

December 22, 2017

Wisconsin Public Service Corporation

700 North Adams Street P.O. Box 19001 Green Bay, WI 54307-9001

www.wisconsinpublicservice.com

Ms. Kimberly D. Bose, Secretary Federal Energy Regulatory Commission 888 First Street NE Washington DC 20425

Dear Ms. Bose:

SUBJECT: Invasive Species Monitoring Plan

| <u>Hydro</u> | FERC Project No. | NATDAM No. | License Article |
|--------------|------------------|------------|-----------------|
| Petenwell | 1984 | WI00740 | 408 |
| Castle Rock | 1984 | WI00724 | 408 |

In accordance with the Federal Energy Regulatory Commission (FERC) Order Approving the Revised Invasive Species Monitoring Plan for the Petenwell and Castle Rock Hydroelectric Project (Project) issued on July 13, 2005 and the Order Amending Purple Loosestrife Control Measures issued July 9, 2009, Wisconsin River Power Company (WRPCO) is required to file the purple loosestrife (PL) monitoring reports to FERC by December 31 of the corresponding year a survey has been completed.

2017 Purple Loosestrife Survey Results

A survey for PL was completed on August 2 and August 23, 2017. Twenty-eight colonies of PL were identified at the Petenwell and Castle Rock Hydroelectric Projects. Of the twenty-eight colonies, fifteen were small or medium colonies and were completely hand pulled and disposed of offsite. No colonies were sprayed to avoid adverse impacts to existing or potential new populations of *Galerucella species* beetles. Appendix A includes the 2017 PL survey results and figures.

In 2017, approximately 4,000 *Galerucella species* beetles were released, roughly 2,000 beetles in two different locations to supplement existing beetle populations. WRPCO observed beetle feeding on twenty-four of the twenty-eight identified colonies.

WRPCO proposes to continue monitoring for PL and releasing a minimum total of 4,000 beetles in at least two separate locations as a biological control method in an attempt to establish healthy beetle populations throughout the Project. WRPCO will complete the next PL survey in 2018, in conjunction with the Eurasian Water Milfoil (EWM) survey.

2017 Eurasian Water Milfoil Survey Results

In accordance with the Plan, EWM surveys are completed once every three years, with the next survey scheduled for 2018.

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Ms. Kimberly D. Bose December 22, 2017 Page 2 of 2

A copy of this report was submitted to the Wisconsin Department of Natural Resources (WDNR) and the US Fish and Wildlife Service (FWS) on October 31, 2017. FWS provided documentation that they had no comments. The WDNR did not provide any comments. Documentation of Consultation is located in Appendix B. In the interest of paperwork reduction, redundant materials are not included in the Documentation of Consultation.

Should you have any questions relative to this material, please do not hesitate to contact Jes Roloff at (920) 433-5558 or email at JRRoloff@integrysgroup.com.

