



Upper Peninsula Power Company

(a subsidiary of Integrys Energy Group)
700 North Adams Street
P.O. Box 19001
Green Bay, WI 54307-9001

December 11, 2012

Ms. Kimberly D. Bose, Secretary
The Federal Energy Regulatory Commission
888 First Street NE
Washington, DC 20426

Dear Secretary Bose:

2012 Nuisance Plant Control Plan Survey Results - Bond Falls Hydroelectric FERC Project # 1864

Bond Falls Reservoir, Victoria Falls Reservoir and Lake Gogebic

As per the Federal Energy Regulatory Commission (FERC) Order Approving Nuisance Plant Control Plan, Upper Peninsula Power Company (UPPCO) is required to submit the results of the Eurasian water milfoil (EWM) and purple loosestrife monitoring surveys completed for the Bond Falls Hydroelectric Project (FERC Project No. 1864).

Purple loosestrife and EWM surveys were completed on August 27 and 28, 2012 for the Bond Falls Reservoir, Victoria Falls Reservoirs and Lake Gogebic. No purple loosestrife was identified at the Bond Falls and Victoria Falls reservoirs.

Purple loosestrife was once again observed at Lake Gogebic. Four colonies were identified as being located within the project boundary. Three of the four colonies were reported as large colonies with greater than 50 + purple loosestrife plants identified. *Galerucella* beetles (beetles) were observed actively feeding on the largest stand of purple loosestrife. Purple loosestrife was not observed at five sites where it had been observed in previous surveys.

In consultation with the Bond Falls Implementation Team (BFIT), UPPCO provided funding to the Lake Gogebic Improvement Association (LGIA) to control purple loosestrife on the reservoir. On July 20, 2012, the LGIA released thousands of beetles at the largest colony site. In addition, on August 9, 2012, the LGIA completed control activities by pulling all but one of the remaining purple loosestrife colonies. The remaining colony was too large to control by pulling.

Follow-up purple loosestrife surveys will be completed in 2013 to determine control success. UPPCO will also consult with the BFIT concerning control methods to be implemented in 2013. Appendix A includes a figure of the purple loosestrife colony locations, beetle release site and data sheet.

EWM transect locations were surveyed and a meander sample for EWM was completed at each of the three reservoirs. The surveys did not indicate the presence of EWM at any of the reservoir. Appendix B includes the 2012 EWM survey results.

Cisco Chain of Lakes

As per the Notice of Proposed Changes to the Bond Falls Hydroelectric Project Approved Nuisance Plant Control Plan provided to FERC on June 7, 2011, UPPCO is providing the purple loosestrife survey results for the Cisco Chain of Lakes.

Purple loosestrife surveys on the Cisco Chain of Lakes were completed from July 22 through July 25, 2012. No purple loosestrife was observed.

20 plants were observed in 2010. These plants were hand pulled during the 2010 survey. The 2012 survey results indicate the control efforts remain successful.

The next EWM survey is proposed to be completed in 2013.

UPPCO provided the 2012 Nuisance Plant Control Plan Survey Results to the BFIT on October 25, 2012. The Wisconsin Department of Natural Resources (WDNR) was the only BFIT member to provide comments. Documentation of Consultation, including the WDNR comments and responses to those comments are included in Appendix C.

Should you have any questions relative to this material, please do not hesitate to contact Jamie Nuthals, at (920) 433-1460.

Sincerely,

A handwritten signature in dark ink, appearing to read "T. Jensky", with a stylized, cursive script.

Terry P. Jensky
Vice President - Generation Assets
for Wisconsin Public Service

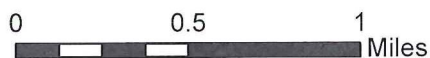
cc: Mr. Jim Melchiori, UPPCO
Mr. Gil Snyder, WPS
Ms. Cheryl Laatsch, WDNR

Mr. Virgil Schlorke, UPPCO
Ms. Carlisa Linton, FERC

APPENDIX A



Lake Gogebic, MI **Purple Loosestrife Survey** **2012**



Date: 10/25/2012

Imagery: Bing Maps

- Project Boundary
- Beetle Release Site
- Purple Loosestrife**
 - 0-5 Plants
 - 6-50 Plants
 - >50 Plants
 - No Plants Found



