

164 FERC ¶ 62,096

UNITED STATES OF AMERICA
FEDERAL ENERGY REGULATORY COMMISSION

Northbrook Wisconsin, LLC

Project No. 2536-082

ORDER APPROVING REVISED COMPREHENSIVE LAND AND WILDLIFE
MANAGEMENT PLAN PURSUANT TO ARTICLES 411 AND 412

(Issued August 21, 2018)

1. On June 14, 2018, and supplemented on August 13, 2018,¹ Northbrook Wisconsin, LLC (licensee) filed a revised comprehensive land and wildlife management plan (plan) pursuant to Articles 411 and 412 of the license for the Little Quinnesec Falls Hydroelectric Project No. 2536.² The project is located on the Menominee River near the City of Niagara in Marinette County, Wisconsin, and Dickinson County, Michigan.

2. Articles 411 and 412 required the licensee to file a wildlife management plan and a land use management plan, respectively, for the project. The licensee filed these plans on May 7, 1998 and we approved them on August 4, 1998.³ Pursuant to Articles 411 and 412, the licensee is to revise and update each plan every five years in consultation with the Wisconsin Department of Natural Resources (Wisconsin DNR), Michigan Department of Natural Resources (Michigan DNR), and the U.S. Fish and Wildlife Service (FWS). The licensee combined and revised the two previously-approved plans in 2003, and we approved the revised comprehensive land and wildlife management plan on June 23, 2004.⁴

3. The approved plan describes the existing land uses at the project, land management guidelines, best management practices, various environmental monitoring

¹ The August 13, 2018 filing of the revised plan is intended to supersede the June 14, 2018 filing.

² Order Issuing New License (79 FERC ¶ 62,095), issued May 7, 1997.

³ 84 FERC ¶ 62,106 (1998) and 84 FERC ¶ 62,107 (1998).

⁴ 107 FERC ¶ 62,267 (2004). Revised plans were further approved on July 9, 2009 (128 FERC ¶ 62,017) and June 10, 2014 (147 FERC ¶ 62,189).

programs (e.g., erosion and purple loosestrife), shoreline development policies, wildlife management policies (e.g., for bald eagles, wood ducks, and wood turtles), and provisions to update the plan every five years in consultation with the appropriate agencies. In the revised plan, the licensee does not propose any changes to the existing plan or management strategies. However, the licensee's proposed plan acknowledges a recently-conducted Forest Assessment and Woodland Management Plan for a portion of project lands. Additionally, the licensee proposes a minor change to the consultation requirements for activities covered by the plan in response to a comment by the Michigan DNR.

4. Prior to filing the proposed plan with the Commission, the licensee requested comments on the plan from the Wisconsin DNR, Michigan DNR, and FWS. The Michigan DNR made the aforementioned recommendation to broaden the consultation requirements for activities under the plan, as well as several other questions. The licensee and Michigan DNR resolved the questions in a follow-up phone conversation, and the licensee addressed the Michigan DNR's consultation concern in the August 13, 2018 supplemental filing. Neither the Wisconsin DNR nor FWS responded with comments on the plan.

5. The proposed minor change to the consultation requirements specifically names the three consulting agencies as well as specific land management activities (e.g., timber harvest, construction, trail development, or improvement) that require prior agency consultation prior to conducting any land-disturbing activities at the project. This proposed change was in response to a previous instance where the licensee conducted forest management activities under the plan without prior consultation from the agencies. We find this change to be appropriate to specifically name the consulting agencies as well as the types of activities that would require consultation in the future. The revised plan would continue to enhance project lands and the wildlife habitat therein and satisfies the requirements of Articles 411 and 412. Thus, the revised plan should be approved. The next five-year plan revision is due May 7, 2023.

The Director orders:

(A) The revised comprehensive land and wildlife management plan, filed by Northbrook Wisconsin, LLC on June 14, 2018, and supplemented on August 13, 2018, pursuant to Articles 411 and 412 for the Little Quinnesec Falls Hydroelectric Project No. 2536, is approved.

(B) This order constitutes final agency action. Any party may file a request for rehearing of this order within 30 days from the date of its issuance, as provided in section 313(a) of the Federal Power Act, 16 U.S.C. § 825l (2012), and the Commission's regulations at 18 C.F.R. § 385.713 (2017). The filing of a request for rehearing does not operate as a stay of the effective date of this order, or of any other

Project No. 2536-082

- 3 -

date specified in this order. The licensee's failure to file a request for rehearing shall constitute acceptance of this order.

Robert J. Fletcher
Land Resources Branch
Division of Hydropower Administration
and Compliance



NPM

NORTHBROOK
POWER
MANAGEMENT

August 13, 2018

The Secretary
Federal Energy Regulatory Commission
888 First Street, NE
Washington, DC 20426

Re: Little Quinnesec Falls Hydroelectric Project, FERC No. 2536
Articles 411 & 412 – Comprehensive Land & Wildlife Management Plan

Dear Secretary:

As requested in Commission letter dated July 9, 2018, enclosed for filing is the five-year update of the Comprehensive Land and Wildlife Management Plan, revised to (1) include the Michigan Department of Natural Resources' desired consultation language, modified slightly to comport with the project license, (2) eliminate an inaccurate reference to Commission approval of the 2017 timber harvest plan, and (3) update the agency consultation record.

Sincerely,

Chuck Ahlrichs
President

**LITTLE QUINNESEC FALLS HYDROELECTRIC PROJECT
COMPREHENSIVE LAND AND WILDLIFE MANAGEMENT PLAN**

FERC Number 2536

2018 Updated Plan

Submitted to:

Federal Energy Regulatory Commission
Kimberly D. Bose, Secretary
Office of Hydropower Licensing
888 First Street, N.E.
Washington, D.C. 20426

Submitted by:

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August 9, 2018

TABLE OF CONTENTS

(I) INTRODUCTION	1
Purpose	1
Report Development Process	1
(II) PROJECT BACKGROUND	1
(III) DESCRIPTION OF EXISTING RESOURCES, LAND USES AND LAND MANAGEMENT ACTIVITIES	2
Existing Development and Use of Project Lands	2
Project Land	2
Industrial Land	2
Open Space and Circulation Corridors	3
Residential and Commercial	3
Recreation Lands	3
Local Zoning and Land Regulation	3
(IV) DESCRIPTION OF RESOURCE COMMUNITIES ASSOCIATED WITH THE PROJECT	3
Habitat Unit Descriptions Associated with the Project	4
Wisconsin Lowland Community	4
Pine Hummocks Community	4
(IV) DESCRIPTION OF WETLANDS AND FLOODPLAINS	4
Wetlands in the Project Boundary	4
Floodplains	5
(IV) PROPOSED LAND MANAGEMENT PLAN	5
Plan Objectives	5
Proposed Land Management Guidelines	6

