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February 15, 2005

The Secretary  
Federal Energy Regulatory Commission  
888 First Street, NE  
Washington, DC 20426

Re: *Flambeau Crowley, Project No. 2473, Flambeau Hydro LLC  
Article 410, Purple Loosetrife Inventory*

FILED  
OFFICE OF THE  
SECRETARY  
2005 FEB 22 11:46  
FEDERAL ENERGY  
REGULATORY  
COMMISSION

Dear Secretary:

Please find enclosed an original and 8 copies of the Flambeau Crowley, Project No. 2473 Purple Loosetrife Inventory for 2004. On December 23, 2004, copies of the inventory were sent to the Wisconsin Department of Natural Resources (WIDNR) and the US Fish & Wildlife Service (USFWS) for comment. No comments were received from the WIDNR or the USFWS.

If you have any questions regarding this submission, please contact Mr. Richard Loeffler at 920-293-4628 ext. 18.

Sincerely,  
NORTH AMERICAN HYDRO, INC.

FOR Charles Alsberg  
Executive Vice President

Cc: FERC -- CRO  
Encl.: 1 original & 8 copies

05-02-15 RAL FLCR 2004 loosetrife survey to FERC.doc

**Flambeau Crowley Project Purple Loosestrife Inventory  
August 16 & 17, 2004  
FERC Project #2473 Article 410**

**Flambeau Hydro, L.L.C.  
116 State St.  
Neshkoro, WI 54960**

*Purple Loosestrife*

On August 16 & 17, 2004, Flambeau Hydro, L.L.C. (FHLLC) performed an inventory of purple loosestrife plants at the Flambeau Crowley Project in Price County, Wisconsin. The method of inventory as approved and modified by Federal Energy Regulatory Commission (FERC) Order of June 18, 2003 was defined as follows:

While Purple Loosestrife is blooming in mid July to early August, the inventory should be conducted using a boat to survey the impoundment above the dam within the Project Boundary and on foot or by boat below the dam within the Project Boundary. County wetland maps may be used to determine other areas where Purple Loosestrife could be found on lands owned by FHLLC within the Project Boundary. Lands owned by FHLLC within the Project Boundary will be surveyed on foot. 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. A GPS receiver will be used to establish a GPS coordinate for the location of the plants. If it is not possible to get close enough to establish an accurate location, an approximate location will be established with reference to an established GPS coordinate. The plants should be inventoried by marking and numbering the location on a Project map along with notes approximating size of plants, stand area, percent cover, stem density, plant density, and location with reference to established GPS coordinates. Photos and/or videotape will be taken of the largest occurrences.

**Example:**

#1 6' tall plants; 4' X 20'; 30% cover; 4 – 5 stems per plant; 4 plants; on shoreline N45° 56.183' W90° 26.748'; no photo

#2 5' - 7' tall plants; 10' X 10'; 25% cover; 4 – 5 stems per plant; 10 plants; in marsh ~50 feet bearing 25° from N45° 56.256' W90° 26.710'; photo No. 1

The area to be inventoried shall be the shoreline of the impoundment to elevation 1428 feet NGVD and lands owned by FHLLC within the Project

Boundary as indicated on the Project Map 1, dated November 1991, included in Exhibit G of Flambeau Paper Corp. Application For A Subsequent License for the Crowley Hydroelectric Project FERC Project #2473.

**General Observations:**

The Flambeau Crowley Project Boundary was divided into three different areas; *the impoundment* (from approximately 500 feet downstream of the Pixley dam to the Crowley dam), *FHLLC owned property within the project boundary* (FHLLC owned property adjacent to the dam and powerhouse), and *the tailrace* (from the dam and powerhouse to approximately 500 feet downstream of the dam).

*The tailrace* was surveyed on foot and no purple loosestrife plants were observed.

*The FHLLC owned property within the project boundary* was surveyed on foot and no purple loosestrife plants were observed.

