



November 18, 2005

ORIGINAL

Ms. Magalie R. Salas, Secretary
Federal Energy Regulatory Commission
888 First Street, N.E.
Washington, DC 20426

Re: Rhinelander Hydroelectric Project, FERC Project No. 2161
Invasive Species Plan

2005 NOV 29 A 11: 10
FILED
OFFICE OF THE
SECRETARY
FEDERAL ENERGY
REGULATORY COMMISSION

Dear Secretary Salas:

Article 406 of the license for the Rhinelander Hydroelectric Project requires preparation of an invasive species plan. Preparation of the plan requires consultation with both the Wisconsin Department of Natural Resources and the U.S. Fish and Wildlife Service. Rhinelander prepared the draft of the requested plan and submitted it to the agencies for comment. A copy of the submittal letter is contained as Enclosure 1. The invasive species plan is enclosed.

The U.S. Fish and Wildlife Service did not provide any comment. In response to the draft plan Mr. Robert Martini of the Wisconsin Department of Natural Resources replied with several comments. His email is included as Enclosure 2. Mr. Martini's comments were:

1. "We recommend pulling small numbers of purple loosestrife plants discovered while surveying the flowage instead of simply recording them to prevent spreading."
2. "We recommend annual surveys to reduce the chances of small colonies becoming major problems by the fifth year".
3. "The Rhinelander Hydro Project is one of the best wild rice areas in the region and should have a level of evasive species prevention effort equivalent to the value of the resource and the threat level associated with the heavy use patterns common to the area. A 5-year interval between surveys is not enough to satisfy the needs based on our experience in the area."


In response to Mr. Martini's comments Rhinelander agrees if it is feasible, to pull small numbers of plants that are observed during the survey.

surveys is not enough to satisfy the need based on our experience in the area.” Rhinelander notes that Mr. Martini tacitly approved the 3 to 5-year interval in surveys in his review of the invasive species plan for the Grandmother Falls Hydroelectric Project, FERC Project No. 2180. In compliance with Article 407 of their license, PCA Hydro submitted their invasive species plan to Mr. Martini for review and comment. Based upon the PCA submittal made September 21, 2005 Mr. Martini did not comment on the identical 3 to 5-year proposed inspection frequency. Rhinelander believes that the 3 to 5-year period is satisfactory to meet the goals of the article and also is compatible with the requirements for other licensees in the same area.

If there are questions regarding this submittal please contact me at 952-544-8133.

Sincerely,

SPAULDING CONSULTANTS, LLC


Douglas A. Spaulding, P.E.
Agent for Rhinelander Paper

cc: Mr. Bruce Olson, Wausau Paper

Enclosure 1



September 22, 2005

Ms. Janet Smith
U.S. Fish and Wildlife Service
Green Bay ES Field Office
2661 Scott Tower Drive
New Franken, WI 54229

Mr. Robert Martini
Wisconsin Department of Natural Resources
107 Sutliff Avenue
Rhineland, WI 54501

Re: Rhineland Hydroelectric Project, FERC Project No. 2161, Invasive Species Plan

Dear Ms. Smith and Mr. Martini:

Article 404 of the FERC license for Project No. 2161 requires that Wausau Paper (Wausau) prepare a plan to monitor invasive species for the Rhineland Hydroelectric Project. This license article also requires that Wausau solicit agency comments and recommendations on the draft plan and allow a 30-day comment period.

Enclosed is a copy of Wausau's plan. Please review this plan and provide us with your comments and recommendations on or before the close of business on October 24, 2005.

Sincerely,

SPAULDING CONSULTANTS, LLC

A handwritten signature in black ink, appearing to read "Douglas A. Spaulding".

Douglas A. Spaulding, P.E.,
Agent for Wausau Paper

cc: Mr. Bruce Olson, Wausau Paper
Ms. Magalie Salas, FERC w/o encl.

