



Wisconsin Public Service Corporation

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**

<u>Hydro</u>	<u>FERC Project No.</u>	<u>NATDAM No.</u>	<u>License Article</u>
Grand Rapids	2433	MI00022	411

In accordance with the Federal Energy Regulatory Commission (FERC) Order Comprehensive Monitoring Report and Future Plan for Eurasian Watermilfoil (Plan), dated May 15, 2012, Wisconsin Public Service (WPS) is required to file purple loosestrife (PL) and Eurasian water milfoil (EWM) surveys to FERC by December 31 of the corresponding year a survey was completed.

2017 Purple Loosestrife Survey Results

A survey for PL was completed on July 25 and August 14, 2017. No PL was observed during the surveys. The 2017 PL survey results and figures are included in Appendix A. WPS will complete the next PL survey in 2018.

2017 Eurasian Water Milfoil Survey Results

In accordance with the Plan, EWM surveys are completed once every three years. EWM surveys were completed at Grand Rapids on July 25 and August 14, 2017. EWM populations were observed to be at greater populations than in 2014; increasing from 10 to 12 acres. The 2017 EWM survey results and figures are included in Appendix B.

Overall, the changes in EWM populations are similar to fluctuations observed in previous surveying events at the Grand Rapids Hydroelectric Project and at other WPS hydroelectric projects.

It is also important to note the acreage included on the figures represents the furthest extent of where the EWM was identified. Diverse aquatic vegetation exists within the EWM defined population boundaries. In approximately all of the transects sampled, EWM was observed at levels less than half of the vegetation population as compared to the surrounding vegetation. WPS will complete the next EWM survey in 2020.

The Michigan Department of Natural Resources requested WPS to add an EWM observation point at the Michigan boat launch. WPS concurs and proposes to add a 16<sup>th</sup> transect point near the Michigan boat launch to start tracking EWM levels near a high boat traffic area.

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), Michigan Department of Natural Resources (MDNR), and US Fish and Wildlife Service (FWS) on October 25, 2017. MDNR provided comments; FWS responded that they had no comments; and the WDNR did not provide any comments. Documentation of consultation is located in Appendix C.

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](mailto: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 (3 pages)  
Appendix B- 2017 Eurasian Water Milfoil Figures and Data (3 pages)  
Appendix C- Documentation of Consultation (19 pages)

cc: Ms. Cheryl Laatsch, WDNR  
Mr. Nicholas Utrup, USFWS  
Mr. John Zygaj, FERC - CRO

**APPENDIX A**  
**2017 PURPLE LOOSESTRIFE FIGURES AND DATA**



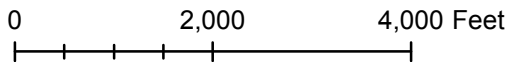
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# Grand Rapids Hydroelectric Project Purple Loosestrife Survey-2017

--- FERC Project Boundary



10/24/2017

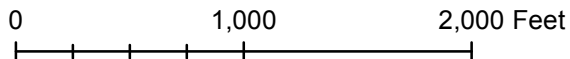


**APPENDIX B**  
**2017 EURASIAN WATER MILFOIL FIGURES AND DATA**



## Grand Rapids Hydroelectric Project Eurasian Water Milfoil Survey-2017

- ★ Transect Point
- Observation Point
- Observation Area
- FERC Project Boundary



10/25/2017

## 2017 Eurasian Water Milfoil Survey Form

Hydroelectric project: Grand Rapids Hydroelectric Project

Inspection date: July 24 & August 14, 2017

Transect #	0 - 0.5 M	0.5 - 1.5 M	1.5 - 3.0 M	> 3.0 M	Origin
1A	0	0	0	0	45.21809
1B	0	0	0	0	-87.39562
1C	0	0	0	0	
2A	0	0	0	0	45.21841
2B	0	0	0	0	-87.39561
2C	0	0	0	0	
3A	0	0	0	0	45.21855
3B	0	0	0	0	-87.39553
3C	0	0	0	0	
4A	0	0	0	N/A	45.22022
4B	0	0	0	N/A	-87.39467
4C	0	0	0	N/A	
5A	0	0	0	0	45.22092
5B	0	0	0	0	-87.39562
5C	0	0	0	0	
6A	0	1	0	0	45.22176
6B	0	0	0	0	-87.39713
6C	0	0	0	0	
7A	0	0	0	0	45.2189
7B	0	0	0	0	-87.39425
7C	0	0	1	0	
8A	0	0	0	N/A	45.2183
8B	0	0	0	N/A	-87.39608
8C	0	0	N/A	N/A	
9A	0	N/A	N/A	N/A	45.21995
9B	0	N/A	N/A	N/A	-87.39216
9C	0	0	0	N/A	
10A	0	0	N/A	N/A	45.22059
10B	0	0	N/A	N/A	-87.3899
10C	0	0	N/A	N/A	
11A	0	0	0	0	45.22174
11B	0	0	0	N/A	-87.38985
11C	0	0	0	N/A	
12A	0	0	0	0	45.22223
12B	0	0	0	N/A	-87.39006
12C	0	0	0	N/A	
13A	0	0	0	0	45.22261
13B	0	0	0	0	-87.39006
13C	0	0	0	0	
14A	0	0	0	N/A	45.22298
14B	0	0	0	N/A	-87.39006
14C	0	0	0	N/A	
15A	0	0	0	0	45.22275
15B	0	0	0	0	-87.39223
15C	0	0	0	0	

