

CONSOLIDATED WATER POWER COMPANY

General Offices

P.O. Box 8050, Wisconsin Rapids, WI 54495-8050

A subsidiary of Verso Corporation

October 30, 2015

Office of the Secretary
Federal Energy Regulatory Commission
888 1st Street, N.E.
Washington, D.C. 20426

(VIA ELECTRONIC FILING)

Wisconsin Rapids Project, FERC No. 2256 - Article 409 (Purple Loosestrife Monitoring – Biennial Report for 2014/2015)

Dear Secretary:

Article 409 of the Wisconsin Rapids Hydroelectric Project License and the Order approving and modifying Consolidated Water Power Company's (CWPCo) Purple Loosestrife Monitoring Plan required annual monitoring of the noxious plants within project waters, filing a report every two years. Enclosed are the results for the 2014 and 2015 monitoring along with the accompanying purple loosestrife plant location project maps.

Background

Article 409 requires purple loosestrife monitoring while it is in boom and documenting plant sites and plant densities. CWPCo denotes plant densities by: (1) small; 1-5 plants, (2) medium; 6-50 plants and (3) dense; >50 plants. For small to medium densities, past control methods included: (1) hand pulling and removal of whole plant or (2) cut plant flower tops off and leave rest of plant for beetles to feed on when beetle activity observed or (3) chemical treatment. For site 12 located in the bedrock below the Wisconsin Rapids dam, control is with the introduction of beetle pots to further establish the beetle population. This area is difficult to control the plants with other means due to the rock outcroppings. CWPCo partners with the Wood County Conservation agency to raise the beetles for transplanting to site 12.

The biennial 2010/11 report had a total of 17 sites monitored for purple loosestrife or 5 additional sites when compared to the 2008/09 time period. Overall, the plant counts were similar to the 2008/09 levels. In 2010, a total of 12 sites were observed with plant density breakdown of 8 small, 3 medium, 1 dense (site 12) with beetle activity at 5 sites. In 2011, a total of 10 sites were observed with plant density breakdown of 9 small and 1 dense (site 12) with beetle activity at 4 sites (see Table 1).

The biennial 2012/13 period, purple loosestrife was present at three sites (sites 2, 12, 17) in 2012 and two sites (sites 11, 12) in 2013, with total plant counts trending lower when compared to the 2010/11 time period (see Table 1). No new monitoring sites were observed during this biennial period.

2014/15 Biennial Summary

The monitoring for purple loosestrife was conducted during summers of 2014 (vehicle July 28th week and boat August 6th) and 2015 (vehicle July 26th week and boat August 13th) on the Project. The biennial 2014/15 saw no new purple loosestrife sites observed.

For biennial 2014/15 period, purple loosestrife was present at five sites (sites 1, 4, 8, 11, 12) in 2014 and six sites (sites 2, 6, 8, 11, 12, 18) in 2015, with sites 8, 11 and 12 being repeat sites over the biennial period. For each year, all sites except for one were observed with either medium or heavy beetle activity, thus indicating a thriving beetle population exists within the project boundary to assist with the control of purple loosestrife. Overall, the plant sites observed with purple loosestrife increased when compared to the 2012/13 biennial time period with a slight increase overall plant count totals. Please refer to Table 1 and the attached plant location maps for the purple loosestrife monitoring site data. With these reported levels and observed beetle activity, project operations are not being impacted by the presence of purple loosestrife.

Site 12 (below Wisconsin Rapids spillway) continues to have a dense stable purple loosestrife population with at least medium beetle activity on all plants. CWPCo continued to work with the Wood County Conservation agency and placed 10 raised beetle pots in 2014 and 4 more in 2015 to supplement the beetle population

This report provides two coordinate based systems for reporting the purple loosestrife locations. Going forward, with the 2017 biennial report, only the Google Earth based coordinate system will be reported, see Table 2. CWPCo feels this coordinate system is more universal for tracking the purple loosestrife colonies.

2014/15 Control Methods

Control methods administered in 2014/15 involved either: (1) hand pulling and removal of whole plant or (2) flower seed top removal where beetle activity was observed with plant densities less than 50 plants. For more than 50 plant densities, the control method is to maintain a healthy beetle population through raised beetle pot introduction (site 12). Beetle activity was ranked and recorded by % leaf damage (observed bee-bee like holes in leaves) as follows: (1) light, <15% leaves, (2) medium, 15% to 30%, or (3) heavy, >30%.

CWPCo continues to distribute information regarding invasive species (PUBL-WM-250-95) via its recreational brochure which is free to the public.