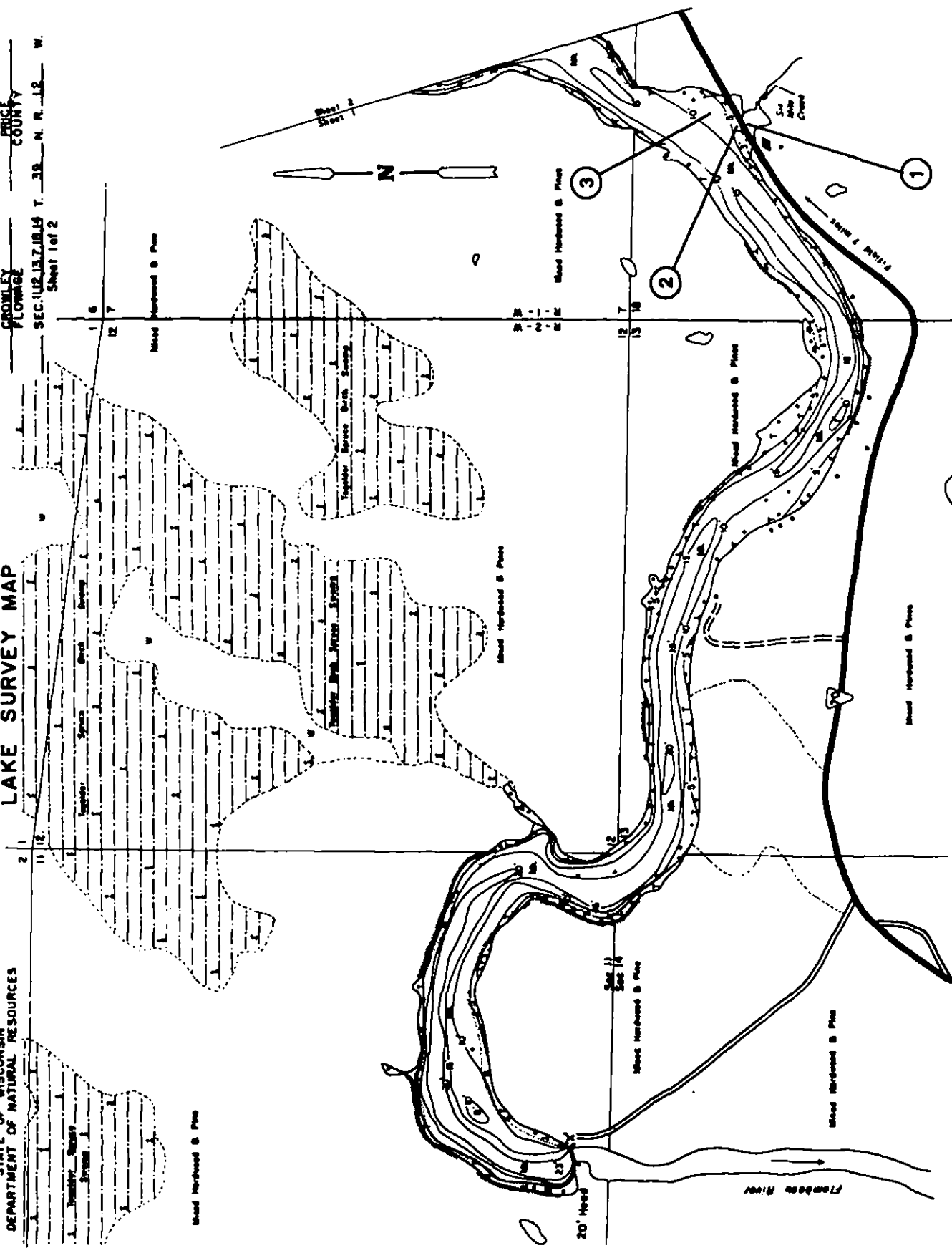
*The impoundment* was surveyed by boat and no new occurrences were found. A single plant that had been found on a bog in a stump field in the river east of the 6-mile boat landing during the 2002 survey was not found in 2003 or in 2004. This plant had the seed heads removed in 2002. Purple loosestrife plants that had been found on the HWY 70 causeway just east of the 6-mile boat landing in 2002 still existed in 2003. In 2003, the plants were treated with an herbicide. In 2004, the amount of plants inventoried at this location was considerably reduced. Spraying permits had been acquired from the Wisconsin Department of Natural Resources and the Wisconsin Department of Transportation and these plants were sprayed with a 1% Aqua Neat (glyphosate)/1% surfactant solution during the survey. The causeway occurrence was revisited two days later and a few of the purple loosestrife plants showed visible signs of stress (leaves were turning brown). These purple loosestrife plants were inventoried and have been noted on the survey sheet(s) and map(s) at the end of this report. No other occurrences of purple loosestrife were observed.

