



Tomahawk Power & Pulp, Co.

Hydroelectric Operations & Management

ORIGINAL

April 13, 2005

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OFFICE OF THE
SECRETARY
2005 APR 21 P 2:26
FEDERAL ENERGY
REGULATORY COMMISSION

The Secretary
Federal Energy Regulatory Commission
Mail Code DHAC, PJ-12.1
888 First Street, NE
Washington, D.C. 20426

Re: FERC License Project No. 2239-018-Wisconsin ⁰³³

Dear Secretary,

Please see the enclosed Tomahawk Power & Pulp Co. Proposed Noxious Plants Management Plan. One original and eight copies are being submitted

Should you need additional information, please feel free to call me.

Highest Regards,
Scott Goodwin
Scott D. Goodwin

SDG:dp
Enclosure

C.C.
Kevin Griebenow
Federal Energy Regulatory Commission
Office of Energy Projects
Division of Dam Safety and Inspection
Chicago Regional Office
230 South Dearborn Street, Suite 3130
Chicago, Illinois 60604

**Tomahawk Power & Pulp Company
Tomahawk, Wisconsin**

**A Proposed Management Plan for the
Monitoring of Purple Loosestrife Plants**

April 2005 Revision

Prepared for the:

**KINGS HYDROELECTRIC STATION
FERC LICENSE NO. 2239 - 033**

**Tomahawk Power & Pulp Company
3330 Clayton Road, Suite B, Concord, CA 94519
Tel: (925) 692-2198 Fax: (925) 692-2199**

**A Proposed Plan
for the
Monitoring of Noxious Plants
at the
Kings Hydroelectric Station**

Introduction

Tomahawk Power & Pulp Company was issued a License by the Federal Energy Regulatory Commission (FERC) authorizing the operation of the existing Kings Hydroelectric Station located on the Wisconsin River, in Lincoln County, Wisconsin.

Article 407 of this license addresses the issue of monitoring noxious plants specifically (*Lythrum Salicaria*) purple loosestrife. The license requires the Licensee to monitor for these according to a schedule after consultation with the U.S. Fish and Wildlife Service (FWS) and the Wisconsin Department of Natural Resources (WDNR). Our plan for satisfying this requirement is as follows.

Baseline Monitoring

The licensee will conduct baseline monitoring for Purple Loosestrife between July 15 and August 15, 2005. This baseline monitoring will be conducted by the project operator who will perform field investigations. Wisconsin Valley Improvement Company has agreed to train our project operator to visually identify Purple Loosestrife. The field investigation would involve the inspection of the Kings Hydroelectric Station headpond by boat with the collection of underwater aquatic plant species to verify observations. The shorelines of the pond would also be inspected for the presence of Purple Loosestrife during field investigation.

Follow-up Monitoring

If baseline monitoring does not locate Purple Loosestrife within the project area, then the licensee would conduct additional monitoring every five years. If baseline monitoring located the presence of Purple Loosestrife, then the licensee would complete follow-up monitoring every two years, at the same level of the survey that is currently scheduled.

If at any time during the period of the license, the FWS and WDNR deem it necessary to control or eliminate Purple Loosestrife, Tomahawk Power & Pulp Company will cooperate in this measure.

Reporting

The licensee will submit a monitoring report to the U.S. Fish and Wildlife Service (FWS) and the Wisconsin Department of Natural Resources (WDNR) within 45 days of each year's monitoring. The reports would be submitted to FERC within 45 days of date of submittal to FWS and WDNR. Reports that confirm the presence of noxious plants would include a map that would document the location and outline of the noxious plant communities as well as report on the water depth and other growth and size characteristics of these plants.

Agency Consultation

The plan has been submitted to the FWS and the WDNR for their review (copies of the submittal letters included in Appendix A). Only the FWS responded (copy of letter included in Appendix A).

The operators will perform the survey after being trained; any aggressive growth would likely be detected through casual monitoring. Formal monitoring will occur every five years.