Sincerely,

Todd P. Jastremski

Asset Manager Hydro Operations

We Energies

800 Industrial Park Drive

Iron Mountain, MI 49801

JRR/rjv

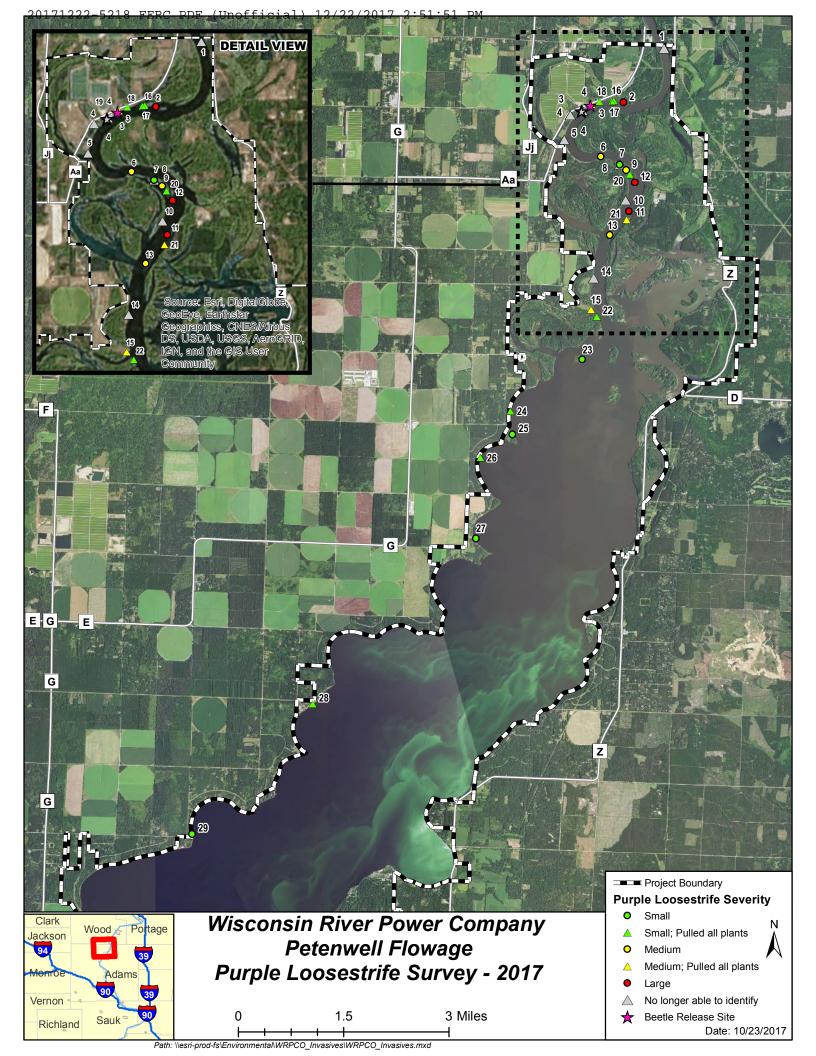
Enc: Appendix A - 2017 Purple Loosestrife Survey Figures and Data (6 pages)

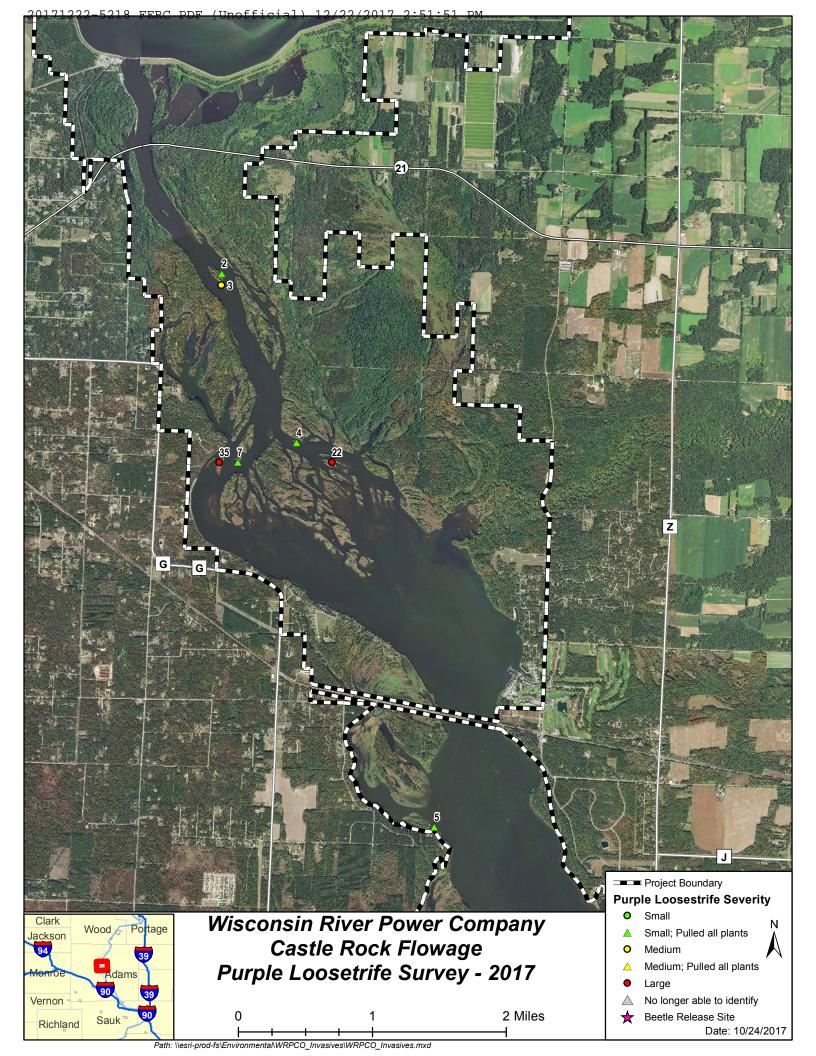
Appendix B - Documentation of Consultation (13 pages)

