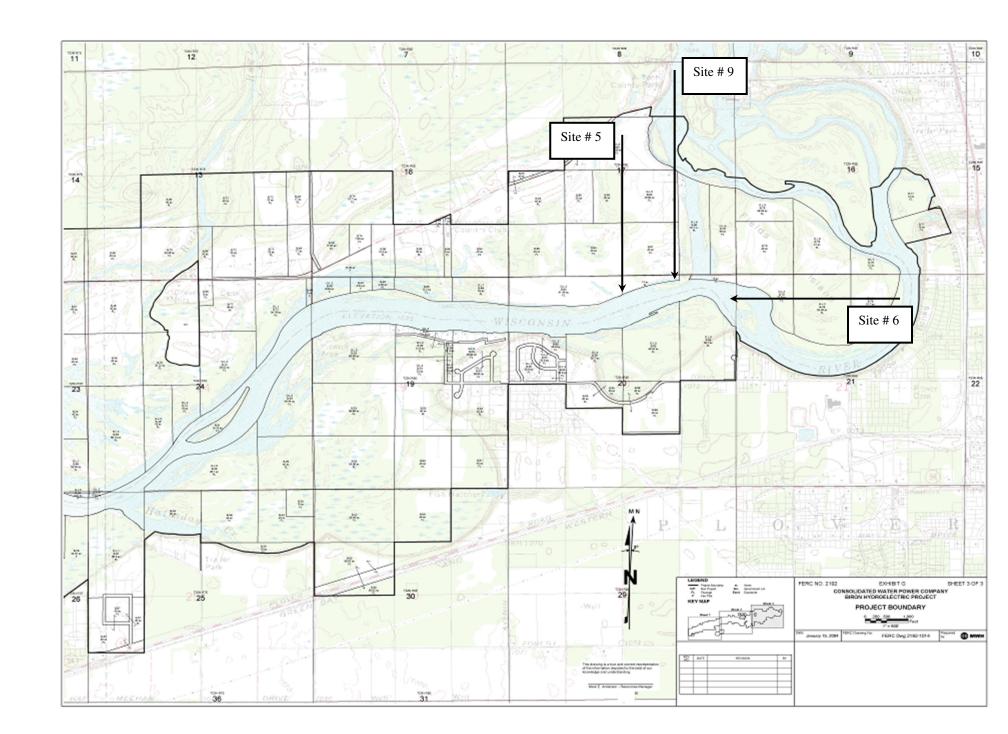
			3 plts None	Heavy	No	2018/21 – no plants
3	S. Shoreline approx. ¹ / ₄ mile downstream from Love Creek entrance	Lat 44.4485, Long - 89.6573	3 plts 2 plts 2 plts None None None	Light Light None	No No No	2010 – dug out and removed 2011 - dug out and removed 2012 – dug out and removed 2013 – no plants 2014/15 – no plants 2016 – no plants
			3 plts None 2 plts	Medium Medium	No No	2017 – dug out and removed 2018/20 – no plants 2021 – removed plants
Site No	Description	Google Earth GPS Coordinates (degrees)	Plt Density	Beetle Activity	Chem Applied	Action Taken
4	Island near entrance to slough for Rusty's Backwater	Lat 44.4543, Long - 89.6448	2 plts None None None None	None	No No	2010 – dug out and removed 2011 - no plants 2012/13 - no plants 2014/15 - no plants 2016/21 – no plants
5	N. Shoreline near Wis. River Country Club G.C.	Lat 44.4664, Long - 89.5805	None None None None 3 plts 2 plts None	Medium Medium	No No No No	2010 – no plants 2011 – no plants 2012/13 - no plants 2014/15 - no plants 2016/17 – no plants 2018 – removed plants 2019 – removed plants 2020-21 – no plants
6	Small rock outcrop in S. Channel around Fields Island	Lat 44.4669, Long - 89.5695	3 plts 2 plts None None None	None None	No No	2010 – dug out and removed 2011 – dug out and removed 2012/13 - no plants 2014/15 - no plants 2016/19 – no plants

			4 plts	Light	No	2020 – removed plants
			3 plts	Light	No	2021 – removed plants
7	Small island NW of #2 site	Lat 44.4559, Long - 89.7007	5 plts 3 plts None None None	None None	No No	2010 – dug out and removed 2011 – dug out and removed 2012/13 - no plants 2014/15 - no plants 2016/21– no plants
8	Upstream Aqua Skier site	Lat 44.4415, Long - 89.7312	5 plts None None	Heavy	No	2013 - removed flower tops, rest for beetles 2014/15 – no plants 2016/21 – no plants
9	Downstream Blue Heron Boat Launch	Lat 44.4673, Long - 89.5742	8 plts 2 plts 2 plts 2 plts 2 plts 2 plts 4 plts None	Light Light Light Medium Medium Heavy	No No No No No	2012 - removed flower tops, rest for beetles 2013 – dug out and removed 2014 – dug out and removed 2015 – dug out and removed 2016 – dug out and removed 2017 – dug out and removed 2018/21 – no plants

Notes: No chemical applications for 2010 - 2021. Beetle activity rating based on percentage of leaves with bee-bee holes from beetle feeding: light less than 15%, medium 15% to 30%, heavy greater than 30%.







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