

We Energies 800 Industrial Park Drive Iron Mountain, MI 49801

www.we-energies.com

November 28, 2016

Ms. Kimberly D. Bose, Secretary Federal Energy Regulatory Commission Division of Licensing and Compliance 888 First Street, NE Washington, DC 20426

Dear Ms. Bose:

#### RE: 2016 Reports on Purple Loosestrife and Nuisance Plants

	FERC No.	License Article
Way / Michigamme Reservoir	1759	413
Hemlock Falls	2074	412
Lower Paint	2072	411
Peavy Falls	11830	411
Michigamme Falls	2073	412
Brule	2431	410
Twin Falls	11831	412
Pine	2486	413
Kingsford	2131	412
Big Quinnesec Falls	1980	412
Chalk Hill	2394	410
White Rapids	2357	410

The "Terrestrial Based Natural Resources Management Plan," filed in September of 1999 as part of the Wilderness Shores Settlement Agreement, which affects Way Dam (FERC No. 1759), Hemlock Falls (FERC No. 2074), Peavy Falls (FERC No. 11830), Michigamme Falls (FERC No. 2073), Lower Paint (FERC No. 2072), Twin Falls (FERC No. 11831), Kingsford (FERC No. 2131), and Big Quinnesec Falls (FERC No. 1980), and the "Order Modifying and Approving Purple Loosestrife and Eurasian Water Milfoil Monitoring Plan" issued on April 30, 1996, for the Pine (FERC No. 2486), August 14, 1997, for the Brule (FERC No. 2431), December 11, 1997, for the Chalk Hill (FERC No. 2394) and White Rapids (FERC No. 2357) projects, require We Energies to provide the final reports on the required annual and biennial monitoring for those projects no later than 30 days after the monitoring is completed. An annual extension for submitting these reports by the end of November was granted in 2010. Monitoring is scheduled each year for a portion of these twelve projects, with the field portion of the monitoring to be completed by August 25.

WAY.II.C.2.50 HEM.II.C.2.46 LPT.II.C.2.45 PEA.II.C.2.32 MCH.II.C.2.45 BRL.II.C.1.40 TWF.II.C.2.46 PIN.II.C.4.41 KFH.II.C.2.46 NEQ.II.C.2.45 CHP.II.C.1.41

#### **Report of 2016 AIS Monitoring**

Please find attached a report of Purple Loosestrife (PL) monitoring activities completed in 2016 consistent with the proposed plan submitted January 22, 2014 and Table 1. The results were presented by Mike Grisar of our environmental staff at our Annual Land Management Meeting held on October 20, 2016, with representatives from the Wisconsin and Michigan DNRs as well as some county and local agency representatives that work on tracking and controlling invasive species. The information was made available to everyone in attendance upon request.

Table 1: Comparison of 2016 PL Data Collected vs Proposed Plan Requirements

Table 1: companison o					
	Proposed New				
	Pl	an			
	2016	2016			
	Plan	Actual			
Way Dam	Х	Χ			
Hemlock Falls					
Peavy Falls					
Lower Paint	Х	Х			
Michigamme Falls					
Brule	Х	Χ			
Twin Falls	Х	Χ			
Pine					
Kingsford	Х	Х			
Big Quinnesec Falls	Х	Х			
Chalk Hill					
White Rapids					

Please call me at (906) 779-4099 if you have any questions concerning this filing.

Sincerely,

Todd P. Jastremski

Asset Manager Hydro Operations

cc: Elle Gulotty – MDNR

Nicholas Utrup – FWS Cheryl Laatsch – WDNR James Fossum – MHRC/RAW

John Zygaj – FERC CRO

Attachments:

2016 Annual Report – Nuisance Plant Control Survey (19 pages)

# We Energies 2016 Annual Report - Nuisance Plant Control Survey Big Quinnesec Falls Reservoir FERC Project #1980

#### Background and Methods

We Energies Environmental Department staff, Mr. Mike Grisar and Mr. Bill Braunschweig, conducted a survey from a boat of the entire shoreline at the Big Quinnesec Falls project on July 28, 2016. All waters and appropriate wetlands accessible from the boat were evaluated for the presence of purple loosestrife (*Lythrum salicaria*).