Proposed Shoreline and Flowage Management Activities	7
Purple Loosestrife – Eurasian Water-Milfoil Monitoring	7
Shoreline Monitoring for Erosion Control	7
Passage of Woody Debris	7
Water Quality Monitoring Plan	7
Purple Wartyback Mussel Recovery Program	7
 (VII) BUFFER ZONE TO ENSURE PUBLIC ACCESS	 7
 (VIII) SHORELINE DEVELOPMENT POLICY	 8
 (IX) BALD EAGLE MANAGEMENT PLAN AND SUPER CANOPY TREE PRESERVATION	 8
Nesting	8
Perch Trees and Future Nest Trees, Super Canopy Tree Preservation	9
 (X) CAVITY TREE/NATURAL SNAGS MANAGEMENT FOR CAVITY- DWELLING SPECIES (WOOD DUCK)	 9
Background	9
Vegetative Management	9
Wood Duck Nest Box Program	10
 (XI) WOOD TURTLE MANAGEMENT	 10
Background	10
Forage Vegetation	10
Sandy Nesting Substrate	10
 (XII) BATS	 11
 (XIII) PROVISIONS FOR CONSULTATION	 11
Agency Consultation	11
 Appendix A. Agency Correspondence	

(I) INTRODUCTION

Purpose

Articles 411 and 412 of the FERC license for the Little Quinnesec Falls Hydroelectric Project includes requirements for the filing of wildlife and land management plans, respectively. Because the two plans are so closely tied together, we generated a comprehensive plan incorporating the provisions of both articles. The Comprehensive Land & Wildlife Management Plan identifies land use and land management within the Project boundary, describes the Project's environmental character measures for the protection and use of the important habitat, recreational and scenic resources. In addition, it outlines specific habitat conservation measures to sustain or improve habitat associated with various reservoir-dependent wildlife species.

Report Development Process

This report was prepared after analysis of existing land uses and experience with the implementation of the existing land and wildlife management plan currently approved for the Project. Additionally, this plan has been provided to the Wisconsin Department of Natural Resources (WDNR), the Michigan Department of Natural Resources (MDNR), and the U.S. Fish & Wildlife Service (USFWS). Correspondence with WDNR, MDNR, and USFWS regarding their review of this 2018 updated plan is provided in Appendix A.

(II) PROJECT BACKGROUND

The Little Quinnesec Falls Project (FERC No. 2536) ("LQF") is located on the Menominee River at the City of Niagara (Marinette County) in far northeastern Wisconsin. The Menominee River forms the political boundary between Wisconsin and Michigan's Upper Peninsula. The Project area also adjoins the unincorporated Michigan community of Quinnesec and is close to the communities of Iron Mountain and Norway, all of which lie in Dickinson County, Michigan.

LQF is no longer operated in conjunction with the NewPage Niagara pulp and paper mill. The NewPage pulp and paper operations were discontinued in August 2008 for business reasons and the mill was subsequently demolished. Northbrook Wisconsin, LLC, the current owner and licensee of LQF, is responsible for project land management and the FERC compliance within the Project boundary through an easement with the current landowner, Niagara Development, LLC. A *Forest Assessment and Woodland Management Plan* was prepared by Timber Valley LLC under contract with Niagara Development, LLC. This Woodland Management Plan appropriately references the Land & Wildlife Management Plan and defers to, and supports, that plan.

LQF is bounded on the upstream side by Big Quinnesec Falls, owned and operated by WE Energies and downstream by the Sturgeon Falls hydroelectric plant, owned and operated by the City of Norway. The dam at LQF has an operating head of approximately 65 feet and impounds an area of 349 surface acres. LQF encompasses approximately 242 acres of project lands that were added to the project after consultation with the various federal and state resource agencies during the development of the original comprehensive land and wildlife management plan.

The terrain is gently rolling to very steep and rugged, with scenic bluffs along the river, but especially downstream of the dam on the Michigan side. The former Niagara mill complex and supporting industrial facilities occupied substantial areas directly above and below the dam, particularly on the Wisconsin side. Manufacturing operations were discontinued in 2008 and a majority of the mill complex has been demolished. Because of its immediate relationship to the City of Niagara, much of the LQF land use and recreation planning over the years has involved close coordination with city officials. In preparation of the original land and wildlife management plan, particular emphasis was given to identifying and protecting key habitat types important to “reservoir-dependent species”, the provision of opportunities for “dispersed public recreation” (e.g., trails, interpretive facilities) and the protection of river scenery and open space.

(III) DESCRIPTION OF EXISTING RESOURCES, LAND USES AND LAND MANAGEMENT ACTIVITIES

Existing Development and Use of Project Lands

Project Land. The existing project boundary incorporates approximately 242 out-of-water acres which offer diverse habitat. The project boundary was expanded about fifteen years ago, after extensive consultation with the resource agencies, to include habitat critical to wood turtle nesting and other reservoir-dependent species. An estimated 0.85 acre of land adjacent to the flowage is dedicated to LQF operation and maintenance. This includes the powerhouse, penstock and dam structures. Non-project lands abutting LQF are used for a variety of purposes, although most are industrial lands, recreational areas, or undeveloped forest and wetland.

Industrial Land. Industrial lands adjoin LQF along the right bank (looking downstream) near the LQF Dam. This industrial area includes, and is associated with, a non-operating paper mill. It extends less than ½ mile both upstream and downstream of the Project dam. A railroad line that served the mill crosses the impoundment about 1,000 feet upstream of the dam and skirts the project boundary along the left bank for about ¼ mile. These lands include a railroad yard area and a not currently operating industrial anaerobic treatment and sludge dewatering facility. Outside of this area, the only industrial land abutting the project boundary is found at LQF’s extreme upper end at the site of the FERC-licensed Big Quinnesec Falls hydroelectric project.

Open Space and Circulation Corridors. The remainder of the land contiguous to the project boundary is primarily forest and wetland, owned by various public and private interests. Exceptions to this otherwise unbroken open space include the recreation sites, the U.S. Highway 141 bridge, and a dredged canal area just downstream from U.S. 141 on the north side of the river. Open space includes land occupied by floodplains, wetlands and forests. These areas provide valuable wildlife habitat and are also used for dispersed recreation.

Residential and Commercial. Close by, though not actually abutting the project boundary, are privately owned residential and commercial developments in the City of Niagara, Wisconsin, and the unincorporated community of Quinnesec, Michigan, which is situated on a river terrace to the north, about 80 feet above the LQF impoundment. In 1986, the City of Niagara prepared a comprehensive plan which discussed existing and future land-use within the city. The section of the city plan that discusses land management was incorporated into the 1991 LQF license application as Appendix 26. Information in that document may be obtained through reference to the application filed with FERC in June, 1991.