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

CONSOLIDATED WATER POWER COMPANY

Thomas J. Witt

Thomas J. Witt
Resources Manager

Enclosure: Purple Loosestrife Location Maps (2)

File: Wisconsin Rapids, LG-90-30, Article 409

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

Table 1 – Purple Loosestrife Monitoring Site Data

Wisconsin Rapids Hydroelectric Project – Purple Loosestrife Monitoring for 2010 - 2015

| Site No | Description | GPS Coordinates | Plt Density | Beetle Activity | Chem Applied | Action Taken |
|---------|---|------------------------|--|---------------------------------|------------------------|--|
| 1 | Small bedrock outcrop E. of Big Island | 16T 0277557 4922583 | 2 plts 5 plts None None 2 plts None | None Heavy None | No No No | 2010 - removed 2011 - removed flower tops, rest for beetles 2012 - no plants 2013 - no plants 2014 – removed 2015 – no plants |
| 2 | Sandy shoreline of a small island | 16T 0277610 4922875 | 2 plts None 2 plts None None 7 plts | None None Medium | No No No | 2010 – removed 2011 - no plants 2012 - removed 2013 - no plants 2014 – no plants 2015 – removed |
| 3 | Island below Biron Dam – Out of Project Boundary, observations under Biron Project Report | | | | | Starting with 2017 biennial report, this site will no longer be part of this report as it is under the Biron Hydroelectric Project, P-2192 |
| 4 | S. Tip of Big Island | 16T 0275617 4920948 | 2 plts None None None 2 plts None | Heavy Heavy | No No | 2010 - removed flower tops, rest for beetles 2011 - no plants 2012 - no plants 2013 - no plants 2014 - removed flower tops, rest for beetles 2015 – no plants |
| 5 | SE Shoreline of Hunter Is. (Kraft Mill) | 16T 0275920 4921946 | 2 plts 2 plts None None None None | None None | No No | 2010 - removed 2011 - removed 2012 - no plants 2013 - no plants 2014 - no plants 2015 - no plants |
| 6 | E. Shoreline adjacent to Pleasant View Lane | 16T 0276303 4920894 | 16 plts 2 plts None None None 1 plt | Heavy Heavy Heavy | No No No | 2010 - removed flower tops, rest for beetles 2011 - removed flower tops, rest for beetles 2012 - no plants 2013 - no plants 2014 - no plants 2015 - removed flower tops, rest for beetles |
| 7 | Small Island and E Shoreline / Strawberry Lane | 16T 0276648 4921127 | 4 plts None None None None None | None | No | 2010 - removed 2011 - no plants 2012 - no plants 2013 - no plants 2014 - no plants 2015 - no plants |

Wisconsin Rapids Hydroelectric Project - Purple Loosestrife Monitoring for 2014/2015

| Site No | Description | GPS Coordinates | Plt Density | Beetle Activity | Chem Applied | Action Taken |
|---------|--|------------------------|---|--|--|---|
| 8 | E. Shoreline above Strawberry Lane | 16T 0276705 4921180 | 8 plts 1 plt None None 4 plts 4 plts | None None Medium Heavy | No No No No | 2010 - removed 2011 - removed 2012 - no plants 2013 - no plants 2014 - removed flower tops, rest for beetles 2015 - removed flower tops, rest for beetles |
| 9 | E. Shoreline of Big Island | 16T 0277670 4922082 | None None None None None None | | No No | 2010 - no plants 2011 - no plants 2012 - no plants 2013 - no plants 2014 - no plants 2015 - no plants |
| 10 | Sm Island E of Big Island near Cranberry ditch outfall | 16T 0277124 4921835 | 4 plts None None None None None | None | No | 2010 - removed 2011 - no plants 2012 - no plants 2013 - no plants 2014 - no plants 2015 - no plants |
| 11 | E Shoreline near Canoe Take Out | 16T 0275484 4920339 | None None None 2 plts 2 plts 4 plts | Heavy Medium Medium | No No No No | 2010 - no plants 2011 - no plants 2012 - no plants 2013 - removed 2014 - removed flower tops, rest for beetles 2015 - removed flower tops, rest for beetles |
| 12 | Tail water area of Spillway Section | 16T 0275423 4919828 | 50-100 plts 50-100 Plts 50-100 plts 50-100 plts 50-100 plts 50-100 plts 50-100 plts | Heavy Light Light Light Medium Medium Medium - Heavy | No No No No No No No | 2010 - place 8 beetle pots, monitor 2011 - place 2 beetle pots, monitor 2012 - monitor 2013- place 4 beetle pots, monitor 2014 - place 10 beetle pots, monitor 2015 - place 4 beetle pots, monitor |
| 13 | E Shoreline below Cranberry Ditch Outfall | 16T 0277165 4921711 | 6 plts 5 plts None None None None | Heavy Heavy | No No | 2010 - removed flower tops, rest for beetles 2011 - removed flower tops, rest for beetles 2012 - no plants 2013 - no plants 2014 - no plants 2015 - no plants |