If any occurrences of purple loosestrife were observed, they were mapped using a Trimble XH GPS unit. Each location was identified as a stand and the number of plants, stems per plant, and relative age of the plants were recorded. Any plants observed were removed by hand including flowers, stems, and roots.

#### Results and Discussion

No purple loosestrife plants were observed along the shores of the Big Quinnesec Falls Reservoir project area.

#### **Conclusions**

Purple loosestrife has yet to be observed at the Big Quinnesec Falls project area since the nuisance plant surveys began. Diligent monitoring will continue to prevent an invasion of this species.

# We Energies 2016 Annual Report - Nuisance Plant Control Survey Kingsford Reservoir FERC Project #2131

#### Background and Methods

We Energies Environmental Department staff, Mr. Mike Grisar and Mr. Bill Braunschweig, conducted a survey from a boat of the entire shoreline at the Kingsford project on July 28, 2016. All waters and appropriate wetlands accessible from the boat were evaluated for the presence of purple loosestrife (*Lythrum salicaria*).

If any occurrences of purple loosestrife were observed, they were mapped using a Trimble XH GPS unit. Each location was identified as a stand and the number of plants, stems per plant, and relative age of the plants were recorded. Any plants observed were removed by hand including flowers, stems, and roots.

#### Results and Discussion

No purple loosestrife plants were observed along the shores of the Kingsford Reservoir project area.

#### Conclusions

Purple loosestrife has yet to be observed at the Kingsford project area since the nuisance plant surveys began. Diligent monitoring will continue to prevent an invasion of this species.

# We Energies 2016 Annual Report - Nuisance Plant Control Survey Twin Falls Reservoir FERC Project #11831

#### Background and Methods

We Energies Environmental Department staff, Mr. Mike Grisar and Mr. Bill Braunschweig, conducted a survey from a boat of the entire shoreline at the Twin Falls project on July 28, 2016. All waters and appropriate wetlands accessible from the boat were evaluated for the presence of purple loosestrife (*Lythrum salicaria*).

If any occurrences of purple loosestrife were observed, they were mapped using a Trimble XH GPS unit. Each location was identified as a stand and the number of plants, stems per plant, and relative age of the plants were recorded. Any plants observed were removed by hand including flowers, stems, and roots.

#### Results and Discussion

No purple loosestrife plants were observed along the shores of the Twin Falls Reservoir project area.

#### Conclusions

Purple loosestrife has yet to be observed at the Twin Falls project area since the nuisance plant surveys began. Diligent monitoring will continue to prevent an invasion of this species.

# We Energies 2016 Annual Report - Nuisance Plant Control Survey Brule Reservoir FERC Project #2431

#### Background and Methods

We Energies Environmental Department staff, Mr. Mike Grisar and Mr. Bill Braunschweig, conducted a survey from a boat of the entire shoreline at the Brule Reservoir project on July 27, 2016. All waters and appropriate wetlands accessible from the boat were evaluated for the presence of purple loosestrife (*Lythrum salicaria*).

If any occurrences of purple loosestrife were observed, they were mapped using a Trimble XH GPS unit. Each location was identified as a stand and the number of plants, stems per plant, and relative age of the plants were recorded. Any plants observed were removed by hand including flowers, stems, and roots.

#### Results & Discussion

No purple loosestrife plants were observed along the shores of the Brule Reservoir project area.

#### Conclusions

It was discouraging that a new location of purple loosestrife was observed in the Brule Reservoir for the first time in 2009. The entire plant was removed, including the flowering heads, stems, and root mass. The removal of the plant observed in 2009 was successful with no reoccurrence of this plant through 2016.

# We Energies 2016 Annual Report - Nuisance Plant Control Survey Lower Paint Reservoir FERC Project #2072

#### Background and Methods

We Energies Environmental Department staff, Mr. Mike Grisar and Mr. Bill Braunschweig, conducted a survey from a boat of the entire shoreline at the Lower Paint project on July 27, 2016. All waters and appropriate wetlands accessible from the boat were evaluated for the presence of purple loosestrife (*Lythrum salicaria*).

If any occurrences of purple loosestrife were observed, they were mapped using a Trimble XH GPS unit. Each location was identified as a stand and the number of plants, stems per plant, and relative age of the plants were recorded. Any plants observed were removed by hand including flowers, stems, and roots.