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**  
**DOCUMENTATION OF CONSULTATION**



Wisconsin Public Service Corporation

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

[www.wisconsinpublicservice.com](http://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>	<u>FERC Project No.</u>	<u>NATDAM No.</u>	<u>License Article</u>
<b>Grand Rapids</b>	<b>2433</b>	<b>MI00022</b>	<b>411</b>

In accordance with the Federal Energy Regulatory Commission (FERC) Order Amending Approved Noxious Plants Monitoring Plans (NPMP) for Grand Rapids dated May 10, 1999, Wisconsin Public Service Corporation (WPS) is to provide monitoring reports of the purple loosestrife (PL) and Eurasian watermilfoil (EWM) surveys to the Wisconsin Department of Natural Resources (WDNR), Michigan Department of Natural Resources (MDNR), and U.S. Fish & Wildlife Service (FWS) by October 31, each year a survey has been completed.

2017 Purple Loosestrife Survey Results

A survey for PL was completed on July 25 and August 14, 2017. No PL was observed during the surveys. The 2017 PL survey results and figures are included in Appendix A. WPS will complete the next PL survey in 2018.

2017 Eurasian Water Milfoil Survey Results

As per the NPMP, EWM surveys are completed once every three years. EWM surveys were completed on Grand Rapids July 25 and August 14, 2017. EWM populations were again observed and were observed at greater populations than in 2014, from 10 to 12 acres. The 2017 EWM survey results and figures are included in Appendix B.

Overall, the changes in EWM populations are similar to fluctuation observed in previous surveying events on the Grand Rapids Hydroelectric Project and at other WPS hydroelectric projects.

It is also important to note that the acres included on the figures represent the furthest extent of where the EWM was identified. Diverse aquatic vegetation exists within the EWM define population boundaries. In approximately 100 percent of the transects sampled, EWM was observed at present less than half compared to the surrounding vegetation. WPS will complete the next EWM survey in 2020.

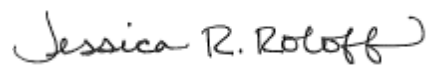
Please provide any comments you may have regarding this report within 30 days. Should you have any questions relative to this material, please do not hesitate to contact me at (920) 433-5558 or [JRRoloff@integrysgroup.com](mailto:JRRoloff@integrysgroup.com).

Ms. Cheryl Laatsch

October 25, 2017

Page 2 of 2

Sincerely,

A handwritten signature in cursive script that reads "Jessica R. Roloff". The signature is written in black ink and is positioned below the word "Sincerely,".

Jes Roloff

Environmental Consultant

Enclosures

**IN THE INTEREST OF PAPERWORK REDUCTION, REDUNDANT MATERIALS ARE NOT  
INCLUDED IN THE DOCUMENTATION OF CONSULTATION.**

**NO COMMENTS RECEIVED BY THE WISCONSIN DEPARTMENT OF NATURAL RESOURCES**



Wisconsin Public Service Corporation

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

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October 25, 2017

Mr. Kyle Kruger  
Michigan Department of Natural Resources  
Mio Field Office  
191 S. Mt. Tom Rd  
Mio, MI 48647

Dear Mr. Kruger:

Invasive Species Monitoring Plan

<u>Hydro</u>	<u>FERC Project No.</u>	<u>NATDAM No.</u>	<u>License Article</u>
<b>Grand Rapids</b>	<b>2433</b>	<b>MI00022</b>	<b>411</b>

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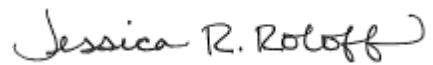
Overall, the changes in EWM populations are similar to fluctuation observed in previous surveying events on the Grand Rapids Hydroelectric Project and at other WPS hydroelectric projects.

It is also important to note that the acres included on the figures represent the furthest extent of where the EWM was identified. Diverse aquatic vegetation exists within the EWM define population boundaries. In approximately 100 percent of the transects sampled, EWM was observed at present less than half compared to the surrounding vegetation. WPS will complete the next EWM survey in 2020.

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](mailto:JRRoloff@integrysgroup.com).

Mr. Kyle Kruger  
October 25, 2017  
Page 2 of 2

Sincerely,

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Jes Roloff  
Environmental Consultant

Enclosures

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**COMMENTS RECEIVED BY THE MICHIGAN DEPARTMENT OF NATURAL RESOURCES**

## COMMENTS RECEIVED BY THE MICHIGAN DEPARTMENT OF NATURAL RESOURCES

MDNR Comment: In order to better-inform resource agencies regarding risk for aquatic invasive/nuisance species transfer, MDNR recommends adding observation points at the boat launches. These observation points would be positioned to describe aquatic vegetation occurring in the vicinity of routes frequently traveled by boat traffic as boats launch or exit the flowage. Aquatic vegetation species composition, presence and cover of AIS, depths and other relevant features would be incorporated in the regular monitoring and reporting process outlined in Article 411 and described in the 1998 Order Modifying and Approving Purple Loosestrife and Eurasian Milfoil Monitoring Plan.

