



Upper Peninsula Power Company

(a subsidiary of WPS Resources Corporation)

700 N. Adams Street

P.O. Box 19001

Green Bay, WI 54307-9001

ORIGINAL

FILED THE
SECRETARY
IN FEB 20 A 10 50
FEDERAL ENERGY
REGULATORY COMMISSION

February 19, 2004

FERC Project No. 1864 - 024

Ms. Magalie R. Salas, Secretary
Federal Energy Regulatory Commission
Mail Code: DTCA, HL 21.3
888 First Street, NE
Washington, DC 20426

Dear Secretary Salas:

Nuisance Plant Control Plan for Bond Falls Hydroelectric Project

In accordance with Article 411 of the Order Issuing New License dated August 20, 2003 for the Bond Falls Hydroelectric Project (FERC Project No. 1864), Upper Peninsula Power Company (UPPCO) is submitting this Nuisance Plant Control Plan for approval.

Members of the Bond Falls Implementation Team and the ex-officio member were consulted with during the preparation of these plans. Documentation of Consultation is located under Appendix 1 of the plan. The Michigan Department of Environmental Quality, U.S. Fish & Wildlife Service, Wisconsin Department of Natural Resources, and the U.S. Department of the Interior - Office of the Field Solicitor did not reply with comments. The Keweenaw Bay Indian Community, Michigan Department of Natural Resources, U.S. Forest Service, and the Michigan Hydro Relicensing Coalition (ex-officio member) did respond with comments. Their comments and responses to the comments can be found under Appendix 1 of the plan.

If you have any questions, please do not hesitate to call Rick Moser at (920) 433-2290.

Sincerely,

A handwritten signature in black ink, appearing to read "T. P. Jensky".

Terry P. Jensky
Assistant Vice President - Energy Supply Operations
for Wisconsin Public Service Corporation
Telephone: (920) 433-2277

vav

Enc.

cc: Ms. Peggy Harding - FERC, Chicago
Mr. Gil Snyder, WPSC - D2
Mr. Bob Meyers, UPPCO - UISC
Mr. Bob Edwards, UPPCO - UHGO
Mr. Shawn Puzen, WPSC - A2
Ms. Joan Johaneck, WPSC - D2
Mr. Don Bussiere, UPPCO - UVD

UPPER PENINSULA POWER COMPANY

BOND FALLS HYDROELECTRIC PROJECT

(FERC PROJECT NO. 1864)

NUISANCE PLANT CONTROL PLAN

**ARTICLE 411 OF AUGUST 20, 2003
ORDER ISSUING NEW LICENSE**

Bond Falls Hydroelectric Project – FERC License No. 1864

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 licensee shall consult with the Michigan Department of Natural Resources, U.S. Fish and Wildlife Service, and other members of the Bond Falls Project Implementation Team (Implementation Plan) (*sic*), 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.

Purple Loosestrife Monitoring Plan for Bond Falls, Victoria, and Bergland

Objective: To monitor the spread of Purple Loosestrife (*Lythrum salicaria*) on waters within the project boundary. Purple Loosestrife is an invasive plant that exhibits aggressive characteristics. The plant is becoming increasingly common to wetland areas. Upper Peninsula Power Company (UPPCO) agrees to annually monitor the species and cooperate with the agencies to implement measures to control/eliminate the plant if the results of the surveys warrant it. Surveys will be paid for by the Bond Falls Mitigation Enhancement Fund. UPPCO will supply a cost projection for the surveys to the Bond Falls Implementation Team (BFIT) prior to implementation.

I. Methods

- A. The monitoring methods will include a survey of the impoundment shorelines, plus adjoining wetlands for the Bond Falls, Victoria, and Bergland impoundments. The surveys will be conducted by boat and/or on foot to determine a baseline of existing colonies and then continued monitoring to determine the increase of density and abundance of the species.

II. Frequency of Survey

- A. Starting in the first summer after plan approval, the survey will be taken annually in July or August, depending upon when the plants are in bloom and the weather.**

III. Documentation of Existing Colonies

- A. The results of the survey will be displayed on a map of the total project area. A copy of the completed map will be provided to BFIT no later than October 31st every year. Included in this submittal will be the results of any control methods implemented that year, if applicable.**
- B. The map will indicate relative populations based on the following criteria:**
 - a. Small Colonies of 1-5 plants**
 - b. Medium Colonies of 6-50 plants**
 - c. Dense Colonies of >50 plants**

IV. Control of Existing Colonies

- A. Small colonies of 1 to 5 plants will be cut by hand and the remaining stems will be hand pulled or sprayed with an appropriate aquatic herbicide. Cutting or pulling shall be timed to occur prior to seed set, or the flower spikes will be bagged and disposed of properly.**
- B. The growth and size of the larger populations will be monitored each year. If control measures are deemed necessary at a later date, then UPPCO will consult with the BFIT.**

V. Public Awareness

- A. Public Awareness about purple loosestrife will be increased by displaying fact sheets supplied by a natural resource agency at UPPCO owned public access areas in the project boundary.**

VI. Documentation of Submittal

- A. Documentation of submittal of monitoring reports to the BFIT will be provided to the FERC by December 31st for the first two years. The filing each year will include any agency comments.**

Eurasian Water Milfoil Monitoring Plan for Bond Falls, Victoria, and Bergland

Objective: Eurasian water milfoil (*Myriophyllum spicatum*) is an exotic aquatic macrophyte that exhibits aggressive characteristics. This plant is becoming increasingly common to inland lakes and rivers. In consultation with the BFIT, UPPCO will periodically monitor the presence and abundance of this species. Surveys will be paid for by the Bond Falls Mitigation Enhancement Fund. UPPCO will supply a cost projection for the surveys to the BFIT prior to implementation.

I. Methods

- a. Monitoring methods will include a routine aquatic macrophyte reconnaissance survey utilizing a boat to take samples at a total of ten transects of approximately 36 feet in length. Two transects will be located on Victoria, five transects will be located on Bergland, and three will be located on Bond Falls.

Transects will be selected based upon location of macrophyte colonies and areas of likely infestation. The location of these transects will be documented using a Global Positioning System. The transect samples will be analyzed for presence and approximate abundance of Eurasian water milfoil.

Each transect will be sampled with a rake in three twelve-foot diameter sections. Each section will be sampled in quarters. The first quarter will be sampled at a depth of 0-0.5 meters below the surface, the second 0.5-1.5 meters below the surface, the third 1.5 – 3.0 meters below the surface and the fourth beyond 3.0 meters below the surface. Typically all of the samples occur in water less than 3 meters.

In addition to select transects, the shore at the boat landings will be surveyed annually for Eurasian water milfoil fragments.

II. Frequency of Survey

- a. Starting the first year after plan approval, a survey of the transects will be conducted every third year in July, August, or September.
- b. Starting the first year after plan approval, the shore at the boat landings will be surveyed for Eurasian water milfoil fragments on an annual basis.

III. Documentation of Existing Colonies

- a. The results of the survey at each transect will be displayed in table form indicating relative abundance of Eurasian water milfoil in each of the aquatic macrophyte samples that were taken. The abundance scale will be documented as the following: 0-Absent, 1-Presence less than half, 2-Equal presence compared to other species, 3-Dominant species, 4-Total infestation. There will be a column in the table indicating if the colony is a new colony or a previously documented colony. A map showing the locations of the transects will also be provided. The completed documentation will be provided to the BFIT no later than October 31st every year in which the monitoring was completed.

IV. Control of Existing Colonies

- a. A natural eradication process will be used if Eurasian water milfoil becomes established. Studies have shown that a native weevil (*Euhrychiopsis lecontei*) can control the population of Eurasian water milfoil by feeding on it. This weevil is native to the area so it does not need to be introduced. This weevil is most commonly found in waterbodies that sustain a population of native Northern milfoil and contains leaf litter on the shoreline. If the monitoring reports support the need to further control this species, then UPPCO will cooperate with the BFIT in developing site-specific measures.

V. Public Awareness

- a. Public Awareness about Eurasian water milfoil will be increased by displaying fact sheets supplied by a natural resource agency at all UPPCO owned public access areas in the project boundary.

VI. Documentation of Submittal

- A. Documentation of submittal of monitoring reports to the BFIT will be provided to FERC by December 31st for the first two monitoring periods. The filing each year will include any agency comments.

Exotic Species Monitoring Plan for the Cisco Chain of Lakes

Objective: To continue the high standard of invasive species monitoring and control at the Cisco Chain of Lakes that is currently being conducted.

I. Methods

- a. Exotic species populations on the Cisco Chain of Lakes are currently being monitored by the Cisco Chain Riparian Owners Association (CCROA). Colonies of Eurasian water milfoil have been found on the Cisco chain of lakes in the past and the CCROA has had success with eliminating these colonies. Since the CCROA is currently performing a thorough and competent job of monitoring and controlling exotic species on Cisco, UPPCO proposes to have the CCROA continue their exotic species monitoring efforts. The CCROA will continue to begin their process by educating its members on how to identify invasive plants. As the licensee, UPPCO will provide any plant identification training or training materials that is needed.
- b. Once trained on identification, the CCROA will monitor for purple loosestrife and Eurasian water milfoil all summer while its members recreate on the flowage. A lake leader will be established for each lake. It will be the responsibility of the lake leader to make sure that a purple loosestrife survey has been conducted on all of the shoreline, including adjacent wetlands each year during July or August. It will also be the responsibility of the lake leader to gather information about the Eurasian water milfoil surveys that are conducted by CCROA members throughout the summer.
- c. If an invasive species is identified, then it will be controlled before it becomes a serious problem. The CCROA may consult with the U.S. Forest Service and the state Department of Natural Resources, if they deem it necessary.
- d. The CCROA has a fund set aside each year for invasive species control. This fund may be used for purchasing chemical controls or for hiring environmental consultants to help with identification or to help develop control measures.
- e. The CCROA also educates members of the general public by posting informational signs regarding exotic species at the public boat landings on the Cisco Chain of Lakes.

UPPCO will monitor their actions to ensure compliance with the FERC license. If the time comes when the CCROA no longer agrees to monitor exotic species, UPPCO will resume the responsibility and will conduct surveys according to the outlined protocols for the Victoria, Bond Falls, and Bergland developments. UPPCO is evaluating the sale of the Cisco Dam. In the event that the Cisco development is removed from Hydroelectric Project No. 1864, UPPCO will be relieved of the requirements related to the Cisco development and the responsibilities will be inherited by the new owner.

II. Frequency of Survey

- a. After the members of the CCROA are educated on how to identify Eurasian water milfoil and purple loosestrife, they will conduct surveys every year during the summer while they are recreating on the flowage.

III. Documentation of Existing Colonies

- a. UPPCO will work with CCROA to generate a summary of their exotic species monitoring and control by September 30th of each year. Purple loosestrife colonies will be mapped showing relative abundance as follows: small colonies of 1-5 plants, medium Colonies of 6-50 plants, and dense colonies of >50 plants.
- b. Eurasian water milfoil colonies will also be clearly mapped. Colonies that were chemically treated will be designated differently than colonies that were not treated. Information will also be displayed in table form indicating relative abundance of the Eurasian water milfoil colony compared to any other surrounding aquatic vegetation. The abundance scale will be documented as the following: 0-Absent, 1-Presence less than half, 2-Equal presence compared to other species, 3-Dominant species, 4-Total infestation. There will be a column in the table indicating if the colony is a new colony or a previously documented colony. UPPCO will in turn submit the results of the Cisco efforts, with the results of Bond Falls, Bergland, and Victoria efforts to the BFIT by October 31st of each year.

IV. Control of Existing and New Colonies

A fund is set-aside in the CCROA budget for control measures. The CCROA has a history of controlling Eurasian water milfoil with the herbicide 2,4D when it is identified within the flowage. The CCROA has not had any colonies reoccur after treatment. The CCROA will continue to control Eurasian water milfoil by using an appropriate aquatic herbicide when they deem necessary. Small colonies of purple loosestrife will be cut by hand and the remaining stems will be hand pulled or sprayed by an appropriate aquatic herbicide. Cutting or pulling shall be timed to occur prior to seed set or the flower spikes will be bagged. UPPCO will consult with members of the BFIT if more control measures are required.

- V. **Public Awareness** - UPPCO will be responsible for insuring that the CCROA continues to post information on invasive species the public boat landings.
- VI. **Documentation of Submittal** - Documentation of submittal of monitoring reports to the BFIT will be provided to FERC by December 31st after the first two monitoring seasons. The filing each year will include any agency comments.

Appendix 1

Documentation of Consultation



Upper Peninsula Power Company

(a subsidiary of WPS Resources Corporation)

700 N. Adams Street

P.O. Box 19001

Green Bay, WI 54307-9001

December 19, 2003

Mr. Robert Evans
U.S. Forest Service
Old U.S. 45
Box 276
Watersmeet, MI 49969

Dear Mr. Evans:

Draft Invasive Species Monitoring Plan for FERC Project No. 1864

Upper Peninsula Power Company (UPPCO) submits this draft Nuisance Plant Control Plan. Per Article 411 of the new license for FERC Project No. 1864, the licensee shall, in consultation with the Michigan Department of Natural Resources, U.S. Fish & Wildlife Service, and other members of the Bond Falls Project Implementation Team develop a Nuisance Plant Control Plan for the four project impoundments of FERC Project No. 1864.

Please review the enclosed plan and make any comments or suggestions within 30 days of this letter. If you have any questions or concerns, please call me.

Sincerely,

Rick J. Moser
Environmental Consultant
Telephone: (920) 433-2290

vav

Enc.



Upper Peninsula Power Company

(a subsidiary of WPS Resources Corporation)

700 N. Adams Street

P.O. Box 19001

Green Bay, WI 54307-9001

December 19, 2003

Mr. Mike Donofrio
Keweenaw Bay Chippewa Tribe
HC1
P. O. Box 9710
L'anse, MI 49926-9710

Dear Mr. Donofrio:

Draft Invasive Species Monitoring Plan for FERC Project No. 1864

Upper Peninsula Power Company (UPPCO) submits this draft Nuisance Plant Control Plan. Per Article 411 of the new license for FERC Project No. 1864, the licensee shall, in consultation with the Michigan Department of Natural Resources, U.S. Fish & Wildlife Service, and other members of the Bond Falls Project Implementation Team develop a Nuisance Plant Control Plan for the four project impoundments of FERC Project No. 1864.

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Sincerely,

Rick J. Moser
Environmental Consultant
Telephone: (920) 433-2290

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Enc.



Upper Peninsula Power Company

(a subsidiary of WPS Resources Corporation)

700 N. Adams Street

P.O. Box 19001

Green Bay, WI 54307-9001

December 19, 2003

Mr. Jim Schramm
Michigan Hydro Relicensing Coalition
P. O. Box 828
Pentwater, MI 49449-0828

Dear Mr. Schramm:

Draft Invasive Species Monitoring Plan for FERC Project No. 1864

Upper Peninsula Power Company (UPPCO) submits this draft Nuisance Plant Control Plan. Per Article 411 of the new license for FERC Project No. 1864, the licensee shall, in consultation with the Michigan Department of Natural Resources, U.S. Fish & Wildlife Service, and other members of the Bond Falls Project Implementation Team develop a Nuisance Plant Control Plan for the four project impoundments of FERC Project No. 1864.

Please review the enclosed plan and make any comments or suggestions within 30 days of this letter. If you have any questions or concerns, please call me.