#### Results and Discussion

In 2010, purple loosestrife was observed for the first time on the Lower Paint Reservoir. A single purple loosestrife plant was observed and removed including the flowering heads, stems, and root mass. In 2014, a single plant was observed again in the upper shores of the reservoir, but approximately ½-mile downstream of where the plant was found in 2010. The entire plant was removed, and documented as an approximate 3 year old plant with 9 stems. Purple loosestrife was not observed in 2015 or 2016.

#### Conclusions

It is discouraging that purple loosestrife has been observed twice in Lower Paint. Fortunately, the manual removal of the 2010 plant was successful as it has not returned at that location. However, the discovery of a new plant in 2014 is an indication that a source population likely occurs upstream. Anecdotal reports have been made of purple loosestrife occurring upstream near Crystal Falls on the Paint River. Management by other parties will be necessary to reduce the potential for purple loosestrife to spread in the Menominee River system.

## We Energies 2016 Annual Report - Nuisance Plant Control Survey Way Dam & Michigamme Reservoir FERC Project #1759

We Energies Environmental department staff, Mr. Mike Grisar, Mr. Bill Braunschweig, Mr. Scott Horzen, and Mr. Tyson Schreiner conducted two separate surveys from a boat at the Way Dam and Michigamme Reservoir project on July 26, 2015 and August 16 and August 17, 2016. All waters and appropriate wetlands accessible from the boat were evaluated for the presence of purple loosestrife (*Lythrum salicaria*).

Additionally, We Energies and NRCS Dickinson County Conservation District staff surveyed the Michigamme River from the Highway 95 bridge north of Channing, MI downstream to Newberg Road at the Way Dam project boundary. These surveys occurred on July 25 and August 15, 2016. This is an approximate 5-mile stretch of the river that We Energies committed to surveying during the annual agency meeting in fall 2008. The effort was done to determine the extent of purple loosestrife immediately upstream of the Way Dam project, and to attempt to minimize the potential for a prolific invasion within the project limits and further down through the Menominee system.

If any occurrences of purple loosestrife were observed, they were mapped using a Trimble XH GPS unit. Each location was identified as a stand and the number of plants, stems per plant, and relative age of the plants were recorded. Any plants observed were removed by hand including flowers, stems, and roots.

#### Way Dam and Michigamme Reservoir Project Area

Purple loosestrife has been observed in the Michigamme Reservoir each year since 2006. Several years prior to 2006, it had been documented at a single location and as a single plant. Each year, every plant found has been removed. From 2006 through 2010 a rapid invasion occurred resulting in significant increases in the number of locations (i.e. stands), total plants, and total stems observed. Plants were found primarily in the east portions of the reservoir and upstream of where the Michigamme River outlets into the main reservoir basin. In 2010, it was the first time purple loosestrife had been observed beyond the mouth of the river and in the main basin, which was in two locations.

Dramatic declines in the number of locations, plants, and total stems were observed in 2011. However, the population spiked in 2012 when the highest recorded levels in the total number of plants and stems were observed. As a result of the 2012 spike, it was decided to conduct two separate surveys for purple loosestrife in an attempt to better locate plants that were developing later in the season and reduce the potential to find multi-year plants the following year. This also would reduce seed production and dispersal by plants not detected during the first survey. It has been noted that the flowering period for purple loosestrife in Way Dam has been variable. By conducting the two surveys each year in 2013 through 2016, it is evident that there is not a distinct peak flowering period, but rather the flowering of individual plants is spread out between mid-July and the end of August.

From the beginning of the recorded surveys (2006), the highest number of total stands and multi-year plant observations spiked in 2014. The 2014 total number of plants and stems observed was higher than 2013 observations, although these were less than previous peak levels observed in 2012. If only a single survey was completed in July as was done between 2006 through 2012, generally much less of an increase would have been observed in the

number of plants, number of stems, and multi-year plant observations. By comparing only the July survey data, this allows for a more direct comparison to previous years. Using the July 2014 results, the number of stands, total plants, and stems observed were comparable to the 2013 July survey results and significantly lower than the previous 2012 peak.

