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ORIGINAL

February 8, 2007

2007 FEB 16 P 2:51

RECEIVED  
FEB 16 2007

The Secretary  
Federal Energy Regulatory Commission  
888 First Street, NE  
Washington, DC 20426

F-2421-052

**Re: Flambeau Lower, Project No. 2421, Flambeau Hydro LLC  
Article 410, Purple Loosestrife Inventory**

Dear Secretary:

Please find enclosed an original and 8 copies of the Flambeau Lower, Project No. 2421 Purple Loosestrife Inventory for 2006. Copies of the inventory have been sent to the Wisconsin Department of Natural Resources (WIDNR) and the US Fish & Wildlife Service (USFWS) and no comments have been received.

If you have any questions regarding this submission, please contact Mr. Richard Loeffler at 920-293-4628.

Sincerely,  
**NORTH AMERICAN HYDRO, INC.**

FOR

Charles Alsberg  
Executive Vice President

Cc: FERC - CRO  
Encl.: 1 original & 8 copies

07-02-06 RAL FLLW 2006 loosestrife survey to FERC.doc

**Flambeau Lower Project Purple Loosestrife Inventory  
September 1, 2006  
FERC Project #2421 Article 410**

**Flambeau Hydro, L.L.C.  
116 State St.  
Neshkoro, WI 54960**

*Purple Loosestrife*

On September 1, 2006, Flambeau Hydro, L.L.C. (FHLLC) performed an inventory of purple loosestrife plants at the Flambeau Lower 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° from N45° 56.256' W90° 26.710'; photo No. 1**

**The area to be inventoried shall be the shoreline of the impoundment to elevation 1468 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 Lower Hydroelectric Project FERC Project #2421.

**General Observations:**

The Flambeau Lower Project Boundary was divided into three different areas; *the impoundment* (from HWY 182 bridge in Park Falls to the 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 the HWY 13 bridge).

*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 no purple loosestrife plants were observed.

During the inventory, a digital camera was used to document new occurrences of purple loosestrife as noted in the survey comments at the end of this report.

**Purple Loosestrife Survey**

**Project:** Flambeau Lower #2421  
**Date:** 9/1/2006  
**Crew:** RAL & CTM

**Datum:** WGS 84  
**Page:** 1 of 1

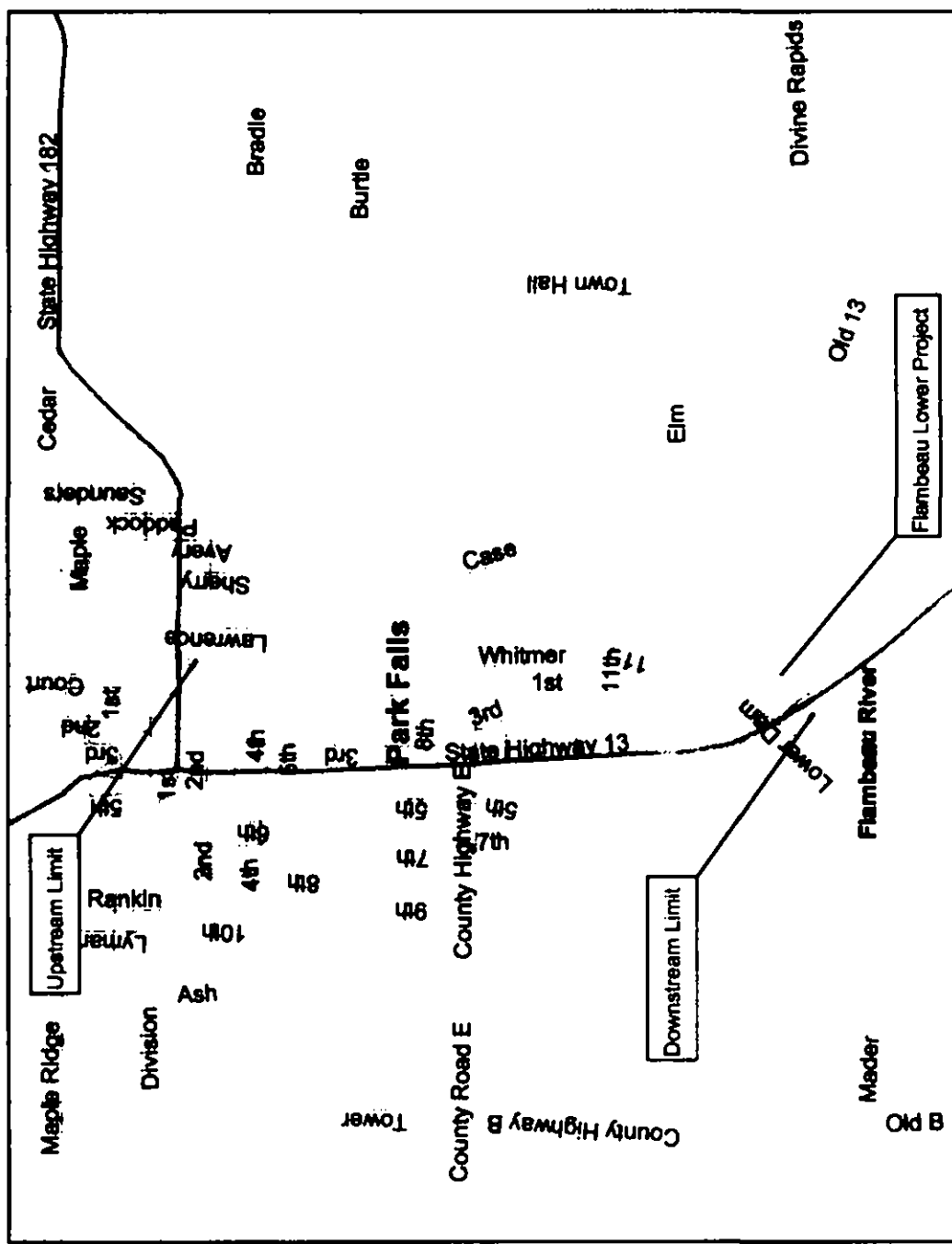
Sighting #	GPS point	Latitude	Longitude	Plant Height	Stand Area	Comments
						No occurrences of purple loosestrife were found within the project boundary in 2006.

