

ORIGINAL



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SECRETARY

Page 1 of 2
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March 1, 2004

2004 MAR -8 P 3:27

Magalie Roman Salas
Secretary Federal Energy Regulatory Commission
888 First Street, NE
Washington DC 20426

FEDERAL ENERGY
REGULATORY COMMISSION

RE: Hydroelectric Project No. P-2212, ⁰³⁶ Article 407 Modification Proposal

Dear Magalie Roman Salas,

On January 14, 1997, Weyerhaeuser Company (licensee) filed a Purple Loosestrife Monitoring Plan, pursuant to Article 407 of the license for the Rothschild Project. The Rothschild Project is located on the Wisconsin River in Marathon County, Wisconsin.

In the Purple Loosestrife Plan, monitoring is scheduled each year beginning in 1997 and a written report summarizing methods and findings of each survey is submitted to the WDNR and the USFWS biennially or each odd numbered year.

Historically, 1997 baseline survey observations established a widespread distribution of purple loosestrife in the project although not significantly different from the 1990 ecological survey. It was suggested this lack of change is likely attributed to the stable water levels provided by the project, which limits the amount of wet shoreline exposed on an annual basis that would offer a suitable substrate for germination. Subsequent, 1998 observations were similar to 1997 with some subtle differences where perhaps private landowners removed plants from their shoreline or where high density areas of purple loosestrife seemed to increase slightly. Removal measures taken to this point consisted of digging and handpulling, which became a futile effort due to the nearly impossible task of removing the entire root mass. In 2000, additional eradication efforts included chemical and biological control in selected areas. 2000 and 2001 monitoring indicated some mortality factors affecting purple loosestrife with an estimated 26 percent reduction. Observations and comparisons of areas treated with herbicide and areas introduced to purple loosestrife leaf eating beetles (*Galerrucella* spp) indicate that most of this reduction was from natural predation. 2002-2003 survey results incorporated purple loosestrife populations and release locations of purple loosestrife beetles. Of significance, is the survey data indicates additional reduction in purple loosestrife populations with an overall decline of 57 percent from the initial monitoring numbers. Collaboration between field observations and the Wisconsin Department of Natural Resources attributes the reductions to beetle grazing. It appears the local beetle population is expanding and per WDNR, local interest continues to raise and release beetles.

PROPOSAL:

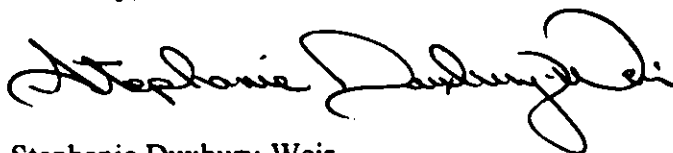
Due to the success of the above mentioned control efforts, it is requested that modifying the Rothschild Purple Loosestrife Plan to biennial monitoring and reporting is as effective as the

current annual monitoring and biennial monitoring and reporting. Supporting concurrence from the Wisconsin Department of Natural Resources and the U.S. Fish and Wildlife Service was requested with the October 16, 2003 Purple Loosestrife Monitoring Reports submittal. Currently no response has been received from the U.S. Fish and Wildlife Service however during the January 2004 annual consultation meeting for wildlife management activities this proposal was discussed. Per attached meeting minutes Mr. Rick Weide, WDNR, agreed with the monitoring reduction and would further discuss with Mr. Robert Martini, WDNR. The attached email indicates concurrence from Mr. Martini that a two-year frequency for fieldwork is agreeable. His comments also suggest communicating any incidental observations of new loosestrife populations that may be encountered in the course of other work on the flowage. Weyerhaeuser agrees with this approach.

Therefore, Weyerhaeuser respectfully requests the Commission to modify Rothschild Hydroelectric Project P-2212, Article 407 Purple Loosestrife monitoring and reporting requirements to odd numbered years. All other conditions of Article 407 and the Rothschild Purple Loosestrife Monitoring Plan would remain with no suggested amendments.

