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CONSOLIDATED WATER POWER COMPANY

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General Office
P.O. Box 8090, Wisconsin Rapids, WI 54495-8090
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FEDERAL ENERGY
REGULATORY COM.

March 1, 2004

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

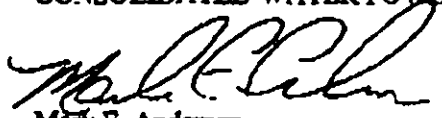
Article 405, Exotic Species Monitoring Plan – Stevens Pehat (FERC No. 2110) and Biron (FERC No. 2192) Hydroelectric Projects

Dear Ms. Salas:

Enclosed are an original and eight copies of the above plan which complies with Article 405 of the new licenses issued on July 30, 2003 for both hydroelectric projects. Attached to this letter is evidence of consultation with the Wisconsin Department of Natural Resources (WDNR) and U.S. Fish & Wildlife Service (FWS). A draft plan was submitted to the agencies for comments on January 13, 2004 with email comments received from the WDNR February 23 and 27. No comments were received from the FWS.

Sincerely,

CONSOLIDATED WATER POWER COMPANY



Mark E. Anderson
Resources Manager

Enclosure: as

cc: File (Ea. Project – LG-90-30, Article 405 – Exotic Species Plan)
Mr. Robert Martini – WDNR
Ms. Janet Smith – USFWS
Mr. Larry Thompson – USFWS
Ms. Peggy Harding – FERC, CRO

CONSOLIDATED WATER POWER COMPANY

General Offices
P.O. Box 8050, Wisconsin Rapids, WI 54495-8050
A subsidiary of Stora Enso North America

January 13, 2004

Mr. Robert Martini
Wisconsin Department of Natural Resources
107 Suttiff Avenue
Rhinelander, WI 54501

Ms. Janet Smith
U.S. Fish & Wildlife Service
2661 Scott Tower Drive
New Franken, WI 54229-9565

Mr. Larry Thompson
U.S. Fish & Wildlife Service
2661 Scott Tower Drive
New Franken, WI 54229-9565

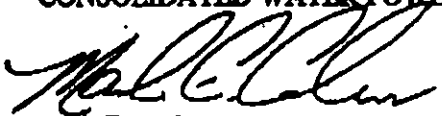
**Request for Consultation - Exotic Species Monitoring Plan, Stevens Point (FERC No. 2110) and
Biron (FERC No. 2192) Hydroelectric Projects**

Dear Messrs. Martini & Thompson, Ms. Smith:

Enclosed for your review and comment is a draft copy of the proposed monitoring plan for exotic species on the above two projects. In accordance with the new licenses issued for these projects, Article 405 stipulates the development of this plan in consultation with your agency. Please review the enclosed plan and provide your comments. We are asking that you review and file your comments with us no later than February 18, 2004 to allow us to incorporate any comments and file the final plan with the FERC. For your convenience you can email your response to us at Mark.Anderson@storaenso.com.

Sincerely,

CONSOLIDATED WATER POWER COMPANY



Mark E. Anderson
Resources Manager

Enclosure:

cc: File (Each Project - LG-90-30, Article 405)

Anderson, Mark

From: Anderson, Mark
Sent: Monday, February 23, 2004 9:10 AM
To: Robert Martini (martini@dnr.state.wi.us); 'Martini, Robert E'; 'Janet_Smith@fws.gov'; Larry Thompson (Larry_Thompson@fws.gov)
Subject: Exotic Species Plan

Bob, Janet, and Larry:

I filed a draft exotic species plan for Byron and Stevens Point on January 13 requesting a response by February 18. I am planning on filing the final plan later this week and was hoping to incorporate any comments you might have. Could you please provide me any comments you have relative to the plan or if you are in concurrence with it as written I would appreciate that also.

You can email me your comments if you wish. Your email will be included as evidence of consultation.

Thank you in advance.

Mark.

Mark E. Anderson
Resources Manager
Consolidated Water Power Company
P.O. Box 8050, 610 High Street
Wisconsin Rapids, WI 54495-8050

715-422-3927 Ofc
715-422-4112 Fax
715-459-5415 Mobile

Anderson, Mark

From: Anderson, Mark
Sent: Monday, February 23, 2004 12:45 PM
To: 'Martini, Robert E'
Subject: RE: Exotic Species Plan

Bob:

Thanks for your quick response. I didn't mention zebra mussels primarily because it wasn't mentioned in the license article. Being that it was just recently discovered downstream of us I can add some language relative to our intended monitoring efforts. The plate sampling you mentioned was conducted at our Petenwell and Castle Rock projects (when we managed those two) and not the others. The individual mills did do periodic sampling (Stevens Point, Biron, Whiting, and Wis. Rapids) since it was believed zebra mussels would impact the mill's river intakes quicker than the hydros. Therefore, indirectly, we had access to this type of sampling data if needed. I don't believe the mills are doing any sampling anymore. We were planning on placing sampling plates at each of our dams starting this summer.

I'm interested to know what this tool kit is. We have been distributing the credit card-size information brochures for zebra mussels, purple loosestrife, and Eurasian milfoil for at least 8-10 yrs already and continue to do so.