Location:

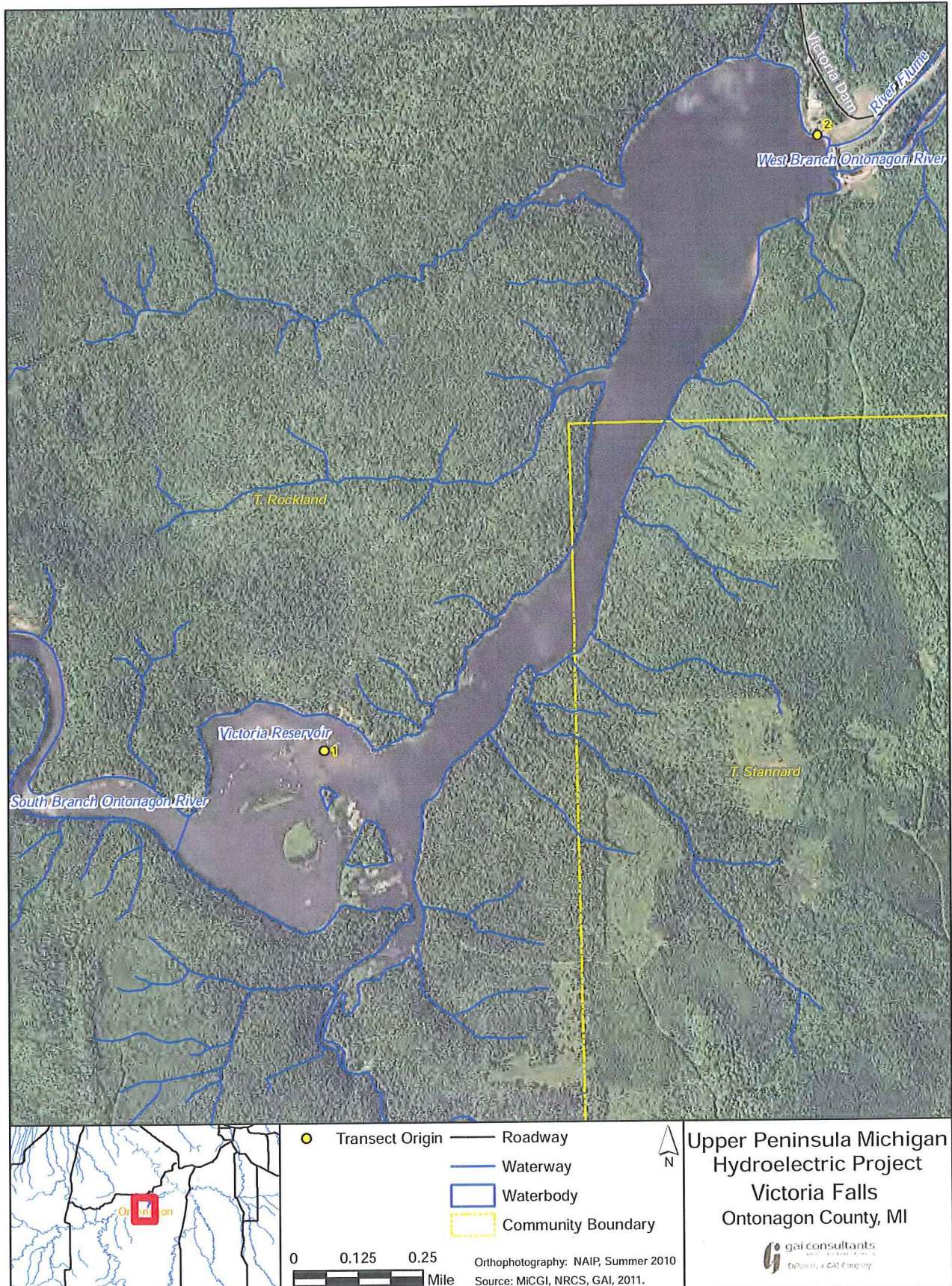
Plant Abundance Scale: Small 1-5 plants, Medium 6-50 plant , Large 50 + plants

