

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

www.wisconsinpublicservice.com

December 22, 2017

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

Dear Ms. Bose:

SUBJECT: Invasive Species Monitoring Plan

HydroFERC Project No.NATDAM No.License ArticleAlexander1979WI00748406

In accordance with the Federal Energy Regulatory Commission (FERC) Order Approving the Invasive Species Monitoring Plan for the Alexander Hydroelectric Project (Project), issued March 4, 2005, Wisconsin Public Service (WPS) is required to file the purple loosestrife (PL), Eurasian water milfoil (EWM), and zebra mussel (ZM) 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 8, 2017. Thirty-seven colonies of PL were identified at the Project. Of the thirty-seven colonies, eight were small colonies and were completely hand pulled and disposed of offsite. The 2017 PL survey results and figures are included in Appendix A.

In 2017, WPS released approximately 6,000 *Galerucella species* beetles, roughly 3,000 beetles in two different locations with existing PL colonies to supplement the existing beetle populations. WPS observed beetle feeding on thirty of the thirty-seven identified colonies.

WPS proposes to continue monitoring for PL and releasing a minimum total of 6,000 beetles annually in at least two separate locations as a biological control method in an attempt to establish healthy beetle populations throughout the Project. WPS will complete the next PL survey in 2018, in conjunction with the EWM survey.

2017 Eurasian Water Milfoil Survey Results

A survey for EWM was completed on August 8, 2017. EWM was not observed during the survey or during any of the previous annual surveys. The 2017 EWM survey results and figures are included in Appendix B. WPS will complete the next EWM survey in 2018, in conjunction with the PL survey.

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

Zebra Mussels

Monthly inspections of substrate samplers for the presence of ZM were conducted during the months of May through September 2017. ZM were not observed during any of the monthly substrate inspections. Appendix C includes the 2017 monthly substrate sampling results.

A copy of this report was submitted to the Wisconsin Department of Natural Resources (WDNR), US Fish and Wildlife Service (FWS), and the University of Wisconsin Sea Grant Institute (UW) on October 25, 2017. FWS and UW provided documentation that they had no comments. The WDNR did not provide any comments. Documentation of Consultation is located in Appendix D. 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 Figures and Data (5 pages)

Appendix B 2017 Eurasian Water Milfoil Figures and Data (3 pages)

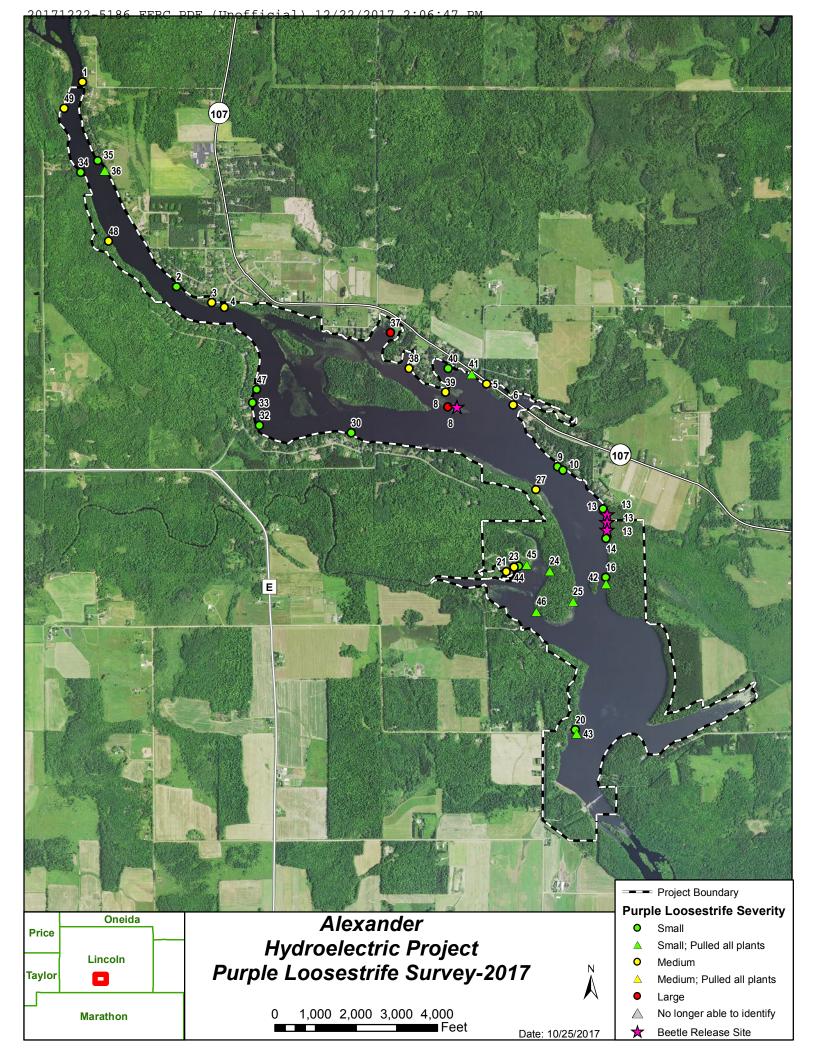
Appendix C 2017 Zebra Mussel Data (2 pages)