WPS Response: WPS accepts the MDNR comment and proposes to add a new transect point to the Michigan boat launch area.

MDNR Comment: WPS provided details and a photo of signage currently maintained at the Michigan boat launch and WPS/MDNR are exploring whether updated/eye-catching signage could be posted. The current sign is small, and has a low visual impact compared to signs alongside it. If WPS does not have access to additional signage and Michigan agency staff are not able to recommend more appropriate signage in the next few weeks, we will plan to discuss this topic at the agency meeting in spring of 2018 as part of a more holistic review.

WPS Response: WPS accepts the MDNR comment. MDNR is sending new signage to WPS to post at the Grand Rapids Hydro Electric Project. WPS will post these signs as soon as practical.

## Roloff, Jessica R

---

**From:** Gulotty, Elle (DNR) <GulottyE@michigan.gov>  
**Sent:** Wednesday, December 13, 2017 9:14 AM  
**To:** Roloff, Jessica R; Grisar, Mike L  
**Cc:** 'Cheryl Laatsch (Cheryl.laatsch@wisconsin.gov)'; 'Utrup, Nick'  
**Subject:** WPS Grand Rapids Hydro Electric Project Invasive Species Monitoring  
**Attachments:** 20171025 Grand Rapids EWMPL-MDNR.PDF

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

MDNR has reviewed WPS' 2017 EWM and Purple Loosestrife report for Grand Rapids Hydro P-2433 and appreciates WPS' responses to questions over the past several weeks. A couple items which would require further action were identified:

- 1) In order to better-inform resource agencies regarding risk for aquatic invasive/nuisance species transfer, MDNR recommends adding observation points at the boat launches. These observation points would be positioned to describe aquatic vegetation occurring in the vicinity of routes frequently traveled by boat traffic as boats launch or exit the flowage. Aquatic vegetation species composition, presence and cover of AIS, depths and other relevant features would be incorporated in the regular monitoring and reporting process outlined in Article 411 and described in the 1998 Order Modifying and Approving Purple Loosestrife and Eurasian Milfoil Monitoring Plan.
- 2) WPS provided details and a photo of signage currently maintained at the Michigan boat launch and WPS/MDNR are exploring whether updated/eye-catching signage could be posted. The current sign is small, and has a low visual impact compared to signs alongside it. If WPS does not have access to additional signage and Michigan agency staff are not able to recommend more appropriate signage in the next few weeks, we will plan to discuss this topic at the agency meeting in spring of 2018 as part of a more holistic review.

Thank you,

Elle Gulotty  
Resource Analyst  
Habitat Management Unit  
DNR Fisheries Division

Customer Service Center  
1990 US HWY 41 South  
Marquette, MI 49855  
PH: 906-228-6561 ext. 3002



Wisconsin Public Service Corporation

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

<u>Hydro</u>	<u>FERC Project No.</u>	<u>NATDAM No.</u>	<u>License Article</u>
<b>Grand Rapids</b>	<b>2433</b>	<b>MI00022</b>	<b>411</b>

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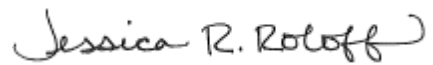
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Mr. Nick Utrup  
October 25, 2017  
Page 2 of 2

Sincerely,

A handwritten signature in cursive script that reads "Jessica R. Roloff". The signature is written in black ink and is positioned below the word "Sincerely,".

Jes Roloff  
Environmental Consultant

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: [Nick\\_Utrup@fws.gov](mailto:Nick_Utrup@fws.gov)

On Mon, Nov 27, 2017 at 3:23 PM, Roloff, Jessica R <[JRRoloff@integrysgroup.com](mailto:JRRoloff@integrysgroup.com)> 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](mailto:JRRoloff@integrysgroup.com)

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---

**From:** Roloff, Jessica R  
**Sent:** Wednesday, November 22, 2017 1:06 PM  
**To:** '[nick\\_utrup@fws.gov](mailto: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](mailto:JRRoloff@integrysgroup.com)

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---

**From:** Roloff, Jessica R  
**Sent:** Tuesday, October 24, 2017 3:12 PM  
**To:** [nick\\_utrup@fws.gov](mailto: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 : 920-433-5558

fax : 920-433-1176

email: [JRRoloff@integrysgroup.com](mailto:JRRoloff@integrysgroup.com)

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Document Content(s)

20171222 GRR Env out.PDF.....1-2

20171222 GRR Env out attach a.PDF.....3-5

20171222 GRR Env out attach b.PDF.....6-8

20171222 GRR Env out attach c.PDF.....9-27