

ORIGINAL



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February 8, 2007

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

P-2640-061

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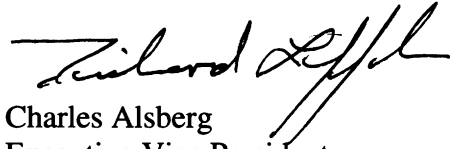
**Re: Flambeau Upper, Project No. 2640, Flambeau Hydro LLC
Article 412, Purple Loosestrife Inventory**

Dear Secretary:

Please find enclosed an original and 8 copies of the Flambeau Upper, Project No. 2640 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.


FER
Charles Alsberg
Executive Vice President

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

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

**Flambeau Upper Project Purple Loosestrife Inventory
September 1, 2006
FERC Project #2640 Article 412**

**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 Upper 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 1487.4 feet NGVD and lands owned by FHLLC within the Project

Boundary as indicated on the Project Maps 1 & 2, dated November 1991, included in Exhibit G of Flambeau Paper Corp. Application For A Subsequent License for the Upper Hydroelectric Project FERC Project #2640.

General Observations:

The Flambeau Upper Project Boundary was divided into three different areas; *the impoundment* (from just downstream of the last rapids before the impoundment to the dam), *the power canal/bypassed reach* (the power canal from the dam to the powerhouse, and the bypassed reach area from the dam to the single lane service bridge just upstream of the HWY 182 bridge), and *the tailrace* (from the single lane service bridge just upstream of the HWY 182 bridge to the HWY 182 bridge).

The tailrace was surveyed by boat and no purple loosestrife plants were observed.

The power canal/bypassed reach was surveyed on foot one new occurrence of purple loosestrife plants was observed in 2006. These purple loosestrife plants were inventoried, pulled, and have been noted on the survey sheet(s) and map(s) at the end of this report. No other occurrences of purple loosestrife were observed.

The impoundment was surveyed by boat. One suspected occurrence of purple loosestrife plants had been observed in this area and is noted on the lake map and survey comments at the end of this report. In 2002, the landowner was sent an informational brochure published by the WDNR and was encouraged to contact the WDNR for identification and control procedures. During the 2003 inventory, specimens from these plants were taken to the Wisconsin Department of Natural Resource Service Center in Wautoma, Wisconsin for identification. Analysis revealed that the plants are winged loosestrife (*Lythrum alatum*) and not purple loosestrife (*Lythrum salicaria*). In 2004, the owner removed these plants. No purple loosestrife plants were observed in the impoundment in 2006.

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.