Douglas Spaulding

From: "Martini, Robert E" <Robert.E.Martini@dnr.state.wi.us>
To: <doug@spauldingconsultants.com>
Sent: Monday, October 24, 2005 1:34 PM
Subject: Rhinelander Hydro Project Invasive Species Plan FERC #2161

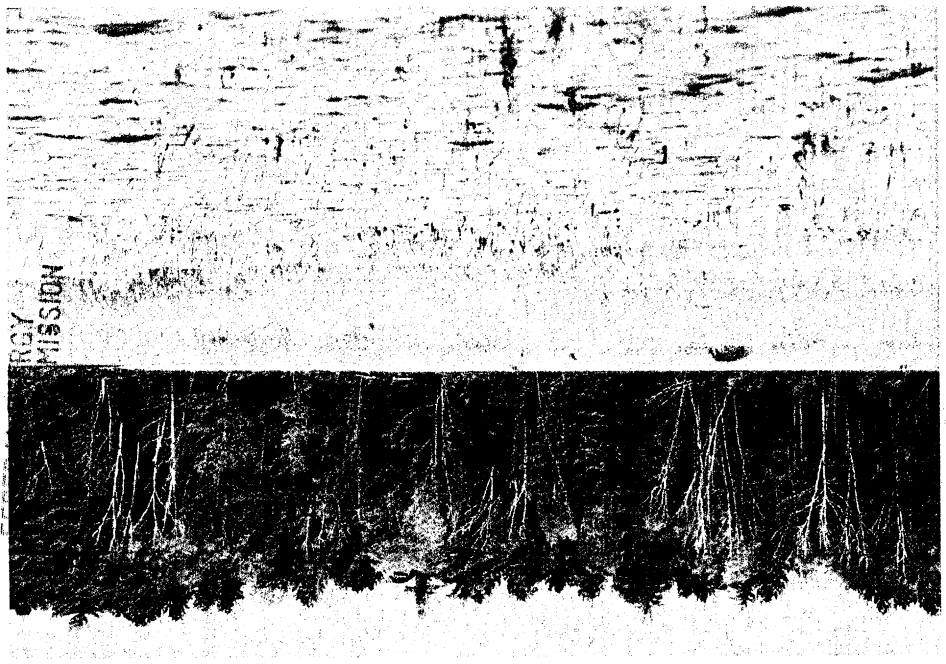
We have reviewed your invasive species plan for the Rhinelander Hydro project and have the following comments: 1. We recommend pulling small numbers of purple loosestrife plants discovered while surveying the flowage instead of simply recording them to prevent spreading. 2. We recommend annual surveys to reduce the chances of small colonies becoming major problems by the fifth year. 3. The Rhinelander Hydro Project is one of the best wild rice areas in the region and should have a level of invasive species prevention effort equivalent to the value of the resource and the threat level associated with the heavy use patterns common to the area. A five year interval between surveys is not enough to satisfy the need based on our experience in the area.

NES Ecological Services
A Division of Robert E. Lee & Associates, Inc.

November 2005

Wausau Paper

Prepared for



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2005 NOV 29 A 11:11

RGY
MISSION

INVASIVE SPECIES MANAGEMENT PLAN

FERC PROJECT 2161-WISCONSIN

FERC RELICENSURE PROJECT

HYDROELECTRIC DAM

RHINELANDER ORIGINAL

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1.0 PURPOSE

The purpose of this management plan is to develop a strategy for Wausau Paper that will be used to monitor the status of purple loosestrife (*Lythrum salicaria*) and Eurasian water milfoil (*Myriophyllum spicatum*) that occur in project waters of the Wisconsin River and its tributaries associated with the FERC hydroelectric project (FERC Project 2161) at the Rhinelander Dam, Oneida County, Wisconsin (Figure 1).