The 2015 survey resulted in the highest number of total stands recorded to date. However, approximately half the total plants, stems, and multi-year plants were observed in 2015 when compared to 2014 results. When considering only the July survey results, the population of purple loosestrife in 2015 was at the lowest levels observed since 2011. Similar to 2014, the additional August survey again proved very productive in 2015. It resulted in the removal of an additional 48% of all stands, 54% of all plants, and 51% of all stems found.

New highs were observed in 2016 in both the total number of stands and number of multi-year plants observed eclipsing the 2012 records. The total number of plants and stems observed increased by two and half times those recorded in 2015; however, these summative totals remained lower than the highest levels recorded in 2012. When comparing survey results from July only, the total number of stands observed was higher than all previous years. However, the number of plants, stems, and multi-year stems remained relatively constant from 2013-2016 and at much lower recorded levels since the 2012 peak.

Another measure of analyzing the management effectiveness is by removing the largest stands observed from the analysis. In each year since 2012, just three to four stands have accounted for a large percentage of the total plants and stems observed, particularly when evaluating only the July surveys. Statistically, with these stands removed from the calculations, the purple loosestrife population was on a consistent downward trend between 2010 and 2014. Slight increases have been observed between 2014 through 2016. Overall, there has been a very positive trend from 2010 through 2016.

One additional measure to determine management effectiveness is how many of the locations where purple loosestrife is found in a given year are locations where it was found in any previous year. Purple loosestrife has been found at 408 total locations in the past 10 years. Of these, only 61 (approximately 15%) stands documented between 2006 and 2015 were locations where the purple loosestrife returned in 2016. This has been a consistent trend since 2010.

While a majority of the stand locations are centralized around the Weber Lake area and upstream, purple loosestrife occurrences expanded further downstream in 2012 into the main reservoir. This was beyond where it had been previously documented prior to 2010. Up until 2010, the furthest downstream observations occurred about ½-mile upstream of where the Michigamme River enters the reservoir basin. By 2012, purple loosestrife had been observed throughout much of the main reservoir basin; however, it was widely distributed and in relatively few locations. In 2013, many of the stands documented to have spread through the main basin between 2010 through 2012 were no longer present. Through 2016, only nine total stands have been found in the main basin, only two of which were observed in 2016.

When considering all factors including the trends in reduced plants and stems as well as the relatively small proportion of the total stands reoccurring from one year to the next, the management technique of manual removal of all plant material has been successful. While it is very labor intensive to conduct these manual removals, it is successful at least at those locations where the loosestrife can be observed.

Two primary objectives will continue to drive the management plan for controlling purple loosestrife within Way Dam. These include early detection of new infestation locations as well as finding and thoroughly managing the larger stands. By implementing the second survey

strategy since 2013, the 2016 results suggest these goals are being achieved. By not conducting the second survey and removing the reproduction potential of these additional plants, the purple loosestrife population would likely have continued to increase exponentially as was being observed between 2006 and 2012.

We Energies plans to continue surveying and managing purple loosestrife at the Way Dam & Michigamme Reservoir project site annually to minimize the potential for mature plants setting and releasing seed into the reservoir.

#### Michigamme River – Highway 95 to Newberg Road

The increase in purple loosestrife within the Way Dam project lands is concerning as there is a viable purple loosestrife population occurring upstream of the Way Dam project area. In agreeing to conduct a survey on the Michigamme River further upstream from the project area, the Company is developing a better understanding of the extent to which purple loosestrife occurs upstream of the reservoir system. We Energies has also been collaborating with Ms. Ann Hruska of the NRCS Dickinson County Conservation District office and Ms. Lindsay Peterson, coordinator for the Wild Rivers Invasive Species Coalition, to combat the purple loosestrife infestation on the Michigamme River.

In 2009, surveys commenced along that stretch of the Michigamme River from the north end of the Way Dam project area up to the first road crossing at M-95 near the Dickinson and Marquette County line. Surveys have continued in this river stretch through 2016, and two distinct surveys were conducted each year from 2013 through 2016.

Similar to the population explosion that occurred in Way Dam, a dramatic increase in the purple loosestrife population occurred between 2009 and 2012. Similar to the trends between 2011 and 2012 on Way Dam, the river stretch experienced a substantial decline in the documented population in 2013. Then a spike in the population on the river stretch occurred again in 2014. Survey results in 2015 and 2016 show declines in the number of stands, plants, and stems observed since the 2014 peak.