Thank you for your consideration in this matter. If you should have any questions regarding this request or require additional information, please contact me at (715) 355-6218.

Sincerely,



Stephanie Duxbury-Weir
Environmental Engineer
Weyerhaeuser Co.

Enclosures: 10/16/2003 Purple Loosestrife-
Monitoring Report & Letter
January 2004 Wildlife Meeting Minutes
WDNR Electronic Correspondence

cc: Official File
Ms. Patricia Grant, M.C.R.P
Environmental Protection Specialist
230 S. Dearborn St. STE.3130
Chicago, IL 60604



200 N Grand Ave
Rothschild WI 54474-1197
Tel (715) 359 3101
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October 16, 2003

Mr. Robert Martini
Wisconsin Department of Natural Resources
North Central Region Headquarters
107 Suliff Avenue
Rhineland, WI 54501

Ms. Janet Smith
U.S. Fish & Wildlife Service
2661 Scott Tower Drive
New Franken, WI 54229

Mr. Rick Weide
Wisconsin Department of Natural Resources
5301 Rib Mountain Drive
Wausau, WI 54401

**RE: Rothschild Hydroelectric Project P-2212,
Purple Loosetrife Monitoring Program**

In accordance with Article 407, of the above mentioned project license please, find enclosed a copy of the 2003 Purple Loosetrife Monitoring Report.

This report includes survey results of 2002-2003 purpleloostribe populations and locations of purpleloostribe beetle releases (*Galerucella* spp.). Of significance is: the years of survey data indicate an overall decline of 57 percent from the initial monitoring numbers, which through field observations and collaboration with the Wisconsin Department of Natural Resources, appears to be due to beetle grazing. Given the success of these control efforts, future monitoring and reporting on a biennial basis potentially may be as effective as the current annual monitoring and biennial monitoring and reporting.

Additionally, access by survey personnel to project waters north of the McCleary Bridge and extending up to the Highway 51/39 bypass project on the Big Rib River may be limited due to planned re-construction and construction activities. Inaccessibility to these areas affects the traditional survey by qualifying a substantial portion of the purpleloostribe population as temporarily not measured and under severe disturbance. A monitoring hiatus during this period preserves current data, maintains its reporting reliability, and establishes a new baseline that recognizes the previous year's activities.

If agencies concur, the Rothschild Hydroelectric Project P-2212 respectfully requests monitoring in 2004 be interrupted and resumed in 2005 with a scheduled monitoring and documentation report. Thank you for your consideration on this matter and your responses.

If you should have any further questions please feel free to contact me at (715) 355-6218.

Sincerely,

Stephanie Duxbury-Weir
Environmental Engineer
Weyerhaeuser Co.
Enclosure (1)

cc: Federal Energy Regulatory commission
Chicago Regional Office
230 South Dearborn Street, Room 3130
Chicago, IL 60604

Official file

**Annual Agency Consultation Meeting Summary
Article 408 License Compliance
Rothschild Hydroelectric Project
FERC Project No. 2212**

January 12, 2004

Attending:

Dan Belter - Wausau Bird Club
Stephanie Duxbury-Weir - Weyerhaeuser
Jon Robaidek - Wisconsin Department of Natural Resources
Perry Rossa - Mead & Hunt, Inc. (Licensing Consultant)
Rick Weide - Wisconsin Department of Natural Resources

Introduction

The meeting was held at the Weyerhaeuser office in Rothschild, Wisconsin. An agenda was distributed to participants prior to the meeting.

