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FEDERAL ENERGY
REGULATORY COMMISSION

CONSOLIDATED PAPERS, INC.

NIAGARA DIVISION
1101 MILL STREET, NIAGARA, WI 54151-1432
PHONE: (715) 251-3151 FAX: (715) 251-1730

December 1, 1997

The Honorable Lois D. Cashell, Secretary
Federal Energy Regulatory Commission
888 First Street NE-11G-1
Washington, DC 20426

Re: Little Quinnesec Project
FERC Project No. 2536 - 022

Subject: License Compliance for Article 409 in Order Issuing a New License
for Little Quinnesec Project, FERC No. 2536

Dear Secretary Cashell:

Enclosed are an original and seven (7) copies of a plan to control the spread of Purple Loosestrife and Eurasian Milfoil for the Little Quinnesec Project, FERC No. 2536, operated by Consolidated Papers, Inc., Niagara Division.

This plan was developed with consultation with Michigan DNR, Wisconsin DNR and US Fish and Wildlife Service.

The plan was provided to the resource Agencies on October 15, 1997. Comments on the plan were received in early November from all three Agencies. Copies of the plan cover letter and Agency comment letters are included as part of this filing.

The resource Agencies made the following comments:

- Include the area 1/4 mile downstream from the project. (MDNR) The plan has been modified to include the area 1/4 mile downstream from the project. This area is outside the project boundary.
- Note that Purple Loosestrife has been found in the area. (MDNR) The plan has been modified to include a comment of Purple Loosestrife and Eurasian Milfoil sightings in the Menominee River basin.

FERC - DOCKETED

DEC - 4 1997

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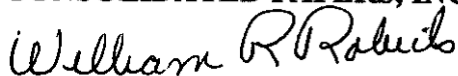
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- Provide signs at recreation areas to assist public in identification of these plants and control measures. The plan has been modified to provide this information at recreation sites.
- Provide brochures regarding identification and control of these plants at recreation sites. Niagara believes these brochures will create litter at the recreation sites. Niagara will provide brochures when requested. This opportunity will be included on the signs at the recreations sites.
- Agencies commented on the timing of the annual survey. The plan has been modified to schedule the survey between July 25 and August 15.
- Agency comments included recommendations for locating plants with GPS coordinates and floating markers in case of Eurasian Milfoil. The Little Quinnesec impoundment consists of only 349 surface acres. The downstream area to be surveyed is estimated to be 60 acres. This relatively small area allows us to easily pinpoint, with reasonable accuracy, the locations of these evasive species on a project map. Therefore, we do not feel locating with GPS is warranted or beneficial. Further, measuring the size of these colonies by use of transacts and counts of subsets is time consuming and outside of the scope of what should be expected of a licensee in cooperating with the resource Agencies in their management of the States natural resources. Niagara will provide, as part of their reports on the monitoring efforts, relative size of the colony and percentage of surface water covered. These more subjective, but less intensive measuring techniques, provide sufficient data to monitor these species in the impoundment and downstream from the project.

Please direct questions or comments to Bill Roberts at Consolidated Papers, Inc., Niagara Division (715) 251-8278.

Yours truly,

CONSOLIDATED PAPERS, INC.



William R. Roberts
Power Superintendent

WRR:sd
enclosure

cc: Craig Paulson
Paul Penkivech
Roger Chapman
Dave Schmutzler
Mark Anderson (PS)
FERC file

Compliance Plan Distribution List:

CPI: Craig Paulson
Paul Penkivech
Roger Chapman
Dave Schmutzler
Mark Anderson (PS)
FERC file

Agencies: Gary Whelan
MDNR
P.O. Box 30446
Lansing, MI 48909-7946

Tom Thuemler
WDNR
P.O. Box 127 - 101 N. Ogden
Peshtigo, WI 54157

Jim Fossum
US Fish & Wildlife
1015 Challenger Ct.
Green Bay, WI 54311

FERC: Ron Lesniak, Secretary
FERC
Chicago Regional Office
230 South Dearborn St - Room 3130
Chicago, IL 60604

PURPLE LOOSESTRIFE AND EURASIAN MILFOIL MONITORING PLAN

**Consolidated Papers Inc.
Niagara Division**

**Hydro Project No. 2536
Little Quinnesec Falls**

I. PURPOSE

This plan is developed to monitor and control potential spread of Purple Loosestrife and Eurasian Milfoil in project waters, on land adjacent to project boundary. This plan is developed in consultation with Michigan DEQ, Wisconsin DNR and the US Fish and Wildlife Services, as required by Article 409 of the order issuing a license for the project.

II. SCOPE

During the license application process, there were no reports of these plants in the surveys conducted. There have been reports of Eurasian Milfoil and Purple Loosestrife in the Menominee River basin. Consolidated Paper's Niagara Division proposes to conduct annual monitoring surveys for Purple Loosestrife and Eurasian Milfoil. These surveys will be conducted in the reservoir and lands along the project boundary.