Wisconsin Rapids Hydroelectric Project - Purple Loosestrife Monitoring for 2014/2015

| Site No | Description | GPS Coordinates | Plt Density | Beetle Activity | Chem Applied | Action Taken |
|---------|--------------------------------------|------------------------|--|-------------------|----------------|--|
| 14 | W Shoreline, above RR trestle | 16T 0275092 4920403 | 4 plts None None None None None | Heavy | No | 2010 - removed flower tops, rest for beetles 2011 - no plants 2012 - no plants 2013 - no plants 2014 - no plants 2015 - no plants |
| 15 | W Shoreline above Kraft Mill area | 16T 0275551 4921154 | None 3 plts None None None None | None | No No | 2010 - no plants 2011 - removed 2012 - no plants 2013 - no plants 2014 - no plants 2015 - no plants |
| 16 | E. Shoreline above Shorewood Terrace | 16T 0276423 4921056 | 4 plts 1 plt None None None None | None None | No No | 2010 - removed 2011 - removed 2012 - no plants 2013 - no plants 2014 - no plants 2015 - no plants |
| 17 | Small Island above Hunter Island | 16T 0277041 4921616 | None 4 plts 1 plt None None None | None Medium | No No No | 2010 - no plants 2011 - removed 2012 - removed 2013 - no plants 2014 - no plants 2015 - no plants |
| 18 | Big Is., SE Cove | 16T 0276245 4921225 | None 2 plts None None None 2 plts | None Heavy | No No No | 2010 - no plants 2011 - removed 2012 - no plants 2013 - no plants 2014 - no plants 2015 - removed |

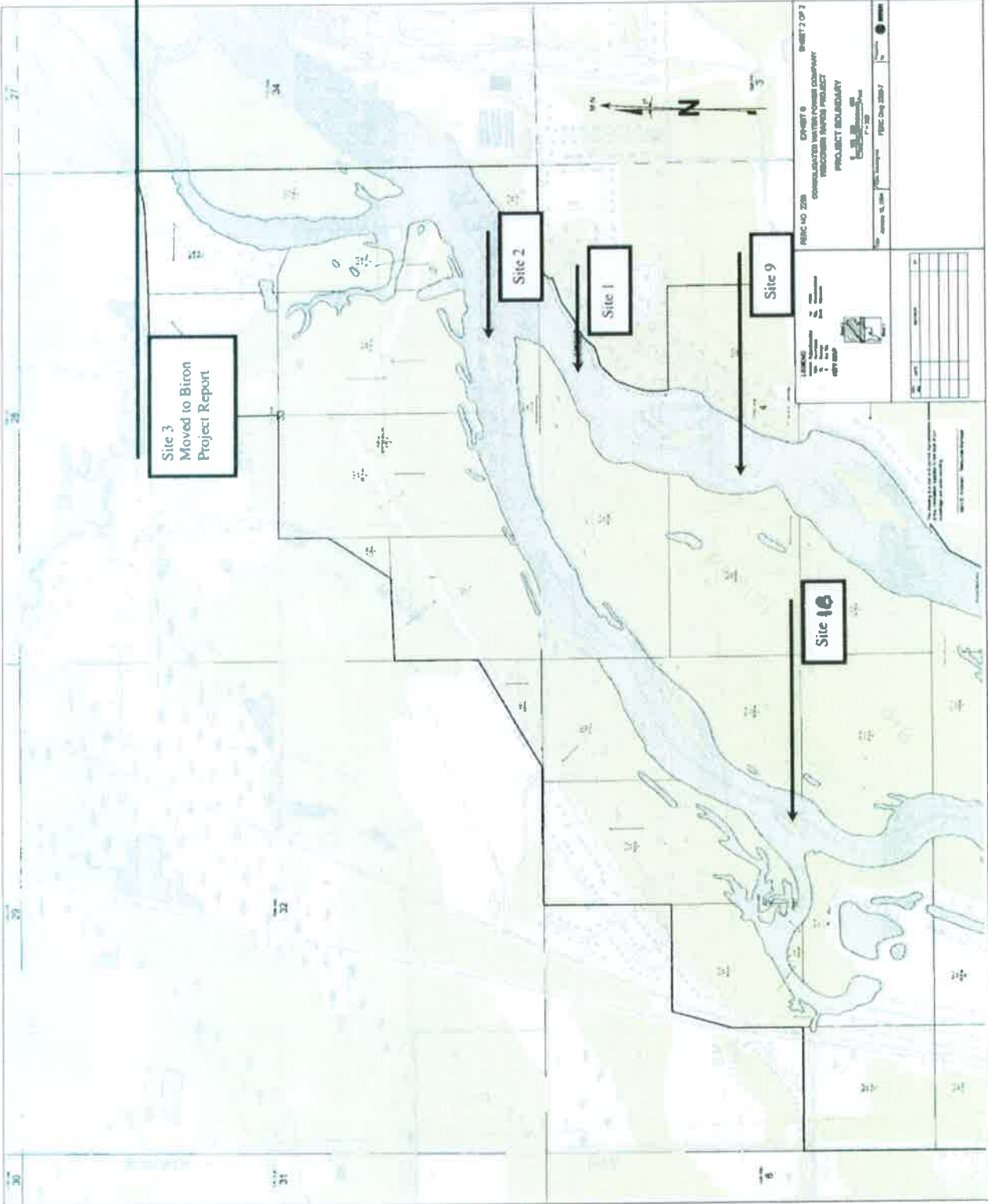
Notes: No chemical applications for 2010 - 2013. Beetle activity rating based on percentage of leaves with bee-holes from beetle feeding: light less than 15%, medium 15% to 30%, heavy greater than 30%.