2.0 BACKGROUND

2.1 Purple Loosestrife

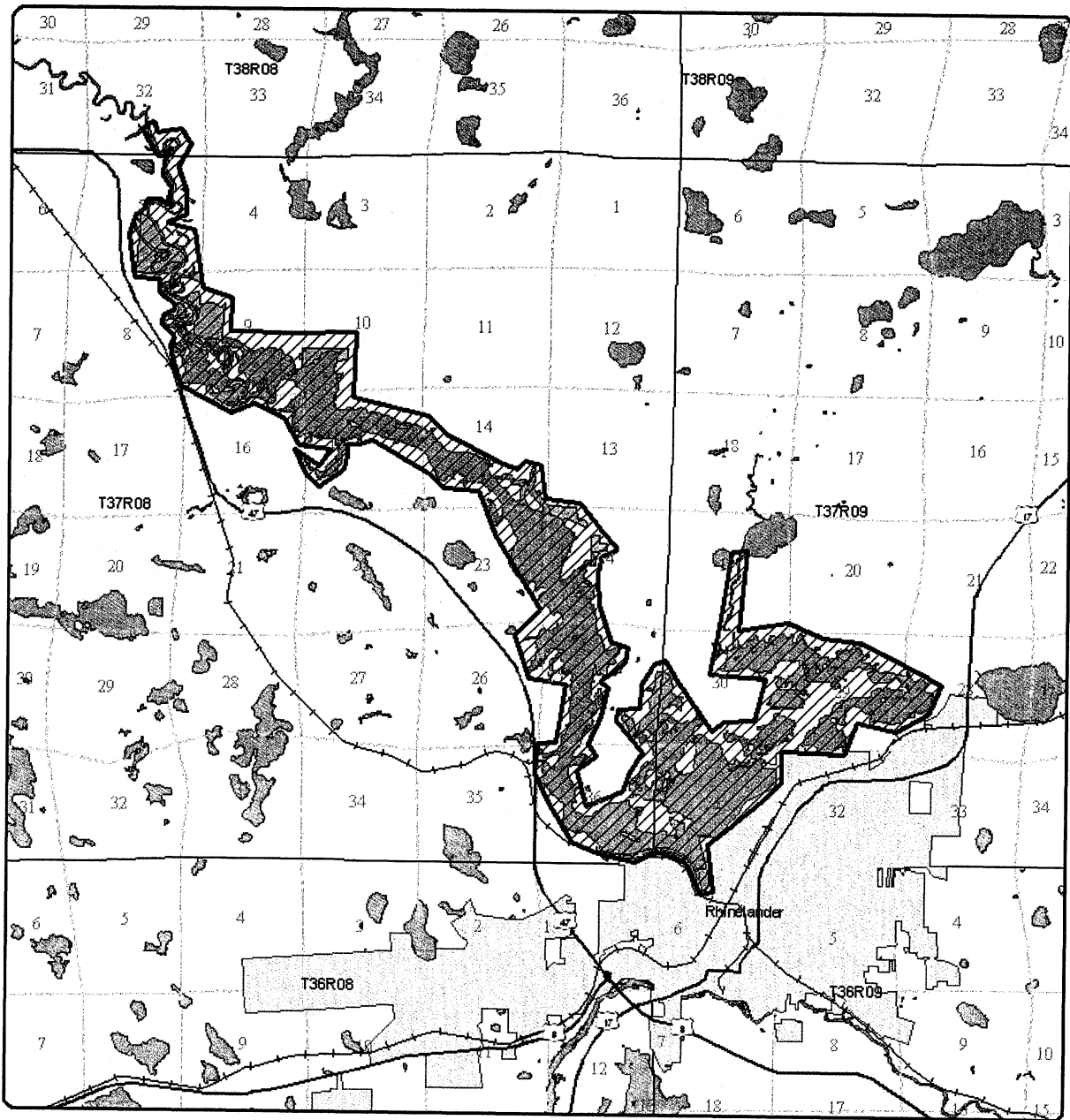
Purple loosestrife originated in Europe and temperate regions of Asia (Borman et al. 1997) and was first documented in the eastern United States in 1814 (Galatowitsch et al. 1999) and Wisconsin in the early 1930's (WDNR 2005). It is believed that populations of the plant first became established in estuarine mud flats along the Atlantic Ocean, where ship ballasts from Europe that contained purple loosestrife seed was deposited (Galatowitsch et al. 1999). Additional spread of the plant occurred via escaped ornamental populations. Currently, purple loosestrife can be found across the north half of the continental United States and in 70 of Wisconsin's 72 counties (WDNR 2005). Purple loosestrife often out-competes native emergent wetland vegetation, allowing it to form monotypic stands that reduce the diversity of wetland plants and animals (WDNR 2005).