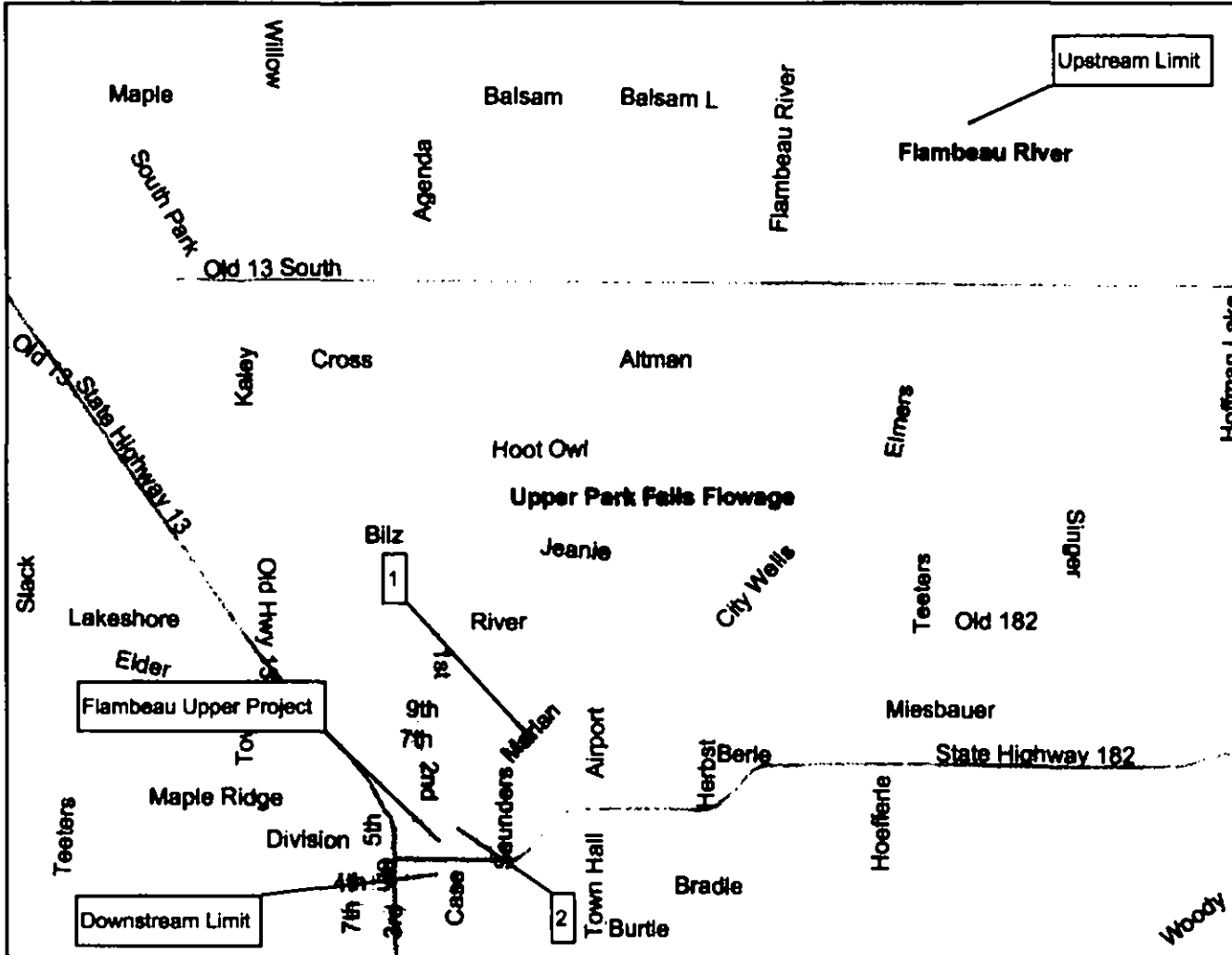
Purple Loosestrife Survey

Project: Flambeau Upper #2640
 Date: 9/1/2006
 Crew: RAL & CTM

Datum: WGS 84
 Page: 1 of 1

Sighting #	GPS point	Latitude	Longitude	Plant Height	Stand Area	Comments
1	2 FLUPPL001	N45°56.807'	W090°26.043'	3' - 4'	~4' x 8'	Located ~3 yards bearing 90° (east) of GPS point on residence shore. Appears to be quite a number of plants, ~15 - 25, growing close together. Plants appear to have ~3 - 5 stems per plant. The landowner was sent an informational brochure published by the Wisconsin Department of Natural Resources (WDNR) and was encouraged to contact the WDNR for identification and control procedures. This occurrence recorded on video tape in 2002. In 2003 samples were taken of this occurrence along with a recording on video tape. Analysis revealed that the plants are winged loosestrife (<i>Lythrum alatum</i>) and not purple loosestrife (<i>Lythrum salicaria</i>). In 2004, the land owner removed these plants. In 2005 and 2006, no purple loosestrife occurred at this location.
2	246 FLUPPL002	N45°56.157'	W090°26.607'	4' - 5'	~4' x 6'	Located on the waypoint in the cattails at the northwest corner of the electrical sub-station fence. There were 3 plants with 1 3 stems per plant. In 2006, these plants were photographed and pulled.

Flambeau Upper #2640 Purple Loosestrife Survey 2006



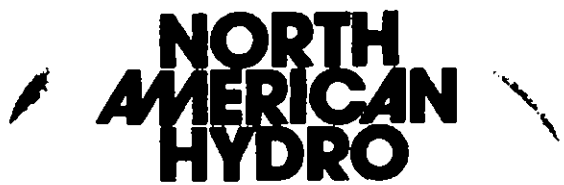
Legend

- 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: 1:60,000

This map is a user generated static 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 4th 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 Upper Project, No. 2640, Flambeau Hydro, L.L.C.
Article 412, 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 412 of the project's federal hydropower license and is being filed with the Federal Energy Regulatory Commission.

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: 08-08-25 RAL FLUP 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: 06-09-25 RAL FLUP 2006 Loosestrife Inv.doc



The licensee believes that the original survey window as prescribed in Article 412 of the Flambeau Upper 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