

January 12, 2016

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

**RE: Flambeau Crowley FERC Project Number 2473
Flambeau Hydro LLC
Final Report 2015 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 2015 Purple Loosestrife Inventory Report* for the Flambeau Crowley Hydroelectric Project. The report is a requirement of Flambeau's Federal license pursuant to article 410.

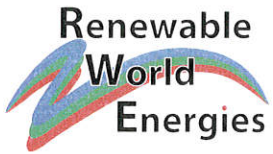
Monitoring was conducted on August 27, 2015. No out of the ordinary issues were encountered. Purple Loosestrife was observed on the Impoundment at 3 sites. The first two sites were FLCR PL001 and FLCR PL002 which are located along the south side of HWY 70 at 6 Mile Creek. 12 plants were observed, pulled and disposed of in an approved manner. The 3rd site is directly across from the above sites and is labeled FLCR PL007. It had 1-3 multi stem plants (considered 1 plant) and could not be accessed because it is separated from the other sites by water; therefore no action was taken at this site. The draft report was sent to the agencies by a letter dated December 10, 2015 as an attachment to an e-mail sent the same day for review and comment. Comment was received from WDNR on December 1, 2015 saying "the reports had been reviewed". They acknowledged that PL was found on the Crowley Flowage and removed by hand except for 1 plant (FLCR PL007). Further they stated "We will see if the hand removal was successful next year." No comments have been received from the USFWS. The next scheduled monitoring event will be conducted in 2016.

If you have any questions concerning this submittal, please contact Mr. Gary Rast at the Renewable World Energies, LLC offices @ 855-994-9376 Ext 105. He can also be reached by e-mail at grast@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

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 "Jason Kreuzscher". The signature is written in a cursive style and is positioned above the printed name and title.

Mr. Jason Kreuzscher
Vice President

Attachment: Flambeau Crowley Final Purple Loosestrife Inventory Report

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

Flambeau Crowley Project Purple Loosestrife Inventory
August 27, 2015
FERC Project # 2473 Article 410

Flambeau Hydro LLC
100 S. State St.
Neshkoro, WI 54960

Purple Loosestrife

On August 27, 2015, 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 degrees 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 by boat 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 plants were observed. See below:

The first site where purple loosestrife was found was FLCR PL001- FLCR PL002. This is along the south side of the Highway 70 causeway at 6-Mile Creek. From 2003 until 2012, this site had been treated with a Glyphosate solution. In 2010 there were 21 purple loosestrife plants observed in this location. In 2011 that number was down to 3. In 2012 there were 11 multi-stem plants between 1-3 feet tall. In 2013 there were again 10 plants along the causeway. In 2014 there were 15 single and multi-stemmed plants located along this stretch. In 2015 there were 12 plants observed, hand pulled and properly disposed of. The second site observed is directly across from PL001 and PL002 and is labeled FLCR PL007. Technically this could be considered an extension of the sighting noted above. It is located in the same general area as above except: It is at the center of the causeway 45' from the road railing at 110° east of the Hwy sign. This site can't be accessed and for that reason was given a label all its own. There were 1-3 multi stem plants 1-3 feet tall. All plants at both sites showed no signs of *Galerucella* beetles feeding on the plants and were between 1-3 feet tall with flowering spikes. 12 of 13 were hand pulled with the root ball and properly disposed of.

None of the other occurrences of purple loosestrife were observed during this year's survey.

All survey information has been entered into the SWIMS database for the 2015 year.