Comparing the July 2014 results to 2013 data as a more direct comparison to the initial survey beginning in 2009, the number of stands, total plants, and stems observed increased substantially over the July 2013 observations. When comparing July 2015 and 2016 to July 2014, a substantial decrease was observed in each of the population categories.

To further improve the management effectiveness, the second survey conducted in each of the past three years has resulted in a significantly more thorough removal of purple loosestrife from the river stretch surveyed below M-95. The August 2016 survey resulted in the removal of an additional 56% of all the stands, 59% of all the plants, and 60% of all the stems detected in 2016 that would not have been removed from the system with the second survey.

Additionally, purple loosestrife has been found at 1101 total locations in the past 8 years. Of these, 203 (approximately 18%) stands documented between 2009 and 2015 were locations where the purple loosestrife returned in 2016.

The effort to expand our understanding of source populations upstream of the Way Dam project area expanded in 2010 by further collaboration with Ms. Ann Hruska. Ms. Hruska was awarded a Wilderness Shores Mitigation Enhancement Fund grant for conducting purple loosestrife management along the Michigamme River upstream of the Way Dam project area. In preparation for implementing this grant, Ms. Hruska conducted road surveys in August 2010 along access points from the M-95 crossing up to and north of Republic. Ms. Hruska found

numerous dense monotypic stands of purple loosestrife along the shores of the Michigamme River in and around the Republic, MI area. Some of these stands were several acres in size. Many other small stands were observed along the Michigamme River banks at road vantage points from the M-95 crossing at the Marquette and Dickinson County line upstream to Republic. It was quite evident the source population(s) for the loosestrife occurring in the Way Dam project area is from the area in and around Republic, MI.

In 2011 and 2012, Ms. Hruska continued the purple loosestrife management efforts upstream of Way Dam by conducting a more detailed survey in the Republic area and on portions of the Michigamme River up and downstream of Republic. She also began implementing a biological control management program for purple loosestrife targeting the most problematic stands documented in the presence/absence surveys she conducted. Further monitoring and biological control measures continued to be implemented in 2013. Results indicated the prior releases of beetles had been effective in reducing the extent and productivity of the source populations upstream of Way Dam. Unfortunately, there was very minimal evidence the released beetles survived the winter of 2013-14. Evidence the beetle populations recovered from the cold winter was observed in 2015. Additional beetles were reared and released with the long-term goal to establish a viable population of beetles that will be able to manage the purple loosestrife population as a self-sustaining biological control agent for the Michigamme River system.

The management activities that have occurred both within the Way Dam project area and the approximate 5-mile stretch of the Michigamme River upstream have had a direct and positive impact on keeping the purple loosestrife infestation within Way Dam in check. We Energies plans to continue to survey and remove purple loosestrife from this stretch between Highway 95 and Newberg Road in 2015. We intend to continue collaborating with Ms. Hruska and Ms. Peterson in further investigating source populations and management for purple loosestrife upstream of the Way Dam project area.

### We Energies Hydroelectric Operations Way Dam Purple Loosestrife Monitoring Summary (2006-2016)

July Survey Only

	2006	2007	2008	2009	2010	2011	2012	2013	2014	2015	2016
# of Observed Stands	4	6	30	28	68	53	65	39	39	55	69
# of Plants Observed	4	9	57	94	558	176	1239	240	275	159	297
# of Stems Observed	51	128	160	271	1732	397	1863	497	521	338	524
Stems Observed per Plant	12.75	14.22	2.81	2.88	3.1	2.26	1.50	2.07	1.89	2.13	1.76
Multi-year Plants Observations	2	4	9	31	314	110	429	190	254	132	230

Total (July & August Surveys Combined)

