

June 7, 2010

**Upper Peninsula Power Company** 

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

FERC Project #1864

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

Dear Secretary Bose:

Request for Amendment for the Bond Falls Hydroelectric

<u>Project #1864 to the FERC Approved Nuisance Plant Control Plan Article 411</u>

Upper Peninsula Power Company (UPPCO) is requesting an Amendment to the Federal Energy Regulatory Commission (FERC) Order Modifying and Approving Nuisance Plant Control Plan for the Bond Falls Hydroelectric Project issued February 24, 2005.

In particular, UPPCO is requesting an amendment to the Exotic Species Monitoring Plan for the Cisco Chain of Lakes Section of the Approved Nuisance Control Plan. Appendix A includes the proposed changes to Exotic Species Monitoring Plan for the Cisco Chain of Lakes Section of the Approved Nuisance Control Plan.

The proposed changes to the Exotic Species Monitoring Plan for the Cisco Chain were provided to the Bond Falls Implementation Team (BFIT) for comments on April 12, 2010. The Michigan Department of Natural Resources and Environment (MDNRE) was the only BFIT member to provide comments. Documentation of Consultation with the BFIT is provided as Appendix B.

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

Sincerely,

Terry P. Jensky

Vice President - Energy Supply Operations for Wisconsin Public Service Corporation

syx

CC:

Ms. Carlisa Linton-Peters, FERC - D.C.

Ms. Joan Johanek, WPS, D2 Mr. Howard Giesler, WPS - PUL Mr. Gil Snyder, WPS - D2

Mr. Shawn Puzen, IBS - D2

Mr. Jim Melchiori, UPPCO - UVD

# BOND FALLS HYDROELETRIC PROJECT APPENDIX B DOCUMENTATION OF CONSULATION

# Eurasian Water Milfoil Monitoring Plan for the Cisco Chain of Lakes

#### Objective:

Eurasian water milfoil (*Myriophyllum spicatum*) is an exotic aquatic macrophyte that can exhibit aggressive characteristics. This plant is becoming increasingly common to inland lakes and rivers. In consultation with the Bond Falls Implementation Team (BFIT), Upper Peninsula Power Company (UPPCO) will periodically monitor for 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 Eurasian water milfoil survey utilizing a boat to take samples near boat landings and other high recreational areas. Transects will be approximately 36 feet in length.

One transect shall be collected at each lake. Each transect should be positioned at boat landings or high recreational areas where available. If not available, than the transect shall be placed in an area where EWM is currently located or where early EWM introduction is likely.

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.

Additionally, a boat meandering survey in likely EWM areas shall be completed for the entire reservoir, if EWM is found the extent of the stand perimeter will document. GPS coordinates will be collected.

# II. Frequency of Survey

A. Following plan approval, a survey of the transects will be conducted in July, August, or September. The survey will then be conducted every third year thereafter.

#### 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.

# Purple Loosestrife Monitoring Plan for the Cisco Chain of Lakes

#### Objective:

To monitor for the presence and 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. UPPCO proposes to 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 BFIT prior to implementation.

#### I. Methods

A. The monitoring methods will include a survey of the impoundment shorelines, plus adjoining wetlands within the project boundary. The surveys will be conducted by boat.

UPPCO owns very limited property within the project boundary. If purple loosestrife is observed within an adjoining wetland within the project boundary, then UPPCO will contact the property owner and ask for permission to control the purple loosestrife. UPPCO will only control the purple loosestrife if permission can be granted and the permission is at no cost to UPPCO.

## II. Frequency of Survey

A. Following plan approval, the survey will be taken annually in July, August or September, depending upon when the plants are in bloom.

#### III. Documentation of Existing Colonies

- A. The results of the survey will be displayed on a map of the total project area. UPPCO will also document 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

If control is warranted, UPPCO will consultant with the BFIT on the most appropriate control method.