III. TIMETABLE AND REPORTING

- A.** The survey will be concluded between July 25 and August 15 of each year to catch Loosestrife in full bloom.
- B.** A report on the survey will be filed with Agencies by October 31 of each year. This report would also be supplied to FERC.
- C.** Reporting criteria:
 - 1.** Purple Loosestrife will be reported and indicated on the map as follows:

Small colony	1-20 plants
Medium colony	20-50 plants
Dense colony	greater than 50 plants

2. Eurasian Milfoil

If Eurasian Milfoil is located during the survey, it will be noted on the map and in the report.

IV. ACTION PLAN

A. Purple Loosestrife

If small colonies of Purple Loosestrife are located on land owned by CPI - Niagara, it will be removed by the root system and properly land filled to decrease spread of the plant. Niagara will consult with the resource Agencies regarding removal of larger colonies.

If Purple Loosestrife is located on land not owned by CPI Niagara, the property owner will be contacted and removal will be encouraged. The property owner will also be asked to contact the WDNR or MDNR.

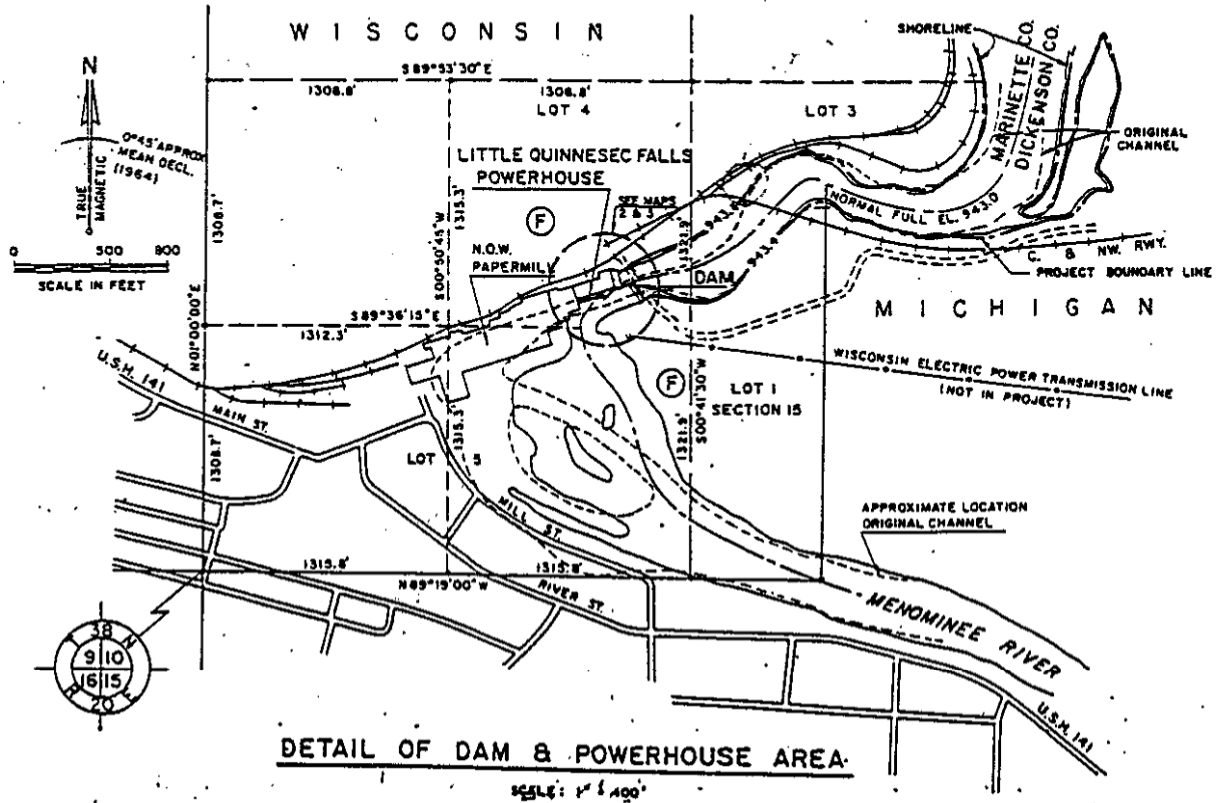
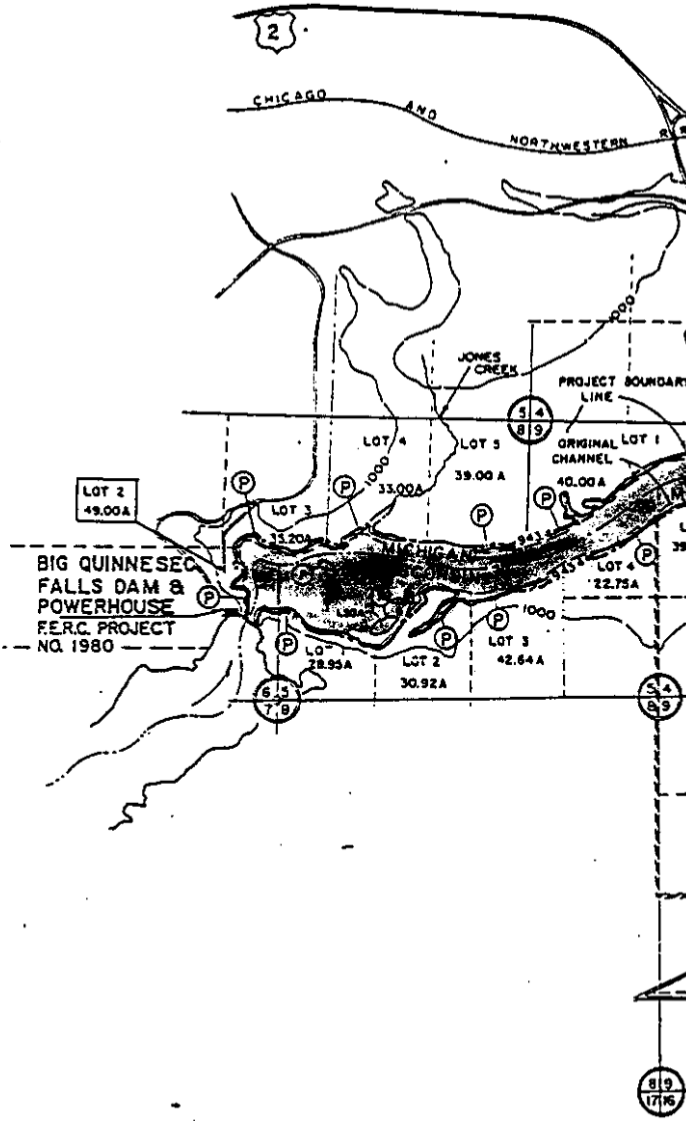
Powerhouse operators who routinely travel project lands will be trained to recognize Purple Loosestrife and to report any located.