Items Discussed

1. The tern-nesting platforms that were unsuccessful on Lake Wausau were given to the Wisconsin Department of Natural Resources (WDNR) for use elsewhere. They ended up being used at the WDNR's Mead Wildlife Area, which has good tern nesting habitat.
2. The osprey nesting platforms were discussed. The southern platform, installed in 2002, was lost during spring high-water in 2003. Rick thinks a contributing factor may have been the relatively shallow depth of the pole installation. There was a hardpan about 5 feet down in the sediments that the jet pump couldn't get past. The northern platform is now leaning and will have to be fixed this winter. Two people have already volunteered to help Rick fix it. Rick will undertake this and submit repair receipts to Stephanie for reimbursement, as with past activities. This platform had an active nest in 2003. Dan observed two chicks fledged from this nest.

Potential alternate locations for another platform were discussed. Feasible locations are very limited due to the territorial needs of the remaining platform's nest and the apparent need for soft sediments for firm installation. Rick believes an upland location would be the only alternative worth pursuing. He knows that the Wisconsin Department of Transportation (WisDOT) has a mitigation plan for the Highway N bridge/causeway reconstruction in progress at the Rib River confluence just upstream of the remaining osprey platform. Tom Meyer (WDNR) was involved in this plan, and Rick will discuss with him the feasibility of WisDOT installing a new platform between Highway N and Highway 51, probably on one of the islands. Weyerhaeuser could pay for the platform out of the remaining funds. Rick will also assess other upland locations, but any feasible location would have to be far away from any trees.

- 3. Migratory bird uses of Lake Wausau during 2003 were reviewed. These were Dan's observations, which are entered each year into the Wisconsin Society for Ornithology's statewide database and published annually in their quarterly journal, Passenger Pigeon.

Lake Wausau had the most common loons Dan has ever seen on the lake (a total of 114). Red-necked grebes showed up again and two firsts – an Iceland gull and a few white-fronted geese – were observed. Iceland gulls can usually be seen around the Lake Michigan shores during migration. Wisconsin seems to be getting more white-fronted geese passing through each year. Another surprise was a Barrow's goldeneye (male). These are usually coastal migrants – eastern Canada and British Columbia/Alaska, although a few birds over winter around Lake Michigan. Dan believes most migrants use Lake Wausau as a resting/loafing area along the Wisconsin River corridor.

- 4. Fund status was reviewed. No funds were used in 2003, so the status remains as follows:

Waterfowl Monitoring Set-Aside	\$1,000
Non-Allocated Funds	\$1,584

Last year, the possibility of setting up a \$500 gift fund account for WDNR use around the lake was investigated. Rick thinks that this would not work well. Most local expenses – i.e., loosestrife beetle production costs – are just too minimal to bother with, and the fund could possibly work against Rick's budget by reducing allocations to his local program. Administrative costs would also be high. Our current system of paying for things by Rick submitting receipts to Stephanie is cheap and effective.

No receipts for loosestrife beetle costs were submitted in 2003. Rick thinks that people just re-used their materials last year. As for 2004, Weyerhaeuser can fund a new platform, if Rick finds a good upland location. The last one (paid for in 2002 and lost in 2003) cost \$185. Rick wants to try seeding wild rice again, this time in the Rib River reach between Highway N and Highway 51. This area is shallower and has more soft sediments than the area downstream of Highway N that was seeded last time. Rick will find a good location this summer and buy seed from a Lincoln County supplier. This seed costs about \$2 per pound and would be seeded in the fall. Rick thinks a new site should be seeded up to three consecutive years. He will submit rice receipts to Stephanie this fall.

We briefly discussed the possibility of installing fish cribs in Lake Wausau. Problems might occur with navigation or over-fishing at the cribs. Another problem is installation on a flowage. Typically, cribs are built on the ice and allowed to sink during breakup. On Lake Wausau, a crib could be carried far downstream before sinking. Rick will talk to Tom Meyer about possible fish structures. Tom has a better background on this.

- 5. Last year we decided to look into posting signs to increase public awareness of species and habitat protection issues, especially WDNR-listed species. Perry investigated this with the WDNR's Bureau of Endangered Resources and Fisheries and Habitat personnel and came up with several signs concerning trumpeter swan conservation. These were sent to Rick, who will post them in suitable locations this year.