Recreation Lands. Within the project boundary are located a carry-in boat launch downstream of the tailrace on the Wisconsin side of the river and a canoe portage on the Michigan side.

Local Zoning and Land Regulation

Land-use regulation and zoning are generally accomplished at the county level of local government in rural Wisconsin and Michigan. However, the provisions of a certain county zoning ordinance may not be in effect for a particular civil town within a county until the ordinance is adopted by the town government. Incorporated villages and cities are responsible for land-use regulation and zoning within their corporate limits. In the area of LQF, the primary local governments responsible for regulating land-use and zoning are the City of Niagara and Marinette County in Wisconsin and Dickinson County, Michigan.

The states of Wisconsin and Michigan have not delegated to local governments the regulation of activities involving the construction of, obstructions in, or infringements to navigable waters, such as boat docks, piers, and walls. Regulation of such activities falls under the purview of the Wisconsin Department of Natural Resources (WDNR), Michigan Department of Environmental Quality (MDEQ), and the U.S. Army Corps of Engineers.

(IV) DESCRIPTION OF RESOURCE COMMUNITIES ASSOCIATED WITH THE PROJECT

During the relicensing of the Project, White Water Associates, an Amasa, MI based environmental consulting firm conducted a wildlife and habitat study which inventoried natural resource

communities on all then SENA owned lands, both project and non-project. Some of the more important habitat units or “types” are described below.

Habitat Unit Descriptions Associated with the Project

Wisconsin Lowland Community. This community contains approximately 280 acres of land of which a portion is within the project boundary. This area has little or no forest habitat fragmentation. The forest is dominated by lowland hardwoods/conifer species such as balsam poplar, black ash, red maple, hemlock, white and black spruces and white cedar, with numerous wetlands contiguous to the Project waters. Recent timber harvesting has been limited although heavy logging is evident from years ago. Some of the Wisconsin Lowland is contained within the 100-year floodplain.

Pine Hummocks Community. This community includes approximately 115 acres of land, largely comprised of forested wetlands along the Menominee River. Dominant tree species include balsam poplar, black ash, American elm, silver and sugar maple, hemlock, white cedar, white pine, tamarack, white and black spruce, and balsam fir. Large white pines grow on hummocks along the eastern and northern borders of the wetland. All of the Pine Hummocks community is located within the 100-year floodplain. Most of this community is in the project boundary.

A number of other habitat types occupy land outside the project boundary. These include the Wisconsin and Michigan Bluffs communities and the Oak Savanna community. The bluffs communities contain a diverse mix of hardwoods and some components. The Oak Savanna community is predominantly northern pin oak and jack pine prairie.

(V) DESCRIPTION OF WETLANDS AND FLOODPLAINS

Wetlands in the Project Boundary

Wetlands near LQF have been mapped in Wisconsin by the WDNR as part of the state’s wetlands inventory. In Michigan, wetlands have been mapped by the U.S. Fish and Wildlife Service (USFWS) as part of the National Wetlands Inventory. In conjunction with the FERC license application filed in June, 1991, aerial photo and field studies were conducted to verify and refine the maps of the WDNR and USFWS for wetlands found near LQF. The wetlands study was part of White Water Associates’ larger study on wildlife and habitat, which was attached as Appendix 16 in the original license application filed June, 1991. By far the most common type of wetland found belongs to the palustrine system and the forested or “shrub-scrub” class of the National Wetlands Inventory classification system. In general, these classes of wetland occur in areas that experience temporary or seasonal flooding or have saturated soils. These wetlands are generally located in the Wisconsin Lowland and Pine Hummocks Communities.

Floodplains

A floodplain is defined as the area adjacent to a watercourse that may be inundated by a flood having a certain probability of occurring in any given year. Commonly, floodplains are delineated with reference to the 100-year flood, which is the flood having a 1% probability of occurring in any year. For the National Flood Insurance Program, local governments must conduct appropriate flood studies to enable mapping of the 100-year floodplain and must properly manage the 100-year floodplain to qualify for federal flood insurance. Flooding can be seriously aggravated by developments that encroach on the floodplain or restrict the stream channel. In addition, waste disposal sites and on-site disposal systems located on a floodplain can lead to contamination of river water. To minimize the potential for flooding of new areas and to reduce potential damage in historic floodplains, the City of Niagara regulates development in designated floodplain areas. Regulation is accomplished through zoning and subdivision ordinances that prevent land platting or building in these areas.

(VI) PROPOSED LAND MANAGEMENT PLAN

Plan objectives

The Land Management Plan for LQF will provide for the protection of the Project area's natural, recreational and aesthetic values. The plan reflects consultation with local and state land management agencies, consulting ecologists, and consideration of land-use and aesthetic resource evaluations. No manufacturing activities occur at LQF that might impact aesthetic, cultural, and ecological resources. Specific objectives of the plan include:

1. Continue to manage LQF lands for general public access and dispersed recreation use of the flowage;
2. Continue to protect the natural character of the LQF shoreline;
3. Continue to manage LQF lands to protect sensitive wildlife habitats. These include wood turtle nesting sites, wood duck nesting sites, bald eagles and osprey habitat, floodplains, and wetlands; and
4. Continue limited forest management on LQF lands in a manner that will enhance timber condition, wildlife habitat and cultural resources protection objectives. Forest management activities will not inhibit public use of or access to the flowage.

Proposed Land Management Guidelines

LQF lands are managed as protected open space. Protected open space includes land managed primarily for the protection of wildlife resources, flood plains, wetlands and shorelines. Public use and access, and occasional timber harvesting will be subject to environmental limitations. LQF lands included in this classification were selected based on the following criteria:

- A minimum 200 foot deep shoreline buffer strip (measured from the ordinary high water mark).
- Wetlands designated by the WDNR or MDNR.
- Wildlife habitat for endangered or threatened species.
- Wetland and slough habitat important to waterfowl, wood turtles and other wetland species.
- Islands and drainage corridor “edges” with high aesthetic value.

Management of protected open space focuses on natural resources protection, wildlife habitat enhancement and preservation of aesthetic values. Public use of these areas will be monitored and controlled by Northbrook Wisconsin to minimize adverse impacts to the resources.