B. Eurasian Milfoil

If Eurasian Milfoil is located during the survey, CPI Niagara will report this finding to MDNR, WDNR and US Fish and Wildlife Service.

C. In consultation with the resource Agencies, public information signs will be developed to be placed at project recreation sites to inform the public on identification and control of these nuisance plants.

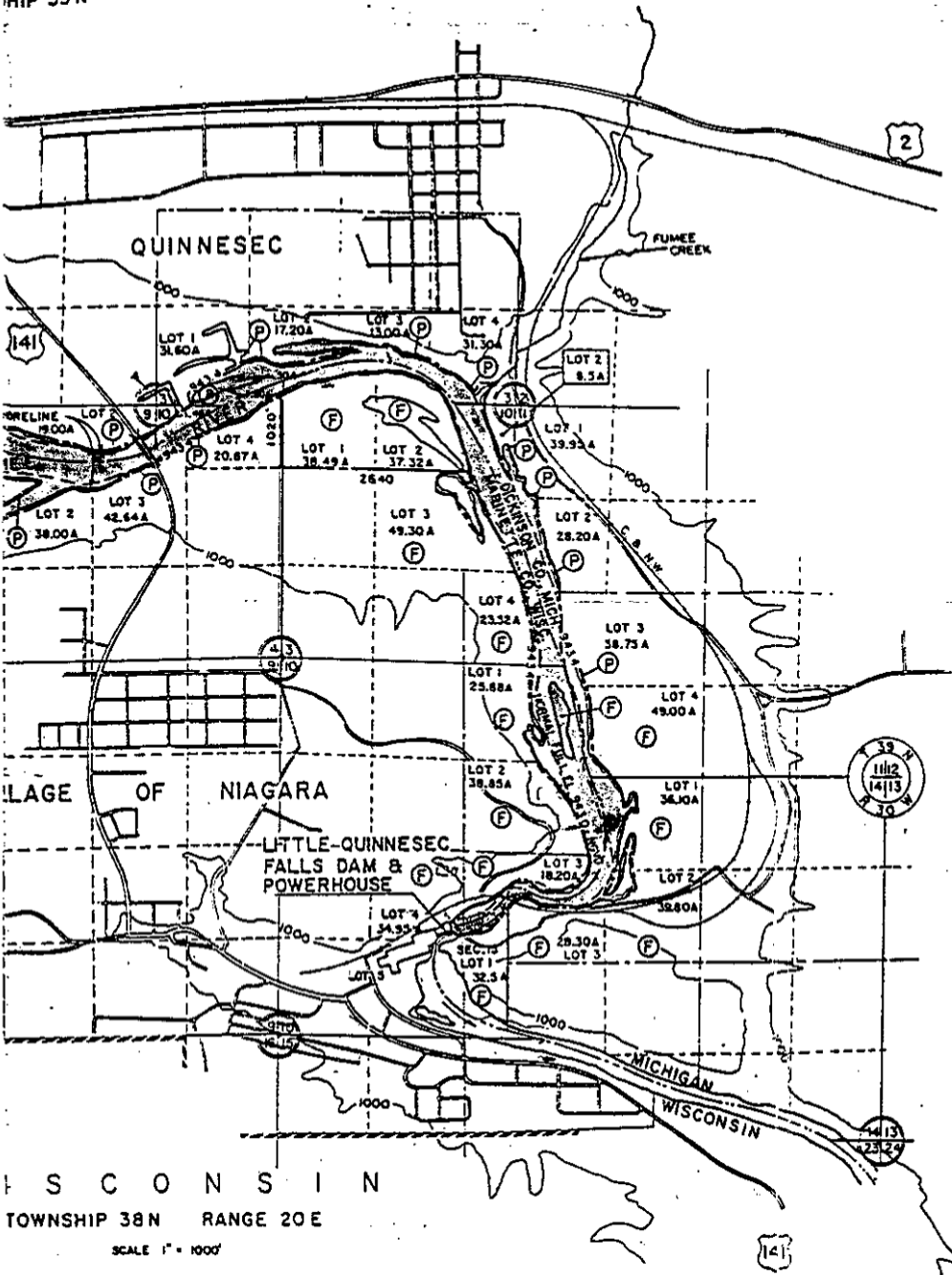
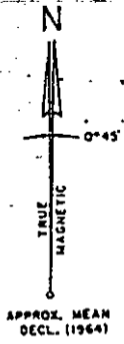
- LEGEND**
- PROJECT BOUNDARY
 - ===== PUBLIC ROADWAYS - HIGHWAYS, TOWN ROADS AND CITY STREETS: ALL EXCLUDED FROM PROJECT
 - UNDESIGNATED TRAILS AND PRIVATE ROADS - ALL EXCLUDED FROM PROJECT
 - RAILROAD - EXCLUDED FROM PROJECT
 - CORPORATE LIMITS
 - SHORELINE OF MAINLAND AND ISLANDS AT NORMAL FULL RESERVOIR ELEVATION AND ROUTE OF TRIBUTARY STREAMS
 - ORIGINAL SHORE LINE
 - PUBLIC LAND SURVEY SECTION LINES: QUARTER LINES AND SIXTEENTH LINES
 - OO TOON ROOM
 - ⊙ LAND OWNED IN FEE
 - ⊙ PREScriptive RIGHTS PROPERTY LINE



DETAIL OF DAM & POWERHOUSE AREA

SCALE: 1" = 100'

CHIGAN
 HIP 39N RANGE 30W



WISCONSIN
 TOWNSHIP 38N RANGE 20E

NOTE:
 THE SURVEY DATA INCORPORATED IN THIS MAP REFERS TO A SURVEY AND LAND DIVISION OF THE SW 1/4 OF SECTION 10, T38N, R20E OF THE 4TH P.M. MADE BY OWEN H. SMITH, DEPUTY COUNTY SURVEYOR, MARINETTE COUNTY, WIS., AND DATED OCT. 31, 1945, WITH REFERENCE TO MONUMENTS SET AND ESTABLISHED FROM ORIGINAL GOVERNMENT BEARING TREES BY S.J. JAMES, SURVEYOR; THIS SURVEY AND MONUMENTS SET THEREBY WERE CONFIRMED IN THE CASE OF KIMBERLY-CLARK CORPORATION VS. NIAGARA TOWNSITE CORPORATION BY DECISION OF THE 804. JUDGE QUINLAN OF THE 20TH DISTRICT CIRCUIT COURT OF WISCONSIN ON OCTOBER 26, 1955.
 OWEN H. SMITH WAS EMPLOYED BY KIMBERLY-CLARK CORPORATION TO MAKE THE REF. SURVEY WHICH WAS CERTIFIED CORRECT AND IN COMPLIANCE WITH FEDERAL AND STATE LAWS, AND SIGNED BY OWEN H. SMITH UNDER DATE OF OCT. 31, 1945.