6. Purple loosestrife populations on Lake Wausau and Weyerhaeuser's recent request to FERC to alter the monitoring frequency (Article 407) were discussed. There has been a 57-percent decline in loosestrife since 2000 due to beetle grazing. Weyerhaeuser has asked to go to biennial monitoring and reporting. Currently, annual monitoring and biennial reporting are required. Rick agrees with this proposal. A factor in this request is the reconstruction of the Highway N causeway, which will eliminate remaining loosestrife there. We talked about continuing beetle releases. There is no guidance on how long an area should be subjected to releases. The groups that Rick is working with want to continue to raise and release beetles. There are only a few areas left on Lake Wausau worth releasing beetle in now. These include the area between Highway N and Highway 51 and the large island in the south end of the lake where the osprey platform was lost. Stephanie reminded Rick that she needs a concurrence letter from the WDNR for FERC to act on the monitoring-reduction request. Rick will discuss this with Bob Martini and get a comment letter to Stephanie. Rick asked Perry if he thought it was okay to reduce the monitoring effort and Perry concurred.

7. With the agenda addressed, the discussion was opened to any remaining topics. Rick asked about the Weyerhaeuser recreation brochure. There are about 1,000 copies left and the brochure will be re-done when these are gone. The brochure has had wide distribution at businesses and WDNR offices. Stephanie said that she would like any comments on what should be in the new brochure, and Rick responded that he thought a note reminding people not to feed wildlife should be included. Rick has seen a lot of progress around the lake on this issue.

Respectfully submitted,

MEAD & HUNT, Inc.



Perry M. Rossa

Duxbury-Weir, Stephanie

From: Duxbury-Weir, Stephanie
Sent: Wednesday, January 21, 2004 11:35 AM
To: 'Robert.E.Martini@dnr.state.wi.us'
Subject: FW: Weyerhaeuser annual wildlife meeting, Article 408

Hello Bob,

Thank you for your agreement with our request to reduce our field monitoring effort to a two-year frequency. We will coordinate/ communicate with you annually concerning any incidental observations of new loosestrife populations that we may encounter in the course of other work on the flowage. I will submit this request formally to FERC over the course of the next several weeks. Thank you again.

Stephanie Duxbury-Weir
Environmental Engineer,
Weyerhaeuser Rothschild
Telephone: 715-355-6218
Fax: 715-355-6347
Email: stephanie.duxbury-weir@weyerhaeuser.com

From: Perry M. Rossa[SMTP:perry.rossa@meadhunt.com]
Sent: Wednesday, January 14, 2004 3:58 PM
To: stephanie.duxbury-weir@weyerhaeuser.com
Subject: FW: Weyerhaeuser annual wildlife meeting, Article 408

Stephanie,

Here is Bob Martini's reply to your recent request to FERC regarding Article 407 modification.

-----Original Message-----

From: Martini, Robert E [<mailto:Robert.E.Martini@dnr.state.wi.us>]
Sent: Wednesday, January 14, 2004 10:48 AM
To: Perry M. Rossa
Subject: RE: Weyerhaeuser annual wildlife meeting, Article 408

We have discussed your proposal to move to a two year frequency on field work for invasive species at the Rothschild project. We concur with your proposal but we ask that the reporting period continue on an annual schedule to document the decline of loosestrife observed while continuing the other work on the flowage.

-----Original Message-----

From: Perry Rossa [<mailto:perry.rossa@meadhunt.com>]
Sent: Thursday, December 18, 2003 9:11 AM
To: Martini, Robert E
Subject: Weyerhaeuser annual wildlife meeting, Article 408

Hello Bob,

We need to schedule the annual 408 meeting at Weyerhaeuser Rothschild. We are looking at the week of January 12, 13, 16 or any day the following week for a meeting at the Weyerhaeuser offices in Rothschild. Please let me know what works for you as soon as possible. Thanks,