Sincerely,

Rick J. Moser
Environmental Consultant
Telephone: (920) 433-2290

vav

Enc.

cc: Mr. Bill Deephouse - MHRC



Upper Peninsula Power Company

(a subsidiary of WPS Resources Corporation)

700 N. Adams Street

P.O. Box 19001

Green Bay, WI 54307-9001

December 19, 2003

Ms. Jessica Mistak
Michigan Dept of Natural Resources
Marquette State Fish Hatchery and Station
488 Cherry Creek Road
Marquette, MI 49855

Dear Ms. Mistak:

Draft Invasive Species Monitoring Plan for FERC Project No. 1864

Upper Peninsula Power Company (UPPCO) submits this draft Nuisance Plant Control Plan. Per Article 411 of the new license for FERC Project No. 1864, the licensee shall, in consultation with the Michigan Department of Natural Resources, U.S. Fish & Wildlife Service, and other members of the Bond Falls Project Implementation Team develop a Nuisance Plant Control Plan for the four project impoundments of FERC Project No. 1864.

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Sincerely,

Rick J. Moser
Environmental Consultant
Telephone: (920) 433-2290

vav

Enc.



Upper Peninsula Power Company
(a subsidiary of WPS Resources Corporation)
700 N. Adams Street
P.O. Box 19001
Green Bay, WI 54307-9001

December 19, 2003

Mr. Bob Martini
Wisconsin Dept of Natural Resources
107 Sutliff Ave.
Rhineland, WI 54501

Dear Mr. Martini:

Draft Invasive Species Monitoring Plan for FERC Project No. 1864

Upper Peninsula Power Company (UPPCO) submits this draft Nuisance Plant Control Plan. Per Article 411 of the new license for FERC Project No. 1864, the licensee shall, in consultation with the Michigan Department of Natural Resources, U.S. Fish & Wildlife Service, and other members of the Bond Falls Project Implementation Team develop a Nuisance Plant Control Plan for the four project impoundments of FERC Project No. 1864.

Please review the enclosed plan and make any comments or suggestions within 30 days of this letter. If you have any questions or concerns, please call me.

Sincerely,

Rick J. Moser
Environmental Consultant
Telephone: (920) 433-2290

vav

Enc.



Upper Peninsula Power Company

(a subsidiary of WPS Resources Corporation)

700 N. Adams Street

P.O. Box 19001

Green Bay, WI 54307-9001

December 19, 2003

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

Dear Mr. Fisher:

Draft Invasive Species Monitoring Plan for FERC Project No. 1864

Upper Peninsula Power Company (UPPCO) submits this draft Nuisance Plant Control Plan. Per Article 411 of the new license for FERC Project No. 1864, the licensee shall, in consultation with the Michigan Department of Natural Resources, U.S. Fish & Wildlife Service, and other members of the Bond Falls Project Implementation Team develop a Nuisance Plant Control Plan for the four project impoundments of FERC Project No. 1864.

Please review the enclosed plan and make any comments or suggestions within 30 days of this letter. If you have any questions or concerns, please call me.

Sincerely,

Rick J. Moser
Environmental Consultant
Telephone: (920) 433-2290

vav

Enc.

cc: Mr. Craig Czarnecki - USFWS



Upper Peninsula Power Company

(a subsidiary of WPS Resources Corporation)

700 N. Adams Street

P.O. Box 19001

Green Bay, WI 54307-9001

December 19, 2003

Mr. John Suppnick
Dept. of Environmental Quality
Surface Water Quality Division
P. O. Box 30273
Lansing, MI 48909

Dear Mr. Suppnick:

Draft Invasive Species Monitoring Plan for FERC Project No. 1864

Upper Peninsula Power Company (UPPCO) submits this draft Nuisance Plant Control Plan. Per Article 411 of the new license for FERC Project No. 1864, the licensee shall, in consultation with the Michigan Department of Natural Resources, U.S. Fish & Wildlife Service, and other members of the Bond Falls Project Implementation Team develop a Nuisance Plant Control Plan for the four project impoundments of FERC Project No. 1864.

Please review the enclosed plan and make any comments or suggestions within 30 days of this letter. If you have any questions or concerns, please call me.

Sincerely,

Rick J. Moser
Environmental Consultant
Telephone: (920) 433-2290

vav

Enc.



Upper Peninsula Power Company
(a subsidiary of WPS Resources Corporation)
700 N. Adams Street
P.O. Box 19001
Green Bay, WI 54307-9001

December 19, 2003

Ms. Marcia Kimball
U.S. Department of the Interior
Office of the Field Solicitor
1 Federal Dr., Room 686
Fort Snelling, MN 55111-4030

Dear Ms. Kimball:

Draft Invasive Species Monitoring Plan for FERC Project No. 1864

Upper Peninsula Power Company (UPPCO) submits this draft Nuisance Plant Control Plan. Per Article 411 of the new license for FERC Project No. 1864, the licensee shall, in consultation with the Michigan Department of Natural Resources, U.S. Fish & Wildlife Service, and other members of the Bond Falls Project Implementation Team develop a Nuisance Plant Control Plan for the four project impoundments of FERC Project No. 1864.

Please review the enclosed plan and make any comments or suggestions within 30 days of this letter. If you have any questions or concerns, please call me.

Sincerely,

Rick J. Moser
Environmental Consultant
Telephone: (920) 433-2290

vav

Enc.

UPPER PENINSULA POWER COMPANY
BOND FALLS HYDROELECTRIC PROJECT
(FERC PROJECT NO. 1864)

NUISANCE PLANT CONTROL PLAN

ARTICLE 411 OF AUGUST 20, 2003
ORDER ISSUING NEW LICENSE

Bond Falls Hydroelectric Project - FERC License No. 1864

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 licensee shall consult with the Michigan Department of Natural Resources, U.S. Fish and Wildlife Service, and other members of the Bond Falls Project 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.

Purple Loosestrife Monitoring Plan for Bond Falls, Victoria, and Bergland

Objective: To monitor the spread of Purple Loosestrife (*Lythrum salicaria*) on project lands. Purple Loosestrife is an invasive plant that exhibits aggressive characteristics. The plant is becoming increasingly common to wetland areas. Upper Peninsula Power Company (UPPCO) agrees to annually monitor the species and cooperate with the agencies to implement measures to control/eliminate the plant if the results of the surveys warrant it.

I. Methods

- A. The monitoring methods will include a shoreline survey of the Bond Falls, Victoria, and Bergland impoundments. The surveys will be conducted by boat and/or on foot to determine a baseline of existing colonies and then continued monitoring to determine the increase of density and abundance of the species.

II. Frequency of Survey

- A. Starting in the first summer after plan approval, the survey will be taken annually in July or August, depending upon when the plants are in bloom and the weather.

III. Documentation of Existing Colonies

- A. The results of the survey will be displayed on a map of the total project area. A copy of the completed map will be provided to the Michigan Department of Natural Resources (MDNR), U.S. Fish and Wildlife Service (USFWS), and other members of the Bond Falls Implementation team no later than October 31st every year.

- B. The map will indicate relative populations based on the following criteria:

1. Small Colonies of 1-5 plants
2. Medium Colonies of 6-50 plants
3. Dense Colonies of >50 plants

IV. Control of Existing Colonies

- A. Small colonies of 1 to 5 plants will be cut by hand and the remaining stems will be hand pulled or sprayed with an appropriate aquatic herbicide.
- B. The growth and size of the larger populations will be monitored each year. If control measures are deemed necessary at a later date, then UPPCO will consult with the MDNR.

V. Public Awareness

- A. Public Awareness about purple loosestrife will be increased by displaying fact sheets supplied by the MDNR at UPPCO owned public access areas in the project boundary.

VI. Documentation of Submittal

- A. Documentation of submittal of monitoring reports to the MDNR, USFWS, and other members of the implementation team will be provided to the FERC by December 31st for the first two years. The filing each year will include any agency comments.

Eurasian Water Milfoil Monitoring Plan for Bond Falls, Victoria, and Bergland

Objective: Eurasian water milfoil (*Myriophyllum spicatum*) is an exotic aquatic macrophyte that exhibits aggressive characteristics. This plant is becoming increasingly common to inland lakes and rivers. In consultation with the MDNR, USFWS, and other members of the Bond Falls Implementation team, UPPCO will periodically monitor the presence and abundance of this species.

I. Methods

- A. Monitoring methods will include a routine aquatic macrophyte reconnaissance survey utilizing a boat to take samples at a total of ten transects of approximately 36 feet in length. Two transects will be located on Victoria, five transects will be located on Bergland, and three will be located on Bond Falls.
- B. Transects will be selected based upon location of macrophyte colonies and areas of likely infestation. The location of these transects will be documented using a Global Positioning System. The transect samples will be analyzed for presence and approximate abundance of Eurasian water milfoil.
- C. Each transect will be sampled with a rake in three twelve-foot diameter sections. Each section will be sampled in quarters. The first quarter will be sampled at a depth of 0-0.5 meters below the surface, the second 0.5-1.5 meters below the surface, the third 1.5 – 3.0 meters below the surface and the fourth beyond 3.0 meters below the surface. Typically all of the samples occur in water less than 3 meters.

II. Frequency of Survey

- A. Starting the first year after plan approval, a survey will be conducted every third year in July, August, or September.

III. Documentation of Existing Colonies

- A. The results of the survey at each transect will be displayed in table form indicating relative abundance (none, low, medium, and high) of Eurasian water milfoil in the aquatic macrophyte samples taken. The completed documentation will be provided to the MDNR and USFWS no later than October 31st every year in which the monitoring was completed.

IV. Control of Existing Colonies

- A. A natural eradication process will be used if Eurasian water milfoil becomes established. Studies have shown that a native weevil (*Euhrychiopsis lecontei*) can control the population of Eurasian water milfoil by feeding on it. This weevil is native to the area so it does not need to be introduced. This weevil is most commonly found in waterbodies that sustain a population of native Northern milfoil and contains leaf litter on the shoreline. If the monitoring reports support the need to further control this species, then UPPCO will cooperate with the MDNR in developing site-specific measures.

V. Public Awareness

- A. Public Awareness about Eurasian water milfoil will be increased by displaying fact sheets supplied by the MDNR at all UPPCO owned public access areas in the project boundary.

VI. Documentation of Submittal

- A. Documentation of submittal of monitoring reports to the MDNR, USFWS, and other members of the implementation team will be provided to FERC by December 31st for the first two monitoring periods. The filing each year will include any agency comments.

Exotic Species Monitoring Plan for Cisco Lake

Objective: To continue the high standard of invasive species monitoring and control at the Cisco Chain of Lakes that is currently being conducted.

I. Methods

- A. Exotic species populations on the Cisco Chain of Lakes are currently being monitored by the Cisco Chain Riparian Owners Association (CCROA). The CCROA will continue to begin their process by educating its members on how to identify invasive plants. The CCROA has concentrated on Eurasian water milfoil in the past, but will also include purple loosestrife in the future. Once trained on identification, the CCROA will monitor for these species all summer while its members recreate on the flowage. If an exotic species is identified, then the location is passed to the lake leader, and the U.S. Forest Service and the state Department of Natural Resources is consulted with. The invasive species is then controlled before it becomes a serious problem. The CCROA has a fund set aside each year for invasive species control. This fund may be used for purchasing chemical controls or for hiring environmental consultants to help with identification or to help develop

control measures. The CCROA also educates members of the general public by posting informational signs regarding exotic species at the public boat landings on the Cisco Chain of Lakes.

- B. Colonies of Eurasian water milfoil have been found on the Cisco chain of lakes in the past and the CCROA has had success with eliminating these colonies.
- C. Since the CCROA is currently performing a thorough and competent job of monitoring and controlling exotic species on Cisco, UPPCO proposes to have the CCROA continue their exotic species monitoring efforts. UPPCO will monitor their actions to ensure compliance with the FERC license. If the time comes when the CCROA no longer agrees to monitor exotic species, UPPCO will resume the responsibility and will conduct surveys according to the outlined protocols for the Victoria, Bond Falls, and Bergland developments.
- D. UPPCO is evaluating the sale of the Cisco Dam and Development. In the event that the Cisco development is removed from Hydroelectric Project No. 1864, UPPCO will be relieved of the requirements related to the Cisco development.

II. Frequency of Survey

- A. After the members of the CCROA are educated on how to identify Eurasian water milfoil and purple loosestrife, they will conduct surveys all summer while they are recreating on the flowage.

III. Documentation of Existing Colonies

- A. UPPCO will work with CCROA to generate a summary of their exotic species monitoring and control by September 30th of each year. Purple loosestrife colonies will be mapped showing relative abundance as follows: small colonies of 1-5 plants, medium Colonies of 6-50 plants, and dense colonies of >50 plants.
- B. Eurasian water milfoil colonies will also be mapped. Colonies that were chemically treated will be designated differently than colonies that were not treated. UPPCO will in turn submit the results of the Cisco efforts, with the results of Bond Falls, Bergland, and Victoria efforts to the MDNR, WDNR, USFWS, and the rest of the Implementation team by October 31st of each year.

IV. Control of Existing Colonies

- A. A fund is set-aside in the CCROA budget for control measures. The CCROA has a history of controlling Eurasian water milfoil with the herbicide 2,4D when it is identified within the flowage. The CCROA has not had any colonies reoccur after treatment. The CCROA will continue to control Eurasian water milfoil by using an appropriate aquatic herbicide when they deem necessary. Small colonies of purple loosestrife will be cut by hand and the remaining stems will be hand pulled or sprayed by an appropriate aquatic herbicide. UPPCO will consult with members of the implementation team if they deem that more control measures are required.

V. Public Awareness

- A. UPPCO will see that the CCROA continues to post information on invasive species at the public boat landings.

VI. Documentation of Submittal

- A. Documentation of submittal of monitoring reports to the MDNR, USFWS, and other members of the implementation team will be provided to FERC by December 31st after the first two monitoring seasons. The filing each year will include any agency comments.

**Comments Received from the Keweenaw Bay Indian
Community**

KEWEENAW BAY INDIAN COMMUNITY

2003 TRIBAL COUNCIL

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MICHAEL F. LAFERNIER, SR., Vice-President
SUSAN J. LAFERNIER, Secretary
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Keweenaw Bay Tribal Center
107 Beartown Road
Baraga, Michigan 49908
Phone (906) 353-6623
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13 January 2004

DOREEN G. BLAKER
LARRY J. DENOMIE III
GARY F. LOONSFOT, SR.
BEVERLY A. LUSSIER
ANN MISEGAN
JENNIFER MISEGAN
WARREN C. SWARTZ, JR.

Mr Rick Moser
Upper Peninsula Power Company
P.O. Box 19001
Green Bay, WI 54307 9001

Subject: Bond Falls Hydroelectric Project (FERC No. 1864)
Comments on the Article 411 Nuisance Plant Control Plan

Dear Mr. Moser:

The Keweenaw Bay Indian Community (KBIC) is in receipt of Upper Peninsula Power Company's (UPPCO) draft copy of the Article 411 Nuisance Plant Control Plan Article dated December 19, 2003. After reviewing the draft plan, we have the following comments:

Purple Loosestrife Monitoring Plan

- IA. Annual surveys of all impoundment shorelines should include all project waters and wetlands.
- IIIA. The results of the survey should be displayed on a map using GPS coordinates and provided to the Bond Falls Implementation Team (BFIT) and pertinent lake associations. The map should also clearly identify new colonies and previously documented colonies.