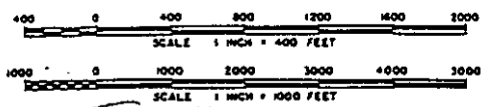


EXHIBIT G MAP 1 OF 3

MAGARA OF WISCONSIN MAGARA, WISCONSIN

LITTLE-QUINSEEC FALLS HYDROELECTRIC PROJECT

F.E.R.C. PROJECT No. 2536

MEMORIEE RIVER
 MARINETTE COUNTY, WISCONSIN
 DICKINSON COUNTY, MICHIGAN

PROJECT MAP

SCALE: AS SHOWN DATE: JUNE 1991

HEAD & HUNT INC.
 Consulting Engineers
 Madison, Wisconsin

CONSOLIDATED PAPERS, INC.

NIAGARA DIVISION
1101 MILL STREET, NIAGARA, WI 54151-1432
PHONE: (715) 251-3151 FAX: (715) 251-1730

October 15, 1997

Attn: Jim Fossum
US Fish & Wildlife
1015 Challenger Ct.
Green Bay, WI 54311

Attn: Tom Thuemler
Wisconsin Department of Natural Resources
P.O. Box 127
101 N. Ogden
Peshtigo, WI 54157

Attn: Gary Whelan
Michigan Department of Natural Resources
P.O. Box 30446
Lansing, MI 48909-7946

Enclosed is a Purple Loosestrife and Eurasian Milfoil Monitoring Plan and a Reservoir Draw Down Plan for Little Quinnesec Project, FERC No. 2536. The proposed plan is developed as required in Article 404 of the order issuing a license for the project dated May 7, 1997.

We would appreciate your comments on the plans by November 20, 1997. We plan to submit the plan to FERC by the December 7, 1997 deadline.

Please direct Bill Roberts at CPI/Niagara Division (715)-251-8278 with any questions you have.

Sincerely,

CONSOLIDATED PAPERS, INC.



William R. Roberts
Power Superintendent

WRR:sd

cc: Craig Paulson
Paul Penkivech
Ken Knapp (PS)

Roger Chapman
Dave Schmutzler
FERC file



State of Wisconsin \ DEPARTMENT OF NATURAL RESOURCES

Tommy G. Thompson, Governor
George E. Meyer, Secretary
William R. Selbig, District Director

Department of Natural Resources
Box 127, 101 N. Ogden Rd.
Peshtigo, Wisconsin 54157
TELEPHONE 715-582-5000
FAX 582-5005

October 31, 1997

IN REPLY REFER TO: 3600

Mr. Bill Roberts
Consolidated Papers, Inc. Niagara Division
1101 Mill Street
Niagara, WI 54151-1730

SUBJECT: Comments on Proposed Plans to Monitor Purple Loosestrife and Eurasian Milfoil, Reservoir Drawdown Plan and Operational Compliance Plan at the Little Quinnesec Falls Project, FERC No. 2536.

Dear Bill:

The Wisconsin Department of Natural Resources has reviewed the above mentioned proposed plans that are required as part of the Little Quinnesec Falls Project, Federal Energy Regulatory Commission license. We have the following comments.

Purple Loosestrife and Eurasian Milfoil Monitoring Plan

Purple Loosestrife -

Scope - The entire shoreline of the Little Quinnesec Flowage, the project's tailwater and other wetlands within the project boundary should be visually surveyed by two observers in a boat.

Timetable and reporting - Monitoring should occur annually with the survey being conducted between the July 25 and August 15 period, unless weather conditions that impact peak blooming time dictate otherwise. Locations of purple loosestrife stands should be permanently marked using a shoreline benchmark with a known Global Position System (GPS) coordinate, and the actual stands should be delineated on a map using GPS coordinates.

Eurasian Milfoil -

It is unclear in the plan, how you are intending to conduct the surveys for the presence of Eurasian Milfoil. As this is a submergent aquatic plant, some means other than a visual inspection is needed to check for its presence or absence. We recommend that a routine aquatic macrophyte survey be conducted. Samples of macrophytes should be taken along at least 15 transects in the flowage with each transect being 40 feet in length. Transects should be selected based upon location of macrophyte colonies and areas of likely infestation. These transects should be analyzed for presence and approximate abundance of Eurasian Milfoil. Each transect should be sampled with a rake in three twelve foot diameter sections. Each section should be sampled in quarters. The first sample should 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. This sampling should be conducted in the month of August or September and needs to be done only once every three years. The first sample should take place in 1998. A report on the survey should be filed with the agencies by October 31 of the year in which the survey was conducted. This report should also be submitted to the Federal Energy Regulatory Commission. Locations of Eurasian milfoil stands should be permanently marked using a shoreline benchmark with a known Global Position System (GPS) coordinate, and the actual stands should be delineated on a map using GPS coordinates. CPI Niagara should work to control or eliminate Eurasian milfoil on the Little Quinnesec Project upon the request of the agencies at any time during the period of the license.

CPI Niagara should post information on purple loosestrife and Eurasian milfoil identification and prevention of spread on bulletin boards located at project recreation facilities. The information used should be that developed by the agencies or other organizations for educational use at water access locations.