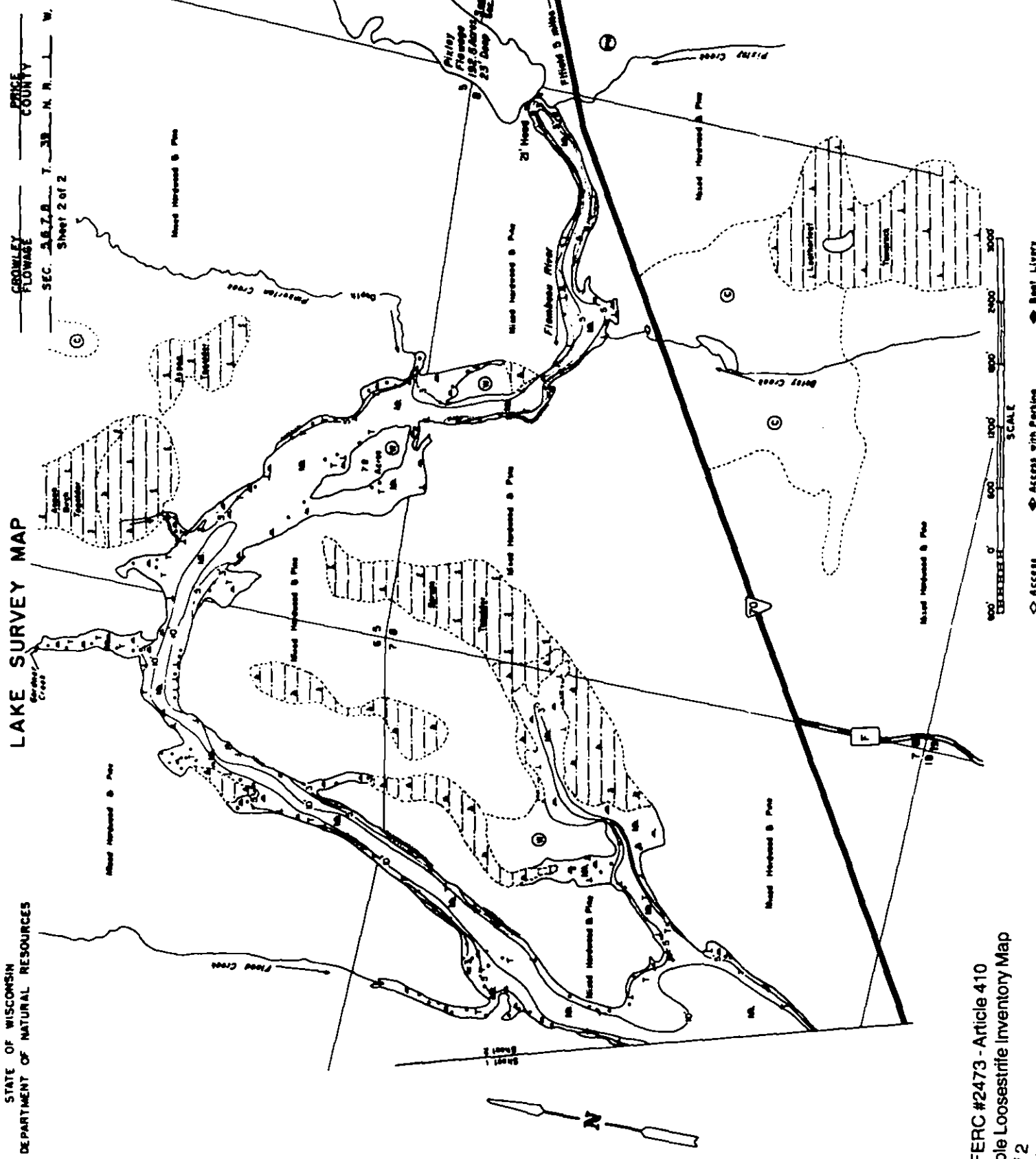
During the inventory, a digital camera was used to document occurrences of purple loosestrife as noted in the survey comments at the end of this report.