Instead of listing agencies that will receive survey results, it would be better to just state that survey results will be provided to the Bond Falls Implementation Team (BFIT). For Bergland (Lake Gogebic), results should also be provided to the two lake associations that are currently in existence there (Lake Gogebic Improvement Association, and North Shore Association).

- IVA-B. For other than small colonies of plants that are most efficiently treated upon discovery, we believe it would be more appropriate for the BFIT to determine whether control measures are needed, and what type of measures should be implemented, rather than UPPCO making that determination. Suggested rewording for this section is as follows (combine A and B into one section):

"Any new colonies of loosestrife plants that are discovered during the survey shall be cut, dug, pulled by hand or treated with an appropriate aquatic herbicide. Cutting or pulling shall be timed to occur prior to seed set, or flower spikes will be bagged/cut into a bag prior to plants being dislodged, to prevent seed dispersal.

If it is determined that the colony cannot be treated when discovered due to size or any other reason, or for older colonies that persist despite past treatment efforts, information as to extent, density and other relevant information about the colony shall be gathered and that information provided to BFIT as soon as possible upon completion of the survey. BFIT will review the information and make a determination as to the most appropriate control measures to implement, if warranted".

- V. Fact sheets about loosestrife to display at access areas may be provided by other agencies as well (USFS has similar fact sheets).
- VI. As with IIIA above, documentation should be made that reports were provided to the full BFIT (no need to list individual agencies).

Also, instead of monitoring results being provided to BFIT for the first two years, we would like to see those results provided to BFIT in every year in which monitoring is conducted. The determination of the number of surveys conducted during the license should be decided in concert with the BFIT. The documentation should also include a report on any control measures implemented that year, and/or planned for the following year, including whether the control was successful or not, and any follow-up monitoring or treatment that may be needed.

Eurasian Water Milfoil Monitoring Plan

- IA. The number of transects suggested is not adequate for the water bodies; with 2-5 transects per lake, it is highly likely that any small, initial infestations of EWM would be missed. It is imperative to find the infestations when they are small and can be easily treated, rather than waiting until a large portion of the lake is infested. Transects should target all the likely infestation areas; that is, shallow, quieter water such as shorelines, small bays, near islands, etc. Boating around the entire shoreline with the rake sampling conducted whenever aquatic macrophyte populations are seen, followed by additional sampling in other shallow areas, is recommended. Also, the shore at all boat landings should be checked for EWM fragments that may have washed up.
- IB. Target areas for transects should also consider likely infestation entry points, such as boat launches and high use motorboat areas.
- IIA. We believe that surveying every three years is not frequent enough, considering the rate at which this invasive plant can spread and the potential for serious and perhaps irreversible damage if infestations are not caught early. The National Invasive Species Council calls for early detection and rapid response to infestations (see *Meeting the Invasive Species Challenge*, National Invasive Species Council, 2001). We recommend that surveys for this species be done every year.

Any infestations of EWM should be mapped to show their extent. If a rating system is used to indicate relative abundance (low, medium, high), information

needs to be provided to better define what these terms mean (i.e., what density of EWM represents a low infestation, a medium infestation, etc.).

III.A. The table should also identify new colonies and previously documented colonies.

Survey results should be provided to the full BFIT (no need to list individual agencies). Reports for Bergland (Lake Gogebic) should also be provided to the two lake associations that are currently in existence there (Lake Gogebic Improvement Association and North Shore Association).

IV.A. We believe that this section needs to be rewritten. We think it is more appropriate for the full BFIT to evaluate the survey information on existing EWM colonies, and determine what control measures are warranted, if any. Therefore, we recommend the following wording for this section:

“All EWM colonies detected through annual surveys will be evaluated by BFIT to determine the most appropriate course of action”.

Relying on possible natural occurrences of the milfoil weevil (*Euhrychiopsis lecontei*) for control is unlikely to be effective. While the weevil is native to the area that does not mean that it occurs naturally in every water body, or in sufficient abundance to provide control of EWM. Some control can be achieved from weevils, under certain conditions, but various factors including fish populations in the lake, the amount of milfoil, etc. can affect this. The impoundments under this license are in frequent use by trailered motorboats and the potential for spread of any EWM to other lakes is high. Eradication rather than suppression should be the goal for most infestations, using a variety of tools (manual pulling for small infestations, aquatic herbicides, weevil release, etc.) depending on the infestation's characteristics. If BFIT determines that weevil milfoil control is to be attempted, surveys for the weevil would first have to be done to determine its presence/abundance, fish populations (e.g., bluegills) would have to be assessed to determine predation pressure on weevils, and other factors would need to be considered to determine whether use of weevils or some other method would be most appropriate.

V. Fact sheets to be placed at boat landings, etc., may be provided by USFS or other agencies (in addition to MDNR). UPPCO has cooperated with USFS in placing a sign at Prickett Reservoir regarding the EWM infestation and how it is spread. We would suggest that, should EWM be discovered in reservoirs within the Bond Falls project, a similar sign should be placed at access points for the infested reservoirs.

VI. Documentation of submittal should be made to the full BFIT (no need to list individual agencies).

Also, instead of monitoring results being provided to BFIT for the first two years, we would like to see those results provided to BFIT in every year in which monitoring is conducted. The documentation should also include a report on any

control measures implemented that year, and/or planned for the following year, including whether the control was successful or not, and any follow-up monitoring or treatment that may be needed.

Exotic Species Monitoring Plan for Cisco Lake

- IA-C.** While we agree that it makes sense to have the CCROA continue their monitoring of the Cisco Chain of lakes for invasive plants, some additional language or clarification is needed here to clearly describe the oversight role that UPPCO will assume for this monitoring. Such oversight responsibilities would include:
- any training needed for CCROA members in plant identification, survey procedures, etc (possibly the BFIT members are aware of possible trainers or training sessions).
 - development or approval of a protocol for conducting nuisance plant surveys, and insuring it is followed.
 - development or approval of a reporting format for the surveys, and insuring it is followed.
- ID.** Please make the following change: "In the event that the Cisco development is removed from Hydroelectric Project No.1864, UPPCO will be relieved of the requirements to the Cisco development *and the responsibilities will be inherited by the new owner.*"
- IIIA.** It should be stated that surveys shall be conducted annually. Colonies should be mapped using GPS coordinates and provided to BFIT. The map should clearly identify new colonies and previously documented colonies. Also, as stated above, a set protocol should be followed when conducting the survey (not just informally while recreating).
- IIIB.** Survey results should be submitted to the full BFIT (no need to list individual agencies).
- IIIC.** As with the Loosestrife and EWM Plans discussed above, we believe that the BFIT (in consultation with the CCROA) is the most appropriate group to determine what control measures are warranted for nuisance plant infestations (other than small colonies of loosestrife, which can be removed using the procedure described under the loosestrife section above). Thus, the sections should be written to indicate that BFIT (and CCROA) will jointly determine what control measures are needed for infestations that are discovered.
- IV.** Control of any new populations should also be discussed. Note previous comment about timing of purple loosestrife control.
- V.** Substitute the words "be responsible for insuring" for the word "see" in the first sentence.
- VI.** Survey results should be submitted to the full BFIT (no need to list individual agencies).

Also, documentation of submittal of monitoring reports to the BFIT should be done at the end of each year, rather than after the first two monitoring seasons.

General Comments

Other than Cisco Chain of Lakes, it is unclear who will conduct surveys such as UPPCO staff or paid consultants. Since the Mitigation Enhancement Fund pays for nuisance plant survey work, approval plant surveying crew and cost projections for all surveys should be provided to the BFIT prior to implementation.

Provision should be made for monitoring and control for Curly pondweed (*Potamogeton crispus*) and other new invasive aquatic species that may become concerns during the life of the license.

Thank you for the opportunity to comment on this document. If you have any questions, please contact me at 906-524-5757 ext 13 or mdonofri@up.net

Sincerely,

A handwritten signature in black ink, appearing to read "m Donofrio".

Michael Donofrio
Natural Resources Director

C: Bond Falls Implementation Team

**Response to Comments Received From the Keweenaw Bay Indian Tribe dated
January 13, 2004**

Purple Loosestrife Monitoring Plan for Bond Falls, Victoria, and Bergland

IA Comment

Annual surveys of all impoundment shorelines should include all project waters and wetlands.

IA Response

The plan has been modified to include all wetlands that adjoin project waters, but will not include isolated wetlands; because it is unlikely that purple loosestrife would be transferred from an isolated wetland to the reservoir.

IIIA Comments

Comment 1: The results of the survey should be displayed on a map using GPS coordinates and provided to the Bond Falls Implementation Team (BFIT) and pertinent lake associations.

Comment 2: The map should also clearly identify new colonies and previously documented colonies.

Comment 3: Instead of listing agencies that will receive survey results, it would be better to just state that survey results will be provided to the Bond Falls Implementation Team (BFIT).

Comment 4: For Bergland (Lake Gogebic), results should also be provided to the two lake associations that are currently in existence there (Lake Gogebic Improvement Association, and North Shore Association).

IIIA Responses

Response 1: The BFIT will receive a map, but the precision of GPS is not required to represent the results of the survey in a clear and accurate manner. GPS has not been required at other hydroelectric projects such as FERC Project Nos. 2525, 2595, 2522, 2546, 2560, and 2581.

Response 2: UPPCO will not distinguish between new colonies and previously documented colonies because these surveys are meant to give a relative abundance, not a detailed summary.

Response 3: The plan has been modified accordingly.

Response 4: UPPCO will not send a copy of the purple loosestrife information to the pertinent lake associations because they are not members of the BFIT, nor are they listed specifically in article 411. UPPCO will follow the reporting protocols outlined in Article 411.

IVA-B Comment

For other than small colonies of plants that are most efficiently treated upon discovery, we believe it would be more appropriate for the BFIT to determine whether control measures are needed, and what type of measures should be implemented, rather than

UPPCO making that determination. Suggested rewording for this section is as follows (combine A and B into one section):

"Any new colonies of loosestrife plants that are discovered during the survey shall be cut, dug, pulled by hand or treated with an appropriate aquatic herbicide. Cutting or pulling shall be timed to occur prior to seed set, or flower spikes will be bagged/cut into a bag prior to plants being dislodged, to prevent seed dispersal. If it is determined that the colony cannot be treated when discovered due to size or any other reason, or for older colonies that persist despite past treatment efforts, information as to extent, density and other relevant information about the colony shall be gathered and that information provided to BFIT as soon as possible upon completion of the survey. BFIT will review the information and make a determination as to the most appropriate control measures to implement, if warranted".

IVA-B Responses

Response 1: UPPCO has amended the plan to state "cutting or pulling shall be timed to occur prior to seed set, or flower spikes will be bagged and disposed of properly".

UPPCO has had success controlling purple loosestrife populations by following these measures at other hydroelectric projects such as FERC Project Nos. 10856 and 2506.

UPPCO has also amended the phrase, "consult with the MDNR", to include the entire BFIT.

Response 2: UPPCO feels it would be inappropriate to have the BFIT determine whether control measures are needed. UPPCO is ultimately responsible for the implementation of the FERC license, and will consult with the BFIT. For this reason, the suggested language has not been adopted.

V Comment

Comment 1: *Fact sheets about loosestrife to display at access areas may be provided by other agencies as well (USFS has similar fact sheets).*

V Response

Response 1: Comment noted.

VI Comments

Comment 1: *As with IIIA above, documentation should be made that reports were provided to the full BFIT (no need to list individual agencies).*

Comment 2: *Also, instead of monitoring results being provided to BFIT for the first two years, we would like to see those results provided to BFIT in every year in which monitoring is conducted.*

Comment 3: *The determination of the number of surveys conducted during the license should be decided in concert with the BFIT.*

Comment 4: *The documentation should also include a report on any control measures implemented that year, and/or planned for the following year, including whether the control was successful or not, and any follow-up monitoring or treatment that may be needed.*

VI Responses

Response 1: The plan has been modified accordingly.

Response 2: The purple loosestrife plan was misread. It states that the members of the BFIT will receive results every year. The documentation of this agency submittal to FERC is being proposed only for the first two surveys. This allows FERC to ensure that the agency submittal procedure meets license requirements and allows FERC to review any comments the agencies may have in the beginning of the process. This method has been acceptable in the past for other FERC projects such as FERC Project No. 2433.

Response 3: UPPCO proposes one purple loosestrife survey per year. As the FERC process mandates, any change to this will be completed through consultation with the BFIT, with eventual FERC approval.

Response 4: UPPCO accepts the recommendation to include results of control methods, if applicable. The plan has been modified accordingly.

Eurasian Water Milfoil Monitoring Plan for Bond Falls, Victoria, and Bergland

IA Comments

Comment 1: *The number of transects suggested is not adequate for the water bodies; with 2-5 transects per lake, it is highly likely that any small, initial infestations of EWM would be missed. It is imperative to find the infestations when they are small and can be easily treated, rather than waiting until a large portion of the lake is infested.*

Comment 2: *Transects should target all the likely infestation areas; that is, shallow, quieter water such as shorelines, small bays, near islands, etc. Boating around the entire shoreline with the rake sampling conducted whenever aquatic macrophyte populations are seen, followed by additional sampling in other shallow areas, is recommended.*

Comment 3: *Also, the shore at all boat landings should be checked for EWM fragments that may have washed up.*

IA Responses

Response 1: UPPCO disagrees that more transects are needed. Even though Lake Gogebic is 13,380 acres in size, a vast majority of this area has conditions unlikely to produce Eurasian water milfoil. Samples need to be concentrated only in areas of likely infestation. In other FERC projects owned by WPS Resources (the parent company of UPPCO), even fewer samples per acre area have been accepted. FERC Project No. 1984 has 40,000 acres of surface water and there is a total of 5 sample points for the entire project. Like Lake Gogebic, a vast majority of the surface water of Petenwell and Castle Rock lakes does not exhibit characteristics of likely infestation.

Response 2: The Eurasian water milfoil plan states that "transects will be selected based upon location of macrophyte colonies and areas of likely infestation". UPPCO feels this statement articulates the same point as Comment 2 of the IA Comments. No change is proposed.

Response3: UPPCO accepts this recommendation and the plan has been modified accordingly.

IB Comment

Target areas for transects should also consider likely infestation entry points, such as boat launches and high use motorboat areas.

IB Response

UPPCO agrees with this statement and considers this when selecting transect locations. Additional annual surveys of the area surrounding boat landings have been added to the plan.

IIA Comments

Comment 1: We believe that surveying every three years is not frequent enough, considering the rate at which this invasive plant can spread and the potential for serious and perhaps irreversible damage if infestations are not caught early. The National Invasive Species Council calls for early detection and rapid response to infestations (see Meeting the Invasive Species Challenge, National Invasive Species Council, 2001). We recommend that surveys for this species be done every year.

Comment 2: Any infestations of EWM should be mapped to show their extent. If a rating system is used to indicate relative abundance (low, medium, high), information needs to be provided to better define what these terms mean (i.e., what density of EWM represents a low infestation, a medium infestation, etc.).

IIA Responses

Response 1: The “Early Detection and Rapid Response” section of the Meeting the Invasive Species Challenge, National Invasive Species Council, 2001, does not define early detection, nor does it state that identification within three years can’t be considered early detection. The parent company of UPPCO, WPS Resources, currently has 16 FERC hydroelectric projects in Michigan and Wisconsin that require Eurasian water milfoil surveys. All of these 16 flowages are surveyed once every three years. To this date, none of the 16 flowages has developed a widespread Eurasian water milfoil problem. For these reasons, UPPCO does not accept the recommendation.

