#### CONSOLIDATED WATER POWER COMPANY

General Offices P.O. Box 8050, Wisconsin Rapids, WI 54495-8050 A subsidiary of Verso Corporation

September 27, 2019

Secretary Federal Energy Regulatory Commission 888 1<sup>st</sup> Street, N.E. Washington, D.C. 20426 (VIA ELECTRONIC FILING)

# Whiting Hydroelectric Project, FERC No. 2590 – Article 407, Purple Loosestrife Monitoring Biennial Report – 2018/2019

Dear Secretary:

In accordance with the order approving and modifying the Purple Loosestrife Monitoring Report, Consolidated Water Power Company (CWPCo) is filing the biennial report for biennial years 2018/19 monitoring efforts.

CWPCo conducted monitoring during the summers of 2018 (vehicle July 16th week and boat July 18th) and 2019 (vehicle July 28th week and boat August 2nd) for the Project. Currently, there are twenty sites monitored, with no new sites identified since 2013.

Overall, the number of purple loosestrife sites and counts showed a significant reduction from 2010 to 2013 and have remained stable from 2014 to 2019, with 4 sites in 2018 and 2 sites in 2019 observed. At these purple loosestrife levels, there are no adverse effects on the Project. For project detail information on the 2018/19 monitored purple loosestrife sites, please refer to Table 1 and Figure 1. It is noted, Table 1 also includes background data from 2010 - 2017 years for comparision.

This report provides a Google Earth based systems for reporting the purple loosestrife locations which was initiated in the 2014/15 biennial report. CWPCo feels the Google Earth coordinate system is more universal for tracking the purple loosestrife colonies.

The control method administered during 2018/19 involved manual plant removal for all sites with less than 5 plants. Other control methods previously used but not administered during this biennial period include: (1) for less than 5 plants per site, cut off plant top above water line and chemical treat stem or (2) for more than 5 plants per site - (a) no observed or light beetle activity, manual plant removal, (b) observed medium or heavy beetle activity, cut the flower tops off plants, leaving rest of the plant for beetle food.

CWPCo continues to distribute information regarding invasive species (PUBL-WM-250-95) via its recreational brochure which is free to the public.

If there are any questions, please feel free to contact us at (715) 422-3927 or contact tom.witt@versoco.com.

Sincerely,

#### CONSOLIDATED WATER POWER COMPANY

Thomas J. Witt

Thomas J. Witt Resources Manager

Enclosure: None

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

cc: Ms. Cheryl Laatsch, Wisconsin Department of Natural Resources (electronic email) Mr. Nicholas Utrup, U.S. Fish & Wildlife Service, St. Paul, MN (electronic email)

## **Table 1 – Purple Loosestrife Monitoring Site Data**

### Whiting Hydroelectric Project – Purple Loosestrife Biennial Monitoring 2010 to 2019

(Google Earth)   ·   Activity   Applied     1   N. Tip of Rock OL7   Lat 44.4978, Long -89.5927   I plt None   None   Yes   2010 - removed, chemical applic 2013 - no plants     2   N. Tip of Rock Outcrop Island GL7   Lat 44.4980, Long -89.5918   None   Wedium A plts   No   2016 - removed     2   N. Tip of Rock Outcrop Island GL7   Lat 44.4980, Long -89.5918   None   2011 - no plants   2011 - no plants     3   E. Shoreline GL1   Lat 44.4953, Long -89.5874   None   2010 - removed, chemical applic     3   F. Shoreline GL1   Lat 44.4953, Long -89.5874   None None   Yes   2010 - removed, chemical applic     4   E. Shoreline GL1   Lat 44.4927, Long -89.5874   Splts   None None   Yes   2010 - removed, chemical applic     4   E. ShorelineGL1   Lat 44.4927, Long -89.5879   6 plts   Light None   No   2013 - no plants     4   E. ShorelineGL1   Lat 44.4927, Long -89.5879   6 plts   Light None   No   2013 - removed     5   Boat Launch   Lat 44.4924, Long -89.5879   6 plts	Site	Description	GPS	Plt	Beetle	Chem	Action Taken
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5 pits neavy No 2019 – removed				3 plts	Heavy	No	2019 – removed

