



STATE OF MICHIGAN

JENNIFER M. GRANHOLM
GOVERNOR

DEPARTMENT OF NATURAL RESOURCES
LANSING

REBECCA A. HUMPHRIES
DIRECTOR

Refer to: 4202.2.40

December 1, 2004

Mr. Bill Rauscher
We Energies
800 Industrial Park Dr.
Iron Mountain, MI 49801

Subject: MDNR Comments on the Wilderness Shores Nuisance Plant Control
Way Dam (1759), Hemlock Falls (2074), Lower Paint (2072), Peavy Falls
(11830), Michigamme Falls (2073), Twin Falls (11831), Kingsford (2131), and
Big Quinnesec Falls (1980)

The Michigan Department of Natural Resources (MDNR) has reviewed your August 2004 Purple Loosestrife and Eurasian Water Milfoil monitoring reports for the Wilderness Shores projects. Based on the FERC approved Land Management Plan and the Wilderness Shores Settlement Agreement, MDNR finds the August 2004 filings inadequate.

Where nuisance plants were found, the 2004 nuisance plant reports (as well as those done in 2002) did not follow approved procedure. We Energies' reports merely stated whether nuisance plants were present and included a general map.

The following approved procedure was not followed and/or missing from the reports:

- The location of any purple loosestrife plants or Eurasian water milfoil found during the survey will be detailed on a map and the size of the population noted.
- For each purple loosestrife stand, the following will be determined: stand area, percent cover, stem density, and plant density. Sampling and measuring methodologies may differ according to stand characteristics but will be sufficiently rigorous to document the character of each stand.
- If a Eurasian water milfoil stand is found, the following will be determined: stand perimeter, mat density, and overall mat thickness.
- Locations of purple loosestrife and Eurasian water milfoil stands will be permanently marked using GPS and the actual stands will be delineated on a map using GPS.
- As it is advisable to remove all purple loosestrife plants at the earliest stage of an infestation, appropriate steps will be taken by We Energies to physically remove any plants at the time of detection.
- We Energies will work to control or eliminate purple loosestrife or Eurasian water milfoil on the projects upon the request of the U.S. Fish and Wildlife Service, Wisconsin DNR, or MDNR at any time during the period of the licenses.

NATURAL RESOURCES COMMISSION

Keith J. Charters-Chair • Mary Brown • Bob Garner • Gerald Hall • John Madigan • Frank Wheatlake


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There also appears to be discrepancy as to whether monitoring is required on an annual or biennial basis. The cover letter of We Energies' August 2004 filing mentions annual monitoring, as does the settlement agreement. Conversely, the second page of We Energies' August 2004 filing and the Land Management Plan mentions biennial monitoring. MDNR requests clarification on the appropriate frequency of survey.

To rectify this situation, we request that a complete survey be done in 2005 and 2006. As mentioned in the approved land management plan, "An effective monitoring program for exotics provides the foundation for a sound management program." Without this information, we are unable to control these nuisance plant species.

If you have any questions, please contact me.

Sincerely,



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cc: Ms. Magalie Salas, FERC
Mr. Larry Thompson, FWS
Mr. Mike Donofrio, WDNR
Mr. Tom Thuemler, MHRC/RAW
Mr. Chris Freiburger, MDNR

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