Response 2: UPPCO accepts this recommendation. A map showing the location of each transect will be included with the results and the relative abundance scale has been defined in the plan.

IIIA Comments

Comment 1: The table should also identify new colonies and previously documented colonies.

Comment 2: Survey results should be provided to the full BFIT (no need to list individual agencies).

Comment 3: Reports for Bergland (Lake Gogebic) should also be provided to the two lake associations that are currently in existence there (Lake Gogebic Improvement Association and North Shore Association).

IIIA Responses

Response 1: UPPCO accepts this recommendation. The plan has been modified accordingly.

Response 2: The plan has been modified accordingly.

Response 3: UPPCO will not send a copy of the purple loosestrife information to the pertinent lake associations because they are not members of the BFIT, nor are they listed

specifically in the article. UPPCO will follow the reporting protocols outlined in Article 411.

IVA Comment

We believe that this section needs to be rewritten. We think it is more appropriate for the full BFIT to evaluate the survey information on existing EWM colonies, and determine what control measures are warranted, if any. Therefore, we recommend the following wording for this section:

"All EWM colonies detected through annual surveys will be evaluated by BFIT to determine the most appropriate course of action".

*Relying on possible natural occurrences of the milfoil weevil (*Euhriopsis lecontei*) for control is unlikely to be effective. While the weevil is native to the area that does not mean that it occurs naturally in every water body, or in sufficient abundance to provide control of EWM. Some control can be achieved from weevils, under certain conditions, but various factors including fish populations in the lake, the amount of milfoil, etc. can affect this. The impoundments under this license are in frequent use by trailered motorboats and the potential for spread of any EWM to other lakes is high. Eradication rather than suppression should be the goal for most infestations, using a variety of tools (manual pulling for small infestations, aquatic herbicides, weevil release, etc.) depending on the infestation's characteristics. If BFIT determines that weevil milfoil control is to be attempted, surveys for the weevil would first have to be done to determine its presence/abundance, fish populations (e.g., bluegills) would have to be assessed to determine predation pressure on weevils, and other factors would need to be considered to determine whether use of weevils or some other method would be most appropriate.*

IVA Response

UPPCO disagrees with the proposed role of the BFIT. As licensee, UPPCO has the responsibility of implementation of the license. It is the responsibility of FERC to review the licensee's conclusions regarding the surveys and determine what control measures are warranted. This means of control has been accepted on other FERC projects such as FERC Project Nos. 10854, 10856, 2506, 2402, 2433, 2525, 2595, 2522, 2546, and 2581. For these reasons, UPPCO notes the objection to this control measure, but does not accept the recommendation.

V Comment

Fact sheets to be placed at boat landings, etc., may be provided by USFS or other agencies (in addition to MDNR). UPPCO has cooperated with USFS in placing a sign at Prickett Reservoir regarding the EWM infestation and how it is spread.

We would suggest that should EWM be discovered in reservoirs within the Bond Falls project, a similar sign should be placed at access points for the infested reservoirs.

V Response

Comment noted.

VI Comments

Comment 1: *Documentation of submittal should be made to the full BFIT (no need to list individual agencies).*

Comment 2: *Also, instead of monitoring results being provided to BFIT for the first two years, we would like to see those results provided to BFIT in every year in which monitoring is conducted.*

Comment 3: *The documentation should also include a report on any control measures implemented that year, and/or planned for the following year, including whether the control was successful or not and any follow-up monitoring or treatment that may be needed.*

Response 1: The plan has been modified accordingly.

Response 2: The Eurasian water milfoil plan was misread. It states that the members of the BFIT will receive results every year a survey is conducted. The documentation of this agency submittal to FERC is being proposed only for the first two surveys. This allows FERC to ensure that the agency submittal procedure meets license requirements and allows FERC to review any comments the agencies may have in the beginning of the process. This method has been acceptable in the past for other FERC projects such as FERC Project No. 2433.

Response 3: UPPCO accepts the recommendation to include results of control methods, if applicable. The plan has been amended.

Exotic Species Monitoring Plan for Cisco Chain of Lakes

IA-C Comments

Comment 1: *While we agree that it makes sense to have the CCROA continue their monitoring of the Cisco Chain of lakes for invasive plants, some additional language or clarification is needed here to clearly describe the oversight role that UPPCO will assume for this monitoring. Such oversight responsibilities would include: - any training needed for CCROA members in plant identification, survey procedures, etc (possibly the BFIT members are aware of possible trainers or training sessions).*

Comment 2: *development or approval of a protocol for conducting nuisance plant surveys, and insuring it is followed.*

Comment 3: *development or approval of a reporting format for the surveys, and insuring it is followed.*

IA-C Responses

Response 1: The plan has been modified accordingly.

Response 2: The plan has been modified accordingly.

Response 3: The plan has been modified accordingly.

ID Comment

Please make the following change: "In the event that the Cisco development is removed from Hydroelectric Project No. 1864, UPPCO will be relieved of the requirements to the Cisco development and the responsibilities will be inherited by the new owner."

ID Response

The plan has been modified accordingly.

IIIA Comments

Comment 1: *It should be stated that surveys shall be conducted annually.*

Comment 2: *Colonies should be mapped using GPS coordinates and provided to BFIT. The map should clearly identify new colonies and previously documented colonies.*

Comment 3: *Also, as stated above, a set protocol should be followed when conducting the survey (not just informally while recreating).*

IIIA Responses

Response 1: Suggestion is accepted and the plan has been modified accordingly.

Response 2: UPPCO does not accept the suggestion. GPS is not required to represent the results of the survey in a clear and accurate manner.

Response3: The plan has been modified accordingly.

IIIB Comment

Survey results should be submitted to the full BFIT (no need to list individual agencies).

IIIB Response

The plan has been modified accordingly.

IIIC Comment

As with the Loosestrife and EWM Plans discussed above, we believe that the BFIT (in consultation with the CCROA) is the most appropriate group to determine what control measures are warranted for nuisance plant infestations (other than small colonies of loosestrife, which can be removed using the procedure described under the loosestrife section above). Thus, the sections should be written to indicate that BFIT (and CCROA) will jointly determine what control measures are needed for infestations that are discovered.

IIIC Response

UPPCO disagrees with the proposed role of the BFIT. As the licensee, UPPCO has the ultimate responsibility to implement the license requirements. If at a later date, a change is required, UPPCO will consult with the BFIT prior to implementation.

IV Comments

Comment 1: *Control of any new populations should also be discussed.*

Comment 2. *Note previous comment about timing of purple loosestrife control.*

IV Responses

Response 1: The title of Section IV has been changed to say "Control of Existing and New Colonies".

Response 2: The proper language regarding control timelines and procedures has been inserted.

V Comment

Substitute the words "be responsible for insuring" for the word "see" in the first sentence.

V Response

The plan has been modified accordingly.

VI Comments

Comment 1: *Survey results should be submitted to the full BFIT (no need to list individual agencies).*

Comment 2: *Also, documentation of submittal of monitoring reports to the BFIT should be done at the end of each year, rather than after the first two monitoring seasons.*

VI Responses

Response 1: The plan has been modified accordingly.

Response 2: The Cisco exotic species monitoring plan was misread. It states that the members of the BFIT will receive results every year a survey is conducted. The documentation of this agency submittal to FERC is being proposed only for the first two surveys. This allows FERC to ensure that the agency submittal procedure meets license requirements and allows FERC to review any comments the agencies may have in the beginning of the process. This method has been acceptable in the past for other FERC projects such as FERC Project No. 2433.

General Comments

Comment 1

Other than Cisco Chain of Lakes, it is unclear who will conduct surveys such as UPPCO staff or paid consultants. Since the Mitigation Enhancement Fund pays for nuisance plant survey work, approval plant surveying crew and cost projections for all surveys should be provided to the BFIT prior to implementation.

Comment 2

*Provision should be made for monitoring and control for Curly pondweed (*Potamogeton crispus*) and other new invasive aquatic species that may become concerns during the life of the license.*

Response 1

Since UPPCO is ultimately responsible for the implementation of this license, UPPCO does not accept the recommendation to have the plant surveying crews approved by the BFIT. UPPCO will determine whether trained staff or paid consultants will conduct the surveys. UPPCO does accept the request to provide cost projections, and the plan has been modified accordingly.

Response 2

Additions may be proposed at a later date after discussions with the BFIT. As the licensee, UPPCO will request any necessary amendments to the approved plan.

**Comments received from the Michigan Department of Natural
Resources**



STATE OF MICHIGAN

DEPARTMENT OF NATURAL RESOURCES
LANSING

JENNIFER M. GRANHOLM
GOVERNOR

K. L. COOL
DIRECTOR

Refer to: 4202.2.36

January 9, 2004

Mr. Rick Moser
Upper Peninsula Power Company
P.O. Box 19001
Green Bay, WI 54307-9001

Subject: Bond Falls Hydroelectric Project (FERC No. 1864)
Comments on Article 411 Nuisance Plant Control Plan

Dear Mr. Moser:

The Michigan Department of Natural Resources (MDNR) is in receipt of Upper Peninsula Power Company's (UPPCO) Bond Falls Article 411 Nuisance Plant Control Plan dated December 19, 2003. After reviewing the draft plan, we have the following comments:

Purple Loosestrife Monitoring Plan

- IA. Annual surveys of all impoundment shorelines should include all project waters and wetlands.
- IIIA. The results of the survey should be displayed on a map using GPS coordinates. The map should also clearly identify new colonies and previously documented colonies.

Instead of listing agencies that will receive survey results, it would be better to just state that survey results will be provided to the Bond Falls Implementation Team (BFIT). For Bergland (Lake Gogebic), results should also be provided to the two lake associations that are currently in existence there (Lake Gogebic Improvement Association, and North Shore Association).

- IVA-B. For other than small colonies of plants that are most efficiently treated upon discovery, we believe it would be more appropriate for the BFIT to determine whether control measures are needed, and what type of measures should be implemented, rather than UPPCO making that determination. Suggested rewording for this section is as follows (combine A and B into one section):

"Any new colonies of loosestrife plants that are discovered during the survey shall be cut, dug, pulled by hand or treated with an appropriate aquatic herbicide. Cutting or pulling shall be timed to occur prior to seed set, or flower spikes will be bagged/cut into a bag prior to plants being dislodged, to prevent seed dispersal. If it is determined that the

colony cannot be treated when discovered due to size or any other reason, or for older colonies that persist despite past treatment efforts, information as to extent, density and other relevant information about the colony shall be gathered and that information provided to BFIT as soon as possible upon completion of the survey. BFIT will review the information and make a determination as to the most appropriate control measures to implement, if warranted".

- V. Fact sheets about loosestrife to display at access areas may be provided by other agencies as well (USFS has similar fact sheets).
- VI. As with IIIA above, documentation should be made that reports were provided to the full BFIT (no need to list individual agencies).

Also, instead of monitoring results being provided to BFIT for the first two years, we would like to see those results provided to BFIT in every year in which monitoring is conducted. The documentation should also include a report on any control measures implemented that year, and/or planned for the following year, including whether the control was successful or not, and any follow-up monitoring or treatment that may be needed.

Eurasian Water Milfoil Monitoring Plan

- IA. The number of transects suggested is not adequate for the water bodies; with 2-5 transects per lake, it is highly likely that any small, initial infestations of EWM would be missed. It is imperative to find the infestations when they are small and can be easily treated, rather than waiting until a large portion of the lake is infested. Transects should target all the likely infestation areas; that is, shallow, quieter water such as shorelines, small bays, near islands, etc. Boating around the entire shoreline with the rake sampling conducted whenever aquatic macrophyte populations are seen, followed by additional sampling in other shallow areas, is recommended. Also, the shore at all boat landings should be checked for EWM fragments that may have washed up.
- IB. Target areas for transects should also consider likely infestation entry points, such as boat launches and high use motorboat areas.
- IIA. We believe that surveying every three years is not frequent enough, considering the rate at which this invasive plant can spread and the potential for serious and perhaps irreversible damage if infestations are not caught early. The National Invasive Species Council calls for early detection and rapid response to infestations (see *Meeting the Invasive Species Challenge*, National Invasive Species Council, 2001). We recommend that surveys for this species be done every year.

Any infestations of EWM should be mapped to show their extent. If a rating system is used to indicate relative abundance (low, medium, high), information needs to be provided to better define what these terms mean (i.e., what density of EWM represents a low infestation, a medium infestation, etc.).

- IIIA. The table should also identify new colonies and previously documented colonies.

Survey results should be provided to the full BFIT (no need to list individual agencies). Reports for Bergland (Lake Gogebic) should also be provided to the two lake associations that are currently in existence there (Lake Gogebic Improvement Association and North Shore Association).

- IVA. We believe that this section needs to be rewritten. We think it is more appropriate for the full BFIT to evaluate the survey information on existing EWM colonies, and determine what control measures are warranted, if any. Therefore, we recommend the following wording for this section:

"All EWM colonies detected through annual surveys will be evaluated by BFIT to determine the most appropriate course of action".

Relying on possible natural occurrences of the milfoil weevil (*Euhrychiopsis lecontei*) for control is unlikely to be effective. While the weevil is native to the area that does not mean that it occurs naturally in every water body, or in sufficient abundance to provide control of EWM. Some control can be achieved from weevils, under certain conditions, but various factors including fish populations in the lake, the amount of milfoil, etc. can affect this. The impoundments under this license are in frequent use by trailered motorboats and the potential for spread of any EWM to other lakes is high. Eradication rather than suppression should be the goal for most infestations, using a variety of tools (manual pulling for small infestations, aquatic herbicides, weevil release, etc.) depending on the infestation's characteristics. If BFIT determines that weevil milfoil control is to be attempted, surveys for the weevil would first have to be done to determine its presence/abundance, fish populations (e.g., bluegills) would have to be assessed to determine predation pressure on weevils, and other factors would need to be considered to determine whether use of weevils or some other method would be most appropriate.

- V. Fact sheets to be placed at boat landings, etc., may be provided by USFS or other agencies (in addition to MDNR). UPPCO has cooperated with USFS in placing a sign at Prickett Reservoir regarding the EWM infestation and how it is spread. We would suggest that, should EWM be discovered in reservoirs within the Bond Falls project, a similar sign should be placed at access points for the infested reservoirs.
- VI. Documentation of submittal should be made to the full BFIT (no need to list individual agencies).

Also, instead of monitoring results being provided to BFIT for the first two years, we would like to see those results provided to BFIT in every year in which monitoring is conducted. The documentation should also include a report on any control measures implemented that year, and/or planned for the following year, including whether the control was successful or not, and any follow-up monitoring or treatment that may be needed.

Exotic Species Monitoring Plan for Cisco Lake

- IA-C. While we agree that it makes sense to have the CCROA continue their monitoring of the Cisco Chain of lakes for invasive plants, some additional language or clarification is

needed here to clearly describe the oversight role that UPPCO will assume for this monitoring. Such oversight responsibilities would include:

- any training needed for CCROA members in plant identification, survey procedures, etc.
- development or approval of a protocol for conducting nuisance plant surveys, and insuring it is followed.
- development or approval of a reporting format for the surveys, and insuring it is followed.