APPENDIX B



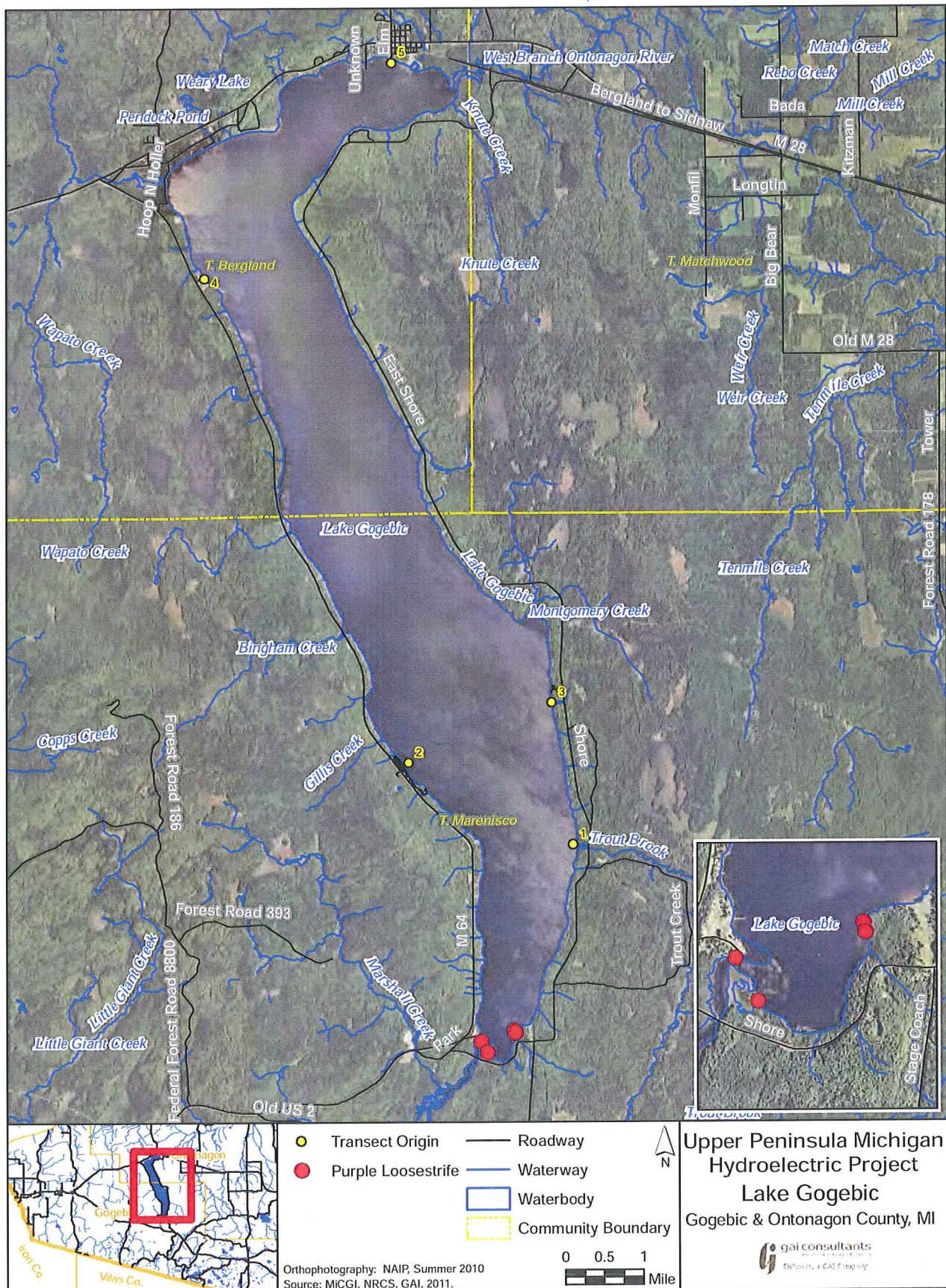
Eurasian Milfoil Survey - August 27, 2012				
Bond Falls, Ontonagon County, Michigan				
Transect #	0 - 0.5 M	0.5 - 1.5 M	1.5 - 3.0 M	> 3.0 M
1A	0	0	NA	NA
1B	0	0	NA	NA
1C	0	0	NA	NA
2A	0	0	NA	NA
2B	0	0	NA	NA
2C	0	0	NA	0
3A	0	0	NA	NA
3B	0	0	NA	NA
3C	0	0	NA	0