2.2 Eurasian Water milfoil

Eurasian water milfoil (EWM) was first introduced to North America in the 1880's (Galatowitsch et al. 1999) and to Wisconsin in the 1960's (WDNR 2005). As of 2004, EWM was present in at least 62 Wisconsin counties (WDNR 2005). As indicated by its name, EWM originated in Europe and Asia (Borman et al. 1997), and spread to North America through the practice of emptying ship ballasts that carried fragments of this invasive macrophyte (Galatowitsch et al. 1999). Once established in a community, EWM often forms dense stands that shade out native aquatic plants and potentially disrupts recreational opportunities such as boating and swimming (WDNR 2005).



3.0 BASELINE SURVEY

A vegetation survey was conducted within the project area on July 17, 18, 22, and 23, and August 12 and 13, 1997. Neither purple loosestrife nor Eurasian water milfoil were observed in the project area at the time the survey took place. It should be noted that the original vegetation survey was conducted over eight years ago. Because these species could have potentially established themselves since this time, Wausau Paper will conduct a baseline survey documenting the presence and location of these species within the project waters during the 2006 growing season, so their prevalence can be tracked over time.



Site Location of FERC Project 2161-Wisconsin

Legend

-  Project Area
-  Paper Company Lands



Approximate project area shown in red

4.0 METHODS

4.1 Eurasian Water Milfoil

Wausau Paper will perform point intercept surveys in late July or early August within the project waters to detect the presence of Eurasian water milfoil using guidelines recommended by the WDNR (WDNR 2004). Once at the survey points, rake tows will be used to search for EWM. If detected, the location of EWM colonies will be mapped and an estimate of its aerial coverage will be assigned. The location of the colony would then be displayed in a GIS format.

4.2 Purple Loosestrife

Purple loosestrife will be searched for by scanning the shoreline and shallow areas of the project waters during a meander survey conducted during late July or early August. If any purple loosestrife is detected, its location will be mapped using a GPS unit and an estimate of its aerial coverage at each location will be assigned. The mapped locations would then be displayed in a GIS format.

4.3 Schedule of Events

During the 2006 growing season, Wausau Paper will conduct a baseline survey using the methods mentioned above. A report documenting the findings of the survey would be submitted to the appropriate agencies within 6 months of completing the late July/early August survey. This process would be repeated every 5 years in order to track the invasive species that occur in the project waters.

Wausau Paper will work with the appropriate agency personnel to monitor the spread of aquatic invasive plant species that may occur in the project area if their presence is such that it threatens the diversity of native plant and animal populations.

5.0 PUBLIC EDUCATION

Wausau Paper realizes the importance of controlling the spread of invasive species. To this end, Wausau Paper agrees to create laminated signage describing the history and background of the species listed in this plan. These signs, along with any additional posting requested by the WDNR or USFWS, will be placed and maintained at the ten public access points to the project waters during the summer of 2006.

6.0 CONCLUSIONS

This plan is designed to develop a strategy that will be used to monitor the status of aquatic invasive plants that occur in waters of the Wisconsin River and its tributaries that are associated with the FERC hydroelectric project at the Rhinelander Dam. At this point, the plan focuses on monitoring Eurasian water milfoil and purple loosestrife; however, if other invasive species are detected, their presence and location will be documented.

7.0 REFERENCES

- Borman, S., R. Korth, and J. Temte. 1999. Through the Looking Glass... A Field Guide to Aquatic Plants. Reindl Printing, Inc., Merrill, WI.
- Galatowitsch, S, N. Anderson, and P. Ascher. Invasiveness in wetland plants in temperate North America. Wetlands 19: 733-755
- WDNR. 2005. Invasive Species. <http://dnr.wi.gov/invasives/index.htm>. Last accessed 06/24/05.
- WDNR. 2004. Recommended Baseline Monitoring of Aquatic Macrophytes. WDNR, Madison, WI, USA.