- ID.** Please make the following change: "In the event that the Cisco development is removed from Hydroelectric Project No.1864, UPPCO will be relieved of the requirements to the Cisco development *and the responsibilities will be inherited by the new owner.*"
- IIIA.** It should be stated that surveys shall be conducted annually. Colonies should be mapped using GPS coordinates. The map should clearly identify new colonies and previously documented colonies. Also, as stated above, a set protocol should be followed when conducting the survey (not just informally while recreating).
- IIIB.** Survey results should be submitted to the full BFIT (no need to list individual agencies).
- IIIC.** As with the Loosestrife and EWM Plans discussed above, we believe that the BFIT (in consultation with the CCROA) is the most appropriate group to determine what control measures are warranted for nuisance plant infestations (other than small colonies of loosestrife, which can be removed using the procedure described under the loosestrife section above). Thus, the sections should be written to indicate that BFIT (and CCROA) will jointly determine what control measures are needed for infestations that are discovered.
- IV.** Control of any new populations should also be discussed. Note previous comment about timing of purple loosestrife control.
- V.** Substitute the words "be responsible for insuring" for the word "see" in the first sentence.
- VI.** Survey results should be submitted to the full BFIT (no need to list individual agencies).

Also, documentation of submittal of monitoring reports to the BFIT should be done at the end of each year, rather than after the first two monitoring seasons.

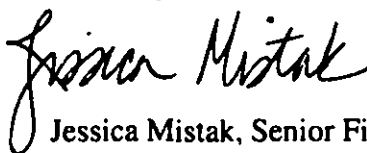
General Comments

Since the Mitigation Enhancement Fund pays for nuisance plant survey work, cost projections for all surveys should be provided to the BFIT prior to implementation.

Curly pondweed (*Potamogeton crispus*) is another invasive aquatic plant that may move into the area (it is known in Wisconsin but not yet in the western Upper Peninsula). Provision should be made for monitoring and control for this and other new invasive aquatic species that may become concerns during the life of the license.

Thank you for the opportunity to comment. If you have any questions, please contact me.

Sincerely,

A handwritten signature in black ink that reads "Jessica Mistak". The signature is fluid and cursive, with the first name "Jessica" written in a larger, more prominent script than the last name "Mistak".

Jessica Mistak, Senior Fisheries Biologist
Marquette Fisheries Station
484 Cherry Creek Rd
Marquette, MI 49855
906-249-1611 ext 308
mistakjl@michigan.gov

cc: Mr. Chris Freiburger, MDNR
Mr. Bill Deephouse, MHRC
Mr. Robert Evans, USFS
Mr. Mark Fedora, USFS
Mr. Burr Fisher, USFWS
Mr. John Suppnick, MDEQ
Mr. Mike Donofrio, KBIC
Mr. Bob Martini, WDNR

Response to Comments Received From the Michigan Department of Natural Resources dated January 9, 2004

Purple Loosestrife Monitoring Plan for Bond Falls, Victoria, and Bergland

IA Comment

Comment 1: Annual surveys of all impoundment shorelines should include all project waters and wetlands.

IA Response

Response 1: The plan has been modified to include all wetlands that adjoin project waters, but will not include isolated wetlands because it is unlikely that purple loosestrife would be transferred from an isolated wetland to the reservoir.

IIIA Comments

Comment 1: The results of the survey should be displayed on a map using GPS coordinates and provided to the Bond Falls Implementation Team (BFIT) and pertinent lake associations.

Comment 2: The map should also clearly identify new colonies and previously documented colonies.

Comment 3: Instead of listing agencies that will receive survey results, it would be better to just state that survey results will be provided to the Bond Falls Implementation Team (BFIT). For Bergland (Lake Gogebic), results should also be provided to the two lake associations that are currently in existence there (Lake Gogebic Improvement Association, and North Shore Association).

IIIA Responses

Response 1: The BFIT will receive a map, but the precision of GPS is not required to represent the results of the survey in a clear and accurate manner. GPS has not been required at other hydroelectric projects such as FERC Project Nos. 2525, 2595, 2522, 2546, 2560, and 2581.

Response 2: UPPCO will not distinguish between new colonies and previously documented colonies because these surveys are meant to give a relative abundance, not a detailed summary.

Response 3: The plan has been modified accordingly.

Response 4: UPPCO will not send a copy of the purple loosestrife information to the pertinent lake associations because they are not members of the BFIT, nor are they listed specifically in article 411. UPPCO will follow the reporting protocols outlined in Article 411.

IVA-B Comment

For other than small colonies of plants that are most efficiently treated upon discovery, we believe it would be more appropriate for the BFIT to determine whether control measures are needed, and what type of measures should be implemented, rather than

UPPCO making that determination. Suggested rewording for this section is as follows (combine A and B into one section):

"Any new colonies of loosestrife plants that are discovered during the survey shall be cut, dug, pulled by hand or treated with an appropriate aquatic herbicide. Cutting or pulling shall be timed to occur prior to seed set, or flower spikes will be bagged/cut into a bag prior to plants being dislodged, to prevent seed dispersal. If it is determined that the colony cannot be treated when discovered due to size or any other reason, or for older colonies that persist despite past treatment efforts, information as to extent, density and other relevant information about the colony shall be gathered and that information provided to BFIT as soon as possible upon completion of the survey. BFIT will review the information and make a determination as to the most appropriate control measures to implement, if warranted".

IVA-B Responses

Response 1: UPPCO has amended the plan to state "cutting or pulling shall be timed to occur prior to seed set, or flower spikes will be bagged and disposed of properly".

UPPCO has had success controlling purple loosestrife populations by following these measures at other hydroelectric projects such as FERC Project Nos. 10856 and 2506.

UPPCO has also amended the phrase, "consult with the MDNR", to include the entire BFIT.

Response 2: UPPCO feels it would be inappropriate to have the BFIT determine whether control measures are needed. UPPCO is ultimately responsible for the implementation of the FERC license, and will consult with the BFIT. For this reason, the suggested language has not been adopted.

V Comment

Comment 1: *Fact sheets about loosestrife to display at access areas may be provided by other agencies as well (USFS has similar fact sheets).*

V Response

Response 1: Comment noted.

VI Comments

Comment 1: *As with IIIA above, documentation should be made that reports were provided to the full BFIT (no need to list individual agencies).*

Comment 2: *Also, instead of monitoring results being provided to BFIT for the first two years, we would like to see those results provided to BFIT in every year in which monitoring is conducted.*

Comment 3: *The documentation should also include a report on any control measures implemented that year, and/or planned for the following year, including whether the control was successful or not, and any follow-up monitoring or treatment that may be needed.*

VI Responses

Response 1: The plan has been modified accordingly.

Response 2: The purple loosestrife plan was misread. It states that the members of the BFIT will receive results every year. The documentation of this agency submittal to FERC is being proposed only for the first two surveys. This allows FERC to ensure that the agency submittal procedure meets license requirements and allows FERC to review any comments the agencies may have in the beginning of the process. This method has been acceptable in the past for other FERC projects such as FERC Project No. 2433.

Response 3: UPPCO accepts the recommendation to include results of control methods, if applicable. The plan has been modified accordingly.

Eurasian Water Milfoil Monitoring Plan for Bond Falls, Victoria, and Bergland

IA Comments

Comment 1: *The number of transects suggested is not adequate for the water bodies; with 2-5 transects per lake, it is highly likely that any small, initial infestations of EWM would be missed. It is imperative to find the infestations when they are small and can be easily treated, rather than waiting until a large portion of the lake is infested.*

Comment 2: *Transects should target all the likely infestation areas; that is, shallow, quieter water such as shorelines, small bays, near islands, etc. Boating around the entire shoreline with the rake sampling conducted whenever aquatic macrophyte populations are seen, followed by additional sampling in other shallow areas, is recommended.*

Comment 3: *Also, the shore at all boat landings should be checked for EWM fragments that may have washed up.*

IA Responses

Response 1: UPPCO disagrees that more transects are needed. Even though Lake Gogebic is 13,380 acres in size, a vast majority of this area has conditions unlikely to produce Eurasian water milfoil. Samples need to be concentrated only in areas of likely infestation. In other FERC projects owned by WPS Resources (the parent company of UPPCO), even fewer samples per acre area have been accepted. FERC Project No. 1984 has 40,000 acres of surface water and there is a total of 5 sample points for the entire project. Like Lake Gogebic, a vast majority of the surface water of Petenwell and Castle Rock lakes does not exhibit characteristics of likely infestation.

Response 2: The Eurasian water milfoil plan states that "transects will be selected based upon location of macrophyte colonies and areas of likely infestation". UPPCO feels this statement articulates the same point as Comment 2 of the IA Comments. No change is proposed.

Response3: UPPCO accepts this recommendation and the plan has been modified accordingly.

IB Comment

Target areas for transects should also consider likely infestation entry points, such as boat launches and high use motorboat areas.

IB Response

UPPCO agrees with this statement and considers this when selecting transect locations. Additional annual surveys of the area surrounding boat landings have been added to the plan.

IIA Comments

Comment 1: We believe that surveying every three years is not frequent enough, considering the rate at which this invasive plant can spread and the potential for serious and perhaps irreversible damage if infestations are not caught early. The National Invasive Species Council calls for early detection and rapid response to infestations (see Meeting the Invasive Species Challenge, National Invasive Species Council, 2001). We recommend that surveys for this species be done every year.

Comment 2: Any infestations of EWM should be mapped to show their extent. If a rating system is used to indicate relative abundance (low, medium, high), information needs to be provided to better define what these terms mean (i.e., what density of EWM represents a low infestation, a medium infestation, etc.).

IIA Responses

Response 1: The "Early Detection and Rapid Response" section of the Meeting the Invasive Species Challenge, National Invasive Species Council, 2001, does not define early detection, nor does it state that identification within three years can't be considered early detection. The parent company of UPPCO, WPS Resources, currently has 16 FERC hydroelectric projects in Michigan and Wisconsin that require Eurasian water milfoil surveys. All of these 16 flowages are surveyed once every three years. To this date, none of the 16 flowages has developed a widespread Eurasian water milfoil problem. For these reasons, UPPCO does not accept the recommendation.

Response 2: UPPCO accepts this recommendation. A map showing the locations of each transect will be included with the results and the relative abundance scale has been defined in the plan.

IIIA Comments

Comment 1: The table should also identify new colonies and previously documented colonies.

Comment 2: Survey results should be provided to the full BFIT (no need to list individual agencies).

Comment 3: Reports for Bergland (Lake Gogebic) should also be provided to the two lake associations that are currently in existence there (Lake Gogebic Improvement Association and North Shore Association).

IIIA Responses

Response 1: UPPCO accepts this recommendation. The plan has been modified accordingly.

Response 2: The plan has been modified accordingly.

Response 3: UPPCO will not send a copy of the purple loosestrife information to the pertinent lake associations because they are not members of the BFIT, nor are they listed

specifically in article 411. UPPCO will follow the reporting protocols outlined in Article 411.

IVA Comment

We believe that this section needs to be rewritten. We think it is more appropriate for the full BFIT to evaluate the survey information on existing EWM colonies, and determine what control measures are warranted, if any. Therefore, we recommend the following wording for this section:

"All EWM colonies detected through annual surveys will be evaluated by BFIT to determine the most appropriate course of action".

*Relying on possible natural occurrences of the milfoil weevil (*Euhrychiopsis lecontei*) for control is unlikely to be effective. While the weevil is native to the area that does not mean that it occurs naturally in every water body, or in sufficient abundance to provide control of EWM. Some control can be achieved from weevils, under certain conditions, but various factors including fish populations in the lake, the amount of milfoil, etc. can affect this. The impoundments under this license are in frequent use by trailered motorboats and the potential for spread of any EWM to other lakes is high. Eradication rather than suppression should be the goal for most infestations, using a variety of tools (manual pulling for small infestations, aquatic herbicides, weevil release, etc.) depending on the infestation's characteristics. If BFIT determines that weevil milfoil control is to be attempted, surveys for the weevil would first have to be done to determine its presence/abundance, fish populations (e.g., bluegills) would have to be assessed to determine predation pressure on weevils, and other factors would need to be considered to determine whether use of weevils or some other method would be most appropriate.*

IVA Response

UPPCO disagrees with the proposed role of the BFIT. As licensee, UPPCO has the responsibility of implementation of the license. It is the responsibility of FERC to review the licensee's conclusions regarding the surveys and determine what control measures are warranted. This means of control has been accepted on other FERC projects such as FERC Project Nos. 10854, 10856, 2506, 2402, 2433, 2525, 2595, 2522, 2546, and 2581. For these reasons, UPPCO notes the objection to this control measure, but does not accept the recommendation.

V Comment

Fact sheets to be placed at boat landings, etc., may be provided by USFS or other agencies (in addition to MDNR). UPPCO has cooperated with USFS in placing a sign at Prickett Reservoir regarding the EWM infestation and how it is spread.

We would suggest that should EWM be discovered in reservoirs within the Bond Falls project, a similar sign should be placed at access points for the infested reservoirs.

V Response

Comment noted.

VI Comments

Comment 1: *Documentation of submittal should be made to the full BFIT (no need to list individual agencies).*

Comment 2: *Also, instead of monitoring results being provided to BFIT for the first two years, we would like to see those results provided to BFIT in every year in which monitoring is conducted.*

Comment 3: *The documentation should also include a report on any control measures implemented that year, and/or planned for the following year, including whether the control was successful or not and any follow-up monitoring or treatment that may be needed.*

Response 1: The plan has been modified accordingly.

Response 2: The Eurasian water milfoil plan was misread. It states that the members of the BFIT will receive results every year a survey is conducted. The documentation of this agency submittal to FERC is being proposed only for the first two surveys. This allows FERC to ensure that the agency submittal procedure meets license requirements and allows FERC to review any comments the agencies may have in the beginning of the process. This method has been acceptable in the past for other FERC projects such as FERC Project No. 2433.

Response 3: UPPCO accepts the recommendation to include results of control methods, if applicable.

Exotic Species Monitoring Plan for Cisco Chain of Lakes

IA-C Comments

Comment 1: *While we agree that it makes sense to have the CCROA continue their monitoring of the Cisco Chain of lakes for invasive plants, some additional language or clarification is needed here to clearly describe the oversight role that UPPCO will assume for this monitoring. Such oversight responsibilities would include: - any training needed for CCROA members in plant identification, survey procedures, etc (possibly the BFIT members are aware of possible trainers or training sessions).*

Comment 2: *development or approval of a protocol for conducting nuisance plant surveys, and insuring it is followed.*

Comment 3: *development or approval of a reporting format for the surveys, and insuring it is followed.*

IA-C Responses

Response 1: The plan has been modified accordingly.

Response 2: The plan has been modified accordingly.

Response 3: The plan has been modified accordingly.

ID Comment

Please make the following change: "In the event that the Cisco development is removed from Hydroelectric Project No. 1864, UPPCO will be relieved of the requirements to the Cisco development and the responsibilities will be inherited by the new owner."

ID Response

The plan has been modified accordingly.

IIIA Comments

Comment 1: *It should be stated that surveys shall be conducted annually.*

Comment 2: *Colonies should be mapped using GPS coordinates and provided to BFIT. The map should clearly identify new colonies and previously documented colonies.*

Comment 3: *Also, as stated above, a set protocol should be followed when conducting the survey (not just informally while recreating).*

IIIA Responses

Response 1: Suggestion is accepted and the plan has been modified accordingly.

Response 2: UPPCO does not accept the suggestion. GPS is not required to represent the results of the survey in a clear and accurate manner.

Response3: The plan has been amended.

IIIB Comment

Survey results should be submitted to the full BFIT (no need to list individual agencies).

IIIB Response

The plan has been modified accordingly.