Abundance Scale	
0	Absent
1	Presence Less than Half
2	Equal Presence Compared to Other Species
3	Dominant Species
4	Total Infestation



Eurasian Milfoil Survey - August 27, 2012				
Victoria Falls, Ontonagon County, Michigan				
Transect #	0 - 0.5 M	0.5 - 1.5 M	1.5 - 3.0 M	> 3.0 M
1A	0	0	NA	NA
1B	0	0	0	NA
1C	0	0	0	NA
2A	0	0	NA	NA
2B	0	0	NA	NA
2C	0	0	0	NA

Abundance Scale	
0	Absent
1	Presence Less than Half
2	Equal Presence Compared to Other Species
3	Dominant Species
4	Total Infestation



Eurasian Milfoil Survey - August 28, 2012				
Lake Gogebic, Gogebic County, Michigan				
Transect #	0 - 0.5 M	0.5 - 1.5 M	1.5 - 3.0 M	> 3.0 M
1A	0	0	NA	NA
1B	0	0	NA	NA
1C	0	0	NA	NA
2A	0	0	NA	NA
2B	0	0	NA	NA
2C	0	0	0	NA
3A	0	0	NA	NA
3B	0	0	0	NA
3C	0	0	0	NA
4A	0	0	NA	NA
4B	0	0	NA	NA
4C	0	0	NA	NA
5A	0	0	NA	NA
5B	0	0	NA	NA
5C	0	0	NA	NA

Abundance Scale	
0	Absent
1	Presence Less than Half
2	Equal Presence Compared to Other Species
3	Dominant Species
4	Total Infestation

APPENDIX C

DOCUMENTATION OF CONSULTATION

Nuthals, James D

From: Nuthals, James D
Sent: Thursday, October 25, 2012 12:36 PM
To: 'Laatsch, Cheryl - DNR'; 'Kruger, Kyle (DNR)'; Norman Nass; 'Burr_Fisher@fws.gov'; 'James Schramm'; 'Gene Mensch'
Cc: 'Gilbert, Stephen J - DNR'
Subject: UPPCO's Bond Falls Hydroelectric Project - 2012 Purple Loosestrife and EWM Survey Results Letter
Attachments: 2012PLSEWMBFWDNR.pdf; Appendix A.pdf; Appendix B.pdf; 2012PLSEWMBFUSDAFS.pdf; 2012PLSEWMBFMHRC.pdf; 2012PLSEWMBFMDNR.pdf; 2012PLSEWMBFKBIC.pdf; 2012PLSEWMBFFWS.pdf

Greetings,

Please reference your attached Upper Peninsula Power Company (UPPCO) Bond Falls Hydroelectric Project – 2012 Purple loosestrife and EWM Survey Results Letter.

Please let me know if you have any questions or concerns.

Sincerely,

James D Nuthals

Natural Resource Management | Environmental Services | Integrys Business Support, LLC

920-433-1460

920-309-0741 *cell (please note cell phone number change)*

920-433-1176 *fax*

jdnuthals@integrysgroup.com

www.integrysgroup.com

Providing support for Integrys Energy Group, Integrys Energy Services, Michigan Gas Utilities, Minnesota Energy Resources, North Shore Gas, Peoples Gas, Upper Peninsula Power Company, Wisconsin Public Service, and Wisconsin River Power.



Upper Peninsula Power Company
(a subsidiary of Integrys Energy Group)
700 North Adams Street
P.O. Box 19001
Green Bay, WI 54307-9001

October 25, 2012

FERC Project # 1864

Mr. Burr Fisher
U.S. Fish and Wildlife Service
East Lansing Field Office
2651 Coolidge Road
East Lansing, MI 48823

Dear Mr. Fisher:

2012 Noxious Plants Monitoring Survey Results - Bond Falls Hydroelectric FERC Project # 1864

Bond Falls Reservoir, Victoria Falls Reservoir and Lake Gogebic

As per the Federal Energy Regulatory Commission (FERC) Order Approving Noxious Plants Monitoring Plan, Upper Peninsula Power Company (UPPCO) is required to submit the results of the Eurasian water milfoil (EWM) and purple loosestrife monitoring surveys completed for the Bond Falls Hydroelectric Project (FERC Project No. 1864).