cc: Ms. Cheryl Laatsch, WDNR

Mr. Nicholas Utrup, USFWS Mr. John Zygaj, FERC - CRO

APPENDIX A 2017 PURPLE LOOSESTRIFE FIGURES AND DATA





2017 Purple Loosestrife Survey Form

Hydroelectric project: <u>Petenwell and Castle Rock Hydroelectric Project</u>

Beetle Release Date: June 21, 2017

Petenwell Inspection date: <u>August 23, 2017</u> Castle Rock Inspection date: <u>August 2, 2017</u>

| | | | General Plant Vigo | | | | |
|-------------|--------------------------------|--|---|--|--|----------------------------|------------------------------------|
| Colony ID # | Colony Size S 0-5 M 6-50 L >50 | Plant Height 4 = >4ft 3 = 2-4ft 2 = 1-2ft 1 = <1ft | Plant Flowering 4 = 100% of plants 3 = 51-99% of plants 2 = 26-50% of plants 1 = <25% of plants | Beetle Feeding 5 = 0% feeding 4 = 1 - 25% feeding 3 = 26-50% feeding 2 = 51-75% feeding 1 = >76% feeding | Total Plant Vigor 10-12 = good 7-9 = fair 4-6 = poor 0-3 = very poor | Notes | GPS Point |
| 1 | | | No Longe | r Able To Identify | | | 1092 (old point) |
| 2 | L >50 | 4 | 3 | 3 | 10 | 2018 beetle release site. | 1649 |
| 3 | | | No Longer Able To | dentify. | | Released 1,000 beetles. | 1109 & 1091 (old point) |
| 4 | | | No Longer Able To | dentify. | | Released 3,000 beetles. | 1110, 1111, 1094 (old point) |
| 5 | | | No Longe | r Able To Identify | | T | 930 (old point) |
| 6 | M 6-50 | 3 | 2 | 3 | 8 | | 1644 |
| 7 | | | No Longe | Able To Identify | | <u> </u> | 1096 (old point) |
| 8 | S 0-5 | 3 | 3 | 3 | 9 | | 1643 |
| 9 | M 6-50 | 3 | 2 | 2 | 7 | | Did not GPS |
| 10 | | T | No Longe | r Able To Identify | | Т | 924 (old point) |
| 11 | L >50 | 3 | 2 | 2 | 7 | | 1640 |
| 12 | L >50 | 4 | 3 | 2 | 9 | | 1641 |
| 13 | M 6-50 | 3 | 3 | 3 | 9 | | 1638 |
| 14 | | | No Longe | Able To Identify | | T | 1099 (old point) |
| 15 | M 6-50 | 2 | 2 | 3 | 7 | Pulled all plants. | 1637 |
| 16 | S 0-5 | 3 | 3 | 4 | 10 | NEW. Pulled all plants. | 1648 |

2017 Purple Loosestrife Survey Form

Hydroelectric project: Petenwell and Castle Rock Hydroelectric Project

Beetle Release Date: June 21, 2017

Petenwell Inspection date: August 23, 2017 Castle Rock Inspection date: August 2, 2017