Appendix D Documentation of Consultation (15 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>Alexander Hydroelectric Project</u>

Beetle Release Date: <u>June 21, 2017</u> Inspection date: <u>August 8, 2017</u>

		General Plant Vigor					
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	M 6-50	4	3	4	11		1761
2	S 0-5	3	3	4	10		1758
3	M 6-50	3	3	4	10		1757
4	M 6-50	3	3	4	10		1756
		-	-				
5	M 6-50	3	3	3	9		1788
	0 00						2700
6	M 6-50	3	2	3	8		1787
	0 30	3	<u> </u>	<u> </u>		L	1707
7			No Longe	r Able To Identify			
,			NO LONGE	Able to identify			
8	L >50	3	2	2	7	Released 2,000 beetles	1104
0	L >30	3	2	2	/	beeties	1104
9	S 0-5	3	2	3	8		1786
9	3 0-3	3	2	3	0		1780
10	S 0-5	3	3	5	11		1785
10	3 0-3	3	3		11	l	1763
11			Nolongo	r Able To Identify			
11			NO LONGE	r Able to identify			
12			Nolongo	r Able To Identify			
12			NO LONGE	r Able to identify		Released 4,000	
4.5				_	_	beetles near	1784, 1105,
13	S 0-5	3	2	3	8	colony 13	1106, 1107
		_	_	_			
14	S 0-5	3	3	5	11		1783
				A11			
15			No Longe	r Able To Identify		1	
		_	_	_			
16	S 0-5	3	3	5	11		1782
17			No Longe	r Able To Identify			

2017 Purple Loosestrife Survey Form

Hydroelectric project: <u>Alexander Hydroelectric Project</u>

Beetle Release Date: <u>June 21, 2017</u> Inspection date: <u>August 8, 2017</u>

	General Plant Vigor						
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18			No Longe	r Able To Identify			
19				r Able To Identify			
	S 0-5	3	3	4	10		1779
	M 6-50	4	2	2	8		1776
22	0 00			r Able To Identify			2770
			ivo Longe	There is identify			
23	S 0-5	3	3	4	10		1774
24	S 0-5	3	3	5	11	Pulled all plants.	1772
25	S 0-5	3	1	4	8	NEW. Pulled all plants.	1770
26			No Longe	r Able To Identify			
27	M 6-50	3	3	4	10		1769
28			No Longe	r Able To Identify			
29			No Longe	r Able To Identify			
30	S 0-5	3	3	4	10		1768
31			No Longe	r Able To Identify			
	S 0-5	3	2	4	9		1767
	S 0-5	4	3	5	12		1766
	S 0-5	3	3	4	10		1763