I am not aware of the 'habitat preference and threat analysis study' you refer to. I'm assuming the local WDNR fisheries biologists or water specialist has or would conduct these types of studies. We would be interested in what data the department already has on this stretch of the river or if you are proposing to conduct this sort of analysis anytime soon. We would be willing to participate as schedules allow and can consider the analyses' results in any type of future monitoring.

Thanks

Mark.

Mark E. Anderson
Resources Manager
Consolidated Water Power Company
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Wisconsin Rapids, WI 54495-8050

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-----Original Message-----

From: Martini, Robert E [mailto:Robert.E.Martini@dnr.state.wi.us]
Sent: Monday, February 23, 2004 10:44 AM
To: Anderson, Mark; Janet_Smith@fws.gov; Larry_Thompson@fws.gov
Subject: RE: Exotic Species Plan

I didn't see any mention of zebra mussels although they have been found in the NEPCO Lake area just downstream of the two projects. Are you still doing the plate sampling at all your dams? The DNR exotic species program can help with materials to inform and notify the public and your employees of the major exotics known to be present in Wisconsin. We have developed a tool kit on exotics that you could use to make your employees aware of the characteristics of the various species that might become a problem on your flowages. I think you should think more broadly about the more than 100 species of exotics that have been found in Wisconsin waters instead of just the two species. I'm not saying you should test for all possible species but an analysis of likely problems would be useful. We could start with a habitat preference and threat analysis.

-----Original Message-----

From: Anderson, Mark [mailto:Mark.Anderson@storaenso.com]
Sent: Monday, February 23, 2004 9:10 AM
To: Martini, Robert E; Martini, Robert E; 'Janet_Smith@fws.gov'; Larry Thompson (Larry.Thompson@fws.gov)
Subject: Exotic Species Plan

Bob, Janet, and Larry:

I filed a draft exotic species plan for Biron and Stevens Point on January 13 requesting a response by February 18. I am planning on filing the final plan later this week and was hoping to incorporate any comments you might have. Could you please provide me any comments you have relative to the plan or if you are in concurrence with it as written I would appreciate that also.

You can email me your comments if you wish. Your email will be included as evidence of consultation.

Thank you in advance.

Mark.

Mark E. Anderson
Resources Manager
Consolidated Water Power Company
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Anderson, Mark

From: Martini, Robert E [Robert.E.Martini@dnr.state.wi.us]
Sent: Friday, February 27, 2004 1:47 PM
To: Anderson, Mark
Subject: RE: Exotic Species Plans

Sounds good. It would be important to describe the level of effort for each inspection if the data are to be comparable from year to year.

-----Original Message-----

From: Anderson, Mark [mailto:Mark.Anderson@storaenso.com]
Sent: Friday, February 27, 2004 1:38 PM
To: Martini, Robert E
Subject: Exotic Species Plans

Bob:

I was thinking a little more about our monitoring effort for zebra mussels. It occurred to me that while we haven't had the plate samplers in the projects up to this time we have (as a matter of habit) always visually inspected our intake racks, gates skins (during their operation), inside the hydros (during maintenance inspections), etc. The manner is not formal or habitually done every month but probably more comprehensive versus routinely looking at a plate sampler. I am considering proposing this in the plan for zebra mussels versus installing plate samplers. My rationale is that those structures are a little rougher, have different types of flow/current patterns, and are spread out around the facility, hence my thought of it being more comprehensive.

Would you be in agreement with that level and type of monitoring for zebra mussels?

Mark.

Mark E. Anderson
Resources Manager
Consolidated Water Power Company
P.O. Box 8050, 610 High Street
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**Exotic Species Monitoring Plan
Stevens Point (FERC No. 2110) and Biron (FERC No. 2192) Hydroelectric Projects**

1. Scope.

This plan pertains to the project waters for the Stevens Point (FERC No. 2110) and Biron (FERC No. 2192) hydroelectric projects.

a. The Stevens Point Hydroelectric Project is located on the Wisconsin River in Portage County, Wisconsin. It is approximately thirteen river miles in length. The powerhouse and dam are located within the municipal boundaries of the City of Stevens Point. Appendix A (sheets 1-3) are copies of the current ownership and project boundary (FERC Exhibit G) maps which provide a good graphical depiction of the flowage.

The project boundary in total encompasses 8,967 acres which includes 3,915 acres of surface water and 5,052 acres of land. CWPCo owns in fee title approximately 450 acres within the project boundary. The remaining land is owned by private individuals or public entities (city and township municipalities).

b. The Biron Hydroelectric Project is located on the Wisconsin River in Wood and Portage Counties, Wisconsin. It is approximately thirteen river miles in length. The powerhouse and dam are located within the municipal boundary of the Village of Biron. Appendix B (sheets 1-3) are copies of the current ownership and project boundary (FERC Exhibit G) maps which provide a good graphical depiction of the flowage.