## Nuthals, James D

From:

Nuthals, James D

Sent:

Monday, April 12, 2010 1:00 PM

To:

'Jessica Mistak'; 'Christie\_Deloria@fws.gov'; 'Norman Nass'; 'Gene Mensch'; Melchiori, James

R: 'Stephen.Gilbert@wisconsin.gov'

Cc: Subject: Puzen, Shawn C; 'James Schramm'; 'Mark Fedora'

Proposed Amendment to the Exotic Species Monitoring Plan for the Cisco Chain of Lakes -

Bond Falls Hydroelectric Project P-1864 Nuisance Control Plan, Article 411

Attachments:

Proposed Amendment to the Exotic Species Monitoring Plan for the Cisco Chain of Lakes.pdf



Proposed endment to the Exo

Greetings,

Upper Peninsula Power Company (UPPCO) is proposing to file with the Federal Energy Regulatory Commission (FERC) for an amendment to the Exotic Species Monitoring Plan for the Cisco Chain of Lakes - Bond Falls Hydroelectric Project P-1864, Nuisance Control Plan Article 411.

The proposed changes include; completing the Eurasian water milfoil and the purple loosestrife surveys at the Cisco Chain Lakes in a format similar to the exotic species monitoring plans for Victoria, Bond Falls, and Lake Gogebic AND that the exotic species surveys do not necessarily have to be completed by a specific Association.

UPPCO is providing thirty (30) days for comment to the attached Proposed Amendment to the Exotic Species Monitoring Plan for the Cisco Chain of Lakes.

Comments will need to be received by May 11, 2010. If comments are not received by this date, UPPCO will assume you support the amendment as proposed.

In discussions with Ms. Carlisa Linton- Peters from FERC, UPPCO would need to provide an amendment to the Exotic Species Monitoring Plan for the Cisco Chain of Lakes if survey methods were to change from the currently approved plan during the 2010 field season. Additionally, to ensure that the surveying methods proposed in the amendment can be completed during the 2010 field survey season, UPPCO will be filing with FERC a "Notice of Proposed Changes" concerning the 2010 exotic species surveys at the Cisco Chain of Lakes.

UPPCO is proposing to competitively bid the 2010 exotic species survey activities for the Cisco Chain of Lakes. One consultant that will be provided a request for proposal includes the Cisco Chain Riparian Owners Association. It will also be provided to other consultants.

The bids received will be provided to the Bond Falls Implementation Team (BFIT) to evaluate. UPPCO in consultation with the BFIT will award the contract.

UPPCO has also indicated in the plan that the BFIT is cooperating to develop an Aquatic Invasive Species Plant Management Plan for the Cisco Chain of Lakes. UPPCO indicates that another amendment to the plan including the Aquatic Invasive Species Plant Management Plan would be filed with FERC upon completion. This plan would supersede any exotic species plan for the Cisco Chain of Lakes.

Please remember to provide your comments by May 11, 2010. If you have any questions concerning this information, please contact me at your earliest convenience.

Sincerely,

Jamie Nuthals Environmental Services-

# Purple Loosestrife Monitoring Plan for the Cisco Chain of Lakes

# Objective:

To monitor for the presence and 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. UPPCO proposes to 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 BFIT prior to implementation.

#### Methods

A. The monitoring methods will include a survey of the impoundment shorelines, plus adjoining wetlands within the project boundary. The surveys will be conducted by boat.

UPPCO owns very limited property within the project boundary. If purple loosestrife is observed within an adjoining wetland within the project boundary, then UPPCO will contact the property owner and ask for permission to control the purple loosestrife. UPPCO will only control the purple loosestrife if permission can be granted and the permission is at no cost to UPPCO.

#### II. Frequency of Survey

A. Following plan approval, the survey will be taken annually in July, August or September, depending upon when the plants are in bloom.

#### III. Documentation of Existing Colonies

- A. The results of the survey will be displayed on a map of the total project area. UPPCO will also document 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

If control is warranted, UPPCO will consultant with the BFIT on the most appropriate control method.

# MICHIGAN DEPARTMENT OF NATURAL RESORUCES AND THE ENVIRONMENT COMMENT

plan for the Cisco Chain of Lakes.

Please remember to provide your comments by May 11, 2010. If you have any questions concerning this information, please contact me at your earliest convenience.

Sincerely,

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