

CONSOLIDATED WATER POWER COMPANY

General Offices
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A subsidiary of NewPage Corporation

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

(VIA ELECTRONIC FILING)

Whiting Hydroelectric Project, FERC No. 2590 – Article 407, Purple Loosestrife Monitoring Biennial Report – 2008/2009, Response to FERC letter dated June 3, 2010

Dear Ms. Salas:

Consolidated Water Power Company (CWPCo) responds to FERC's June 3, 2010 letter requesting additional information regarding the Whiting Project's 2008 / 2009 biennial purple loosestrife report. CWPCo manages five FERC licensed hydroelectric projects (DuBay, Stevens Point, Whiting, Biron and Wisconsin Rapids) on the Wisconsin River. The Whiting project is located downstream of the Stevens Point Project (No. 2110) dam and upstream of the Biron Project (No. 2192). Mark Anderson, CWPCo's resource manager for years, left CWPCo in February 2008 and at that time I became CWPCo's resource manager. I have reviewed and discussed with Mark Anderson and Roy Arndt (CWPCo Utility crew – assisted with annual monitoring) the purple loosestrife monitoring and control plan history, the biennial reports and CWPCo / agency correspondences.

Whiting Purple Loosestrife Background

Two sites containing purple loosestrife have been located at the Whiting Project. Both are located on islands below County Highway HH (see Figure 1). Originally, the plants at these sites were removed manually during the required monitoring events. In 2006, due to increasing numbers of plants, CWPCo consulted with the WDNR and FWS to identify more effective control measures needed for larger stands. As a result of those consultations, on January 17, 2008 FERC amended the Whiting Project's purple loosestrife management plan to allow chemical application in addition to the purple loosestrife control methods that FERC had previously approved, i.e. the manual removal of small stands and the introduction of insects for biocontrol if such efforts prove effective at CWPCo's Stevens Point flowage for other flowages.

FERC Approved Purple Loosestrife Control Methods

On page 2 of your June 3, 2010 letter, you suggest that FERC has only approved manual removal and chemical treatment as purple loosestrife control methods at the Whiting Project and that any other method must be approved by the Commission pursuant to a license amendment. This is not CWPCo's understanding and we need to clarify this issue.

CWPCo's purple loosestrife monitoring plan for the Whiting Project states that CWPCo will be cooperating with the Wisconsin Department of Natural Resources to release insects, i.e. Galerucella Beetles, for biocontrol of purple loosestrife at CWPCo's Stevens Point Project and that if this method of biocontrol proves effective that CWPCo will work with WDNR to introduce the insects to CWPCo's other flowages. FERC approved the plan, including the biocontrol methods, on July 24, 1997. See 80 FERC ¶ 62,062. Galerucella Beetles have proven to be an effective method of controlling purple loosestrife and accordingly CWPCo introduced a pilot beetle site on the Biron flowage (No. 2192) in 2009. CWPCo assumed that this

was the intent of FERC's July 24, 1997 approval of the Whiting Project's purple loosestrife monitoring plan and that CWPCo is required only to report on the progress of such efforts in the biennial reports. We did not interpret FERC's approval as requiring an amendment to each of CWPCo's licenses before implementing these biocontrol measures. This year, after working with WDNR and Wood County Land Conservation, CWPCo is planning to introduce beetles at the Biron Project (No. 2192) and the Wisconsin Rapids Project (No. 2256). If we should not do this without an approved license amendment, please let us know ASAP.

Response to Additional Information Requests

1. Dates monitoring was conducted in 2008 and 2009.

CWPCo conducted the 2008 monitoring on July 15, August 5 and 6 and the 2009 monitoring on July 8, August 4 and 5.

2. Full description of cutting process / procedures conducted in 2008 and 2009 for control of purple loosestrife at this Project, as well as a description of how the cut portions of the plants were disposed.

