CONSOLIDATED WATER POWER COMPANY

General Offices 610 High Street, Wisconsin Rapids, WI 54495 A subsidiary of Verso Corporation

October 11, 2021

Secretary
Federal Energy Regulatory Commission
888 1st Street, N.E.
Washington, D.C. 20426

(VIA ELECTRONIC FILING)

Whiting Hydroelectric Project, FERC No. 2590 – Article 407, Purple Loosestrife Monitoring Biennial Report – 2020/2021

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 2020/21 monitoring efforts.

CWPCo conducted monitoring during the summers of 2020 (vehicle July 24th week and boat July 21st) and 2021 (vehicle July 18th week and boat July 21st) 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 through 2021, with 3 sites in 2020 and 2 sites in 2021 observed (none of which were more than 3 plants for a site). At these purple loosestrife levels, there are no adverse effects on the Project. For project detail information on the history and 2020/21 monitored purple loosestrife sites, please refer to Table 1 and Figure 1. It is noted, Table 1 also includes background data from 2010 – 2019 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 2020/21 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)

<u>Table 1 – Purple Loosestrife Monitoring Site Data</u>

Whiting Hydroelectric Project – Purple Loosestrife Biennial Monitoring 2010 through 2021

Site	Description	GPS	Plt	Beetle	Chem	Action Taken
No		Coordinates	Density	Activity	Applied	
		(Google Earth)		Activity	Applied	
1	N. Tip of Rock	Lat 44.4978,	1 plt	None	Yes	2010 - removed, chemical applied
	Outcrop Island	Long -89.5927	None			2011 - no plants
	GL7	8	None			2012 – no plants
			None			2013 – no plants
			None			2014 – no plants
			2 plts	Medium	No	2015 – removed
			4 plts	Medium	No	2016 – removed
			None			2017-21 – no plants
2	N. Tip of Rock	Lat 44.4980,	None			2010-13 - no plants
	Outcrop Island	Long -89.5918	None			2014-21 – no plants
	GL7	Long 07.5710				1
3	E. Shoreline	Lat 44.4953,	3 plts	None	Yes	2010 - removed, chemical applied
	GL1	Long -89.5874	None			2011 - no plants
			None			2012 – no plants
			None			2013 – no plants
			None			2014-17 – no plants
			1 plt	Medium	No	2018 – removed
			None			2019 – no plants
			1 plt	Light	No	2020 – removed
			None			2021 – no plants
4	E. ShorelineGL1	Lat 44.4927,	6 plts	Light	Yes	2010 - removed, chemical applied
	Ass't Care	Long -89.5841	9 plts	Light	No	2011 - removed
			2 plts	Light	No	2012 – removed
			1 plt	Light	No	2013 – removed
			None			2014/15 – no plants
			None			2016 – no plants
			2 plts	Light	No	2017 – removed
			None			2018-21 – no plants
5	Boat Launch	Lat 44.4924,	2 plts	None	Yes	2010 - removed, chemical applied
		Long -89.5879	None			2011-13 - no plants
	H D	T -4 44 4000	None	NI	X 7	2014-21 – no plants
6	Upstrm Boat	Lat 44.4928,	2 plts	None	Yes	2010 - removed, chemical applied
	Launch W side	Long -89.5899	None	NT	NT.	2011 - no plants
			1 plt	None	No	2012 – removed
			None			2013 – no plants
7	Upstrm Boat	Lat 44.4949,	None 2 plts	None	Yes	2014-21 – no plants
/	Launch W side		2 plts	None	ies	2010 - removed, chemical applied
	Launch W side	Long -89.5929	None 3 plts	Light	No	2011 - no plants 2012 – removed
			2 plts	Light None	No	2012 – removed 2013 – removed
			None 2 pits	INOILE	INU	2013 – removed 2014-21 – no plants
8	Small Rock	Lat 44.4966,	2 plts	None	Yes	2014-21 – no plants 2010 - removed, chemical applied
8	Island W GL2	Long -89.5932	1 plt	Light	No	2010 - removed, chemical applied 2011 – removed
	Island W ULZ	Long -09.3932	5 plts	Light	No	2012 – removed
			None	Ligin	110	2012 – removed 2013 – no plants
			4 plts	Light	No	2014/15 – removed
			4 plts	Heavy	No	2016 – removed
			None	11001 9	110	2017 – no plants
			4 plts	Heavy	No	2017 – no plants 2018 – removed
			3 plts	Heavy	No	2019 – removed
			2 plts	Light	No	2020 – removed
			None		1,5	2021 – no plants
	L	1	1,0110	1	1	-0-1 110 piunto

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	rvone	103	2011 - no plants
	Island	201g 0).3)13	None			2012 – no plants
			None			2013 – no plants
			None			2014/15 – no plants
			4 plts	Light	No	2016 – removed
			None			2017-21 – 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			2019-21 – 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			2014-21 – 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
			None			2014-21 – no plants
13	South of Trans	Lat 44.5040,	4 plts	None	Yes	2010 - removed, chemical applied
	Line, W shore	Long -89.5955	None			2011 - no plants
			3 plts	Light	No	2012 – removed
			2 plts	Light	No	2013 – removed
			2 plts	Light	No	2014/15 – removed
			None			2016/17 – no plants
			5 plts	Light	No	2018 – removed plants
			3 plts	Medium	No	2019 – removed plants
			3 plts	Light	No	2020 – removed plants
1.4	G DD E	T 4.4.5.100	2 plts	Light	No	2021 – removed plants
14	S. RR cross, E	Lat 44.5122,	5 plts	None	Yes	2010 - removed, chemical applied
	shore Sect 32	Long -89.5870	None	NT	NT.	2011 - no plants
			2 plts	None	No	2012 – removed
			None			2013 – no plants
15	C DD areas E	I of AA 5115	None 5 plts	None	Yes	2014-21 - no plants
13	S. RR cross, E	Lat 44.5115,	5 plts None	none	ies	2010 - removed, chemical applied
	shore GL1	Long -89.5869	None			2011 - no plants 2012 – no plants
			None			2012 – no plants 2013 – no plants
			None			2015 – no plants 2014-21 – no plants
16	S HH bridge	Lat 44.5000,	10 plts	None	Yes	2010 - removed, chemical applied
10	E shore	Long -89.5911	None	None	103	2011 - no plants
	2 511010	20119 07.3711	None			2012 – no plants
			None			2013 – no plants
			None			2014-21 – no plants
17	Under HH	Lat 44.5009,	4 plts	None	Yes	2010 - removed, chemical applied
	bridge E shore	Long -89.5911	None			2011 - no plants
	2.62 = 2.010		None			2012 – no plants
			None			2013 – no plants
			None			2014-20 – no plants
			2 plts	Light	No	2021 – removed
			1			

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			2014-21 – 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			2018-21 – 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			2016-21 – 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