General Plant Vigor **Beetle Feeding** Plant Height Plant Flowering 5 = 0% feeding **Total Plant Vigor** 4 = >4ft 4 = 100% of plants 4 = 1 - 25% feeding 10-12 = good **Colony Size** S 0-5 3 = 2-4ft3 = 51-99% of plants 3 = 26-50% feeding 7-9 = fairM 6-50 2 = 1-2ft 2 = 26-50% of plants 2 = 51-75% feeding 4-6 = poorColony ID# L >50 1 = <1ft 1 = <25% of plants 1 = >76% feeding 0-3 = very poor**GPS Point** Notes NEW. Pulled all 17 S 0-5 3 5 12 1647 4 plants. NEW. Pulled all S 0-5 2 10 plants. 1646 18 4 4 NEW. Pulled all 19 2 10 1645 M 6-50 4 4 plants. NEW. Pulled all 1642 20 S 0-5 3 2 3 8 plants. NEW. Pulled all 21 M 6-50 3 3 3 9 plants. 1639 NEW. Pulled all 22 S 0-5 4 3 4 11 plants. 1636 S 0-5 3 3 10 NEW. 1635 23 4 NEW. Pulled all 24 3 3 10 1634 S 0-5 4 plants. S 0-5 25 2 2 4 8 NEW. 1633 NEW. Pulled all 26 S 0-5 4 4 4 12 plants. 1632 27 S 0-5 3 3 5 16311 NEW. Pulled all 28 S 0-5 4 3 4 11 plants. 1629 Need shovel to 29 S 0-5 4 3 remove roots. 1650 4 11 22 (old point) 30 No Longer Able to Identify Castle Rock NEW. Pulled all 1750 Castle S 0-5 31 4 3 4 11 plants. Rock

2017 Purple Loosestrife Survey Form

Hydroelectric project: <u>Petenwell and Castle Rock Hydroelectric Project</u>

Beetle Release Date: June 21, 2017

Petenwell Inspection date: <u>August 23, 2017</u> Castle Rock Inspection date: <u>August 2, 2017</u>

| | | | General Plant Vigo | or | | | |
|-------------|---|--|---|--|--|-----------------------------------|----------------------------|
| Colony ID # | Colony Size S 0-5 M 6-50 L >50 | Plant Height 4 = >4ft 3 = 2-4ft 2 = 1-2ft 1 = <1ft | Plant Flowering 4 = 100% of plants 3 = 51-99% of plants 2 = 26-50% of plants 1 = <25% of plants | Beetle Feeding 5 = 0% feeding 4 = 1 - 25% feeding 3 = 26-50% feeding 2 = 51-75% feeding 1 = >76% feeding | Total Plant Vigor 10-12 = good 7-9 = fair 4-6 = poor 0-3 = very poor | Notes | GPS Point |
| <u> </u> | | | P | 0 | , , , | 110,00 | <u> </u> |
| 32 | M 6-50 | 4 | 3 | 4 | 11 | | 1749 & 1751 Castle Rock |
| 33 | S 0-5 | 4 | 3 | 5 | 12 | NEW. Pulled all plants. | 1752 Castle Rock |
| 34 | S 0-5 | 4 | 3 | 5 | 12 | NEW. Pulled all plants. NEW. 2018 | 1753 Castle Rock |
| 35 | L >50 | 4 | 3 | 4 | 11 | beetle release site. | 1747 Castle Rock |
| 36 | S 0-5 | 2 | 1 | 4 | 7 | NEW. Pulled all plants. | 1748 Castle Rock |
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APPENDIX B DOCUMENTATION OF CONSULTATION



October 24, 2017

Wisconsin Public Service Corporation

700 North Adams Street P.O. Box 19001 Green Bay, WI 54307-9001

www.wisconsinpublicservice.com

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

Dear Ms. Laatsch:

Invasive Species Monitoring Plan

| <u>Hydro</u> | FERC Project No. | NATDAM No. | <u>License Article</u> |
|--------------|------------------|------------|------------------------|
| Petenwell | 1984 | WI00740 | 408 |
| Castle Rock | 1984 | WI00724 | 408 |

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In 2017, approximately 4,000 *Galerucella species* beetles were released in two different locations to supplement existing beetle populations. WRPCO observed beetle feeding on twenty-four of the twenty-eight identified colonies.

WRPCO proposes to continue monitoring for PL and releasing a minimum of 4,000 beetles in at least two separate locations as a biological control method in an attempt to establish healthy beetle populations throughout the Project. WRPCO will complete the next PL survey in 2018, in conjunction with the EWM survey.

2017 Eurasian Water Milfoil Survey Results

As per the Plan, Eurasian Watermilfoil surveys are completed once every three years, with the next survey scheduled for 2018.

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Ms. Cheryl Laatsch October 24, 2017 Page 2 of 2

Please provide any comments you may have regarding this report within 30 days. Should you have any questions relative to this material, please do not hesitate to contact me at (920) 433-5558 or JRRoloff@integrysgroup.com.