STATE OF WISCONSIN  
DEPARTMENT OF NATURAL RESOURCES

# LAKE SURVEY MAP

CROWLEY  
FLOWAGE  
PRICE  
COUNTY  
SEC. 11, 12, 13, 14 T. 39 N. R. 12 W.  
Sheet 1 of 2



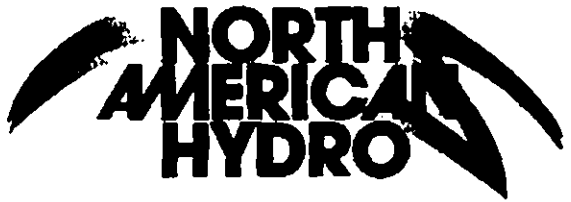


**Purple Loosestrife Survey**

**Project:** Flambeau Crowley #2473  
**Date:** 8/16/2004 & 8/17/2004  
**Crew:** RAL & CTM

**Datum:** WGS 84  
**Page:** 1 of 1

| Sighting # | GPS point | Latitude                     | Longitude                    | Plant Height | Stand Area | Comments   |
|------------|-----------|------------------------------|------------------------------|--------------|------------|--|
| 1          | 209 - 215 | N45°51.816' -<br>N45°51.850' | W90°32.859' -<br>W90°32.786' | 3' - 5'      | ~375' x 8' | Located between GPS points 209 and 215 on the south side of the causeway formed by HWY 70 just east of the 6-mile boat landing. There are ~11 plants spread out over a 375 foot long area. The largest concentration is 2 plants and the rest are individual plants. Plants appear to have 1-2 stems per plant. All seed heads were harvested in August 2002 to prevent propagation. This occurrence recorded on digital photos and video tape in 2002. All plants were treated with herbicide in 2003. This occurrence recorded on videotape in 2003. All plants were treated with herbicide in 2004. This occurrence recorded on digital photos in 2004. |
| 2          | 216 - 217 | N45°51.857' -<br>N45°51.853' | W90°32.806' -<br>W90°32.814' | N/A          | N/A        | Located between GPS points 216 and 217 on the north side of the causeway formed by HWY 70 just east of the 6-mile boat landing. All seed heads were harvested in August 2002 to prevent propagation. This occurrence recorded on digital photos in 2002. All plants were treated with herbicide in 2003. This occurrence recorded on videotape in 2003. No purple loosestrife plants were observed at this location in 2004.   |
| 3          | 208       | N45°51.926'                  | W90°32.788'                  | N/A          | N/A        | Located on a bog in a stump field in the river east of the 6-mile boat landing. There is one plant. Plant appears to have ~2 - 3 stems per plant. All seed heads were harvested in August 2002 to prevent propagation. This occurrence recorded on digital photos in 2002. This occurrence was not found in 2003 or 2004.  |
|            |           |                              |                              |              |            |  |
|            |           |                              |                              |              |            |  |
|            |           |                              |                              |              |            |  |
|            |           |                              |                              |              |            |  |
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|            |           |                              |                              |              |            |  |
|            |           |                              |                              |              |            |  |
|            |           |                              |                              |              |            |  |



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December 23, 2004

Mr. Jeffrey Scheirer  
Northern Region FERC Manager  
Wisconsin Department of Natural Resources  
875 South 4<sup>th</sup> Avenue  
Park Falls, WI 54552

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

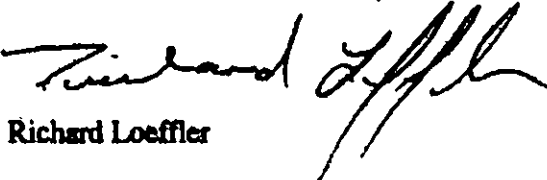
*Re: Flambeau Crowley Project, No. 2473, Flambeau Hydro, L.L.C.  
Article 410, Purple Loosetrife Inventory*

Dear Mr. Scheirer and Ms. Smith:

Attached is a copy of our "Purple Loosetrife Inventory" for 2004. This annual report has been prepared to comply with Article 410 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 at 920-293-4628 extension 18 if you wish discussion or have any questions. Your cooperation is appreciated.

Sincerely,  
*NORTH AMERICAN HYDRO, Inc.*  
  
Richard Loeffler

Attachment