IIIC Comment

As with the Loosestrife and EWM Plans discussed above, we believe that the BFIT (in consultation with the CCROA) is the most appropriate group to determine what control measures are warranted for nuisance plant infestations (other than small colonies of loosestrife, which can be removed using the procedure described under the loosestrife section above). Thus, the sections should be written to indicate that BFIT (and CCROA) will jointly determine what control measures are needed for infestations that are discovered.

IIIC Response

UPPCO disagrees with the proposed role of the BFIT. As the licensee, UPPCO has the ultimate responsibility to implement the license requirements through consultation with the BFIT. It is the responsibility of FERC to review the licensee's conclusions regarding the survey and determine what control measures are warranted. If at a later date, a change is required, UPPCO will consult with the BFIT prior to implementation.

IV Comments

Comment 1: *Control of any new populations should also be discussed.*

Comment 2. *Note previous comment about timing of purple loosestrife control.*

IV Responses

Response 1: The title of Section IV has been changed to say " Control of Existing and New Colonies".

Response 2: The proper language regarding control timelines and procedures has been inserted.

V Comment

Substitute the words "be responsible for insuring" for the word "see" in the first sentence.

V Response

The plan has been amended accordingly.

VI Comments

Comment 1: Survey results should be submitted to the full BFIT (no need to list individual agencies).

Comment 2: Also, documentation of submittal of monitoring reports to the BFIT should be done at the end of each year, rather than after the first two monitoring seasons.

VI Responses

Response 1: The plan has been amended.

Response 2: The Cisco exotic species monitoring plan was misread. It states that the members of the BFIT will receive results every year a survey is conducted. The documentation of this agency submittal to FERC is being proposed only for the first two surveys. This allows FERC to ensure that the agency submittal procedure meets license requirements and allows FERC to review any comments the agencies may have in the beginning of the process. This method has been acceptable in the past for other FERC projects such as FERC Project No. 2433.

General Comments

Comment 1

Since the Mitigation Enhancement Fund pays for nuisance plant survey work, cost projections for all surveys should be provided to the BFIT prior to implementation.

Comment 2

Curly pondweed (Potamogeton crispus) is another invasive aquatic plant that may move into the area (it is known in Wisconsin but not yet in the western Upper Peninsula). Provision should be made for monitoring and control for this and other new invasive aquatic species that may become concerns during the life of the license.

Response 1

UPPCO has accepted the suggestion and the plan has been modified accordingly.

Response 2

Additions may be proposed at a later date after discussions with the BFIT. As the licensee, UPPCO will request any necessary amendments to the approved plan.

**Comments Received from the United States Department of
Agriculture – Forest Service**



United States
Department of
Agriculture

Forest
Service

Ottawa National Forest
Supervisor's Office

E6248 US2
Ironwood, MI 49938
(906) 932-1330
(906) 932-0122 (FAX)
(906) 932-0301 (TTY)

File Code: 2770-2

Date: January 9, 2004

Mr. Rick Moser
Upper Peninsula Power Company
700 N. Adams Street
P.O. Box 19001
Green Bay, WI 54307-9001

Dear Mr. Moser:

Thank you for the opportunity to review Upper Peninsula Power Company's (UPPCO) draft Nuisance Plant Control Plan dated December 19, 2003. After reviewing the draft plan, we have the following comments, organized by section:

Purple Loosestrife Monitoring Plan

III A. Instead of listing agencies that will receive survey results, it would be better to just state that survey results will be provided to the Bond Falls Implementation Team (BFIT). For Bergland (Lake Gogebic), results should also be provided to the two lake associations that are currently in existence there (Lake Gogebic Improvement Association, and North Shore Association).

IVA-B. For other than small colonies of plants that are most efficiently treated upon discovery, we believe it would be more appropriate for the BFIT to determine whether control measures are needed, and what type of measures should be implemented, rather than UPPCO making that determination. Suggested rewording for this section is as follows (combine A and B into one section):

"Any new colonies of loosestrife plants that are discovered during the survey shall be cut, dug, or pulled by hand or treated with an appropriate aquatic herbicide. Cutting or pulling shall be timed to occur prior to seed set, or flower spikes will be bagged/cut into a bag prior to plants being dislodged, to prevent seed dispersal. If it is determined that the colony cannot be treated when discovered due to size or any other reason, or for older colonies that persist despite past treatment efforts, information as to extent, density and other relevant information about the colony shall be gathered and that information provided to BFIT as soon as possible upon completion of the survey. BFIT will review the information and make a determination as to the most appropriate control measures to implement, if warranted".



V. Fact sheets about loosestrife to display at access areas may be provided by other agencies as well (USFS has similar fact sheets).

VI. As with IIIA above, documentation should be made that reports were provided to the full BFIT (no need to list individual agencies).

Also, instead of monitoring results being provided to BFIT for the first two years, we would like to see those results provided to BFIT in every year in which monitoring is conducted. The documentation should also include a report on any control measures implemented that year, and/or planned for the following year, including whether the control was successful or not, and any follow-up monitoring or treatment that may be needed.

Eurasian Watermilfoil (EWM) Plan

IA. The number of transects suggested is not adequate for the water bodies; with 2-5 transects per lake, it is highly likely that any small, initial infestations of EWM would be missed. It is imperative to find the infestations when they are small and can be easily treated, rather than waiting until a large portion of the lake is infested. Transects should target all the likely infestation areas; that is, shallow, quieter water such as shorelines, small bays, near islands, etc. Boating around the entire shoreline with the rake sampling conducted whenever aquatic macrophyte populations are seen, followed by additional sampling in other shallow areas, is recommended. Also, the shore at all boat landings should be checked for EWM fragments that may have washed up.

IB. Target areas for transects should also consider likely infestation entry points, such as boat launches and high use motorboat areas.

IIA. We believe that surveying every three years is not frequent enough, considering the rate at which this invasive plant can spread and the potential for serious and perhaps irreversible damage if infestations are not caught early. The National Invasive Species Council calls for early detection and rapid response to infestations (see *Meeting the Invasive Species Challenge*, National Invasive Species Council, 2001). We recommend that surveys for this species be done every year.

Any infestations of EWM should be mapped to show their extent. If a rating system is used to indicate relative abundance (low, medium, high), information needs to be provided to better define what these terms mean (i.e., what density of EWM represents a low infestation, a medium infestation, etc.).

IIIA. Survey results should be provided to the full BFIT (no need to list individual agencies). Reports for Bergland (Lake Gogebic) should also be provided to the two lake associations that are currently in existence there (Lake Gogebic Improvement Association and North Shore Association).

IVA. We believe that this section needs to be rewritten. We think it is more appropriate for the full BFIT to evaluate the survey information on existing EWM colonies, and determine what control measures are warranted, if any. Therefore, we recommend the following wording for this section:

“All EWM colonies detected through annual surveys will be evaluated by BFIT to determine the most appropriate course of action”.

Relying on possible natural occurrences of the milfoil weevil (*Euhrychiopsis lecontei*) for control is unlikely to be effective. While the weevil is native to the area that does not mean that it occurs naturally in every water body, or in sufficient abundance to provide control of EWM. Some control can be achieved from weevils, under certain conditions, but various factors including fish populations in the lake, the amount of milfoil, etc. can affect this. The impoundments under this license are in frequent use by trailered motorboats and the potential for spread of any EWM to other lakes is high. Eradication rather than suppression should be the goal for most infestations, using a variety of tools (manual pulling for small infestations, aquatic herbicides, weevil release, etc.) depending on the infestation's characteristics. If BFIT determines that weevil milfoil control is to be attempted, surveys for the weevil would first have to be done to determine its presence/abundance, fish populations (e.g., bluegills) would have to be assessed to determine predation pressure on weevils, and other factors would need to be considered to determine whether use of weevils or some other method would be most appropriate.

V. Fact sheets to be placed at boat landings, etc., may be provided by USFS or other agencies (in addition to MDNR). UPPCO has cooperated with USFS in placing a sign at Prickett Reservoir re. the EWM infestation, and how it is spread. We would suggest that, should EWM be discovered in reservoirs within the Bond Falls project, a similar sign should be placed at access points for the infested reservoirs. USFS is willing to cooperate in the design and placement of such signs.

VI. Documentation of submittal should be made to the full BFIT (no need to list individual agencies).

Also, instead of monitoring results being provided to BFIT for the first two years, we would like to see those results provided to BFIT in every year in which monitoring is conducted. The documentation should also include a report on any control measures implemented that year, and/or planned for the following year, including whether the control was successful or not, and any follow-up monitoring or treatment that may be needed.

Cisco Lake Monitoring Plan

IA – C. While we agree that it makes sense to have the Cisco Chain of Lakes Riparian Owners Association (CCROA) continue their monitoring of the Cisco Chain of lakes for invasive plants,

some additional language or clarification is needed here to clearly describe the oversight role that UPPCO will assume for this monitoring. Such oversight responsibilities would include:

- any training needed for CCROA members in plant identification, survey procedures, etc.
- development or approval of a protocol for conducting nuisance plant surveys, and insuring it is followed.
- development or approval of a reporting format for the surveys, and insuring it is followed.

IIIA. It should be stated that surveys shall be conducted annually. Also, as stated above, a set protocol should be followed when conducting the survey (not just informally while recreating).

IIIB. Survey results should be submitted to the full BFIT (no need to list individual agencies).

IIIC. As with the Loosestrife and EWM Plans discussed above, we believe that the BFIT (in consultation with the CCROA) is the most appropriate group to determine what control measures are warranted for nuisance plant infestations (other than small colonies of loosestrife, which can be removed using the procedure described under the loosestrife section above). Thus, the sections should be written to indicate that BFIT (and CCROA) will jointly determine what control measures are needed for infestations that are discovered.

IV. Control of any new populations should also be discussed. Note previous comment about timing of purple loosestrife control.

V. Substitute the words "be responsible for insuring" for the word "see" in the first sentence.

VI. Survey results should be submitted to the full BFIT (no need to list individual agencies).

Also, documentation of submittal of monitoring reports to the BFIT should be done at the end of each year, rather than after the first two monitoring seasons.

Other Items to Include in Plan

Since the Mitigation Enhancement Fund pays for nuisance plant survey work, cost projections for all surveys should be provided to the BFIT prior to implementation.

Curly pondweed (*Potamogeton crispus*) is another invasive aquatic plant that may move into the area (it is known in Wisconsin but not yet in the western Upper Peninsula). Provision should be made for monitoring and control for this and other new invasive aquatic species that may become concerns during the life of the license.

Thank you for the opportunity to comment. If you have any questions, please contact Bob Evans (906-265-5139, ext. 29) or Mark Fedora (906-932-1330, ext. 318).

Sincerely,

A handwritten signature in black ink that reads "Robert Lueckel". The signature is written in a cursive style with a large, stylized "R" and "L".

ROBERT LUECKEL
Forest Supervisor

cc: Ms. Jessica Mistak, MDNR, Mr. Bill Deepphouse, MHRC, Robert A Evans, Mark Fedora, Mr. Burr Fisher, USFWS, Mr. John Suppnick, MDEQ, Mr. Mike Donofrio, KBIC, Mr. Bob Martini, WDNR, Nick Schmal

**Response to Comments Received From the United States Department of Agriculture
– Forest Service dated January 9, 2004**

Purple Loosestrife Monitoring Plan for Bond Falls, Victoria, and Bergland

IIIA Comment

Comment 1: *Instead of listing agencies that will receive survey results, it would be better to just state that survey results will be provided to the Bond Falls implementation Team (BFIT).*

Comment 2: *For Bergland (Lake Gogebic), results should also be provided to the two lake associations that are currently in existence there (Lake Gogebic Improvement Association, and North Shore Association).*

IIIA Responses

Response 1: The plan has been modified accordingly.

Response 2: UPPCO will not send a copy of the purple loosestrife information to the two lake associations because they are not members of the BFIT, nor are they listed specifically in the article. UPPCO will follow the reporting protocols outlined in Article 411.

IVA-B Comment

For other than small colonies of plants that are most efficiently treated upon discovery, we believe it would be more appropriate for the BFIT to determine whether control measures are needed, and what type of measures should be implemented, rather than UPPCO making that determination. Suggested rewording for this section is as follows (combine A and B into one section):

"Any new colonies of loosestrife plants that are discovered during the survey shall be cut, dug, pulled by hand or treated with an appropriate aquatic herbicide. Cutting or pulling shall be timed to occur prior to seed set, or flower spikes will be bagged/cut into a bag prior to plants being dislodged, to prevent seed dispersal. If it is determined that the colony cannot be treated when discovered due to size or any other reason, or for older colonies that persist despite past treatment efforts, information as to extent, density and other relevant information about the colony shall be gathered and that information provided to BFIT as soon as possible upon completion of the survey. BFIT will review the information and make a determination as to the most appropriate control measures to implement, if warranted".

IVA-B Responses

Response 1: UPPCO has amended the plan to state "cutting or pulling shall be timed to occur prior to seed set, or flower spikes will be bagged and disposed of properly". UPPCO has had success controlling purple loosestrife populations by following these measures at other hydroelectric projects such as FERC Project Nos. 10856 and 2506. UPPCO has also amended the phrase, "consult with the MDNR", to include the entire BFIT.

Response 2: UPPCO feels it would be inappropriate to have the BFIT determine whether control measures are needed. UPPCO is ultimately responsible for the implementation of the FERC license, and will consult with the BFIT. For this reason, the suggested language has not been adopted.

V Comment

Comment 1: *Fact sheets about loosestrife to display at access areas may be provided by other agencies as well (USFS has similar fact sheets).*

V Response

Response 1: Comment noted.

VI Comments

Comment 1: *As with IIIA above, documentation should be made that reports were provided to the full BFIT (no need to list individual agencies).*

Comment 2: *Also, instead of monitoring results being provided to BFIT for the first two years, we would like to see those results provided to BFIT in every year in which monitoring is conducted.*

Comment 3: *The documentation should also include a report on any control measures implemented that year, and/or planned for the following year, including whether the control was successful or not, and any follow-up monitoring or treatment that may be needed.*

VI Responses

Response 1: The plan has been modified accordingly.

Response 2: The purple loosestrife plan was misread. It states that the members of the BFIT will receive results every year. The documentation of this agency submittal to FERC is being proposed only for the first two surveys. This allows FERC to ensure that the agency submittal procedure meets license requirements and allows FERC to review any comments the agencies may have in the beginning of the process. This method has been acceptable in the past for other FERC projects such as .

Response 3: UPPCO accepts the recommendation to include results of control methods, if applicable. The plan has been amended.

Eurasian Water Milfoil Monitoring Plan for Bond Falls, Victoria, and Bergland

IA Comments

Comment 1: *The number of transects suggested is not adequate for the water bodies; with 2-5 transects per lake, it is highly likely that any small, initial infestations of EWM would be missed. It is imperative to find the infestations when they are small and can be easily treated, rather than waiting until a large portion of the lake is infested.*

Comment 2: *Transects should target all the likely infestation areas; that is, shallow, quieter water such as shorelines, small bays, near islands, etc. Boating around the entire shoreline with the rake sampling conducted whenever aquatic macrophyte populations are seen, followed by additional sampling in other shallow areas, is recommended.*

Comment 3: *Also, the shore at all boat landings should be checked for EWM fragments that may have washed up.*

IA Responses

Response 1: UPPCO disagrees that more transects are needed. Even though Lake Gogebic is 13,380 acres in size, a vast majority of this area has conditions unlikely to produce Eurasian water milfoil. Samples need to be concentrated only in areas of likely infestation. In other FERC projects owned by WPS Resources (the parent company of UPPCO), even fewer samples per acre area have been accepted. FERC Project No. 1984 has 40,000 acres of surface water and there is a total of 5 sample points for the entire project. Like Lake Gogebic, a vast majority of the surface water of Petenwell and Castle Rock lakes does not exhibit characteristics of likely infestation.