Purple Loosestrife Survey

Project: Flambeau Crowley #2473

Datum: WGS 84

Date: August 27, 2015

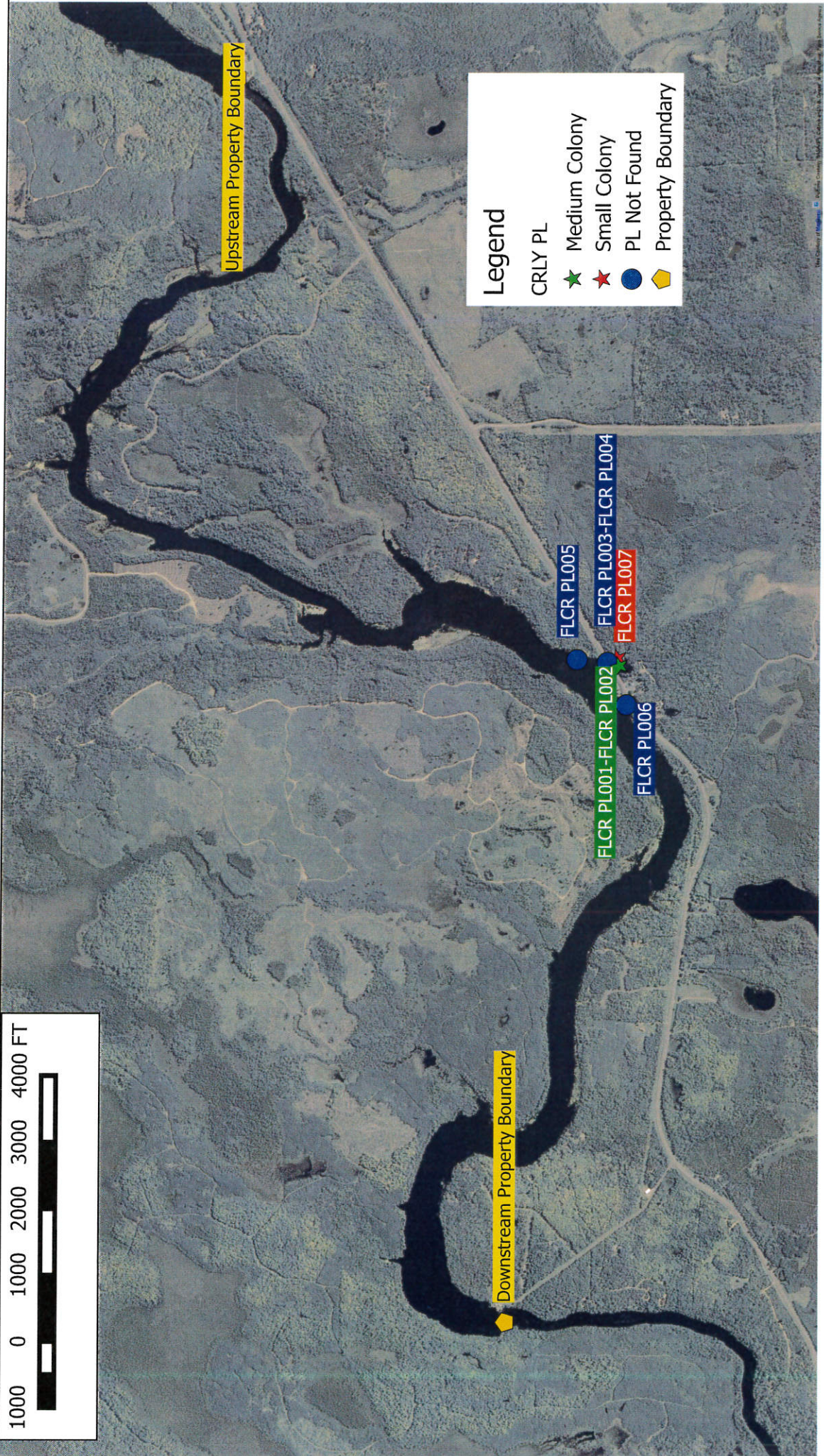
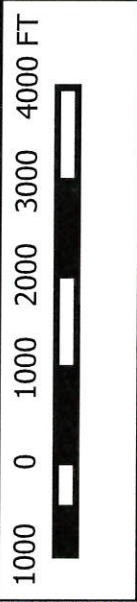
Page: 1 of 2

Crew: GGR and JT

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'	~180' x 25' 15 multi-stem plants	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 were treated yearly with herbicide between 2003 and 2012 with the exception of 2005, when 1 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, but plants were small in size and most without blooms. In 2011 the number of plants decreased again. The 3 plants found were treated with herbicide. In 2012 the plant population went back up in number and was again treated with herbicide. This occurrence recorded on digital photos and/or video tape from 2002-2008, 2013, 2014, & 2015. In 2013 (10), 2014 (15), 2015 (12) were hand pulled to the roots and properly disposed of.

Sighting #	GPS Point	Latitude	Longitude	Plant Height	Stand Area	Comments
2	216-217 FLCR PL003 - FLCR PL004	N45 51.857' N45 51.853	W90 32.806' W90 32.814'	N/A	N/A	Located between GPS points 216 (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 were found at this location in 2007, 2008, and 2009. In 2010 one large plant was located at this site and treated with herbicide. The one plant found at this site in 2011 was pulled. This occurrence recorded on digital photos and/or video tape in 2002, 2003, 2005, & 2006. No plants found at this site in 2012, 2013, 2014, or 2015.
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 landing. First observed in 2008. All plants pulled in 2008 and 2009. No plants observed in 2010 thru 2015. Photos in 2008.
5	FLCR PL 007			1'-3'	~3' x 5' 1-3 multi-stem plants	Discovered in 2015. Located center of causeway east of rail 45' @ 110° E of Hwy sign & directly across from Site #1. Can't be accessed and were not pulled.