The project boundary in total encompasses 7,860 acres which includes 2,078 acres of surface water and 5,782 acres of land. CWPCo owns in fee title approximately 480 acres within the project boundary. The remaining land is owned by private individuals or public entities (city and township municipalities).

2. Purpose.

Consolidated Water Power Company's (CWPCo) Exotic Species Monitoring Plan (ESMP) has been developed in accordance with the conditions set forth in Article 405 of the new licenses for each of the respective hydroelectric projects listed above. These licenses were issued on July 30, 2003 for a term of thirty (30) years. This monitoring plan has been developed in consultation with the Wisconsin Department of Natural Resources (WDNR) and U.S. Fish & Wildlife Service (USFWS).

Specifically, the plan discusses how CWPCo will monitor for purple loosestrife (*Lythrum salicaria*), Eurasian water milfoil (*Myriophyllum spicatum*), and curly-leaf pondweed (*Potamogeton crispus*). Lastly, zebra mussels (*Dreissena polymorpha*) were recently discovered in the river system downstream from these two projects. The plan also addresses CWPCo's efforts in monitoring for this invasive mussel.

**Exotic Species Monitoring Plan
Stevens Point (FERC No. 2110) and Biron (FERC No. 2192) Hydroelectric Projects**

All of these plants are invasive species that exhibit aggressive growth characteristics and can out-compete native species. The most predominant invasive species that are present or have the potential is Purple Loosestrife and Eurasian Water milfoil. Zebra mussels can clog water-intake systems of power plants and water treatment facilities, as well as irrigation systems, and the cooling systems of boat engines. Zebra mussels have not been discovered in the project waters but have been confirmed in the Wisconsin River at locations approximately five miles downstream from the Biron Project and twenty miles from the Stevens Point Project. While monitoring efforts will primarily focus on the known species, this plan provides for the periodic monitoring and reporting of all four species.

2. Monitoring Method and Frequency.

Inventories of the above flowages during relicensing did not produce any observations of the two aquatic invasive species (water milfoil and pondweed) however conversations with local WDNR personnel indicated they had records of the presence of Eurasian water-milfoil. Purple loosestrife has been observed in various degrees of abundance and size on both flowages although it is sporadic and dispersed.

Both flowages have numerous backwater areas on private property which preclude visual observance from a public road. Therefore, while vehicular monitoring will be employed whenever possible, boat surveys will be conducted where necessary using visual observation to complete any monitoring effort. CWPCo will conduct a survey of both projects in 2004 to develop a baseline map and table of known areas augmented with any data of known sites acquired from the WDNR. This survey will become the baseline for future monitoring.

During actual surveys for the invasive species, CWPCo will employ GPS technology to properly locate any sites of the three species and include that data into a report which will be filed with the FERC and the resource agencies. Along with the location, CWPCo will report the relative size (# of plants or approximate dimensions).

Because existing data does not indicate large populations of any of the above species, CWPCo proposes to formally monitor the projects on a biennial basis. During the off-year, CWPCo will informally monitor the projects during the conduct of normal or routine work. An annual report will be filed with the FERC and each resource agency providing tabular data of known sites and approximate size or number of plants. Since CWPCo would only monitor on a formal basis every other year, the interim years will normally only address any known changes to any sites located during the previous years' formal monitoring.

CWPCo has had an informal monitoring program for zebra mussels for over ten years. This has predominantly involved visual observation of our intake structures and generating equipment during periods of maintenance. Because maintenance of the

**Exotic Species Monitoring Plan
Stevens Point (FERC No. 2110) and Biron (FERC No. 2192) Hydroelectric Projects**

structures and equipment requires close inspection of surfaces for deterioration, personnel take the opportunity to also inspect the surfaces for the mussela.

We have also monitored the surfaces of our spillway trainter gates for mussel growth during their annual operation and/or during flood events. Both operating and maintenance personnel have been issued these cards and have been instructed to contact management personnel if any evidence of zebra mussels is observed. CWPCo proposes to continue with this method of monitoring since our maintenance and operations provide opportunities for visual monitoring throughout the year. This plan does not propose any formal testing of water for the presence of larvae.

CWPCo has acquired wallet-sized identification cards for the two most potential plant species (Purple loosestrife and Eurasian water milfoil) and the zebra mussel, which provide color pictures of the invasive species, basic identifying characteristics, and contact information should an individual discover a colony. These cards are provided free of charge to anyone from the public who inquires about our recreation maps. CWPCo will continue to distribute these cards while they are provided by the Wisconsin Sea Grant Program and/or WDNR.

3. Monitoring Program.

In accordance with the biennial program detailed above, CWPCo proposes to conduct formal baseline monitoring in 2004 and thereafter every two years (2006, 2008, etc.). Annual reports will be filed with the FERC and resource agencies providing information gathered during the formal monitoring or discovered during routine field work or maintenance activities during interim years.

4. Cooperative Efforts.

CWPCo agrees that if the resource agencies' demonstrate significant negative affects to fish or wildlife populations as a result of the presence of invasive species; we will cooperate with them to undertake reasonable measures to control that particular species.

5. Reporting.

An annual report will be filed no later than December 31 of each reporting year to the Commission and each resource agency.