Response 2: The Eurasian water milfoil plan states that “transects will be selected based upon location of macrophyte colonies and areas of likely infestation”. UPPCO feels this statement articulates the same point as Comment 2 of the IA Comments. No change is proposed.

Response3: UPPCO accepts this recommendation and the plan has been modified accordingly.

IB Comment

Target areas for transacts should also consider likely infestation entry points, such as boat launches and high use motorboat areas.

IB Response

UPPCO agrees with this statement and considers this when selecting transect locations. Additional annual surveys of the area surrounding boat landings have been added to the plan.

IIA Comments

Comment 1: *We believe that surveying every three years is not frequent enough, considering the rate at which this invasive plant can spread and the potential for serious and perhaps irreversible damage if infestations are not caught early. The National Invasive Species Council calls for early detection and rapid response to infestations (see Meeting the Invasive Species Challenge, National Invasive Species Council, 200 1). We recommend that surveys for this species be done every year.*

Comment 2: *Any infestations of EWM should be mapped to show their extent. If a rating system is used to indicate relative abundance (low, medium, high), information needs to be provided to better define what these terms mean (i.e., what density of EWM represents a low infestation, a medium infestation, etc.).*

IIA Responses

Response 1: The “Early Detection and Rapid Response” section of the Meeting the Invasive Species Challenge, National Invasive Species Council, 2001, does not define early detection, nor does it state that identification within three years can’t be considered early detection. The parent company of UPPCO, WPS Resources, currently has 16 FERC hydroelectric projects in Michigan and Wisconsin that require Eurasian water

milfoil surveys. All of these 16 flowages are surveyed once every three years. To this date, none of the 16 flowages has developed a widespread Eurasian water milfoil problem. For these reasons, UPPCO does not accept the recommendation.

Response 2: UPPCO accepts this recommendation. A map showing the location of each transect will be included with the results and the relative abundance scale has been defined in the plan.

IIIA Comments

Comment 1: *Survey results should be provided to the full BFIT (no need to list individual agencies).*

Comment 2: *Reports for Bergland (Lake Gogebic) should also be provided to the two lake associations that are currently in existence there (Lake Gogebic Improvement Association and North Shore Association).*

IIIA Responses

Response 1: The plan has been modified accordingly.

Response 2: UPPCO will not send a copy of the purple loosestrife information to the pertinent lake associations because they are not members of the BFIT, nor are they listed in article 411. UPPCO will follow the reporting protocols outlined in Article 411.

IVA Comment

We believe that this section needs to be rewritten. We think it is more appropriate for the full BFIT to evaluate the survey information on existing EWM colonies, and determine what control measures are warranted, if any. Therefore, we recommend the following wording for this section:

"All EWM colonies detected through annual surveys will be evaluated by BFIT to determine the most appropriate course of action".

*Relying on possible natural occurrences of the milfoil weevil (*Euhrychiopsis lecontei*) for control is unlikely to be effective. While the weevil is native to the area that does not mean that it occurs naturally in every water body, or in sufficient abundance to provide control of EWM. Some control can be achieved from weevils, under certain conditions, but various factors including fish populations in the lake, the amount of milfoil, etc. can affect this. The impoundments under this license are in frequent use by trailered motorboats and the potential for spread of any EWM to other lakes is high. Eradication rather than suppression should be the goal for most infestations, using a variety of tools (manual pulling for small infestations, aquatic herbicides, weevil release, etc.) depending on the infestation's characteristics. If BFIT determines that weevil milfoil control is to be attempted, surveys for the weevil would first have to be done to determine its presence/abundance, fish populations (e.g., bluegills) would have to be assessed to determine predation pressure on weevils, and other factors would need to be considered to determine whether use of weevils or some other method would be most appropriate.*

IVA Response

UPPCO disagrees with the proposed role of the BFIT. As licensee, UPPCO has the responsibility of implementation of the license. It is the responsibility of FERC to review the licensee's conclusions regarding the surveys and determine what control measures are warranted. This means of control has been accepted on other FERC projects such as

FERC Project Nos. 10854, 10856, 2506, 2402, 2433, 2525, 2595, 2522, 2546, and 2581. For these reasons, UPPCO notes the objection to this control measure, but does not accept the recommendation.

V Comment

Fact sheets to be placed at boat landings, etc., may be provided by USFS or other agencies (in addition to MDNR). UPPCO has cooperated with USFS in placing a sign at Prickett Reservoir regarding the EWM infestation and how it is spread. We would suggest that should EWM be discovered in reservoirs within the Bond Falls project, a similar sign should be placed at access points for the infested reservoirs. USFS is willing to cooperate in the design and placement of such signs.

V Response

Comment noted.

VI Comments

Comment 1: *Documentation of submittal should be made to the full BFIT (no need to list individual agencies).*

Comment 2: *Also, instead of monitoring results being provided to BFIT for the first two years, we would like to see those results provided to BFIT in every year in which monitoring is conducted.*

Comment 3: *The documentation should also include a report on any control measures implemented that year, and/or planned for the following year, including whether the control was successful or not and any follow-up monitoring or treatment that may be needed.*

Response 1: The plan has been modified accordingly.

Response 2: The Eurasian water milfoil plan was misread. It states that the members of the BFIT will receive results every year a survey is conducted. The documentation of this agency submittal to FERC is being proposed only for the first two surveys. This allows FERC to ensure that the agency submittal procedure meets license requirements and allows FERC to review any comments the agencies may have in the beginning of the process. This method has been acceptable in the past for other FERC projects such as FERC Project No. 2433.

Response 3: UPPCO accepts the recommendation to include results of control methods, if applicable.

Exotic Species Monitoring Plan for Cisco Chain of Lakes

IA-C Comments

Comment 1: *While we agree that it makes sense to have the CCROA continue their monitoring of the Cisco Chain of lakes for invasive plants, some additional language or clarification is needed here to clearly describe the oversight role that UPPCO will assume for this monitoring. Such oversight responsibilities would include: - any training needed for CCROA members in plant identification, survey procedures, etc.*

Comment 2: *development or approval of a protocol for conducting nuisance plant surveys, and insuring it is followed.*

Comment 3: *development or approval of a reporting format for the surveys, and insuring it is followed.*

IA-C Responses

Response 1: The plan has been modified accordingly.

Response 2: The plan has been modified accordingly.

Response 3: The plan has been modified accordingly.

IIIA Comments

Comment 1: *It should be stated that surveys shall be conducted annually.*

Comment 2: *Also, as stated above, a set protocol should be followed when conducting the survey (not just informally while recreating).*

IIIA Responses

Response 1: The plan has been modified accordingly.

Response 2: The plan has been modified accordingly.

IIIB Comment

Survey results should be submitted to the full BFIT (no need to list individual agencies).

IIIB Response

The plan has been modified accordingly.

IIIC Comment

As with the Loosestrife and EWM Plans discussed above, we believe that the BFIT (in consultation with the CCROA) is the most appropriate group to determine what control measures are warranted for nuisance plant infestations (other than small colonies of loosestrife, which can be removed using the procedure described under the loosestrife section above). Thus, the sections should be written to indicate that BFIT (and CCROA) will jointly determine what control measures are needed for infestations that are discovered.

IIIC Response

UPPCO disagrees with the proposed role of the BFIT. As the licensee, UPPCO has the ultimate responsibility to implement the license requirements. If at a later date, a change is required, UPPCO will consult with the BFIT prior to implementation.

IV Comments

Comment 1: *Control of any new populations should also be discussed.*

Comment 2: *Note previous comment about timing of purple loosestrife control.*

IV Responses

Response 1: The title of Section IV has been changed to say "Control of Existing and New Colonies".

Response 2: The proper language regarding control timelines and procedures has been inserted.

V Comment

Substitute the words "be responsible for insuring" for the word "see" in the first sentence.

V Response

The plan has been modified accordingly.

VI Comments

Comment 1: *Survey results should be submitted to the full BFIT (no need to list individual agencies).*

Comment 2: *Also, documentation of submittal of monitoring reports to the BFIT should be done at the end of each year, rather than after the first two monitoring seasons.*

VI Responses

Response 1: The plan has been amended.

Response 2: The Cisco plan was misread. It states that the members of the BFIT will receive results every year a survey is conducted. The documentation of this agency submittal to FERC is being proposed only for the first two surveys. This allows FERC to ensure that the agency submittal procedure meets license requirements and allows FERC to review any comments the agencies may have in the beginning of the process. This method has been acceptable in the past for other FERC projects such as FERC Project No. 2433.

Other Items to Include in Plan

Comment 1

Since the Mitigation Enhancement Fund pays for nuisance plant survey work, cost projections for all surveys should be provided to the BFIT prior to implementation.

Comment 2

*Curly pondweed (*Potamogeton crispus*) is another invasive aquatic plant that may move into the area (it is known in Wisconsin but not yet in the western Upper Peninsula). Provision should be made for monitoring and control for this and other new invasive aquatic species that may become concerns during the life of the license.*

Response 1

UPPCO has accepted the suggestion and the plan has been modified.

Response 2

Additions may be proposed at a later date after discussions with the BFIT. As the licensee, UPPCO will request any necessary amendments to the approved plan.

Comments Received from the Michigan Hydro Relicensing Coalition

Michigan Hydro Relicensing Coalition
1210 E. Fifth Avenue
Houghton, Michigan 49931

January 12, 2004

Mr. Rick Moser
Upper Peninsula Power Company
P.O. Box 19901
Green Bay, Wisconsin 54307

Re: Bond Falls Hydro Project No. 1864
Article 411 Nuisance Plant Control Plan

Dear Mr. Moser:

The Michigan Hydro Relicensing Coalition (MHRC) has reviewed Nuisance Plant Control Plan from the Upper Peninsula Power Company (UPPCO) and has the following comments:

Purple Loosestrife Monitoring Plan for Bond Falls, Victoria and Bergland

IA. Although we understand that the Cisco Chain Riparian Owner's Association (CCROA) has been monitoring nuisance plant species on the Cisco Chain of Lakes in the past, this section should stipulate that annual surveys of all project waters will be conducted. This will ensure that all impoundment shorelines and wetlands will be surveyed annually in a uniform fashion as required by Article 411.

III A-B. Annual survey results should be displayed on detailed lake maps according to size or abundance and including GPS coordinates. We recommend an occurrence map for each development (Bergland, Bond Falls and Victoria).

It is not necessary to begin listing the various agencies and organizations of which the Bond Falls Implementation Team (BFIT) is comprised. A simple reference to the acronym BFIT will suffice. Additionally, survey results for the Bergland Development (Lake Gogebic) should be provided to the two lake organizations which are active there (Lake Gogebic Improvement Association and North Shore Association).

IV A-B. For other than small colonies of plants that are most efficiently treated upon discovery, we believe it would be more appropriate for the BFIT to determine whether control measures are needed, and what type of measures should be implemented, rather than UPPCO making that determination. Suggested rewording for this section is as follows (combine A and B into one section):

"Any new colonies of loosestrife plants that are discovered during the survey shall be cut, dug, pulled by hand or treated with an appropriate aquatic herbicide. Cutting or pulling shall be timed to occur prior to seed set, or flower spikes will be bagged/cut into a bag prior to plants being dislodged, to prevent seed dispersal. If it is determined that the colony cannot be treated when discovered due to size or any other reason, or for older colonies that persist despite past treatment efforts, information as to extent, density and other relevant information about the colony shall be gathered and that information provided to BFIT as soon as possible upon completion of the survey. BFIT will review the information and make a determination as to the most appropriate control measures to implement, if warranted".

V. Besides using MDNR fact sheets, information from other agencies and organizations is available. UPPCO should work with all organizations to ensure that such information is posted at all public access points on development impoundments.

VL As with IIIA above, documentation should be made that monitoring reports were provided to all members of the BFIT (not necessary to list individual organizations).

Instead of monitoring results being provided to BFIT for the first two years, we would like to see those results provided to BFIT in every year in which monitoring is conducted. The documentation should also include a report on any control measures implemented that year, and/or planned for the following year, including whether the control was successful or not, and any follow-up monitoring or treatment that may be needed.

Eurasian Water Milfoil Monitoring Plan for Bond Falls, Victoria and Bergland

Objective: Reference to BFIT is sufficient (not necessary to list individual organizations).

I A-B. The proposed number of transects to be surveyed is not sufficient. Lake Gogebic is 13,380 acres in size and 16 miles long with 36 miles of shoreline. Only five transects are proposed where a minimum of 30 to 40 should be done. Bond Falls Flowage is about 2000 acres with many bays and islands and an extensive shoreline. It contains abundant shoal water with plenty of Eurasian Water Milfoil (EWM) habitat. The three proposed transects should be increased to at least 30. Victoria Reservoir is the smallest of the three waterbodies at 405 acres but it is almost three miles in length with several bays. We recommend at least 10 transects be sampled at Victoria.

Even with the increased number of transects to be sampled it will still be difficult to find new, small infestations of EWM. It is important to find these small infestations and treat them as soon as possible rather than waiting until larger, more difficult to treat areas are found with less intensive sampling.

Likely infestation areas should be emphasized for sampling such as shallow, clear, quiet water areas in bays, around islands and in the upper end of the impoundments. We recommend boating around the entire shoreline and using rake-sampling methods where aquatic macrophytes are observed, followed by additional sampling in other shallow areas. The shoreline at all boat launching areas should be investigated for EWM fragments.

Key areas to be sampled are likely infestation points such as boat launches and high use motorboat locations.

II B. The proposal to sample every third year is not frequent enough considering how fast EWM can spread once it is introduced. We recommend annual surveys to assure new infestations are found early on.

III A. All infestations should be accurately mapped to allow for evaluation of any proposed eradication efforts. This will also allow for documenting how rapidly a given infestation may spread. Some type of evaluation method is needed to estimate the relative abundance of EWM colonies and the terms used to describe it accurately defined (low, medium, high). Such terms may be subjective or quasi-quantitative but at least it will allow the BFIT to visualize abundance of given infestation in written reports.

Any tables produced to show survey results should also identify new colonies as well as previously documented colonies. Survey results should be provided to the full BFIT (not necessary to list individual agencies). Additionally, survey results for the Bergland Development (Lake Gogebic) should be provided to the two lake organizations which are active there (Lake Gogebic Improvement Association and North Shore Association).

IV A. This section is not acceptable as written. Once EWM becomes established, it does not "naturally eradicate". We recommend that all EWM colonies found through annual surveys be evaluated by the BFIT to determine the most appropriate course of action. We refer you to the large paragraph contained in this section of the MDNR response to the plan and agree with it.

V. Fact sheets to be place at boat landings, etc., may be provided by USFS or other agencies (in addition to MDNR). UPPCO has cooperated with USFS in placing a sign at Prickett Reservoir regarding the EWM infestation and how it is spread. We would suggest that, should EWM be discovered in reservoirs within the Bond Falls project, a similar sign should be placed at access pints for the infested reservoirs.

VI. Documentation of submittal should be made to the full BFIT (not necessary to list individual agencies).

Also, instead of monitoring results being provided to BFIT for the first two years, we would like to see those results provided to BFIT in every year in which monitoring is conducted. The documentation should also include a report on any control measures implemented that year, and/or planned for the following year, including whether the control was successful or not, and any follow-up monitoring or treatment that may be needed.