CROWLEY HYDROELECTRIC PROJECT
FERC #2473 PURPLE LOOSESTRIFE 2015



Legend

CRLY PL

- ★ Medium Colony
- ★ Small Colony
- PL Not Found
- ⬠ Property Boundary

Year 2015 Purple Loosestrife Survey

Flambeau Crowley Hydroelectric Project - FERC # 2640

Date: 8/27/15 Conducted By: GARY RAST + JIM TESCH
 HWL: 1427.31 TWL: 1406.6 PROJECT FLOW 56 CFS
 Time Survey Started: 9:00 AM Time Survey Ended: 2:00 PM
 Weather Conditions: CALM, FAIR, CLEAR, BRIGHT SUN,
54°F, & BAR @ 30.15.
 Location of Survey Area: Tailrace _____ Bypass Reach _____ Impoundment X
 Time of Sighting(s): 9:00 AM
 Location of Sighting(s) (GPS Coordinates): SEE SURVEY SHEET

(Attach Photos & Map if Applicable)

Purple Loosestrife: YES ① SITE SAME AS IN PAST.
 Other Species Observed: 1 EAGLE (PERCHED) 4 LOONS, 2 PAIR
DUCKS, SNAILS, & SONG BIRDS.

Other Pertinent Survey Information

1 SITE ALONG THE SOUTH SIDE OF THE
HWY 70 CAUSEWAY @ 6 MILE CREEK.
10 SINGLE STEM PLANTS FOUND + PULLED,
3 MULTI STEM PLANTS FOUND, 2 WERE
PULLED + 1 WAS NOT. IT COULD NOT BE
ACCESSED (CENTER OF CAUSEWAY EAST OF RAIL,
45' FROM HWY SIGN @ 110° EAST.

Gary Rast

Year 2015 Purple Loosetrife Survey

Flambeau Crowley Hydroelectric Project - FERC # 2640

Date: 8/27/15 Conducted By: GARY RAST + JIM TESH

HWL: 1427.31 TWL: 1406.6 PROJECT FLOW 561 CFS

Time Survey Started: 2:00 PM Time Survey Ended: 2:25 PM

Weather Conditions: WINDS S @ 9 MPH, FAIR, CLEAR, BRIGHT SUN, 72°F, + BAR @ 30.09.

Location of Survey Area: Tailrace _____ Bypass Reach X Impoundment _____
FHLIC PROPERTY

Time of Sighting(s): N/A _____

Location of Sighting(s) (GPS Coordinates): N/A _____

(Attach Photos & Map if Applicable)

Purple Loosetrife: NONE

Other Species Observed: _____

Other Pertinent Survey Information

Gary Rast

Year 2015 Purple Loosetrife Survey PAGE 3

Flambeau Crowley Hydroelectric Project – FERC # 2640

Date: 8/27/15 Conducted By: GARY RAST - JIM TESCH
HWL: 1427.31 TWL: 1406.6 PROJECT FLOW 561 CFS
Time Survey Started: 2:25PM Time Survey Ended: 3:00PM
Weather Conditions: WINDS SW @ 9MPH, MOSTLY CLOUDY, BRIGHT SUN, 73°F, & BAR @ 30.09.
Location of Survey Area: Tailrace X Bypass Reach _____ Impoundment _____
Time of Sighting(s): N/A _____
Location of Sighting(s) (GPS Coordinates): N/A _____

(Attach Photos & Map if Applicable)

Purple Loosetrife: NONE

Other Species Observed: _____

Other Pertinent Survey Information

Gary Rast



Crowley Project PL Survey August 27, 2015



Crowley Project – FLCR PL001 & FLCR PL002 –2015

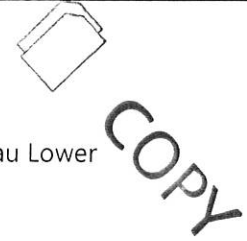


Crowley Project – FLCR PL 007 – 2015

Correspondence

Gary Rast

From: Laatsch, Cheryl - DNR <Cheryl.Laatsch@wisconsin.gov>
Sent: Tuesday, December 01, 2015 10:14 AM
To: Gary Rast; Jason Kreuzscher
Subject: FW: AIS reports for Crowley, Pixley, FLambeau Upper, Flambeau Lower



See below.