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In consultation with the Bond Falls Implementation Team (BFIT), UPPCO provided funding to the Lake Gogebic Improvement Association (LGIA) to control purple loosestrife on the reservoir. On July 20, 2012, the LGIA released thousands of beetles at the largest colony site. In addition, on August 9, 2012, the LGIA completed control activities by pulling all but one of the remaining purple loosestrife colonies. The remaining colony was too large to control by pulling.

Follow up purple loosestrife surveys will be completed in 2013 to determine control success. UPPCO will also consult with the BFIT concerning control methods to be implemented in 2013. Appendix A includes a figure of the purple loosestrife colony locations, beetle release site and data sheet.

EWM transect locations were surveyed and a meander sample for EWM was completed at each of the three reservoirs. The surveys did not indicate the presence of EWM at any of the reservoir. Appendix B includes the 2012 EWM survey results.

Mr. Burr Fisher
October 25, 2012
Page 2 of 2

Cisco Chain of Lakes

As per the Notice of Proposed Changes to the Bond Falls Hydroelectric Project Approved Nuisance Plant Control Plan provided to FERC on June 7, 2011, UPPCO is providing the purple loosestrife survey results for the Cisco Chain of Lakes.

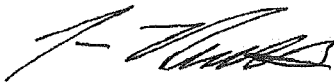
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Should you have any questions relative to this material, please do not hesitate to call me.

Sincerely,

A handwritten signature in black ink, appearing to read 'J. Nuthals', written in a cursive style.

James Nuthals
Environmental Services-
Natural Resource Management
(920) 433-1460

Enc.



Upper Peninsula Power Company
(a subsidiary of Integrys Energy Group)
700 North Adams Street
P.O. Box 19001
Green Bay, WI 54307-9001

October 25, 2012

FERC Project # 1864

Mr. Gene Mensch
KBIC – Natural Resources Department
HCRO1 Box 120
L'Anse, MI 49946

Dear Mr. Mensch:

2012 Noxious Plants Monitoring Survey Results - Bond Falls Hydroelectric FERC Project # 1864

Bond Falls Reservoir, Victoria Falls Reservoir and Lake Gogebic

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EWM transect locations were surveyed and a meander sample for EWM was completed at each of the three reservoirs. The surveys did not indicate the presence of EWM at any of the reservoir. Appendix B includes the 2012 EWM survey results.

Mr. Gene Mensch
October 25, 2012
Page 2 of 2

Cisco Chain of Lakes

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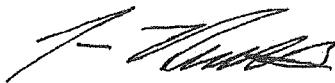
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James Nuthals
Environmental Services-
Natural Resource Management
(920) 433-1460

Enc.



Upper Peninsula Power Company
(a subsidiary of Integrys Energy Group)
700 North Adams Street
P.O. Box 19001
Green Bay, WI 54307-9001

October 25, 2012

FERC Project # 1864

Mr. Kyle Kruger
Michigan Department of Natural Resources
Mio Field Office
191 S. Mt. Tom Rd
Mio, MI 48647

Dear Mr. Kruger:

2012 Noxious Plants Monitoring Survey Results - Bond Falls Hydroelectric FERC Project # 1864

Bond Falls Reservoir, Victoria Falls Reservoir and Lake Gogebic

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Mr. Kyle Kruger
October 25, 2012
Page 2 of 2

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James Nuthals
Environmental Services-
Natural Resource Management
(920) 433-1460

Enc.



Upper Peninsula Power Company
(a subsidiary of Integrys Energy Group)
700 North Adams Street
P.O. Box 19001
Green Bay, WI 54307-9001

October 25, 2012

FERC Project # 1864

Mr. Jim Schramm
Michigan Hydro Relicensing Coalition
1210 East Fifth Avenue
Houghton, MI 49931

Dear Mr. Schramm:

2012 Noxious Plants Monitoring Survey Results - Bond Falls Hydroelectric FERC Project # 1864

Bond Falls Reservoir, Victoria Falls Reservoir and Lake Gogebic

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Mr. Jim Schramm
October 25, 2012
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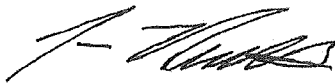
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James Nuthals
Environmental Services-
Natural Resource Management
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Upper Peninsula Power Company
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700 North Adams Street
P.O. Box 19001
Green Bay, WI 54307-9001