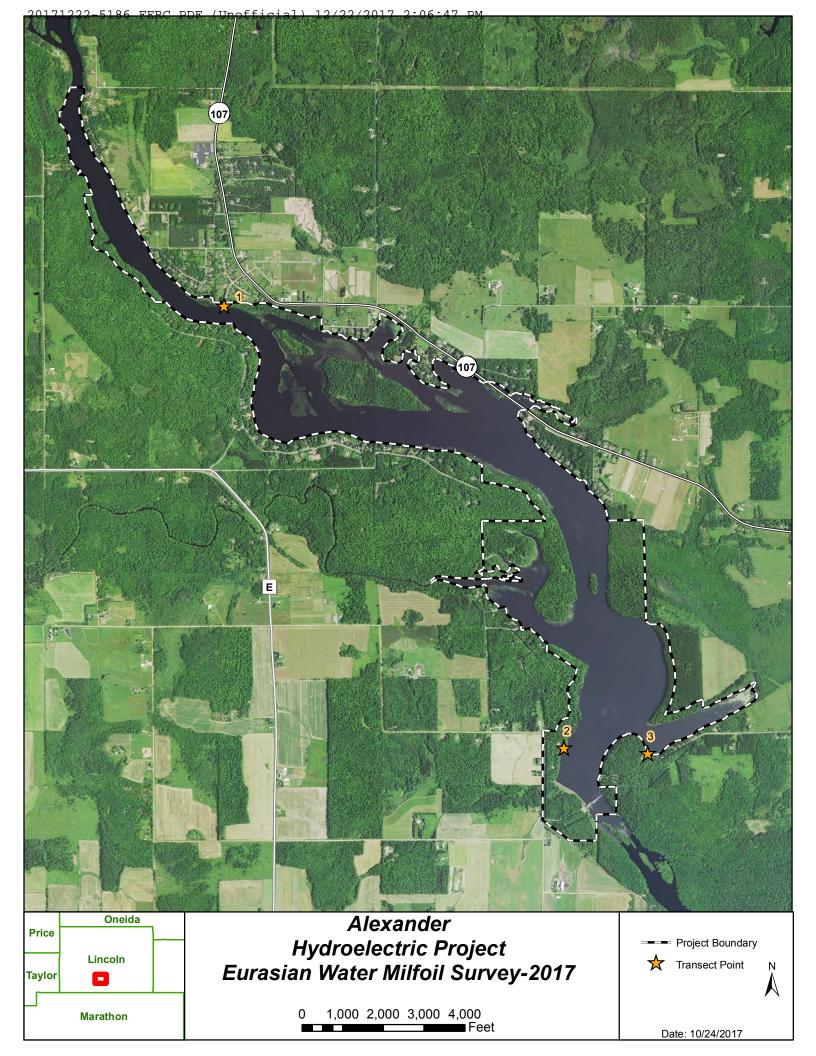
2017 Purple Loosestrife Survey Form

Hydroelectric project: <u>Alexander Hydroelectric Project</u>

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		General Plant Vigor					
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
35	S 0-5	3	3	4	10	NEW	1760
36	S 0-5	4	3	4	11	NEW. Pulled all plants.	1759
37	L >50	3	3	4	10	NEW. Shallow.	1793
38	M 6-50	3	2	2	7	NEW	1792
39	M 6-50	3	3	2	8	NEW	1791
40	S 0-5	3	3	4	10	NEW	1790
						NEW. Pulled all	
41	S 0-5	3	2	1	6	plants.	1789
						NEW. Pulled all	
42	S 0-5	1	3	5	9	plants.	1781
						NEW. Pulled all	
43	S 0-5	2	1	4	7	plants.	1778
44	M 6-50	4	2	3	9	NEW	1775
						NEW. Pulled all	
45	S 0-5	3	3	4	10	plants.	1773
						NEW. Pulled all	
46	S 0-5	4	3	4	11	plants.	1771
47	S 0-5	3	3	5	11	NEW	1765
				_			
48	M 6-50	4	3	4	11	NEW. Shallow.	1764
40	NA C 50	2	2	<u> </u>	40	NEW	4760
49	M 6-50	3	3	4	10	NEW	1762
	<u> </u>					<u> </u>	