We are committed to service excellence.

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

Cheryl Laatsch
Phone: 920-387-7869
Cheryl.laatsch@wisconsin.gov

From: Kleist, Jon J - DNR
Sent: Monday, November 30, 2015 2:15 PM
To: Laatsch, Cheryl - DNR
Cc: Aartila, Tom P - DNR
Subject: RE: AIS reports for Crowley, Pixley, FLambeau Upper, Flambeau Lower

Hi Cheryl,

I reviewed the 4 reports. I do not have any comments. The only reported PL was on Crowley flowage which was reported to be removed by hand (except for one plant) We will see if the hand removal was successful next year.

Let me know if you need anything else

Thanks

Jon

We are committed to service excellence.

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

Jon Kleist
Phone: 715-762-1344
jon.kleist@wisconsin.gov

From: Laatsch, Cheryl - DNR
Sent: Monday, November 16, 2015 9:02 AM
To: Roesler, Craig P - DNR; Kleist, Jon J - DNR
Cc: Aartila, Tom P - DNR
Subject: AIS reports for Crowley, Pixley, FLambeau Upper, Flambeau Lower
Importance: High

Here are 4 reports from RWE for AIS monitoring. Please take a look and let me know if you have any comments or questions. Please respond by Nov 30. Thanks for your assistance.

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 – Watershed Bureau/Water Division

Wisconsin Department of Natural Resources

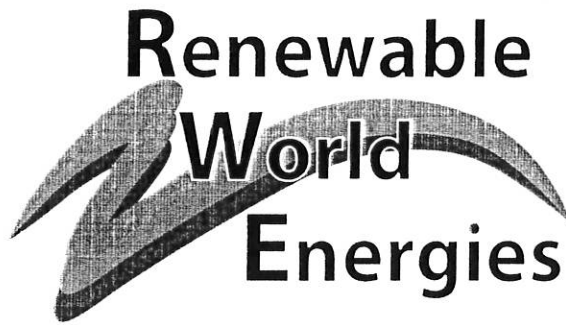
N7225 Highway 28, Horicon WI 53032


Phone: 920-387-7869

Fax: 920-387-7888

Cheryl.laatsch@wisconsin.gov





 COPY

November 10, 2015

Mr. Nick Utrup
U.S. Fish and Wildlife Service
WI/MN Ecological Services Field Office
4101 American Boulevard East
Bloomington, MN 55425

Ms. Cheryl Laatsch
Statewide FERC Coordinator
Wisconsin Dept. of Natural Resources
N7725 HWY 28
Horicon, WI 53032

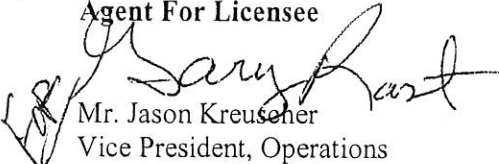
**Re: Flambeau Crowley Project FERC # 2473
Flambeau Hydro, LLC
Article 410, 2015 DRAFT Purple Loosetrife Inventory**

Dear Ms. Laatsch, and Mr. Utrup:

Attached you will find a copy of the Flambeau Hydro, LLC "Purple Loosetrife Inventory" for 2015. This annual report has been prepared to comply with the federal hydropower license of the project and article named above. A final copy will be filed with the Federal Energy Regulatory Commission with any comments you might add by the end of January.

If you have any questions regarding this submission, please contact Mr. Gary Rast at Renewable World Energies Neshkoro office @ (855)994-9376, ext. 105. He can also be reached via email at grast@rwehydro.com.

Sincerely,
Renewable World Energies, LLC
Agent For Licensee


Mr. Jason Kreuscher
Vice President, Operations

Attachment: Flambeau Crowley 2015 Purple Loosetrife Inventory Draft Report

CC: RWE Corporate


15-11-10 GGR CRLY 2015 P L Inv Draft Rpt To AG

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Fax: 906-563-9344

Gary Rast


COPY

From: Gary Rast
Sent: Tuesday, November 10, 2015 1:32 PM
To: 'Laatsch, Cheryl - DNR'; Utrup, Nick
Subject: Draft 2015 CRLY PL Report
Attachments: 15-11-10 GGR CRLY 2015 PL INV DRAFT RPT TO AG.pdf

Cheryl & Nick,

Attached is the 2015 Draft Purple Loosetrife Report for the Flambeau Crowley Hydro Project.

Gary

Gary Rast
Regulatory/Compliance Manager



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