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ORIGENIA Confield Operations:

Manufacturing

1323 B Everest Avenue Schofield, WI 54476 USA

Tel: 715-359-0209 Fax: 715-359-1049

March 19, 1998

Mr. Tom Thuemler Regional FERC Coordinator Wisconsin Department of Natural Resources P.O. Box 127, 101 Ogden Road Peshtigo, WI 54157

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Re: Oconto Falls (Upper) Project, No. 2523, N.E.W. Hydro, Inc.

Article 407, Purple Loosestrife & Eurasian Watermilfoil Inventory &

Control Plan

Dear Tom:

Attached is a preliminary copy of our "Purple Loosestrife & Eurasian Watermilfoil Inventory & Control Plan". This plan has been prepared to comply with Article 407 of the project's federal hydropower license.

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 if you wish discussion or have any questions. Your cooperation is appreciated.

Sincerely,

NORTH AMERICAN HYDRO, In

Loyal Gake, P.E.

Director of Development and

Regulatory Compliance

Attachment

Cc: Lois Cashell - FERC

Ron Lesniak - CRO

98-03-19 loyal ocfls up 2523 art 407 purp loos-eur mil plan cov let dnr.doc

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FERC - DOCHETED

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Preliminary

Oconto Falls Upper Project - Purple Loosestrife & Eurasian Watermilfoil Inventory & Control Plan FERC Project #2523 Article 407

NEW Hydro, Inc. March 9, 1998

Purple Loosestrife

In 1999, a baseline inventory of Purple Loosestrife will be performed by N.E.W. Hydro, Inc. (NEW) using the following method:

After Purple Loosestrife has bloomed in mid July to early August, the inventory should be conducted using a boat to survey the impoundment above the dam and by foot or boat to survey below the dam. 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. The plant should be inventoried by marking and numbering the location on a lake map along with notes approximating size of plants, area that they cover, and location with reference to landmarks. These landmarks should also be noted on the lake map. Photos and/or videotape may be taken of the largest occurrences.

Example:

#1 6' tall plants; 4' X 20'; on shoreline SW of boathouse and NE of power pole on N shoreline; no photo

#2 5' - 7' tall plants; 10' X 10'; in marsh at head of impoundment on N shoreline SW of power pole; photo #1

The area to be inventoried shall be the shoreline within the Project Boundary as indicated on the Project Boundary map included as Exhibit G of NEW Hydro, Inc. Application For New License for the Oconto Falls Hydroelectric Project FERC Project #2523. The project boundary is shown as the water and shoreline of the impoundment from approximately 6000' upstream of the State Highway 32 bridge to approximately 500' downstream of the Project dam.

Within 60 days of completion of the inventory, the results will be mailed to the Wisconsin Department of Natural Resources (WDNR), the U.S. Fish and Wildlife Service (USFWS), and the Federal Energy Regulatory Commission (FERC).

File: 98-03-09 Rick Oconto Falls Upper 2523 Article 407 Preliminary 2 Purple Loosestrife - Eurasian Milfoli Inventory Plan.doc

Preliminary

In 2000, another inventory of Purple Loosestrife will be performed by NEW using the same method as in 1999. After the results are mailed to the WDNR, USFWS, and FERC, NEW will consult with the WDNR and USFWS to determine the frequency of future inventories. The results of this agreement will be filed with the FERC.

NEW will cooperate with any Federal, State, and community funded Purple Loosestrife control program located within the Project Boundary.

Eurasian watermilfoil

In 1999, a baseline inventory of Eurasian watermilfoil will be performed by N.E.W. Hydro, Inc. (NEW) using the following method:

After Eurasian watermilfoil has developed in mid July to early August, the inventory should be conducted by boating transects in the impoundment above and below the dam. The person(s) inventorying should visually search areas with depths of 12 feet or less for the dense mats of the plants on and below the water surface. 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. If necessary, a sample may be taken for identification later. The plant should be inventoried by marking and numbering the location on a lake map along with notes approximating area that they cover and location with reference to landmarks. These landmarks should also be noted on the lake map. Photos and/or videotape may be taken of the largest occurrences.

Example:

#1 40' X 20'; dense mat in 3' depth SW of boathouse and NE of power pole on N shoreline; no photo

#2 8' X 10'; dense mat in 4' depth at head of impoundment on N shoreline SW of power pole; photo #1

The area to be inventoried shall be that within the Project Boundary as indicated on the Project Boundary map included as Exhibit G of NEW Hydro, Inc. Application For New License for the Oconto Falls Hydroelectric Project FERC Project #2523. The project boundary is shown as the water and shoreline of the impoundment from approximately 6000' upstream of

Preliminary

the State Highway 32 bridge to approximately 500' downstream of the Project dam.

Within 60 days of completion of the inventory, the results will be mailed to the Wisconsin Department of Natural Resources (WDNR), the U.S. Fish and Wildlife Service (USFWS), and the Federal Energy Regulatory Commission (FERC).

In 2000, another inventory of Eurasian watermilfoil will be performed by NEW using the same method as in 1999. After the results are mailed to the WDNR, USFWS, and FERC, NEW will consult with the WDNR and USFWS to determine the frequency of future inventories. The results of this agreement will be filed with the FERC.

NEW will cooperate with any Federal, State, and community funded Eurasian watermilfoil control program located within the Project Boundary.