Reservoir Drawdown Plan

Planned maintenance drawdowns should be scheduled in September if possible to minimize adverse effects to aquatic organisms present in the littoral zone. Drawdowns in the spring and early summer could adversely affect fish spawning activities for many fish species and drawdown in winter could freeze aquatic organisms that are in the riverbed and inactive.

In regards to the drawdowns necessitated for maintenance at the Big Quinnesec Falls Project, we recommend that all maintenance and inspection activities take place during a single drawdown rather than the multiple drawdowns proposed. We also recommend that the timing of the annual maintenance drawdown for the Little Quinnesec Falls Project be coordinated with the maintenance drawdown at Big Quinnesec Falls, so that only a single drawdown is needed. Multiple drawdowns during a year subject fish and other aquatic organisms to unnecessary stress from multiple dewatering of the flowage shoreline. The resource agencies will also discuss this issue with Wisconsin Electric Power Company.

Operational Compliance Plan

We concur with the proposed operational compliance plan for the Little Quinnesec Project. However a response time is needed for supplying project operating logs to the agencies. It would be acceptable to the Wisconsin Department of Natural Resources if a request for a small number of daily operational logs (less than 30 days) be supplied to the requesting agency within five working days. A larger request for operating logs should be supplied to the requesting agency within ten working days.

We note that most of your compliance plans show consultation with the Michigan Department of Environmental Quality and not the Michigan Department of Natural Resources. We suggest that you contact the Michigan Department of Natural Resources to determine which compliance issues should be handled by which Department.

If you have any questions on any of these comments please feel free to contact me.

Sincerely,



Thomas F. Thuemler
Regional FERC Coordinator

cc: Gary Whelan - MDNR
Jim Fossum - FWS
Gary Schnicke

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**NATURAL RESOURCES
COMMISSION**

JERRY C. BARTNIK
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JOHN ENGLER, Governor
DEPARTMENT OF NATURAL RESOURCES

STEVENS T MASON BUILDING, PO BOX 30028, LANSING MI 48909-7528

K. L. COOL, Director

REPLY TO:

FISHERIES DIVISION
PO BOX 30446
LANSING MI 48909-7946

Refer to: 4202.2.32

October 30, 1997

Mr. William R. Roberts
Power Superintendent
Consolidated Papers, Inc
Niagara Division
1101 Mill Street
Niagara, WI 54151-1432

Dear Mr. Roberts:

Re: Little Quinnesec Falls Hydroelectric Project (FERC No. 2536)
Article 409 - Purple Loosestrife and Eurasian Milfoil Plan
Article 404 - Reservoir Drawdown Plan Comments

Dear Mr. Roberts:

The Department of Natural Resources (Department) has reviewed the above mentioned plans for the Little Quinnesec Hydroelectric Project as detailed in your October 15, 1997 letter, which was received by the Department on October 21, 1997. The Department has the following comments:

Article 409 - Purple Loosestrife and Eurasian Milfoil Plan

1. Page 1, Scope - There are recent reports of both of these species near the project. WDNR personnel detected Eurasian milfoil in Twin Falls Impoundment in Florence County in 1994. Resource agency (MDNR, WDNR and USFWS) personnel found purple loosestrife at the base of Piers Gorge in 1997. In addition, purple loosestrife has been found in the Michigamme River system above Way Dam. These observations should be noted in this section.
2. Page 1, Scope - The shoreline survey of shoreline of the project must include all waters and wetlands within the project boundary to include 1/4 mile downstream of the project powerhouse.
3. Page 2, Timetable and Reporting, Monitoring Period - The Department recommends that the last week of July and the first week of August should be the typical survey period rather than the period from July 15 and August 15 as implied in the draft plan. The recommended period will ensure that both plants will be at their maximum blooming and would be the easiest to identify. However, weather conditions each year will be the determining factor when surveys are actually done.
4. Page 2, Timetable and Reporting, Reporting Criteria - The Department has the following comments and recommendations for mapping and estimating stand sizes: a) For purple loosestrife, there should be an estimate of the area of each stand. We recommend the estimation of the overall percent cover and stem densities should be estimated at a minimum of 3 locations within the stand using a meter square frame. At least 10% of each stand should be measured for plant density and an average stem density computed; b) For Eurasian milfoil, the perimeter should be marked around each matted area with floating markers. The