As explained below, CWPCo did not remove or chemical treat any plants in 2008. In 2009, CWPCo manually removed all plants at the two Whiting Project sites by first cutting the upper portion of the plant to remove the spike covered with flowers and then placed the spike in a plastic bag to prevent flower seed dispersion. The remaining plant stalk and root system was then removed by hand by loosing the ground around the root area to allow the root structure and the remaining plant stalk to be removed intact. After removal, the roots and stalk were placed in the plastic bag. The plastic bags were tied shut and disposed at the municipal landfill. A total of 14 plants were removed in 2009.

3. Explanation of why chemical treatment activities were not used or were not needed in 2008 and 2009.

2008. Chemical treatment in 2007 had significantly reduced the number of plants at the two sites, i.e. from a total of 30 to about 15. All of the plants identified in 2008 were immature, single stalk plants. In addition, several plants displayed beetle activity with bee-bee size holes observed in the stalk leaves. CWPCo, in cooperation with the WDNR, had introduced beetles as a mechanism to control purple loosestrife at the upstream Stevens Point Project and we assumed that the beetles observed at the Whiting Project were the result of the natural expansion of those upstream efforts. Accordingly, we thought it best to encourage the establishment and growth of the fledgling beetle population at Whiting, and decided not to remove the plants until we observed the effect of the beetles during 2009 monitoring.

2009. Plants observed were similar to the 2008, i.e. immature, single stalk, but the signs of beetle activity were minimal. The plant counts were comparable to 2008, with one site increasing by 2 plants and the other decreasing by 3 plants. CWPCo manually removed all plants using the process described above. The plants were easily removed from the moist shoreline by the procedure described above and chemical treatment was not necessary.

4. Indication of whether or not control measures were used in during the 2008 monitoring survey and if not, why they were not used.

As explained in response to Question 3, no control measures were applied in 2008 because at each site a few plants displayed initial signs of beetle activity. Beetle releases at the Stevens Point Project (just upriver of this project) has successfully controlled the spread of purple loosestrife at Stevens Point. CWPCo's experience at Stevens Point suggested that beetle control is effective once a critical threshold beetle population is established and that the process of establishing the critical population may take a few years. During monitoring in 2008 we observed what we thought could be the beginning of a sustaining beetle population at Whiting, and accordingly thought it best to not remove any plants to allow the beetles more time to establish a sustainable population base. During 2009 monitoring, we did not observe sufficient evidence of increasing beetle population, so we removed all of the plants manually as described in response to Question 2.

5. Clarification of how many purple loosestrife plants were found in 2008 verses 2009.

Site 1: 2008 – 7 plants, 2009 – 9 plants.

Site 2: 2008 – 8 plants, 2009 – 5 plants.

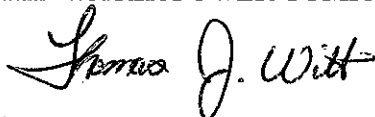
Summary

CWPCo will continue to manually remove purple loosestife at the Whiting Project and will use chemical treatment as necessary for larger stands. We will also continue to look for and facilitate the establishment of a beetle population for long term biocontrol of purple loosestrife, unless FERC determines that a license amendment is necessary to authorize this activity.

Sincerely,

CONSOLIDATED WATER POWER COMPANY

Thomas J. Witt



Thomas J. Witt
Resources Manager

Enclosure: Purple Loosestrife Location Map

cc: File (Whiting, LG-90-30, Article 407)