# Flambeau Lower #2421 Purple Loosestrife Survey 2006



- Legend**
- County Boundaries
  - ▬ Major Highways
  - ▬ Interstate
  - ▬ US Highway
  - ▬ State Highway
  - ▬ Local Roads
  - ▬ Civil Towns
  - ▬ Civil Town
  - ▬ 24K Open Water
  - ▬ 24K Rivers and Shorelines
  - ▬ Cities and Villages
  - ▬ Village
  - ▬ City

Scale: 1:25,342



0 2500 5000 7500 ft

This map is a user generated scale output from an internet mapping site and is for general reference only. Data layers that appear on this map may or may not be accurate, current, or otherwise reliable. THIS MAP IS NOT TO BE USED FOR NAVIGATION.



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December 28, 2006

Mr. Jeffrey Scheirer  
Northern Region FERC Manager  
Wisconsin Department of Natural Resources  
875 South 4<sup>th</sup> Avenue  
Park Falls, WI 54552

Ms. Louise Clemency  
Field Supervisor  
U.S. Fish and Wildlife Service  
2661 Scott Tower Drive  
New Franken, WI 54229

**Re: *Flambeau Lower Project, No. 2421, Flambeau Hydro, L.L.C.  
Article 410, Purple Loosestrife Inventory***

Dear Mr. Scheirer and Ms. Clemency:

Attached is a copy of our "Purple Loosestrife Inventory" for 2006. This annual report has been prepared to comply with Article 410 of the project's federal hydropower license.

In 2006, a purple loosestrife survey crew visited the 6-mile Creek HWY 70 causeway site (N45°51.850' W90°32.786' WGS84) at the Crowley Hydroelectric Project impoundment near Park Falls, Wisconsin on July 20, 2006 to help determine an effective survey period of purple loosestrife in this area. At that time, four plants were observed in the early blooming stage with flowers emerging at the bottom of the flower spikes (purple loosestrife blooms from bottom to top). An additional 16 plants were observed that were not blooming. All plants were between 1' - 3' tall.

On August 31, 2006, the survey crew revisited the site and performed the annual survey as prescribed in Article 410 of the Crowley license. At this time, 53 plants were observed in all blooming stages with flowers emerging at the bottom, middle, and top of the flower spikes of different plants. An additional four plants were observed that were not blooming at all. All plants were between 1' - 7' tall. All plants were sprayed with an herbicide, and, two days later on September 2, 2006, the site was revisited to observe treatment effectiveness. At this observation, plants were still blooming with a few showing the beginning signs of stress from the treatment (flowers beginning to wilt and reddish-brown leaf edges and leaf tips).

File: 06-09-08 RAL FLLW 2006 Loosestrife Inv doc



**Purple Loosestrife at 6-mile Creek on July 20, 2006**



**Purple Loosestrife at 6-mile Creek on August 31, 2006**

File: 06-09-08 RAL FLLW 2006 Loosestrife Inv.doc



The licensee believes that the original survey window as prescribed in Article 410 of the Flambeau Lower license that reads "While purple loosestrife is blooming from mid July to early August" is too narrow and more appropriate wording would be "While purple loosestrife is blooming from mid-July to mid-September" to allow for a more flexible and effective inventory. The licensee has been inventorying purple loosestrife at the Crowley site since 2002, and previous observations support the need for a broader survey window.

We invite you to review and comment, but we respectfully request that any written response be provided to us within thirty (30) days from the date of this letter. Please contact me at 920-293-8514 if you wish to discuss or have any questions.

Sincerely,  
*NORTH AMERICAN HYDRO, Inc*

A handwritten signature in black ink, appearing to read "Richard Loeffler". The signature is written in a cursive style and is positioned above the printed name.

Richard Loeffler

Attachment