- perimeter should be measured and the identified mat(s) within each area measured for density. Overall mat thickness should be estimated using multiple locations within each mat;
- c) Locations for each species should be permanently marked using a shoreline benchmark with a known GPS coordinate and the actual stands should be delineated on a map using GPS coordinates; and
 - d) We also recommend using US Agricultural Stabilization and Conservation Service (ASCS) true color aerial photos of the project area to assist in your surveys of the impoundments, if available. The prominent color of purple loosestrife will show up well on photos. These recommendations should be included in your plan.
5. Page 2, Action Plan, Purple Loosestrife – The Department concurs with your plan to physically remove all small stands of purple loosestrife when these are found in the annual surveys. Our interpretation of this proposal is that the licensee will control larger amounts of purple loosestrife with technical input from the resource agencies.
 6. Page 2, Action Plan, Eurasian Milfoil - The Department is willing to provide technical assistance for the control of Eurasian water milfoil. It is our expectation that the licensee would conduct the actual removal of these exotic plants upon the request of the Department using methodologies approved by the resource agencies. This should be included in your plan.
 7. Public Awareness – There is no discussion on any type of public awareness program concerning the spread of these exotic species. We recommend that advisory signs be posted at all access points to the project that identify these exotic species and document steps to be taken to prevent the spread of these species. The sign should be developed in consultation with the resource agencies. When and if these exotic species are found in the project area, we recommend that brochures on the control and spread of these species should be placed at all access points. These brochures should be developed in consultation with the resource agencies. These inexpensive measures should help prevent the establishment and spread of these exotic species to your project and should significantly reduce problems on this waterbody, which translates to lower control costs for your company.

Article 404 – Reservoir Drawdown Plan

1. Page 1, Normal Maintenance Drawdowns, Scope – The plan should provide for obtaining an automatically renewable State of Michigan Public Act 346 permit for the annual penstock/forebay drawdown and the Big Quinnesec Project drawdown. This permit acts as an individual drawdown permit and provides compliance with Section 404 (MDEQ has delegated authority). The details are discussed below.
2. Page 1, Normal Maintenance Drawdowns, Public Act 346 Permits - The Department recommends that Public Act 346 permits be applied for all planned maintenance drawdowns greater than the agreed upon operational band. This measure allows for the necessary coordination between the resource agencies and the your company along with any mitigative measures. It also allows for the customization of mitigative measures for each drawdown. The permit will act as an individual drawdown plan and should be filed with the Commission at minimum 45 days before the drawdown is to occur. Additionally, this permit ensures compliance with Section 404 of the Clean Water Act.
3. Page 1, Normal Maintenance Drawdowns, If Public Act 346 is changed - If Public Act 346 is changed to not require permits for such operations, then CP-Niagara should consult with the resource agencies on drawdown and refill rates and necessary mitigation at least 120 days before such drawdowns are to commence which are greater than the agreed upon operational band. The company should then submit the individual drawdown plan with the necessary drawdown and refill rates and mitigation to the Commission for approval along with the resource agencies recommendations at minimum 60 days before the drawdown is to occur.
4. Page 1, Normal Maintenance Drawdowns, Procedures - The Department recommends that all planned drawdowns be conducted during August and September. We concur with the proposed maximum drawdown rate of 0.1 feet per hour; this rate can be customized for each drawdown as necessary. Additionally, we recommend a minimum flow of 75% of inflow for

- refill period; this value can be customized for each drawdown as necessary. Both of these values are excellent starting points for either agency consultation or permit application.
5. Page 1, Normal Maintenance Drawdowns, Procedures – There is no discussion of how you will deal with fish stranding during drawdown periods. The Department recommends that each drawdown should be surveyed for stranded fish, and all fish should be accounted for and stranded fish returned to the main river channel. The survey should be conducted during each drawdown to prevent damage to the public trust properties of the State of Michigan. In addition, these systems change over time and the periodicity/amount of drawdown may influence the location and amount of stranding.
 6. Page 2, Emergency Drawdowns - Consultation with the Department and the other resource agencies should be conducted within 1 working day of all emergency drawdown orders and this consultation will provide information on the timing and extent of such drawdowns.
 7. Page 2, Emergency Drawdowns, Public Act 346 Permits - Within 7 days, the Department recommends that Public Act 346 permits be applied for all emergency drawdowns greater than the agreed upon operational band. This measure allows for the necessary coordination between resource agencies and the your company along with any mitigative measures. It also allows for the customization of all mitigative measures for each emergency drawdown. The permit will act as the emergency drawdown plan for each instance and should be filed with the Commission at minimum 7 days before the drawdown is to occur, when possible, or within 30 days of the notification of emergency drawdowns when early notification is not possible. In addition, the permit will ensure the project complies with Section 404 of the Clean Water Act.
 8. Page 2, Emergency Drawdowns, If Public Act 346 is changed - If Public Act 346 is changed to not require permits for such operations, then CP-Niagara should consult with the resource agencies on emergency drawdown and refill rates and necessary mitigation within 7 days of such drawdowns are to commence which are greater than the agreed upon operational band. The company should then submit the individual emergency drawdown plans with the necessary drawdown and refill rates and mitigation to the Commission for approval along with the resource agencies recommendations 7 days before the drawdown is to occur, when possible, or within 30 days of the notification of emergency drawdowns when early notification is not possible.
 9. Page 2, Emergency Drawdowns, Other conditions - The fish stranding, drawdown and minimum flow recommendations as stated above for maintenance drawdowns are also applicable to emergency drawdowns.