APPENDIX B 2017 EURASIAN WATER MILFOIL FIGURES AND DATA



2017 Eurasian Water Milfoil Survey Form

Hydroelectric project: Alexander Hydroelectric Project

Inspection date: August 8, 2017

Transect #	0 - 0.5 M	0.5 - 1.5 M	1.5 - 3.0 M	> 3.0 M	Origin
1A	0	0	0	-	45.22123
1B	0	0	0	-	-89.79001
1C	0	0	0	-	
2A	0	0	0	-	45.19135
2B	0	0	0	-	-89.75769
2C	0	0	0	-	
3A	0	0	0	-	45.19097
3B	0	0	0	-	-89.7497
3C	0	0	0	-	
<u> </u>	<u> </u>	December Land There He	<u> </u>		1

Abundance Scale: 0-Absent, 1-Present, 2-Presence Less Than Half, 3-Equal Presence Compared to Other Species,

⁴⁻Dominant Species Present, 5-Total Infestation

APPENDIX C 2017 ZEBRA MUSSEL DATA

ZEBRA MUSSEL INSPECTION RESULTS WESTERN HYDROELECTRIC PROJECTS

HYDRO NAME

	Grandfather Falls Wausau	□ X	Merrill Alexander	·		Tomahawk Jersey	☐ Otter Rapids ☐ Hat Rapids
DAT	PECTION TYPE: E: <u>\$-31-</u> IMENTS/RESULT	17	_	ECTION	oly	☐ INSPECTION DI	URING DRAWDOWN
DAT	PECTION TYPE: E: 6-13-17 IMENTS/RESULT		MONTHLY INSPE - <i>O</i>	ECTION		☐ INSPECTION DI	URING DRAWDOWN
DAT	PECTION TYPE: E: 【タールート】 IMENTS/RESULT		MONTHLY INSPE	ECTION		☐ INSPECTION DU	URING DRAWDOWN
DAT	PECTION TYPE: E: <u>8-22-1</u> IMENTS/RESULT	<u>י' ד</u>	MONTHLY INSPE	ECTION		☐ INSPECTION DU	JRING DRAWDOWN
DAT	PECTION TYPE: E: 9–20- IMENTS/RESULT	٦ '	MONTHLY INSPE	CCTION		☐ INSPECTION DU	JRING DRAWDOWN
DAT	PECTION TYPE: E: IMENTS/RESULT		MONTHLY INSPE -	CTION		☐ INSPECTION DU	JRING DRAWDOWN
DAT	ECTION TYPE: E: MENTS/RESULT		MONTHLY INSPE -	CTION		☐ INSPECTION DU	JRING DRAWDOWN
DAT	ECTION TYPE: E: MENTS/RESULT:		ONTHLY INSPE	CTION		☐ INSPECTION DU	JRING DRAWDOWN
DATI	ECTION TYPE: E: MENTS/RESULT:		ONTHLY INSPE	CTION		☐ INSPECTION DU	JRING DRAWDOWN
DATI	ECTION TYPE: E: MENTS/RESULTS		ONTHLY INSPE	CTION		☐ INSPECTION DU	JRING DRAWDOWN

APPENDIX D DOCUMENTATION OF CONSULTATION



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

www.wisconsinpublicservice.com

October 25, 2017

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.	<u>NATDAM No.</u>	<u>License Article</u>
Alexander	1979	WI00748	406

In accordance with the Federal Energy Regulatory Commission (FERC) Order Approving the Invasive Species Monitoring Plan for the Alexander Hydroelectric Project (Project), issued March 4, 2005, Wisconsin Public Service Corporation (WPS) is to provide monitoring reports of the purple loosestrife (PL), Eurasian watermilfoil (EWM), and zebra mussel (ZM) 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.

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WPS proposes to continue monitoring for PL and releasing a minimum of 6,000 beetles annually in at least two separate locations as a biological control method in an attempt to establish healthy beetle populations throughout the Project. WPS will complete the next PL survey in 2018, in conjunction with the EWM survey.

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Ms. Cheryl Laatsch October 25, 2017 Page 2 of 2

Zebra Mussels

Monthly inspections of substrate samplers for the presence of ZM were conducted during the months of May through September 2017. ZM were not observed during any of the monthly substrate inspections. Appendix C includes the 2017 monthly substrate sampling results.