The management of LQF lands will be consistent with the aesthetic guidelines published by the WDNR and MDNR on Best Management Practices (BMPs). Management of LQF will follow Wisconsin’s Forestry Best Management Practices for Water Quality. Specific management guidelines to be followed for lands designated as protected open space include:

1. Restrict management activities to those needed to improve wildlife habitat, promote forest health or enhance aesthetic values (e.g. thinning may be used to improve forest conditions, or clearing a small area to improve wildlife habitat).
2. Timber harvest will be focused on selective cutting to maintain a diversity of tree age, size and species. Small, carefully planned clear cuts, consistent with guideline 1. above, may occasionally be appropriate.
3. Facilities will be located a minimum 200 feet from shorelines. Exceptions are trails, overlooks, and interpretive facilities.
4. Facilities will reflect rustic designs, using natural colors and materials to blend with the environment.
5. Roadways and trails will parallel natural contours to minimize grading.
6. Public use of LQF lands will be controlled by location of recreation facilities and limiting the number of vehicular and pedestrian access opportunities.
7. Trail locations will be compatible with wildlife management objectives.
8. Motorized trail bikes, ATVs and other off-road vehicles will be prohibited without express written permission from Northbrook Wisconsin.
9. Passive, dispersed recreational uses will be allowed on all LQF open lands.

Proposed Shoreline and Flowage Management Activities

In addition to the above management guidelines, Northbrook Wisconsin will continue to undertake specific LQF-wide activities to protect recreation, wildlife, and scenic values of the shoreline and flowage. These include:

Purple Loosestrife - Eurasian Water-milfoil Monitoring. In consultation with resource agencies, Northbrook Wisconsin conducts biannual monitoring of LQF to document and report locations and relative abundance of purple loosestrife and Eurasian water-milfoil. White Water Associates has been retained to conduct this monitoring. Reports are submitted to the agencies. Currently, LQF has no purple loosestrife and only limited Eurasian water-milfoil.

Shoreline Monitoring for Erosion Control. Northbrook Wisconsin conducts periodic shoreline monitoring for erosion. No active erosion is presently occurring at LQF.

Passage of Woody Debris. Northbrook Wisconsin has an approved plan detailing the passage of woody debris.

Water Quality Monitoring Plan. As per the FERC Order Modifying and Amending Water Quality Monitoring Plan (Issued December 24, 2002), a twenty year water quality monitoring study is in progress (2001-2021). The most recent periodic water quality monitoring study was completed by Northbrook Wisconsin in 2016. The next one is scheduled for 2021.

Purple Wartyback Mussel Recovery Program. In accordance with Article 410, Northbrook Wisconsin agrees to prepare a recovery plan within 180 days after notification by WDNR that a state-approved recovery plan for the Purple Wartyback Mussel has been completed. It is understood that the Purple Wartyback recovery plan developed by Northbrook Wisconsin will only be applicable LQF lands.

(VII) BUFFER ZONE TO ENSURE PUBLIC ACCESS

Northbrook Wisconsin's policy, consistent with federal regulations regarding public access to LQF lands, is to allow public access for dispersed recreation activities (e.g., fishing, hunting, hiking, cross-country skiing and nature observation) to all areas except those related to the dam, powerhouse and ancillary project features. No overnight camping or fires are allowed. The only exception to the no camping policy allows the local Boy Scout troop to conduct periodic non-scheduled camp outs on a small parcel located within the project boundary.

Northbrook Wisconsin's land-use policies, existing recreation sites, and the land management guidelines noted above will ensure that public access to LQF lands and water is maintained, while protecting the recreation, aesthetic and natural resource values of the flowage and its shoreline.

(VIII) SHORELINE DEVELOPMENT POLICY

Northbrook Wisconsin's present policy with respect to allowing the construction of piers, docks, boat landings and other shoreline facilities is to evaluate requests on a case-by-case basis. Private property owners, townships and county park departments all have access and/or improvements on their own properties. Northbrook Wisconsin does not foresee the need to site private docks or piers on LQF lands. The existing improved recreation sites provide sufficient access to LQF waters.

(IX) BALD EAGLE MANAGEMENT PLAN AND SUPER CANOPY TREE PRESERVATION

There are presently no known bald eagle or osprey nest sites located on or near LQF lands. Northbrook Wisconsin will periodically monitor bald eagle/osprey activity during the course of the company's regular monitoring of LQF lands. If activity is observed, the appropriate state resource agencies will be notified with the location and observed activity. In addition, if and when bald eagle nesting activity is established, the company will manage the immediate buffer zones around the nest sites in accordance with USFWS and WDNR bald eagle management guidelines. This management plan provides guidelines for the protection of bald eagles that may utilize the wildlife habitat resources of LQF in the future. The guidelines used for development of this plan are described in detail by the USFWS (National Bald Eagle Management Guidelines, USFWS May 2007)¹ and the WDNR (Bald Eagles in Wisconsin -A Management Guide for Landowners, 1997)².

Nesting

Northbrook Wisconsin will periodically communicate with WDNR wildlife staff for updates on bald eagle nesting in the vicinity of the LQF project. If any nest sites are identified on LQF lands in the future, Northbrook Wisconsin will carry out the following procedures:

Establish a no logging, no development, no chemical use zone within the Primary Buffer Zone (330 ft.) of all nest sites. New nests identified within the project boundary will be included under the protection measures described in this plan. Human entry will be discouraged by placing a public informational sign at public access points. The sign will prohibit entry into secondary buffer

¹ <http://www.fws.gov/migratorybirds/currentbirdissues/management/baldeagle/nationalbaldeaglemanagementguidelines.pdf>

² <http://worldcat.org/arcviewer/1/WIDAG/2007/06/08/0000066365/viewer/file22.pdf>

zones in spring and summer. No signs will be placed at the actual buffer zones since such signs may serve as an attractant rather than a deterrent to public entry. Vehicular, foot and other access will be seasonally prohibited within the secondary buffer zone, further discouraging human entry.

Perch Trees and Future Nest Trees, Super Canopy Tree Preservation

It is the intent of Northbrook Wisconsin to manage for super canopy trees on LQF lands to provide for potential nesting opportunities. The large hardwoods on the island that lies mid-reservoir at the southern border of the Wisconsin Lowland Community and the large white pines that occur roughly ¼ mile away from the river in the Pine Hummocks Community will be given particular attention as potential nest and perch trees.

Recreational areas have been developed at sites removed from known sensitive environmental areas. Planning these recreational sites was accomplished in cooperation with state and local natural resource and park agencies. Thus, there is little chance for encroachment on wetlands and other environmentally sensitive areas (including eagle nest buffer zones).

(X) CAVITY TREE / NATURAL SNAGS MANAGEMENT FOR CAVITY-DWELLING SPECIES (WOOD DUCK)

Background

Existing snags and potential cavity trees were identified by White Water Associates and are fairly numerous along the riparian zone and likely to become more prevalent with appropriate timber management. Management prescriptions can be employed that provide for wood ducks and a variety of other cavity dwelling bird and mammal species (e.g. hooded merganser, flying squirrel, saw whet owl, barred owl, American kestrel).