Table 2 - Purple Loosetrife GPS Coordinate Conversion to Google Earth

Wisconsin Rapids Hydroelectric Project – Purple Loosetrife Colony Locations 2014 - 2015

| Site No. | Description | Current GPS Coordinates | Google Earth GPS Coordinates (degrees) |
|----------|---|-------------------------|--|
| 1 | Small bedrock outcrop E. of Big Island | 16T 0277557 4922583 | Lat 44.4202, Long -89.7984 |
| 2 | Sandy shoreline of a small island | 16T 0277610 4922875 | Lat 44.4249, Long -89.7944 |
| 3 | Island below Biron Dam – Out of Project Boundary, observations under Biron Project Report | | |
| 4 | S. Tip of Big Island | 16T 0275617 4920948 | Lat 44.4072, Long -89.8171 |
| 5 | SE Shoreline of Hunter Is. (Kraft Mill) | 16T 0275920 4921946 | Lat 44.4039, Long -89.8221 |
| 6 | E. Shoreline adjacent to Pleasant View Lane | 16T 0276303 4920894 | Lat 44.4069, Long -89.8090 |
| 7 | Small Island and E Shoreline / Strawberry Ln | 16T 0276648 4921127 | Lat 44.4087, Long -89.8059 |
| 8 | E. Shoreline abve Straw Ln | 16T 0276705 4921180 | Lat 44.4093, Long -89.8046 |
| 9 | E. Shoreline of Big Island | 16T 0277670 4922082 | Lat 44.4165, Long -89.8007 |
| 10 | Sm Island E of Big Island near Cranberry ditch outfall | 16T 0277124 4921835 | Lat 44.4154, Long -89.7996 |
| 11 | E Shoreline near Canoe Take Out | 16T 0275484 4920339 | Lat 44.4019, Long -89.8187 |
| 12 | Tail water area of Spillway Section | 16T 0275423 4919828 | Lat 44.3965, Long -89.8206 |
| 13 | E Shoreline below Cranberry Ditch Outfall | 16T 0277165 4921711 | Lat 44.4155, Long -89.7980 |
| 14 | W Shoreline, above RR trestle | 16T 0275092 4920403 | Lat 44.4024, Long -89.8241 |
| 15 | W Shoreline above Kraft Mill area | 16T 0275551 4921154 | Lat 44.4085, Long -89.8194 |
| 16 | E. Shoreline above Shorewood Terrace | 16T 0276423 4921056 | Lat 44.4123, Long -89.8031 |
| 17 | Small Island above Hunter Island | 16T 0277041 4921616 | Lat 44.4106, Long -89.8087 |
| 18 | Big Is., SE Cove | 16T 0276245 4921225 | Lat 44.4165, Long -89.8147 |
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Attached Purple Loosestrife Plant Location Maps
(two maps)