Sincerely,

Jes Roloff

Environmental Consultant

Jessica R. Roloff

Enclosures

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October 24, 2017

Wisconsin Public Service Corporation

700 North Adams Street P.O. Box 19001 Green Bay, WI 54307-9001

www.wisconsinpublicservice.com

Mr. Nicholas Utrup U.S. Fish & Wildlife Service Department of the Interior 4101 American BLVD E Bloomington, MN 55425

Dear Mr. Utrup:

Invasive Species Monitoring Plan

| <u>Hydro</u> | FERC Project No. | NATDAM No. | License Article |
|--------------|------------------|------------|-----------------|
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Mr. Nicholas Utrup October 24, 2017 Page 2 of 2

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Jes Roloff

Environmental Consultant

Jessica R. Roloff

Enclosures

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COMMENTS RECEIVED BY THE US FISH AND WILDLIFE SERVICE

Roloff, Jessica R

From: Utrup, Nick <nick_utrup@fws.gov>
Sent: Tuesday, November 28, 2017 6:45 AM

To: Roloff, Jessica R

Subject: Re: Invasive Species Monitoring Reports

WARNING: This email was sent from an external address. Exercise caution when opening links or attachments. Thanks Jes, I don't have any comments.

Nick

Nick Utrup U.S. Fish and Wildlife Service Minnesota/Wisconsin Field Office 4101 American Boulevard East Bloomington, MN 55425

Office: (952) 252-0092 Ext. 204

FAX: (952) 646-2873 Email: <u>Nick_Utrup@fws.gov</u>

On Mon, Nov 27, 2017 at 3:23 PM, Roloff, Jessica R < <u>JRRoloff@integrysgroup.com</u>> wrote:

Hi Nick,

I just realized that the due dates I gave for the invasive comments fell on the Holiday weekend. That was not intentional. I was just counting 30 days from when I sent the reports and even though I could obviously see "Thanksgiving" on my calendar; it didn't register!

If you do have comments please feel free to take till the end of the month.

Thanks,

Jes Roloff

Environmental Consultant

WEC Energy Group – Business Services

office: 920-433-5558

fax: 920-433-1176

email: JRRoloff@integrysgroup.com

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From: Roloff, Jessica R

Sent: Wednesday, November 22, 2017 1:06 PM

To: 'nick_utrup@fws.gov'

Subject: Invasive Species Monitoring Reports

Good Afternoon Nick,

I just wanted to send a friendly reminder that comments on the Hydro Electric Project Invasive Species Monitoring Reports for Petenwell and Castle Rock are due by Friday, November 24; Grand Rapids is due by Saturday, November 25; and Wausau is due by Monday, November 27. Please let me know if you have any comments or questions on the reports that were sent last month that you would like included in our final reports to FERC in December.

I appreciate your time.

Thank you

Jes Roloff

Environmental Consultant

WEC Energy Group – Business Services

office: 920-433-5558

fax: 920-433-1176

email: JRRoloff@integrysgroup.com

Serving WEC Energy Group, We Energies, Wisconsin Public Service, Michigan Gas Utilities, Minnesota Energy Resources, Peoples Gas and North Shore Gas.

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From: Roloff, Jessica R

Sent: Tuesday, October 24, 2017 3:12 PM

To: nick_utrup@fws.gov

Subject: WRPCO Invasive Species Monitoring Report

Good Afternoon Mr. Utrup,

In accordance with the Federal Energy Regulatory Commission (FERC) Order Approving the Revised Invasive Species Monitoring Plan for the Petenwell and Castle Rock Hydroelectric Project issued on July 13, 2005 and the Order Amending Purple Loosestrife Control Measures issued July 9, 2009, Wisconsin River Power Company (WRPCO) is to provide monitoring reports of the purple loosestrife (PL) surveys to the Wisconsin Department of Natural Resources (WDNR) and U.S. Fish & Wildlife Service (FWS) by October 31, each year a survey has been completed. Please see attached for the monitoring reports.

Please provide any comments you may have regarding this report within 30 days. Should you have any questions relative to this material, please do not hesitate to contact me.

Jes Roloff

Environmental Consultant

WEC Energy Group – Business Services

office: 920-433-558

fax: 920-433-1176

email: JRRoloff@integrysgroup.com

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