

WAUSAUPAPER

February 8, 2011

Ms. Kimberly Bose, Secretary
Federal Energy Regulatory Commission
888 First Street, N.E.
Washington, DC 20426

Re: Rhinelander Hydroelectric Project, FERC Project No. 2161
Future Plans for Control of Invasive Species

Dear Secretary Bose:

The license issued for the Rhinelander Hydroelectric Project, FERC Project No. 2161 included a requirement (Article 406) that the Licensee Wausau Paper ("Wausau") develop a monitoring program to document the occurrence of invasive species including Eurasian Water Milfoil (EWM) and Purple Loosestrife (PL). The monitoring program was to extend over a 5-year period. A plan to monitor the occurrence of these two species was filed on November 29, 2005 in accordance with Article 406 and the FERC approved the plan in an order dated April 26, 2006.

Wausau has completed monitoring surveys for the last 5-year period. Reports documenting the yearly results of this monitoring have been submitted to the Wisconsin DNR, the U.S. Fish and Wildlife Service and to the FERC annually. The last submittal for the final year of the monitoring plan was submitted to the FERC on December 8, 2010.

In order to evaluate the plan for future years, Wausau commissioned their contractor North American Hydro to prepare the summary report for the entire 5-year monitoring plan. A copy of this report is enclosed. As indicated in this report there has been no documentation or any evidence observed that EWM is present in the project impoundments. The occurrence of EWM therefore does not appear to be a current concern. The report prepared by North American Hydro however did document the ongoing occurrence of PL both upstream of the dam powerhouse structures and downstream. The report indicated that the occurrence downstream were less severe likely due to the presence of the Galerucella beetle. This beetle is used for PL control on projects downstream of the Rhinelander Project.

WausauPAPER

The occurrence of PL upstream of the dam was generally constant. As indicated in the North American report the number of plants and locations has varied but generally presence remains relatively stable. As part of their monitoring program North American Hydro removed plants from public land or in areas where land owners provided permission. This partial removal of plants appeared to be relatively useful in preventing the expansion of the PL population.

Wausau reviewed several options for future PL control. The options included continuation of monitoring at a reduced frequency as recommended in the North American summary report. In addition Wausau contacted Oneida County and the Wisconsin Department of Water Resources (WDNR) to obtain their input and suggestions regarding a future control/monitoring program. Wausau representatives met with WDNR telephonically and face to face on several occasions to discuss options. Kevin Gauthier of the WDNR stated that his agency was going to perform an extensive survey on the system for a number of invasive species, and that our survey would be a duplicate of what they will perform. The format for the Wausau data would also not make the data of use to them. Based on these discussions the WDNR proposed that rather than fund continuing monitoring programs, that Wausau provide funding to hire a seasonal summer employee from mid-May through August. This person will be directed by the WDNR and their duties would be focused both on control and monitoring of PL in the project area. As described in the attached email from Mr. Kevin Gautier, Land Management Coordinator, WDNR, the seasonal employee's activities would include:

- Watercraft inspection AIS (Aquatic Invasive Species) monitoring (Eurasian water milfoil, curly leaf pond weed, purple loosestrife, spiny water-flea, zebra mussels and possibly others).
- Public education and involvement
- Updating signage as needed
- Aquatic plant surveys – AIS and aquatic mapping
- AIS removal
- Train volunteers on watercraft inspection and citizen volunteering monitoring activities – other AIS activities as needed

The WDNR requested that Wausau fund this position for a period of five years. At the end of the 5-year period a review would be made regarding the effectiveness of this procedure in the control of PL and other evasive species.

WausauPAPER

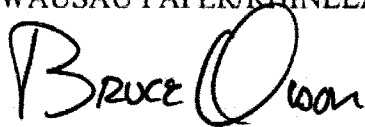
Wausau believes that funding of the AIS person would be a valuable contribution in the control of the evasive species. Wausau further believes that this funding in lieu of continuation of the monitoring program would provide a more effective and coordinated use of funds to enhance the quality of the Rhinelander impoundment areas. For this reason Wausau requests that FERC provide approval for this program.

The approval would involve continuing funding for the AIS position for a period of five years at which time a review could be made regarding the ongoing effectiveness.

If there are questions regarding these recommendations please contact Mr. Bruce Olson at 715-369-4244 or Mr. Douglas Spaulding at 952-544-8133.

Sincerely,

WAUSAU PAPER/RHINELANDER MILL

A handwritten signature in black ink that reads "Bruce Olson". The signature is written in a cursive style with a large, prominent "B" and "O".

Bruce Olson
Utilities Manager

Hi Bruce,

As requested here is a budget number for a seasonal AIS position with possible work activities that can be discussed and prioritized annually.


Budget - To hire a seasonal AIS person for 560 Hours (approximately mid-May through the end of August) x \$10/hour, w/fringe and indirect costs will cost around \$8,000.

Activities:

- watercraft inspections
- AIS monitoring (eurasian water-milfoil, curly-leaf pondweed, purple loosestrife, spiny water-flea, zebra mussels, and possibly others)
- public education and involvement
- updating signage as needed
- aquatic plant surveys
- AIS and aquatic plant mapping
- AIS removal
- train volunteers on watercraft inspection and citizen volunteer monitoring activities
- other AIS related activities as needed

Thanks and let me know if you have any questions.

Kevin

 Kevin J. Gauthier

Lakes Management Coordinator
Wisconsin Department of Natural Resources
107 Sutliff Ave
Rhineland, WI 54501

(☎) phone: (715) 365-8937
(☎) fax: (715) 365-8932
(✉) e-mail: Kevin.GauthierSr@wisconsin.gov