Exotic Species Monitoring Plan for Cisco Lake

I A-C. The Cisco Chain of Lakes is comprised of 16 lakes totaling just over 4000 acres. MHRC agrees that it will be most cost effective and efficient to have CCROA continue monitoring the Cisco Chain for invasive plants. However, it must be conducted under an agreed upon protocol and not at the recreational convenience of the CCROA. The BFIT and UPPCO will have to agree upon the number of transects to be run per lake and how to have oversight responsibilities for the CCROA members performing the surveys.

The protocol should be similar to that of the other three developments as well as that of the reporting format. Plant identification, survey procedures, reporting responsibilities and record-

keeping requirements for CCROA members will have to be undertaken by UPPCO with BFIT agreement. We want the results of survey work performed by CCROA to be comparable to that done on the other development reservoirs.

I D. MHRC requests that the following change be made: "In the event that the Cisco development is removed from Hydroelectric Project No. 1864, UPPCO will be relieved of the requirements related to the Cisco development **and the responsibilities will be inherited by the new owner**".

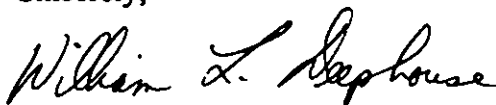
III A. Annual survey results should be displayed on detailed lake maps according to size or abundance and including GPS coordinates. The map should clearly identify new colonies and previously documented colonies. We recommend an occurrence map for each lake in the Cisco Chain. Surveys are to be conducted annually. As noted above, a set protocol should be followed when conducting the surveys.

IV A. See previous comments about purple loosestrife control for the other developments. Timing of the surveys to be the same as **II A.** on page 3.

V. Substitute the words "be responsible for insuring" for the word "see" in the first sentence.

We appreciate the opportunity to comment on this matter. If you have any questions, please don't hesitate to contact me.

Sincerely,



William L. Deephouse
906-482-6607
riverkpr@up.net

CC: James Schramm, MHRC
Mike Donofrio, KBIC
Robert Evans, USFS
Mark Fedora, USFS
Burr Fisher, USFWS
Jessica Mistak, MDNR
John Suppnick, MDEQ

Response to Comments Received From the Michigan Hydro Relicensing Coalition dated January 12, 2004 (Note: The Michigan Hydro Relicensing Coalition is an ex-officio member of the BFIT and they only have an advisory role in the process. It is not mandatory for their comments to be addressed or incorporated into the plan).

IA Comment

(It appears that this comment was placed in the incorrect section. UPPCO's response can be found in the Cisco Exotic Species Monitoring Plan section).

IIIA-B Comments

Comment 1: Annual survey results should be displayed on detailed lake maps according to size or abundance and including GPS coordinates. We recommend an occurrence map for each development (Bergland, Bond Falls and Victoria).

Comment 2: It is not necessary to begin listing the various agencies and organizations of which the Bond Falls Implementation Team (BFIT) is comprised. A simple reference to the acronym BFIT will suffice.

Comment 3: Additionally, survey results for the Bergland Development (Lake Gogebic) should be provided to the two lake organizations which are active there (Lake Gogebic Improvement Association and North Shore Association).

IIIA-B Responses

Response 1: The BFIT will receive a map, but the precision of GPS is not required to represent the results of the survey in a clear and accurate manner. GPS has not been required at other hydroelectric projects such as FERC Project Nos. 2525, 2595, 2522, 2546, 2560, and 2581.

Response 2: The plan has been modified accordingly.

Response 3: UPPCO will not send a copy of the purple loosestrife information to the pertinent lake associations because they are not members of the BFIT, nor are they listed specifically in article 411. UPPCO will follow the reporting protocols outlined in Article 411.

IVA-B Comment

For other than small colonies of plants that are most efficiently treated upon discovery, we believe it would be more appropriate for the BFIT to determine whether control measures are needed, and what type of measures should be implemented, rather than UPPCO making that determination. Suggested rewording for this section is as follows (combine A and B into one section):

"Any new colonies of loosestrife plants that are discovered during the survey shall be cut, dug, pulled by hand or treated with an appropriate aquatic herbicide.

Cutting or pulling shall be timed to occur prior to seed set, or flower spikes will be bagged/cut into a bag prior to plants being dislodged, to prevent seed dispersal. If it is determined that the colony cannot be treated when discovered due to size or any other reason, or for older colonies that persist despite past treatment efforts, information as to

extent, density and other relevant information about the colony shall be gathered and that information provided to BFIT as soon as possible upon completion of the survey. BFIT will review the information and make a determination as to the most appropriate control measures to implement, if warranted".

IVA-B Responses

Response 1: UPPCO has amended the plan to state "cutting or pulling shall be timed to occur prior to seed set, or flower spikes will be bagged and disposed of properly".

UPPCO has had success controlling purple loosestrife populations by following these measures at other hydroelectric projects such as FERC Project Nos. 10856 and 2506.

UPPCO has also amended the phrase, "consult with the MDNR", to include the entire BFIT.

Response 2: UPPCO feels it would be inappropriate to have the BFIT determine whether control measures are needed. UPPCO is ultimately responsible for the implementation of the FERC license, and will consult with the BFIT. For this reason, the suggested language has not been adopted.

V Comment

Besides using MDNR fact sheets, information from other agencies and organizations is available. UPPCO should work with all organizations to ensure that such information is posted at all public access points on development impoundments.

V Response

"MDNR or other agencies", has been added.

VI Comments

Comment 1: *As with IIIA above, documentation should be made that monitoring reports were provided to all members of the BFIT (not necessary to list individual organizations).*

Comment 2: *Instead of monitoring results being provided to BFIT for the first two years, we would like to see those results provided to BFIT in every year in which monitoring is conducted.*

Comment 3: *The documentation should also include a report on any control measures implemented that year, and/or planned for the following year, including whether the control was successful or not, and any follow-up monitoring or treatment that may be needed.*

VI Responses

Response 1: The plan has been modified accordingly.

Response 2: The purple loosestrife plan was misread. It states that the members of the BFIT will receive results every year. The documentation of this agency submittal to FERC is being proposed only for the first two surveys. This allows FERC to ensure that the agency submittal procedure meets license requirements and allows FERC to review any comments the agencies may have in the beginning of the process. This method has been acceptable in the past for other FERC projects such as FERC Project No. 2433.

Response 3: UPPCO accepts the recommendation to include results of control methods, if applicable.

Eurasian Water Milfoil Monitoring Plan for Bond Falls, Victoria, and Bergland

Comment on Objective

Reference to BFIT is sufficient (not necessary to list individual organizations).

Response to Comment on Objective

The plan has been modified accordingly.

IA-B Comments

Comment 1: The proposed number of transects to be surveyed is not sufficient. Lake Gogebic is 13,380 acres in size and 16 miles long with 36 miles of shoreline. Only five transects are proposed where a minimum of 30 to 40 should be done. Bond Falls Flowage is about 2000 acres with many bays and islands and an extensive shoreline. It contains abundant shoal water with plenty of Eurasian Water Milfoil (EWM) habitat. The three proposed transects should be increased to at least 30. Victoria Reservoir is the smallest of the three waterbodies at 405 acres but it is almost three miles in length with several bays. We recommend at least 10 transects be sampled at Victoria.

Even with the increased number of transects to be sampled it will still be difficult to find new, small infestations of EWM. It is important to find these small infestations and treat them as soon as possible rather than waiting until larger, more difficult to treat areas are found with less intensive sampling.

Comment 2: Likely infestation areas should be emphasized for sampling such as shallow, clear, quiet water areas in bays, around islands and in the upper end of the impoundments. We recommend boating around the entire shoreline and using rake-sampling methods where aquatic macrophytes are observed, followed by additional sampling in other shallow areas.

Comment 3: The shoreline at all boat launching areas should be investigated for EWM fragments. Key areas to be sampled are likely infestation points such as boat launches and high use motorboat locations.

IA Responses

Response 1: UPPCO disagrees that more transects are needed. Even though Lake Gogebic is 13,380 acres in size, a vast majority of this area has conditions unlikely to produce Eurasian water milfoil. Samples need to be concentrated only in areas of likely infestation. In other FERC projects owned by WPS Resources (the parent company of UPPCO), even fewer samples per acre area have been accepted. FERC Project No. 1984 has 40,000 acres of surface water and there is a total of 5 sample points for the entire project. Like Lake Gogebic, a vast majority of the surface water of Petenwell and Castle Rock lakes does not exhibit characteristics of likely infestation.

Response 2: The Eurasian water milfoil plan states that "transects will be selected based upon location of macrophyte colonies and areas of likely infestation". UPPCO feels this statement articulates the same point as Comment 2 of the IA Comments. No change is proposed.

Response3: UPPCO accepts this recommendation and the plan has been modified accordingly.

IIB Comment

The proposal to sample every third year is not frequent enough considering how fast EWM can spread once it is introduced. We recommend annual surveys to assure new infestations are found early on.

IIB Response

UPPCO disagrees with the recommendation that Eurasian water milfoil surveys must be conducted every year. The parent company of UPPCO, WPS Resources, currently has 16 FERC hydroelectric projects in Michigan and Wisconsin that require Eurasian water milfoil surveys. All of these 16 flowages are surveyed once every three years, and none of them to this date has had a widespread infestation of Eurasian water milfoil.

IIIA Comments

Comment 1: *All infestations should be accurately mapped to allow for evaluation of any proposed eradication efforts. This will also allow for documenting how rapidly a given infestation may spread.*

Comment 2: *Some type of evaluation method is needed to estimate the relative abundance of EWM colonies and the terms used to describe it accurately defined (low, medium, high). Such terms may be subjective or quasi-quantitative but at least it will allow the BFIT to visualize abundance of given infestation in written reports.*

Comment 3: *Any tables produced to show survey results should also identify new colonies as well as previously documented colonies.*

Comment 4: *Survey results should be provided to the full BFIT (not necessary to list individual agencies). Additionally, survey results for the Bergland Development (Lake Gogebic) should be provided to the two lake organizations which are active there (Lake Gogebic Improvement Association and North Shore Association).*

IIIA Responses

Response 1: The BFIT will receive a map with the results of the survey, and it will show the transect locations. The BFIT will be able to use the table portion of the results to document how rapidly a given infestation may have spread. A map is not required to show this so UPPCO does not adopt this recommendation.

Response 2: The plan has been modified accordingly.

Response 3: The plan has been modified accordingly.

Response 4: UPPCO will not send a copy of the purple loosestrife information to the pertinent lake associations because they are not members of the BFIT, nor are they listed specifically in article 411. UPPCO will follow the reporting protocols outlined in Article 411.

IVA Comment

This section is not acceptable as written. Once EWM becomes established, it does not "naturally eradicate". We recommend that all EWM colonies found through annual surveys be evaluated by the BFIT to determine the most appropriate course of action. We

refer you to the large paragraph contained in this section of the MDNR response to the plan and agree with it.

IVA Response

UPPCO disagrees with the proposed role of the BFIT. As licensee, UPPCO has the responsibility of implementation of the license. It is the responsibility of FERC to review the licensee's conclusions regarding the surveys and determine what control measures are warranted. This means of control has been accepted on other FERC projects such as FERC Project Nos. 10854, 10856, 2506, 2402, 2433, 2525, 2595, 2522, 2546, and 2581. For these reasons, UPPCO notes the objection to this control measure, but does not accept the recommendation.

V Comment

Fact sheets to be placed at boat landings, etc., may be provided by USFS or other agencies (in addition to MDNR). UPPCO has cooperated with USFS in placing a sign at Prickett Reservoir regarding the EWM infestation and how it is spread. We would suggest that should EWM be discovered in reservoirs within the Bond Falls project, a similar sign should be placed at access points for the infested reservoirs.

V Response

Comment noted.

VI Comments

Comment 1: *Documentation of submittal should be made to the full BFIT (no need to list individual agencies).*

Comment 2: *Also, instead of monitoring results being provided to BFIT for the first two years, we would like to see those results provided to BFIT in every year in which monitoring is conducted.*

Comment 3: *The documentation should also include a report on any control measures implemented that year, and/or planned for the following year, including whether the control was successful or not and any follow-up monitoring or treatment that may be needed.*

Response 1: The plan has been modified accordingly.

Response 2: The Eurasian water milfoil plan was misread. It states that the members of the BFIT will receive results every year a survey is conducted. The documentation of this agency submittal to FERC is being proposed only for the first two surveys. This allows FERC to ensure that the agency submittal procedure meets license requirements and allows FERC to review any comments the agencies may have in the beginning of the process. This method has been acceptable in the past for other FERC projects such as FERC Project No. 2433.

Response 3: UPPCO accepts the recommendation to include results of control methods, if applicable.

Exotic Species Monitoring Plan for Cisco Chain of Lakes

Comment IA (From the first page)

Although we understand that the Cisco Chain Riparian Owner's Association (CCROA) has been monitoring nuisance plant species on the Cisco Chain of Lakes in the past, this section should stipulate that annual surveys of all project waters will be conducted. This will ensure that all impoundment shorelines and wetlands will be surveyed annually in a uniform fashion as required by Article 411.

Response to IA

The plan has been modified accordingly.

IA-C Comment

The Cisco Chain of Lakes is comprised of 16 lakes totaling just over 4000 acres. NHRC agrees that it will be most cost effective and efficient to have CCROA continue monitoring the Cisco Chain for invasive plants. However, it must be conducted under an agreed upon protocol and not at the recreational convenience of the CCROA. The BFIT and UPPCO will have to agree upon the number of transects to be run per lake and how to have oversight responsibilities for the CCROA members performing the surveys. The protocol should be similar to that of the other three developments as well as that of the reporting format. Plant identification, survey procedures, reporting responsibilities and record-keeping requirements for CCROA members will have to be undertaken by UPPCO with BFIT agreement. We want the results of survey work performed by CCROA to be comparable to that done on the other development reservoirs.

IA-C Response

UPPCO disagrees that the survey method should match the method used by UPPCO. Doing so, would reduce the amount of surveying that is currently being conducted by the CCROA. The Cisco Flowage is a personal issue for the CCROA. They currently survey for Eurasian water milfoil from ice melt to ice formation. Limiting this group to survey an agreed upon number of transects, located in agreed upon locations would encourage them to reduce their effort.

UPPCO has amended the plan to include more detail on how all project waters and their adjoining wetlands will be surveyed during the proper times and not just at the recreational convenience of the CCROA. UPPCO also agrees that the reporting format should be similar to what UPPCO produces for the other flowages within this project. The plan has been modified accordingly.

ID Comment

NHMC requests that the following change be made: "In the event that the Cisco development is removed from Hydroelectric Project No. 1864, UPPCO WHI be relieved of the requirements related to the Cisco development and the responsibilities will be inherited by the new owner".

ID Response

UPPCO accepts the suggestion and the plan has been modified.

IIIA Comments

Annual survey results should be displayed on detailed lake maps according to size or abundance and including GPS coordinates. The map should clearly identify new colonies and previously documented colonies. We recommend an occurrence map for each lake in the Cisco Chain. Surveys are to be conducted annually. As noted above, a set protocol should be followed when conducting the surveys.

IIIA Responses

The plan has been amended to guarantee that any map submitted will clearly show the results.

IV A Comments

See previous comments about purple loosestrife control for the other developments. Timing of the surveys to be the same as 11 A. on page 3.

IV A Response

See previous responses about purple loosestrife control.

V Comment

Substitute the words "be responsible for insuring" for the word "see" in the first sentence.

V Response

Plan Amended