Vegetative Management

The primary strategy for providing nest cavities for wood ducks and other cavity-dwelling species will be forest management with emphasis on maintenance of cavity trees. The encouragement of natural cavities will be the preferred management strategy for wood ducks. Such a strategy also provides dwelling opportunities for a variety of other species.

Wood Duck Nest Box Program

As a component of the original plan, fifteen wood duck nest boxes were installed along the flowage to encourage nesting. These boxes have had varying degrees of nesting success. Previous consultation determined that natural cavity trees are the best dwellings and that active management for these trees could eventually phase out the nest box program. Northbrook Wisconsin will continue to periodically maintain these boxes with a goal of reducing the number of boxes as suitable cavity trees are developed. Active management for cavity trees may occur as large potential trees are identified (e.g., trees may be ‘girdled’ to commence deterioration and development into cavity trees).

(XI) WOOD TURTLE MANAGEMENT

Background

Wood turtles of various ages were found in several locations upstream of the LQF dam during the 1990 surveys, indicating that necessary habitat features are present. Two habitat features, forage vegetation and sandy nesting substrate, lend themselves to management within the project boundary.

Forage Vegetation

Wood turtles favor partially shaded, moist, rich herbaceous vegetation, particularly areas with a diverse ground cover of dicot species. Such areas are found in the proposed new Project boundaries within the Wisconsin Lowlands and Pine Hummocks communities. The original plan proposed to protect these riparian zones so that a process of natural succession will perpetuate this type of forage vegetation. Periodic flooding along the backwaters produces a diverse herbaceous ground cover. Northbrook Wisconsin proposes to continue with this level of protection.

Sandy Nesting Substrate

Wood turtles require habitat with exposed sand or sandy-gravel areas for egg-laying. Sites close to a river are favored and those that receive afternoon sun are preferred. In conjunction with the implementation of the original plan, three nesting sites were developed at LQF. The details of these sites were provided in a White Water Associates report dated September 1998 and filed with the FERC and the resource agencies.

(XII) BATS

The activities outlined in this plan are consistent with conservation of bat species that use the LQF project area as part of their habitat (as an example see WDNR Little Brown Bat Species Guidance³). Northbrook Wisconsin is willing to cooperate with the WDNR in conducting bat surveys in the project area.

(XIII) PROVISIONS FOR CONSULTATION

Agency Consultation

Prior to conducting activities that will affect or have the potential to affect land and wildlife resources associated with the project, project lands or the Menominee River ecosystem, Northbrook Wisconsin will consult with Michigan DNR, Wisconsin DNR and USFWS. Northbrook Wisconsin will consult with the agencies concerning land or wildlife management activities that occur on LQF lands. In addition, the Licensee or those working on the Licensee's behalf will cooperate with the agencies if they desire to conduct additional wildlife inventories on Northbrook/project properties. In addition to updating the plan on a five-year basis and prior to conducting land-disturbing activities (including but not limited to: timber harvest, construction, trail development or improvement), Northbrook Wisconsin will formally consult with the Wisconsin DNR, Michigan DNR and USFWS.

³ Wisconsin Department of Natural Resources. 2013. Wisconsin Little Brown Bat Species Guidance. Bureau of Natural Heritage Conservation, Wisconsin Department of Natural Resources, Madison, Wisconsin. PUB-ER-705 (<http://dnr.wi.gov/files/pdf/pubs/er/er0705.pdf>)

APPENDIX A
AGENCY CORRESPONDENCE

Chuck Ahlrichs

From: Chuck Ahlrichs
Sent: Thursday, August 09, 2018 1:00 PM
To: 'Laatsch, Cheryl - DNR'; Gulotty, Elle (DNR); Tornes, Angie; Utrup, Nick
Subject: RE: Response requested FW: LITTLE QUINNESEC FALLS HYDROELECTRIC PROJECT COMPREHENSIVE LAND AND WILDLIFE MANAGEMENT PLAN (FERC No. 2536) - 2018 Updated Plan Draft (Articles 411 and 412)

Elle- Quite simply: (1) the topic at hand is land and wildlife management, pursuant to Articles 411 and 412 of our FERC license, not other types of natural resources; and (2) the relevant license articles require consultation with 3 agencies.

The revised plan was due to be filed yesterday. Are there any other comments?

Thank you,
-Chuck

From: Laatsch, Cheryl - DNR <Cheryl.Laatsch@wisconsin.gov>
Sent: Monday, August 06, 2018 9:40 AM
To: Gulotty, Elle (DNR) <GulottyE@michigan.gov>; Tornes, Angie <Angie_Tornes@nps.gov>; Utrup, Nick <Nick_Utrup@fws.gov>
Cc: Chuck Ahlrichs <cahlrichs@nbenergy.com>
Subject: RE: Response requested FW: LITTLE QUINNESEC FALLS HYDROELECTRIC PROJECT COMPREHENSIVE LAND AND WILDLIFE MANAGEMENT PLAN (FERC No. 2536) - 2018 Updated Plan Draft (Articles 411 and 412)

For many of the plans that are for land/wildlife, it is common to see FWS and DNR agencies as the only commenters or reviewers, as these are commonly the lead authorities for these type of resource reviews. The times that I have seen NPS and other NGOs or Tribes is when there is a settlement agreement. Hope this helps.

We are committed to service excellence.

Visit our survey at <http://dnr.wi.gov/customersurvey> to evaluate how I did.

Cheryl Laatsch
Statewide FERC Coordinator
Bureau of Environmental Analysis and Sustainability
Wisconsin Dept of Natural Resources
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Horicon WI 53032
(T) 920-387-7869 (Fax) 920-387-7888
Cheryl.laatsch@wisconsin.gov



From: Gulotty, Elle (DNR) <GulottyE@michigan.gov>
Sent: Thursday, August 02, 2018 7:02 PM
To: Tornes, Angie <Angie_Tornes@nps.gov>; Utrup, Nick <Nick_Utrup@fws.gov>; Laatsch, Cheryl - DNR <Cheryl.Laatsch@wisconsin.gov>

Subject: Response requested FW: LITTLE QUINNESEC FALLS HYDROELECTRIC PROJECT COMPREHENSIVE LAND AND WILDLIFE MANAGEMENT PLAN (FERC No. 2536) - 2018 Updated Plan Draft (Articles 411 and 412)

Angie, Nick, Cheryl,

Please either respond with comment, preferably to Chuck as well, or let me know you have none.

I would want it to say natural resources because that is what I am used to seeing.
I find it strange that they tighten up the language to exclude NPS and any tribe/NGOs.