October 25, 2012

FERC Project # 1864

Mr. Norman Nass
United States Department of Agriculture – Forest Service
Old US Hwy 2 East
Watersmeet, MI 49969

Dear Mr. Nass:

2012 Noxious Plants Monitoring Survey Results - Bond Falls Hydroelectric FERC Project # 1864

Bond Falls Reservoir, Victoria Falls Reservoir and Lake Gogebic

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Mr. Norm Nass
October 25, 2012
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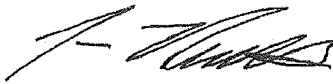
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Green Bay, WI 54307-9001

October 25, 2012

FERC Project # 1864

Ms. Cheryl Laatsch
Wisconsin Department of Natural Resources
P.O. Box 7921
Madison, WI 53707-7921

Dear Ms. Laatsch:

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Bond Falls Reservoir, Victoria Falls Reservoir and Lake Gogebic

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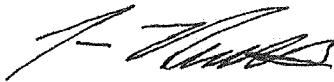
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James Nuthals
Environmental Services-
Natural Resource Management
(920) 433-1460

Enc.

Appendix A & B are the same as the appendices being provided to FERC. The appendices were specially left out in an effort to reduce the overall size of the document.

WDNR COMMENTS

Nuthals, James D

From: Laatsch, Cheryl - DNR [Cheryl.Laatsch@Wisconsin.gov]
Sent: Monday, November 19, 2012 1:25 PM
To: Nuthals, James D
Subject: RE: UPPCO's Bond Falls Hydroelectric Project - 2012 Purple Loosestrife and EWM Survey Results Letter

Follow Up Flag: Follow up
Flag Status: Flagged

Jamie – Here are our comments for the Bond Falls AIS efforts. I encourage UPPCO to move forward with the plans that you and I previously discussed regarding addressing our comments. Thanks

1. Wisconsin is a mosaic of waterways representing the Mississippi River and the Great Lakes Regions. With this vast mosaic of waterways and river systems, comes an array of aquatic invasive species. As we move forward with identifying and eradicating AIS, there are basic steps that all hydro owners need to participate in, to help improve the resource. Some AIS can significantly hinder hydro operations that may result in excessive operation and maintenance costs, including lost generation. We encourage the utility to work with the WDNR to develop Best Management Practices for their operations and maintenance of the hydro, to reduce the introduction and spread of AIS. Additionally, the WDNR recommends revisions to the current AIS plan to address the following concerns:
 - a. Identify all existing AIS within the study area and discuss which new AIS are most likely to arrive (i.e. SMART analysis).
 - b. Determine an acceptable survey and mapping methodology
 - c. Identify and implement quality control measures, and equipment calibration measures
 - d. Improve awareness and the dynamics of the study area
 - e. Avoid duplicate workload for agency staff, utilities, and local associations
 - f. Manage and analyze the data collected to define population characteristics, establish trends, and evaluate management success.
 - g. Establish and implement protocols for management/removal of AIS
 - h. Provide a timeline to review the current AIS plans and revise the plans as appropriate for the project area

Cheryl Laatsch, Horicon DNR
N7725 HIGHWAY 28
HORICON WI 53032
(920) 387-7869
(920) 485-3028 (Fax)

e-mail: Cheryl.laatsch@wisconsin.gov
Website: dnr.wi.gov
www.facebook.com/WIDNR

From: Nuthals, James D [<mailto:JDNuthals@integrysgroup.com>]

Sent: Thursday, October 25, 2012 12:36 PM

To: Laatsch, Cheryl - DNR; 'Kruger, Kyle (DNR)'; Norman Nass; 'Burr_Fisher@fws.gov'; 'James Schramm'; 'Gene Mensch'

Cc: Gilbert, Stephen J - DNR

Subject: UPPCO's Bond Falls Hydroelectric Project - 2012 Purple Loosestrife and EWM Survey Results Letter

Greetings,

Please reference your attached Upper Peninsula Power Company (UPPCO) Bond Falls Hydroelectric Project – 2012 Purple loosestrife and EWM Survey Results Letter.

Please let me know if you have any questions or concerns.