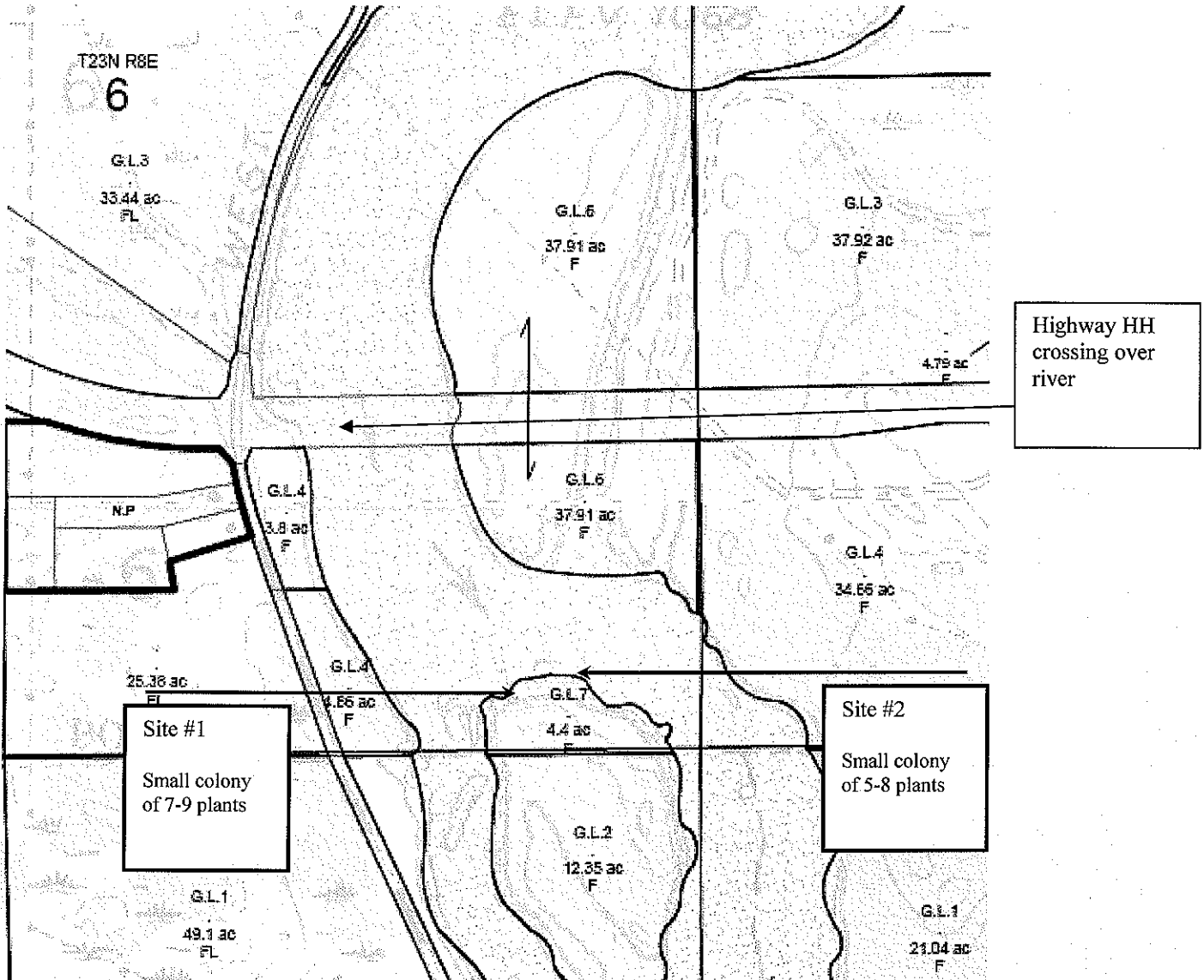
Ms. Peggy A. Harding, Regional Director, Chicago Regional Office, Federal Energy
Regulatory Commission (paper copy)

Mr. Scott Watson, Wisconsin Department of Natural Resources, Wausau, WI (electronically)

Ms. Louise Clemency and Mr. Nick Ultrup U.S. Fish & Wildlife Service, Green Bay, WI (electronically)

Figure 1
(2008 / 2009 Site Location)

Whiting Hydroelectric Project – FERC No. 2590
Invasive Aquatic Species Monitoring



Document Content(s)

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