Thank you,
Elle

From: Gulotty, Elle (DNR)
Sent: Tuesday, July 10, 2018 12:38:11 AM
To: Tornes, Angela; Utrup, Nick; Laatsch, Cheryl - DNR; Donofrio, Michael C - DNR; Kruger, Kyle (DNR)
Subject: Fw: Response requested FW: LITTLE QUINNESEC FALLS HYDROELECTRIC PROJECT COMPREHENSIVE LAND AND WILDLIFE MANAGEMENT PLAN (FERC No. 2536) - 2018 Updated Plan Draft (Articles 411 and 412)

Thoughts?

Angie, do you feel that LAND and wildlife acknowledges NPS?

From: Chuck Ahlrichs <cahlrichs@nbenergy.com>
Sent: Monday, July 9, 2018 5:06:49 PM
To: Gulotty, Elle (DNR)
Subject: RE: Response requested FW: LITTLE QUINNESEC FALLS HYDROELECTRIC PROJECT COMPREHENSIVE LAND AND WILDLIFE MANAGEMENT PLAN (FERC No. 2536) - 2018 Updated Plan Draft (Articles 411 and 412)

Elle- As you may have seen, FERC has provided comments to the Updated Land & Wildlife Management Plan we filed on 6/14. Among the comments is a requirement to either file an updated plan that includes the agency consultation clarifications recommended by you or provide reasons why we do not accept your recommended language.

Although we believe the original Plan language succinctly captures our consultation obligations, we will not belabor the matter. That said, in view of the specific requirements of our license we propose to slightly modify your recommendation to read as follows:

Prior to conducting activities that will affect or have the potential to affect land and wildlife ~~natural~~ resources associated with the project, project lands or the Menominee River ecosystem, Northbrook Wisconsin will consult with Michigan DNR, Wisconsin DNR and USFWS ~~and any agencies or parties with a relevant interest.~~ Northbrook Wisconsin will consult with the agencies concerning land or wildlife management activities that occur on LQF lands. In addition, the Licensee or those working on the Licensee's behalf will cooperate with the agencies if they desire to conduct additional wildlife inventories on Northbrook/project properties. In addition to updating the plan on a five-year basis and prior to conducting land-disturbing activities (including but not limited to: timber harvest, construction, trail development or improvement), Northbrook Wisconsin will formally consult with the Wisconsin DNR, Michigan DNR, and U.S. Fish & Wildlife Service, ~~the National Park Service.~~

Please provide any comments you may have to the proposed revisions.

Thank you,
-Chuck

From: Chuck Ahlrichs
Sent: Monday, June 18, 2018 8:37 AM
To: 'Gulotty, Elle (DNR)' <GulottyE@michigan.gov>
Cc: Dean Premo <dean.premo@white-water-associates.com>; 'Cheryl Laatsch' <Cheryl.Laatsch@Wisconsin.gov>; Utrup, Nick (<Nick_Utrup@fws.gov>) <Nick_Utrup@fws.gov>; Kruger, Kyle (DNR) <KRUGERK@michigan.gov>; Chris Sinclair <csinclair@nbenergy.com>; nick.ghere@niagaraworldwide.com; Brian Bartos <Brian.Bartos@ferc.gov>
Subject: RE: Response requested FW: LITTLE QUINNESEC FALLS HYDROELECTRIC PROJECT COMPREHENSIVE LAND AND WILDLIFE MANAGEMENT PLAN (FERC No. 2536) - 2018 Updated Plan Draft (Articles 411 and 412)

Elle- Our error in not consulting with the agencies had absolutely nothing to do with the description of our consultation requirements in the Plan. The omission was caused by our confusion around FERC's approval of the Forest Assessment and Woodland Management Plan. We have acknowledged and apologized for our error and have committed to steadfastly complying with land and management consultation obligations. The consultation record is included in the updated Plan. -Chuck

From: Gulotty, Elle (DNR) <GulottyE@michigan.gov>
Sent: Monday, June 18, 2018 8:26 AM
To: Chuck Ahlrichs <cahlrichs@nbenergy.com>
Cc: Dean Premo <dean.premo@white-water-associates.com>; 'Cheryl Laatsch' <Cheryl.Laatsch@Wisconsin.gov>; Utrup, Nick (<Nick_Utrup@fws.gov>) <Nick_Utrup@fws.gov>; Kruger, Kyle (DNR) <KRUGERK@michigan.gov>; Chris Sinclair <csinclair@nbenergy.com>; nick.ghere@niagaraworldwide.com; Brian Bartos <Brian.Bartos@ferc.gov>
Subject: RE: Response requested FW: LITTLE QUINNESEC FALLS HYDROELECTRIC PROJECT COMPREHENSIVE LAND AND WILDLIFE MANAGEMENT PLAN (FERC No. 2536) - 2018 Updated Plan Draft (Articles 411 and 412)

Hi Chuck,

There was a failure to properly consult in advance of timber harvest at Little Quinnesec Falls. That suggests that the current language is unclear to some. I requested the language be clarified to reduce the likelihood of this occurring in the future. I proposed draft wording and invited you to recommend revisions or alternatives.

You committed in your email to formally consult with the Wisconsin DNR, Michigan DNR and U.S. Fish & Wildlife Service prior to all future land-disturbing activities, including but not limited to timber harvest, construction and trail development or improvement. Memorializing this commitment by editing the language in the plan will ensure that if any of us on this thread are no longer part of the discussion, the language and intent will be clear. Updating the language to clarify it as I requested is a reasonable measure.

Elle

From: Chuck Ahlrichs [<mailto:cahlrichs@nbenergy.com>]
Sent: Monday, June 18, 2018 11:02 AM
To: Gulotty, Elle (DNR)
Cc: Dean Premo; 'Cheryl Laatsch'; Utrup, Nick (<Nick_Utrup@fws.gov>); Kruger, Kyle (DNR); Chris Sinclair; nick.ghere@niagaraworldwide.com
Subject: RE: Response requested FW: LITTLE QUINNESEC FALLS HYDROELECTRIC PROJECT COMPREHENSIVE LAND AND WILDLIFE MANAGEMENT PLAN (FERC No. 2536) - 2018 Updated Plan Draft (Articles 411 and 412)

Hi Elle- No, there is no mistake. At the end of the day, we felt the original language succinctly described our obligations. -Chuck

From: Gulotty, Elle (DNR) <GulottyE@michigan.gov>

Sent: Monday, June 18, 2018 5:52 AM

To: Chuck Ahlrichs <cahlrichs@nbenergy.com>

Cc: Dean Premo <dean.premo@white-water-associates.com>; 'Cheryl Laatsch' <Cheryl.Laatsch@Wisconsin.gov>; Utrup, Nick (<Nick_Utrup@fws.gov>) <Nick_Utrup@fws.gov>; Kruger, Kyle (DNR) <KRUGERK@michigan.gov>; Chris Sinclair <csinclair@nbenergy.com>; nick.ghere@niagaraworldwide.com

Subject: RE: Response requested FW: LITTLE QUINNESEC FALLS HYDROELECTRIC PROJECT COMPREHENSIVE LAND AND WILDLIFE MANAGEMENT PLAN (FERC No. 2536) - 2018 Updated Plan Draft (Articles 411 and 412)

Hi Chuck,

Did an incorrect version of the plan get filed? It appears to have identical language to 2014. I was expecting the paragraph on page 11 to have been clarified per our earlier discussion.