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

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October 25, 2017

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

HydroFERC Project No.NATDAM No.License ArticleAlexander1979WI00748406

In accordance with the Federal Energy Regulatory Commission (FERC) Order Approving the Invasive Species Monitoring Plan for the Alexander Hydroelectric Project (Project), issued March 4, 2005, Wisconsin Public Service Corporation (WPS) is to provide monitoring reports of the purple loosestrife (PL), Eurasian watermilfoil (EWM), and zebra mussel (ZM) 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.

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Mr. Nick Utrup October 25, 2017 Page 2 of 2

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Sincerely,

Jes Roloff

Environmental Consultant

Jessica R. Roloff

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COMMENTS RECEIVED BY THE US FISH AND WILDLIFE SERVICE

Roloff, Jessica R

From: Utrup, Nick <nick_utrup@fws.gov>
Sent: Wednesday, October 25, 2017 11:27 AM

To: Roloff, Jessica R

Subject: Re: WPS Alexander Hydro Electric Project Invasive Species Monitoring Report

WARNING: This email was sent from an external address. Exercise caution when opening links or attachments. Thanks Jessica, I won't be providing any comments on the invasive reports

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 Wed, Oct 25, 2017 at 11:16 AM, Roloff, Jessica R < <u>JRRoloff@integrysgroup.com</u>> wrote:

Good Morning Nick,

In accordance with the Federal Energy Regulatory Commission (FERC) Order Approving the Invasive Species Monitoring Plan for the Alexander Hydroelectric Project (Project), issued March 4, 2005, Wisconsin Public Service Corporation (WPS) is to provide monitoring reports of the purple loosestrife (PL), Eurasian watermilfoil (EWM), and zebra mussel (ZM) 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 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: 920-433-5558

fax: 920-433-1176

email: JRRoloff@integrysgroup.com

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

www.wisconsinpublicservice.com

October 24, 2017

Titus S. Seilheimer UW-Manitowoc 705 Viebahn St. Manitowoc, WI 54220

Mr. Seilheimer:

Invasive Species Monitoring Plan

HydroFERC Project No.NATDAM No.License ArticleAlexander1979WI00748406

In accordance with the Federal Energy Regulatory Commission (FERC) Order Approving the Invasive Species Monitoring Plan for the Alexander Hydroelectric Project (P-1979), issued March 4, 2005, Wisconsin Public Service Corporation (WPS) is to provide monitoring reports of the zebra mussel surveys to the University of Wisconsin Sea Grant by October 31, each year a survey has been completed.

Monthly inspections of substrate samplers for the presence of zebra mussels were conducted during the months of May through September 2017. Zebra mussels were not observed during any of the monthly substrate inspections. Appendix A includes the 2017 monthly substrate sampling results.

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

Sincerely,

Jessica Roloff

Environmental Consultant

Jessica R. Roloff

Enclosure

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Roloff, Jessica R

From: TITUS SEILHEIMER <tseilheimer@aqua.wisc.edu>

Sent: Wednesday, October 25, 2017 7:18 AM

To: Roloff, Jessica R

Subject: RE: Alexander Annual Zebra Mussel Report

WARNING: This email was sent from an external address. Exercise caution when opening links or attachments. Thanks Jes.

Titus S. Seilheimer, Ph.D. Fisheries Specialist Wisconsin Sea Grant 920-683-4697 tseilheimer (at) aqua.wisc.edu

From: Roloff, Jessica R [mailto:JRRoloff@integrysgroup.com]

Sent: Tuesday, October 24, 2017 3:41 PM

To: TITUS SEILHEIMER < tseilheimer@aqua.wisc.edu Subject: Alexander Annual Zebra Mussel Report

Good Afternoon Mr. Seilheimer,

In accordance with the Federal Energy Regulatory Commission (FERC) Order Approving the Invasive Species Monitoring Plan for the Alexander Hydroelectric Project (P-1979), issued March 4, 2005, Wisconsin Public Service Corporation (WPS) is to provide monitoring reports of the zebra mussel surveys to the University of Wisconsin Sea Grant 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: 920-433-5558 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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