Sincerely,

James D Nuthals

Natural Resource Management | Environmental Services | Integrys Business Support, LLC

920-433-1460

920-309-0741 *cell (please note cell phone number change)*

920-433-1176 *fax*

jdNuthals@integrysgroup.com

www.integrysgroup.com

Providing support for Integrys Energy Group, Integrys Energy Services, Michigan Gas Utilities, Minnesota Energy Resources, North Shore Gas, Peoples Gas, Upper Peninsula Power Company, Wisconsin Public Service, and Wisconsin River Power.

UPPCO RESPONSE TO WDNR COMMENTS

Upper Peninsula Power Company (UPPCO) received comments from the Wisconsin Department of Natural Resources (WDNR) after submittal of the 2012 Bond Falls Hydroelectric Project Nuisance Plant Monitoring Report (FERC Project # 1864). As an overall comment, UPPCO is concerned that the WDNR comments are beyond the scope of License Article 411 for the Bond Falls Hydroelectric Project and the Federal Energy Regulatory Commission (FERC) Order Modifying and Approving Nuisance Plant Control Plan issued February 24, 2005, Comprehensive Five Year Eurasian Watermilfoil (EWM) Monitoring Report filed with FERC on January 25, 2010, and Notice of Proposed Changes to the Bond Falls Hydroelectric Project Approved Nuisance Plant Control Plan provided to FERC on June 7, 2011. In all circumstances, the WDNR has already reviewed and commented prior to plan and license article approval by FERC.

The comments are general and are not directly related to the report submitted for review. WDNR has not provided specific data that additional Aquatic Invasive Species (AIS) are present within the project boundary. Additionally, no justification has been provided indicating that monitoring, control, or eradication of additional AIS species is warranted.

The Aquatic Invasive Species License Requirements included in License Article 411 for the Bond Falls Hydroelectric Project read as follows:

Article 411

Within six months after the issuance of a new license, the licensee shall file for Commission approval, a Nuisance Plant Control Plan for the four project impoundments. Implementation of the Plan shall be funded by the Mitigation Enhancement Fund described in Section 7 of the Settlement.

The license shall consult with the Michigan Department of Natural Resources, U.S. Fish and Wildlife Service, and other members of the Bond Falls Implementation Team (Implementation Plan), prior to filing the Plan with the Commission. The Plan shall include an implementation schedule, documentation of agency consultation, copies of agency comments and recommendations, and specific descriptions of how the agency comments are accommodated by the Plan. The licensee shall allow a minimum of 30 days for the Team to comment and to make recommendations, before filing the Plan with the Commission. If the licensee does not adopt a recommendation, the filing shall include the licensee's reasons, based on project – specific information.

The Commission reserves the right to require changes to the Plan. The Nuisance Plant Control Plan shall not be implemented until the licensee is notified that the Plan is approved. Upon Commission approval, the licensee shall implement the Plan according to the approved schedule, including any changes required by the Commission.

WDNR SPECIFIC COMMENTS

WDNR COMMENT: Wisconsin is a mosaic of waterways representing the Mississippi River and the Great Lakes Regions. With this vast mosaic of waterways and river systems, comes an array of aquatic invasive species.

UPPCO RESPONSE: Comment noted.

WDNR COMMENT: As we move forward with identifying and eradicating AIS, there are basic steps that all hydro owners need to participate in, to help improve the resource.

UPPCO RESPONSE: The Bond Falls Hydroelectric Project Nuisance Plant Control Plan already provides for identification and if necessary control of specific AIS. In addition, the eradication of AIS in some circumstances would be impractical if not impossible. UPPCO will continue to implement the measures outlined in the FERC approved Bond Falls Hydroelectric Project Nuisance Plant Control Plan.

WDNR COMMENT: Some AIS can significantly hinder hydro operations that may result in excessive operation and maintenance costs, including lost generation. We encourage the utility to work with the WDNR to develop Best Management Practices for their operations and maintenance of the hydro, to reduce the introduction and spread of AIS.

UPPCO RESPONSE: UPPCO complies with all applicable state and federal laws concerning the introduction and spread of AIS. In addition, the Bond Falls Hydroelectric Project Nuisance Plant Control Plan already provides for measures to control the spread of specific AIS, where necessary. WPS will continue to implement the measures outlined in the FERC approved Bond Falls Hydroelectric Project Nuisance Plant Control Plan.