Site 3
Moved to Biron
Project Report

Site 2

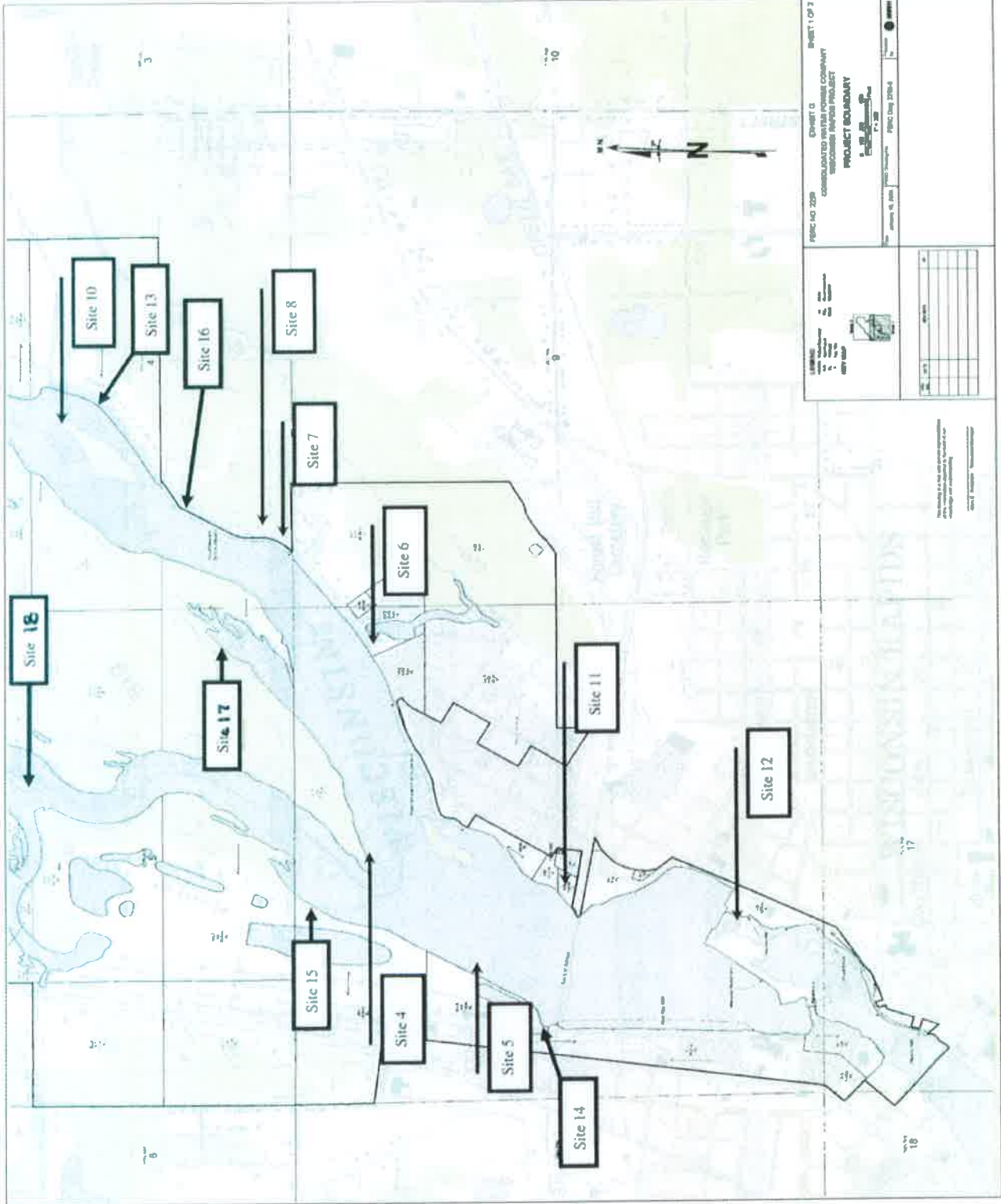
Site 1

Site 9

Site 16

PROJECT 6
SHEET 2 OF 7
PERC NO. 228
CONSOLIDATED WATER POWER COMPANY
WISCONSIN NORTH PROJECT
PROJECT BOUNDARY
DATE: 11/11/11
BY: [Signature]

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PROJECT NO. 229 SHEET 0 SHEET 1 OF 2
 CONSULTING ENGINEERING COMPANY
 PROJECT BOUNDARY
 DATE: 11/11/11
 PROJECT: 229-4
 SHEET: 0

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DATE: 11/11/11 PROJECT: 229-4 SHEET: 0

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