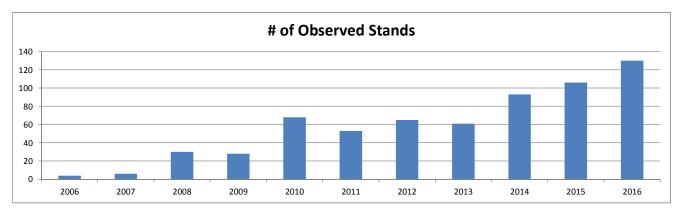
	Total (daly & Magast Galveys Combined)											
	2006	2007	2008	2009	2010	2011	2012	2013	2014	2015	2016	
# of Observed Stands	4	6	30	28	68	53	65	61	93	106	130	
# of Plants Observed	4	9	57	94	558	176	1239	290	720	347	890	
# of Stems Observed	51	128	160	271	1732	397	1863	680	1247	686	1714	
Stems Observed per Plant	12.75	14.22	2.81	2.88	3.1	2.26	1.50	2.34	1.73	1.98	1.93	
Multi-year Plants Observations	2	4	9	31	314	110	429	233	565	269	756	

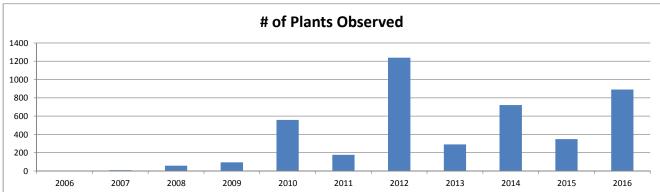
July Survey with Largest Stands Removed

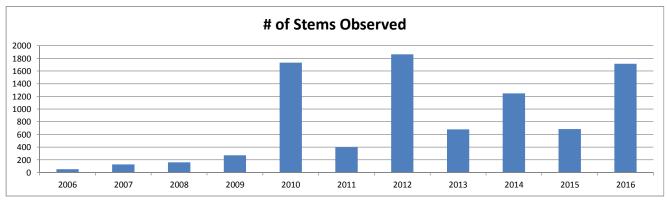
	2006	2007	2008	2009	2010	2011	2012	2013	2014	2015	2016
# of Observed Stands	4	6	30	28	68	53	61	62	36	52	57
# of Plants Observed	4	9	57	94	558	176	111	93	86	113	132
# of Stems Observed	51	128	160	271	1732	397	358	248	247	277	259
Stems Observed per Plant	12.75	14.22	2.81	2.88	3.10	2.26	1.50	2.67	2.87	2.45	1.96
Multi-year Plants Observations	2	4	9	31	314	110	170	88	81	97	107

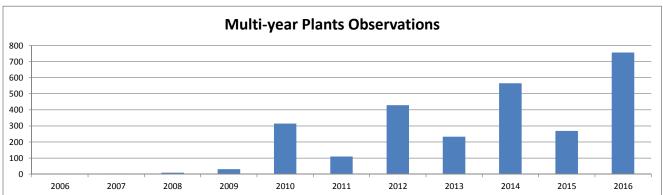
#### We Energies - Purple Loosestrife Monitoring 2006-2016 on Way Dam Reservoir

Total Observations

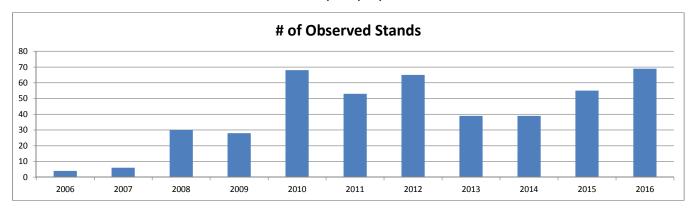


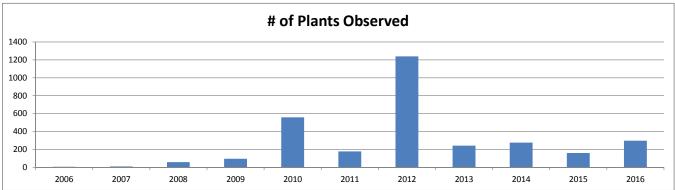


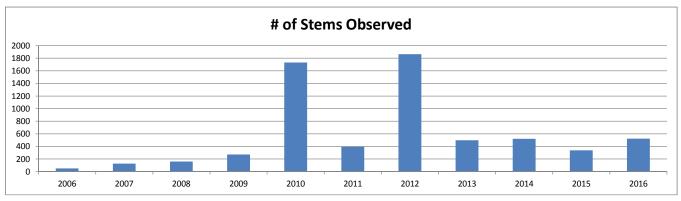


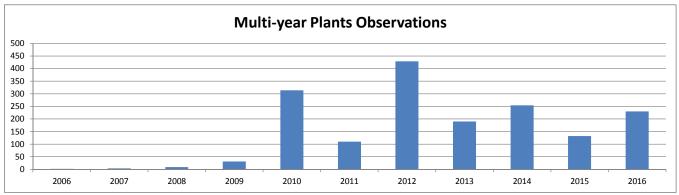


We Energies - Purple Loosestrife Monitoring 2006-2016 on Way Dam Reservoir July Survey Only