The Department appreciates the opportunity to comment on these plans and looks forward to implementing them with you. With the inclusion of the above comments, the Department can concur with the plan.

If you have any questions, please contact me.

Sincerely,



Gary E. Whelan
MI DNR FERC Project Coordinator
FISHERIES DIVISION
(517) 373-1280

cc: Mr. Thomas Thuemler, WDNR
Mr. James Fossum, USFWS
Mr. Gary Schnicke, MHRC



United States Department of the Interior

FISH AND WILDLIFE SERVICE

Green Bay ES Field Office
1015 Challenger Court
Green Bay, Wisconsin 54311-8331
Telephone 920/465-7440
FAX 920/465-7410

October 29, 1997

Mr. William R. Roberts, Power Superintendent
Consolidated Papers, Inc., Niagara Division
1101 Mill Street
Niagara, Wisconsin 54151-1432

re: Compliance plans for the Little Quinnesec Falls
Hydroelectric Project, FERC Project No. 2536,
Menominee River

Dear Mr. Roberts:

Your letter of October 15, 1997, requested U.S. Fish and Wildlife Service (FWS) review of several compliance plans to comply with articles of the license for the referenced hydroelectric (hydro) project. Our comments on each plan follow:

Purple Loosestrife and Eurasian Milfoil

Locations of purple loosestrife stands should be permanently marked using a shoreline benchmark with a known Global Position System (GPS) coordinate, and the actual stands should be delineated on a map using GPS coordinates. We recommend that your Eurasian milfoil surveys be done in accordance with the survey procedures recommended by the Wisconsin Department of Natural Resources (DNR) in their comment letter on this compliance plan.

We recommend that laminated signs be posted at all recreational areas that give information to the public on the identification, control, and spread of these exotic plant species, especially control measures pertaining to trailering watercraft. In the year following any discovery of purple loosestrife or Eurasian milfoil at the Little Quinnesec Falls Hydro Project, brochures describing the control and spread of these species should be placed at all recreation areas at the hydro project. These pamphlets can be obtained by contacting the Wisconsin and Michigan DNRs.

Normal Reservoir Drawdown Plan

Planned maintenance drawdowns should be scheduled in August or early September if possible to minimize adverse effects to aquatic organisms present in the littoral zone. Drawdowns in the spring and early summer could adversely affect fish spawning activities for many fish species and drawdown in winter could freeze aquatic organisms that are in the riverbed and inactive.

Big Quinnesec Falls Draw Down

It is stated, "Drawdowns are normally required two to four times per year to allow inspection and maintenance of the units at Big Quinnesec and from two to ten days..." The FWS strongly recommends that all inspection and maintenance be conducted during one drawdown per year, rather than two to four. Multiple drawdowns during a year subject fish and other aquatic organisms to

unnecessary stress from multiple dewatering of the flowage shoreline. This is an issue that the resource agencies will discuss with the Wisconsin Electric Power Company.

Under procedures, No. 1, please replace "wildlife" with FWS.

Plan for passing woody debris

Your plan for passing woody debris is acceptable to the FWS. The FWS supports sluicing all vegetative debris after the human generated trash is removed.

Compliance with minimum flow

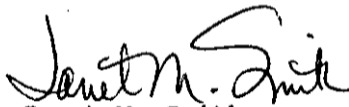
It states here what parameters would be logged for daily hydro operations. Spillway discharge is not mentioned, although it has a column for it on the log sheet. Please include recording spillway discharge in your operational compliance plan.

We concur with the notched staff gauge design, but recommend that more of the gauge be numbered rather than just numbering the maximum and minimum water levels allowed. This would make the staff gauge more useful should it be necessary to record water levels that are not within the normal operation band.

We noted that most of your compliance plans show consultation with the Michigan Department of Environmental Quality (DEQ) and not Michigan DNR. We suggest that you contact the Michigan DNR to determine what compliance issues should be handled by the Michigan DEQ and what compliance issues should be handled by the Michigan DNR.

We hope this information is helpful in preparation of your final compliance plans. If you need to discuss our comments further, please contact Jim Fossum of my staff at 920-465-7421.

Sincerely,



Janet M. Smith
Field Supervisor

cc: Tom Thuemler, Wisconsin DNR, Peshtigo, WI
Gary Whelan, Michigan DNR, Lansing, MI
Gary Schnicke, MHRC, Iron River, MI