1. The survey will be conducted by Robert McAllister, who will be trained by Wisconsin Valley Improvement Company staff.
2. If Purple Loosestrife is found, the size and location of the bed will be mapped and a copy of the map and description will be provided to the FWS and the WDNR.
3. If Purple Loosestrife is present, samples will be pulled and vouchers collected for reference.
4. Water depth and turbidity will be recorded at the location of the Purple Loosestrife found.

Appendix A
Agency Consultation



Tomahawk Power & Pulp, Co.

Hydroelectric Operations & Management

March 11, 2005

Robert Martini
Wisconsin Department. Of Natural Resources & Conservation
107 Sutliff
Rhineland, WI 54157

RE: FERC Lic #2239

Dear Bob,

Please see the enclosed Tomahawk Power & Pulp Co. Proposed Noxious Plants Management Plan. Please let us know your comments or revisions in writing after you have had a chance to review our plan.

Should you want clarification on this information, please feel free to contact me.

Sincerely,

Scott D. Goodwin
Scott D. Goodwin

SDG:dp
Enclosure



Tomahawk Power & Pulp, Co.

Hydroelectric Operations & Management

March 18, 2005

Janet Smith
Field Supervisor
U.S. Fish & Wildlife Service
2661 Scott Power Drive
New Franken, WI 54229

Re: FERC License No. 2239-018-Wisconsin

Dear Janet,

Please see the enclosed Tomahawk Power & Pulp, Co. Proposed Noxious Plants Management Plan. Please let us know your comments or revisions in writing after you have had a chance to review our plan.

Should you want clarification on this information, please feel free to contact me.

Highest regards,

Scott D. Goodwin
Scott D. Goodwin

SDG:dp
Enclosure



United States Department of the Interior

FISH AND WILDLIFE SERVICE

Green Bay ES Field Office
2661 Scott Tower Drive
New Franken, Wisconsin 54229-9565
Telephone 920/866-1717
FAX 920/866-1710

March 24, 2005

Mr. Scott D. Goodwin
Tomahawk Power & Pulp Company
3330 Clayton Road, Suite B
Concord, California 94519

Dear Mr. Goodwin:

Thank you for your letter containing Tomahawk Power & Pulp Company's proposed plan to monitor purple loosestrife (*Lythrum salicaria*) in waters within the Kings Hydroelectric Project, No. 2239 (project).

The U.S. Fish and Wildlife Service (FWS) reviewed the plan and is pleased to learn that your company will coordinate with the Wisconsin Valley Improvement Company to receive training on the monitoring methods to be applied; in the past, they have been successful in the monitoring and control of this invasive plant on the Wisconsin River.

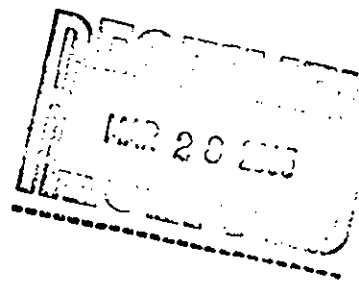
Regarding the frequency of monitoring, the proposed plan is to conduct follow-up monitoring every 5 years if results of the baseline surveys locate purple loosestrife. The FWS recommends follow-up monitoring every 2 years within the project area, whether or not purple loosestrife is located during any single survey; this is because purple loosestrife can become established and spread very quickly, from the seed stock or rhizomes of only a few plants within the project or in nearby areas.

The proposed plan also mentions collections of underwater aquatic plants. We agree that observation to detect the potential presence of other invasive plants is a good practice, and applaud you for these efforts. Invasive aquatic plants such as Eurasian milfoil (*Myriophyllum spicatum*) can spread rapidly, dominate other aquatic plants, and result in altered fish communities.

We appreciate the opportunity to provide these comments and recommendations.

Sincerely,

Janet M. Smith
Field Supervisor



cc: **Wisconsin DNR, Rhinelander, WI Attn: Bob Martini**
Secretary, Federal Energy Regulatory Commission, Washington D.C.