Thank you,
Elle

From: Chuck Ahlrichs [<mailto:cahlrichs@nbenergy.com>]

Sent: Thursday, May 31, 2018 12:03 PM

To: Gulotty, Elle (DNR)

Cc: Dean Premo; 'Cheryl Laatsch'; Utrup, Nick (<Nick_Utrup@fws.gov>); Kruger, Kyle (DNR); Chris Sinclair; nick.ghere@niagaraworldwide.com

Subject: FW: Response requested FW: LITTLE QUINNESEC FALLS HYDROELECTRIC PROJECT COMPREHENSIVE LAND AND WILDLIFE MANAGEMENT PLAN (FERC No. 2536) - 2018 Updated Plan Draft (Articles 411 and 412)

Hello Elle- Thank you for participating in a call with Ben Parsons and me regarding the scope of recent forest management activities at Little Q. It seems Ben's characterization of those activities was well received, notwithstanding our slipup over prior consultation needs after FERC accepted the Forest Assessment and Woodland Management Plan. Rest assured that prior to all future land-disturbing activities, including but not limited to timber harvest, construction and trail development or improvement, Northbrook will formally consult with the Wisconsin DNR, Michigan DNR and U.S. Fish & Wildlife Service as required by the project FERC license.

Thank you,
-Chuck

From: Chuck Ahlrichs

Sent: Tuesday, May 29, 2018 2:30 PM

To: 'Gulotty, Elle (DNR)' <GulottyE@michigan.gov>

Cc: Dean Premo <dean.premo@white-water-associates.com>; Chris Sinclair <csinclair@nbenergy.com>

Subject: RE: Response requested FW: LITTLE QUINNESEC FALLS HYDROELECTRIC PROJECT COMPREHENSIVE LAND AND WILDLIFE MANAGEMENT PLAN (FERC No. 2536) - 2018 Updated Plan Draft (Articles 411 and 412)

Hi Elle- Niagara Development's forester, Ben Parsons, believes it will be most productive to have a phone call to address your questions. Let me know your availability this week and I will organize a call.

Thank you,
-Chuck

From: Gulotty, Elle (DNR) <GulottyE@michigan.gov>

Sent: Tuesday, May 29, 2018 11:28 AM

To: Chuck Ahlrichs <cahlrichs@nbenergy.com>

Subject: Response requested FW: LITTLE QUINNESEC FALLS HYDROELECTRIC PROJECT COMPREHENSIVE LAND AND WILDLIFE MANAGEMENT PLAN (FERC No. 2536) - 2018 Updated Plan Draft (Articles 411 and 412)

Hi Chuck,

Following up on my questions/clarifications from 5/15 below.

Thank you,

Elle

From: Gulotty, Elle (DNR)

Sent: Tuesday, May 15, 2018 5:29 PM

To: 'Chuck Ahlrichs'; Dean Premo; Laatsch, Cheryl - DNR (Cheryl.Laatsch@wisconsin.gov); 'Utrup, Nick'; Kruger, Kyle (DNR); Tornes, Angela; Chris Sinclair

Cc: Johnson, Jennifer (DNR); nick.ghere@niagaraworldwide.com

Subject: RE: LITTLE QUINNESEC FALLS HYDROELECTRIC PROJECT COMPREHENSIVE LAND AND WILDLIFE MANAGEMENT PLAN (FERC No. 2536) - 2018 Updated Plan Draft (Articles 411 and 412)

Thank you Chuck,

I added some numbers to the comments/questions. If you *didn't* mean that questions labeled 2, 3 and 5 below were directed to the forester, please let me know.

In addition, do you have any issues/edits to the recommended changes for the 2018 Updated plan in 1?

Thank you for clarifying regarding the two plans, and for your responses so far.

Elle

From: Chuck Ahlrichs [<mailto:cahlrichs@nbenergy.com>]

Sent: Tuesday, May 15, 2018 4:10 PM

To: Gulotty, Elle (DNR); Dean Premo; Laatsch, Cheryl - DNR (Cheryl.Laatsch@wisconsin.gov); 'Utrup, Nick'; Kruger, Kyle (DNR); Tornes, Angela; Chris Sinclair

Cc: Johnson, Jennifer (DNR); nick.ghere@niagaraworldwide.com

Subject: RE: LITTLE QUINNESEC FALLS HYDROELECTRIC PROJECT COMPREHENSIVE LAND AND WILDLIFE MANAGEMENT PLAN (FERC No. 2536) - 2018 Updated Plan Draft (Articles 411 and 412)

Elle- The forester has been contacted to help provide responses to your comments/questions 1, 2 & 4. With respect to question 3, if there is a discrepancy between the Woodland Management Plan and the Land and Wildlife Management Plan, the latter plan governs. -Chuck

From: Gulotty, Elle (DNR) <GulottyE@michigan.gov>

Sent: Monday, May 14, 2018 12:12 PM

To: Chuck Ahlrichs <cahlrichs@nbenergy.com>; Dean Premo <dean.premo@white-water-associates.com>; Laatsch, Cheryl - DNR (Cheryl.Laatsch@wisconsin.gov) <Cheryl.Laatsch@wisconsin.gov>; 'Utrup, Nick' <nick_utrup@fws.gov>; Kruger, Kyle (DNR) <KRUGERK@michigan.gov>; Tornes, Angela <angie_tornes@nps.gov>; Chris Sinclair <csinclair@nbenergy.com>

Cc: Johnson, Jennifer (DNR) <JohnsonJ17@michigan.gov>

Subject: FW: LITTLE QUINNESEC FALLS HYDROELECTRIC PROJECT COMPREHENSIVE LAND AND WILDLIFE MANAGEMENT PLAN (FERC No. 2536) - 2018 Updated Plan Draft (Articles 411 and 412)

Hi Folks,

1. The following clarification should be made to the 2018 plan:

Prior to conducting activities that will effect or have the potential to effect natural resources associated with the project, project lands or the Menominee River ecosystem, Northbrook Wisconsin, LLC will consult with Michigan DNR, Wisconsin DNR, and USFWS and any agencies or parties with a relevant interest.. Northbrook Wisconsin, LLC will consult with the agencies concerning land or wildlife management activities that occur on LQF lands. In addition, the Licensee or those working on the Licensee's behalf will cooperate with the agencies if they desire to conduct additional wildlife inventories on Northbrook/project properties. In addition to updating the plan on a five-year basis and prior to conducting land-disturbing activities (including but not limited to: timber harvest, construction, trail development or improvement), Northbrook Wisconsin, LLC will formally consult with the Wisconsin DNR, Michigan DNR, U.S. Fish & Wildlife Service, the National Park Service.