Site	Description	GPS	Plt	Beetle	Chem	Action Taken
No		Coordinates	Density	Activity	Applied	
9	SW corner GL2	Lat 44.4946,	1 plt	None	Yes	2010 - removed, chemical applied
	Island	Long -89.5913	None			2011 - no plants
			None			2012 – no plants
			None			2013 – no plants
			None			2014/15 – no plants
			4 plts	Light	No	2016 – removed
			None			2017 - no plants
			None			2018/19 – no plants
10	Above HH	Lat 44.5012,	10 plts	Heavy	No	2010 – removed flower tops, rest for beetles
	bridge W shore	Long -89.5963	None			2011 – no plants
			2 plts	Light	No	2012 – removed
			None			2013 – no plants
			None			2014-17 – no plants
			6 plts	Medium	No	2018 – removed flower tops, rest for beetles
			None			2019 – no plants
11	Above recr site	Lat 44.5063,	8 plts	None	Yes	2010 - removed, chemical applied
	fishing area	Long -89.5935	None			2011 - no plants
			None			2012 – no plants
			None			2013 – no plants
			None			2014-19 – no plants
12	McDonald	Lat 44.5114,	1 plt	None	Yes	2010 - removed, chemical applied
	Island	Long -89.5890	6 plts	Heavy	No	2011 - removed flower tops, rest for beetles
	NW tip		None			2012 – no plants
			None			2013 – no plants
10	G .1 675	1	None	N	XZ	2014-19 – no plants
13	South of Trans	Lat 44.5040,	4 plts	None	Yes	2010 - removed, chemical applied
	Line, W shore	Long -89.5955	None	<b>T</b> • <b>1</b>	N	2011 - no plants
			3 plts	Light	No	2012 – removed
			2 plts	Light	No	2013 – removed
			2 plts	Light	No	2014/15 – removed
			None 5 plts	Licht	No	2016/17 – no plants
			5 plts	Light Medium	No No	2018 – removed plants
14	S. RR cross, E	Lat 44.5122 ,	3 plts	None	Yes	2019 – removed plants 2010 - removed, chemical applied
14	shore Sect 32	Long -89.5870	5 plts None	None	168	
	shore sect 52	Long -09.3070	2 plts	None	No	2011 - no plants 2012 – removed
			None	None	NO	2012 - removed 2013 - no plants
			None			2013 – no plants
15	S. RR cross, E	Lat 44.5115,	5 plts	None	Yes	2014-19 - no plants 2010 - removed, chemical applied
15	shore GL1	Long -89.5869	None	THOME	105	2010 - removed, chemical applied 2011 - no plants
		Long -09.3009	None			2011 - no plants 2012 - no plants
			None			2012 - no plants 2013 - no plants
			None			2013 - 10 plants 2014-19 - no plants
16	S HH bridge	Lat 44.5000,	10 plts	None	Yes	2010 - removed, chemical applied
10	E shore	Long -89.5911	None	1,0110	100	2010 - removed, enemie an applied 2011 - no plants
		2016 07.3711	None			2011 - no plants 2012 - no plants
			None			2012 = no plants 2013 = no plants
			None			2013 = 10 plants 2014-19 = 10 plants
17	Under HH	Lat 44.5009,	4 plts	None	Yes	2010 - removed, chemical applied
17	bridge E shore	Long -89.5911	None	1,0110	1.00	2010 - removed, enemical applied 2011 - no plants
		2015 07.5711	None			2011 - no plants 2012 - no plants
			None			2012 = no plants 2013 = no plants
			None			2013 – no plants 2014-19 – no plants
			TONC			
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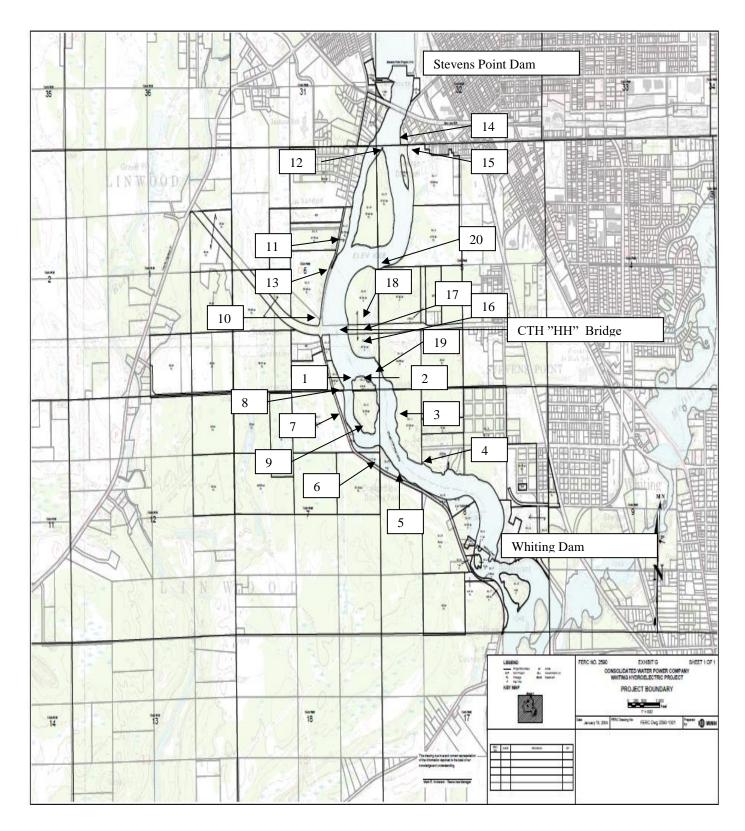
Site	Description	GPS	Plt	Beetle	Chem	Action Taken
No		Coordinates	Density	Activity	Applied	
18	N HH bridge	Lat 44.5013,	3 plts	None	Yes	2010 - removed, chemical applied
	E shore	Long -89.5910	None			2011 - no plants
			None			2012 – no plants
			None			2013 – no plants
			None			2014-19 – no plants
19	Rock Island E	Lat 44.4968,	4 plts	None	Yes	2010 - removed, chemical applied
	shore, GL1	Long -89.5889	None			2011 - no plants
			None			2012 – no plants
			2 plts	None	No	2013 – removed
			None			2014/15 – no plants
			None			2016 – no plants
			2 plts	Light	No	2017 – removed
			None			2018/19 – no plants
20	Small island	Lat 44.5047,	4 plts	Light	No	2012 – removed
	above HH brdg	Long -89.5899	None			2013 – no plants
		-	4 plts	Light	No	2014 – removed
			3 plts	Medium	No	2015 – removed
			None			2016-19 – no plants

Notes: 2010 chemical applied to area around removed plant base. Beetle activity rating based on percentage of leaves with bee-bee holes from beetle feeding: light less than 15%, medium 15% to 30%, heavy greater than 30%.

# Figure 1

Whiting Hydroelectric Project – FERC No. 2590

Invasive Aquatic Species Monitoring



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