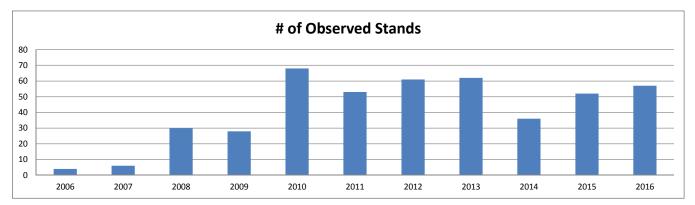


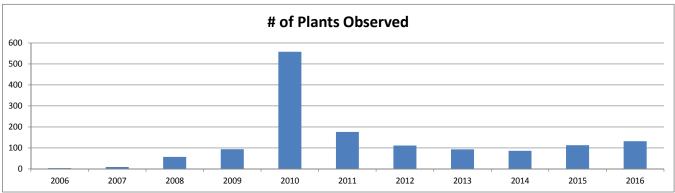


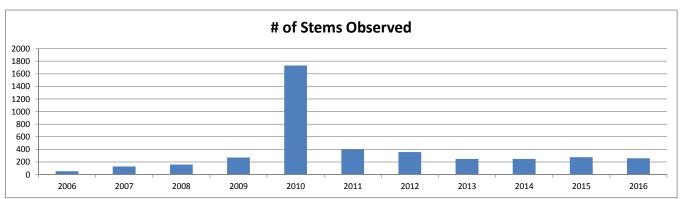


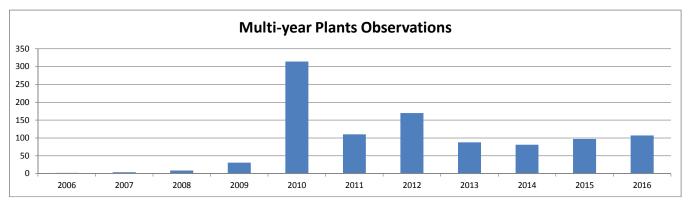


### We Energies - Purple Loosestrife Monitoring 2006-2016 on Way Dam Reservoir July survey only minus largest 2012-2016 stands









### We Energies Hydroelectric Operations Michigamme River Purple Loosestrife Monitoring (2009-2016)

July Survey Only

_	2009	2010	2011	2012	2013	2014	2015	2016
# of Observed Stands	56	140	149	217	99	221	168	157
# of Plants Observed	113	362	592	915	361	535	292	352
# of Stems Observed	361	1234	1149	1732	585	873	487	584
Stems Observed per Plant	3.19	3.41	1.94	1.89	1.62	1.63	1.67	1.66
Multi-year Plants Observations	79	317	282	525	280	451	230	278

Total (July & August Surveys Combined)

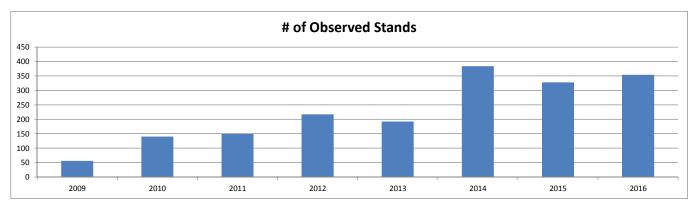
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	2009	2010	2011	2012	2013	2014	2015	2016	
# of Observed Stands	56	140	149	217	192	384	328	354	
# of Plants Observed	113	362	592	915	686	994	755	859	
# of Stems Observed	361	1234	1149	1732	1132	1750	1473	1470	
Stems Observed per Plant	3.19	3.41	1.94	1.89	1.65	1.76	1.95	1.71	
Multi-year Plants Observations	79	317	282	525	524	832	636	653	