Feel free to recommend appropriate rewording for clarity/grammar, and let me know if I missed something.

2. Please provide a map describing the locations of the various stands/treatments described in the Niagara Development LLC Ownership Forest Assessment and Woodland Management Plan. For example, I am interested in knowing what areas are being targeted for increased aspen generation because of the observed mortality of the fir-spruce plantation.
3. What about 85 sq feet BA is more "idealistic" for Northern Hardwoods? Please provide supporting rationale pertinent to the Land Management Plan and forestry BMPs.
4. Please describe what is meant by *supports* regarding the Woodland Management Plan. If there is a discrepancy, does the Land and Wildlife Management plan supersede?
5. Please provide details on species and volumes harvested in the last few years (including under the Woodland Plan) as well as outlining what is planned for the next year, for timber harvest and any other land disturbing activities.

I may have additional comments after further review of the plans and/or conditions on the ground.

Thank you,
Elle

From: Kruger, Kyle (DNR)

Sent: Tuesday, May 08, 2018 7:17 PM

To: Gulotty, Elle (DNR)

Subject: FW: LITTLE QUINNESEC FALLS HYDROELECTRIC PROJECT COMPREHENSIVE LAND AND WILDLIFE MANAGEMENT PLAN (FERC No. 2536) - 2018 Updated Plan Draft (Articles 411 and 412)

I'm out right now, but I think you may want to take a look. I'll do so when I can, but would guess you can handle unless you have questions.

From: Dean Premo <dean.premo@white-water-associates.com>

Sent: Monday, May 7, 2018 4:37 PM

To: Kruger, Kyle (DNR) <KRUGERK@michigan.gov>

Cc: 'Chuck Ahlrichs' <cahlrichs@nbenergy.com>

Subject: LITTLE QUINNESEC FALLS HYDROELECTRIC PROJECT COMPREHENSIVE LAND AND WILDLIFE MANAGEMENT PLAN (FERC No. 2536) - 2018 Updated Plan Draft (Articles 411 and 412)

Dear Kyle,

Enclosed is a draft copy of the LITTLE QUINNESEC FALLS HYDROELECTRIC PROJECT COMPREHENSIVE LAND AND WILDLIFE MANAGEMENT PLAN (FERC Number 2536). This is the 5-year proposed revised plan (2018). We are not proposing changes to the existing plan or management strategies. One update that we have made is acknowledgement of a **Forest Assessment and Woodland Management Plan** that was prepared by Timber Valley LLC under contract with Niagara Development, LLC and submitted to the FERC in August of 2017 and approved in September. This Woodland Management Plan appropriately references and supports the Land & Wildlife Management Plan.

As required in the license article, we are providing you a thirty-day comment period before filing the final revised plan with the FERC. Please provide your comments to us by June 8, 2018. Any comments you provide will be filed to the FERC in conjunction with our final filing.

If you have questions or concerns that might be addressed most expediently via phone, feel free to call me at 906-822-7889. Your official consultation comments can be provided through email. Thanks.

Dean Premo

Dean Premo, Ph.D., President

White Water Associates, Inc.

429 River Lane, P.O. Box 27

Amasa, Michigan 49903

Phone: (906) 822-7889

Fax: (906) 822-7977

E-mail: dean.premo@white-water-associates.com

Web: <http://www.white-water-associates.com>



Chuck Ahlrichs

From: Dean Premo <dean.premo@white-water-associates.com>
Sent: Monday, May 07, 2018 1:36 PM
To: 'Laatsch, Cheryl - DNR'
Cc: Chuck Ahlrichs
Subject: LITTLE QUINNESEC FALLS HYDROELECTRIC PROJECT COMPREHENSIVE LAND AND WILDLIFE MANAGEMENT PLAN (FERC No. 2536) - 2018 Updated Plan Draft (Articles 411 and 412)
Attachments: LQF-Land & Wildlife Management Plan-2018 Update.pdf

Dear Cheryl,

Attached is a draft copy of the LITTLE QUINNESEC FALLS HYDROELECTRIC PROJECT COMPREHENSIVE LAND AND WILDLIFE MANAGEMENT PLAN (FERC Number 2536). This is the 5-year proposed revised plan (2018). We are not proposing changes to the existing plan or management strategies. One update that we have made is acknowledgement of a **Forest Assessment and Woodland Management Plan** that was prepared by Timber Valley LLC under contract with Niagara Development, LLC and submitted to the FERC in August of 2017 and approved in September. This Woodland Management Plan appropriately references and supports the Land & Wildlife Management Plan.

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Dean Premo

Dean Premo, Ph.D., President

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Chuck Ahlrichs

From: Dean Premo <dean.premo@white-water-associates.com>
Sent: Monday, May 07, 2018 1:38 PM
To: 'Utrup, Nick'
Cc: Chuck Ahlrichs
Subject: LITTLE QUINNESEC FALLS HYDROELECTRIC PROJECT COMPREHENSIVE LAND AND WILDLIFE MANAGEMENT PLAN (FERC No. 2536) - 2018 Updated Plan Draft (Articles 411 and 412)
Attachments: LQF-Land & Wildlife Management Plan-2018 Update.pdf

Dear Nick,

Enclosed is a draft copy of the LITTLE QUINNESEC FALLS HYDROELECTRIC PROJECT COMPREHENSIVE LAND AND WILDLIFE MANAGEMENT PLAN (FERC Number 2536). This is the 5-year proposed revised plan (2018). We are not proposing changes to the existing plan or management strategies. One update that we have made is acknowledgement of a **Forest Assessment and Woodland Management Plan** that was prepared by Timber Valley LLC under contract with Niagara Development, LLC and submitted to the FERC in August of 2017 and approved in September. This Woodland Management Plan appropriately references and supports the Land & Wildlife Management Plan.

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If you have questions or concerns that might be addressed most expediently via phone, feel free to call me at 906-822-7889. Your official consultation comments can be provided through email. Thanks.

Dean Premo

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429 River Lane, P.O. Box 27

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