WDNR COMMENT: Additionally, the WDNR recommends revisions to the current AIS plan to address the following concerns:

UPPCO RESPONSE: WDNR has not provided specific data that additional AIS are present within the project boundary. No justification has been provided by WDNR indicating that monitoring, control, or eradication of additional AIS species is necessary. UPPCO will continue to implement the measures outlined in the FERC approved Bond Falls Hydroelectric Project Nuisance Plant Control Plan.

WDNR COMMENT: Identify all existing AIS within the study area and discuss which new AIS are most likely to arrive (i.e. SMART analysis).

UPPCO RESPONSE: WDNR has not provided specific data that additional AIS are present within the project boundary. No justification that monitoring, control, or eradication of additional AIS species is necessary has been provided by WDNR. UPPCO will continue to implement the measures outlined in the FERC approved Bond Falls Hydroelectric Project Nuisance Plant Control Plan.

WDNR COMMENT: Determine an acceptable survey and mapping methodology.

UPPCO RESPONSE: In the approved Bond Falls Hydroelectric Project Nuisance Plant Control Plan, protocols for monitoring methods, frequency of survey, mapping, and implementation of control measures have already been established. UPPCO will continue to implement the measures outlined in the FERC approved Bond Falls Hydroelectric Project Nuisance Plant Control Plan.

WDNR COMMENT: Identify and implement quality control measures, and equipment calibration measures.

UPPCO RESPONSE: UPPCO ensures that all AIS surveying and control equipment is clean and in proper working condition. UPPCO will continue to implement the measures outlined in the FERC approved Bond Falls Hydroelectric Project Nuisance Plant Control Plan.

WDNR COMMENT: Improve awareness and the dynamics of the study area.

UPPCO RESPONSE: The Bond Falls Hydroelectric Project Nuisance Plant Control Plan already requires UPPCO to display invasive species information at specific public access areas. WPS will continue to implement the measures outlined in the FERC approved Bond Falls Hydroelectric Project Nuisance Plant Control Plan.

WDNR COMMENT: Avoid duplicate workload for agency staff, utilities, and local associations.

UPPCO RESPONSE: The annual Implementation Team meeting provides an opportunity for the WDNR to express its concerns about duplicate workload for agency staff, utilities and local associations.

WDNR COMMENT: Manage and analyze the data collected to define population characteristics, establish trends, and evaluate management success.

UPPCO RESPONSE: The Bond Falls Hydroelectric Project Nuisance Plant Control Plan already provides for specific AIS data to be provided to the WDNR for their analysis on an annual basis. WPS will continue to implement the measures outlined in the FERC approved Bond Falls Hydroelectric Project Nuisance Plant Control Plan.

WDNR COMMENT: Establish and implement protocols for management/removal of AIS.

UPPCO RESPONSE: Under the approved Bond Falls Hydroelectric Project Nuisance Plant Control Plan, protocols for monitoring methods, frequency of survey, mapping, and implementation of control measures have already been established. In addition, UPPCO would like to point out that some AIS species may fluctuate in population but remain in check with the surrounding aquatic community and may not require management or removal. For instance, at the Wisconsin Public Service Corporation (WPS) Grand Rapids Hydroelectric Project (FERC Project # 2433), WPS has been completing EWM surveys since 1998. Since 2006, EWM has shown natural fluctuations in populations but has overall remained in check. EWM stands encompassed 15.58 acres in 2006, 47.8 acres in 2007, 81 acres in 2008, 1.6 acres in 2009, 2.0 acres in 2010 and 10.9 acres in 2011. Based on these results, EWM is only one plant of many aquatic plant species located in a healthy aquatic plant community. UPPCO will continue to implement the measures outlined in the FERC approved Bond Falls Hydroelectric Project Nuisance Plant Control Plan.

WDNR COMMENT: Provide a timeline to review the current AIS plans and revise the plans as appropriate for the project area.

UPPCO RESPONSE: WDNR has not provided specific data that additional AIS are present within the project boundary. No justification that monitoring, control, or eradication of additional AIS species has been provided by WDNR. UPPCO will continue to implement the measures outlined in the FERC approved Bond Falls Hydroelectric Project Nuisance Plant Control Plan.