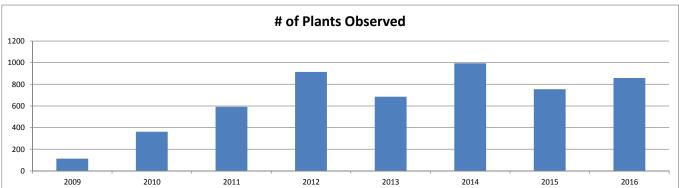
July Survey with Largest Stands Removed

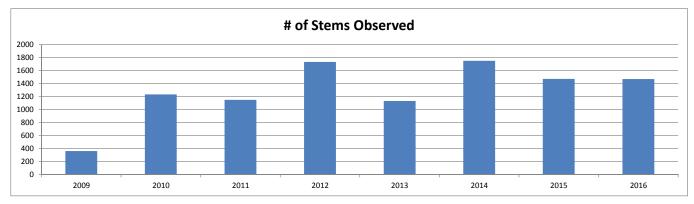
_	day carvey with Largest Stands Removed									
	2009	2010	2011	2012	2013	2014	2015	2016		
# of Observed Stands	56	140	149	217	96	219	168	156		
# of Plants Observed	113	362	592	915	242	498	292	324		
# of Stems Observed	361	1234	1149	1732	399	817	487	529		
Stems Observed per Plant	3.19	3.41	1.94	1.89	1.65	1.64	1.67	1.63		
Multi-year Plants Observations	79	317	282	525	192	417	230	255		

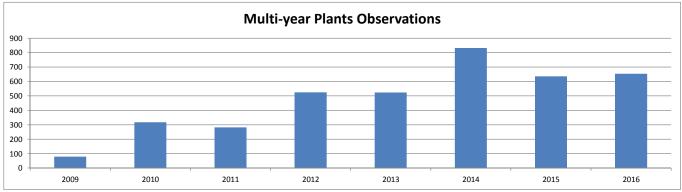
<sup>\*</sup> No large stands observed during the July 2015 surveys.

### We Energies - Purple Loosestrife Monitoring 2009-2016 on Michigamme River

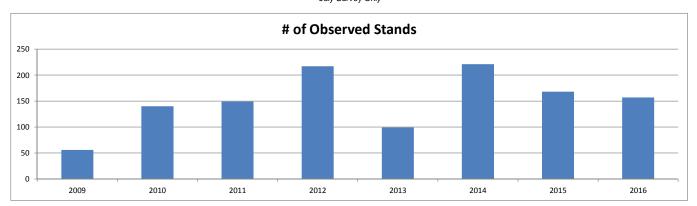


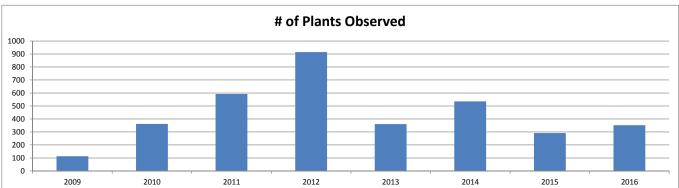


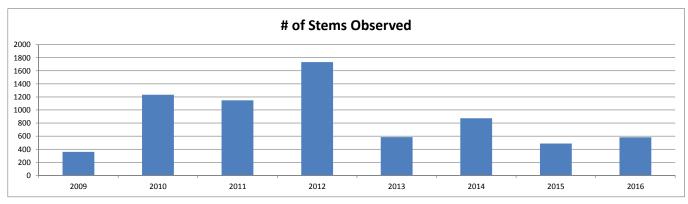


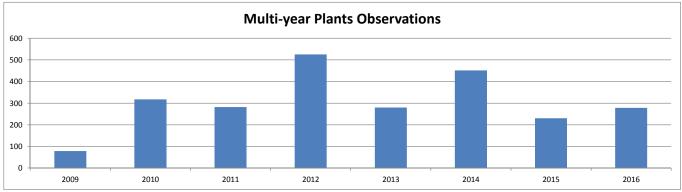


### We Energies - Purple Loosestrife Monitoring 2009-2016 on Michigamme River July Survey Only









### We Energies - Purple Loosestrife Monitoring 2009-2016 on Michigamme River July survey only minus largest 2013-2016 stands

