



We Energies
 Iron Mountain Hydro Operations
 800 Industrial Park Drive
 Iron Mountain, MI 49801
 www.we-energies.com

November 22, 2019

Ms. Kimberly D. Bose, Secretary
 Federal Energy Regulatory Commission
 888 First Street, NE
 Washington, DC 20426

Dear Ms. Bose:

SUBJECT: 2019 Reports on Nuisance Plant Surveys

	<u>FERC No.</u>	<u>NAT DAM#</u>	<u>License Article</u>
Way/Michigamme Reservoir	1759	MI00205	413
Hemlock Falls	2074	MI00172	412
Lower Paint	2072	MI00179	411
Peavy Falls	11830	MI00191	411
Michigamme Falls	2073	MI00156	412
Brule	2431	MI00184	410
Twin Falls	11831	MI00143	412
Pine	2486	WI00738	413
Kingsford	2131	MI00177	412
Big Quinnesec Falls	1980	MI00103	412
Chalk Hill	2394	MI00160	410
White Rapids	2357	MI00207	410

The “Terrestrial Based Natural Resources Management Plan,” filed in September of 1999 as part of the Wilderness Shores Settlement Agreement, which affects Way Dam (FERC No. 1759), Hemlock Falls (FERC No. 2074), Peavy Falls (FERC No. 11830), Michigamme Falls (FERC No. 2073), Lower Paint (FERC No. 2072), Twin Falls (FERC No. 11831), Kingsford (FERC No. 2131), and Big Quinnesec Falls (FERC No. 1980), and the “Order Modifying and Approving Purple Loosestrife and Eurasian Water Milfoil Monitoring Plan” issued on April 30, 1996, for the Pine (FERC No. 2486), August 14, 1997, for the Brule (FERC No. 2431), December 11, 1997, for the Chalk Hill (FERC No. 2394) and White Rapids (FERC No. 2357) projects, require We Energies to provide the final reports on the required annual and biennial monitoring for those projects no later than 30 days after the monitoring is completed. An annual extension for submitting these reports by the end of November was granted in 2010. Monitoring is scheduled each year for a portion of these twelve projects, with the field portion of the monitoring to be completed by August 25.

Report of 2019 Nuisance Plant Monitoring

Please find attached a report of Purple Loosestrife (PL) monitoring activities completed in 2019 consistent with the proposed plan submitted January 22, 2014 and Table 1. The results were presented by Mike Grisar of our environmental staff at our Annual Land Management Meeting held on October 15, 2019, with representatives from the Wisconsin and Michigan DNRs as well as some county and local

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agency representatives that work on tracking and controlling invasive species. The information was made available to everyone in attendance upon request.

Table 1: Comparison of 2019 PL Data Collected vs Proposed Plan Requirements

	Proposed New Plan	
	2019 Plan	2019 Actual
Way Dam	X	X
Hemlock Falls	X	X
Peavy Falls	X	X
Lower Paint		
Michigamme Falls	X	X
Brule		X*
Twin Falls		
Pine	X	X
Kingsford		
Big Quinnesec Falls		
Chalk Hill		X*
White Rapids	X	X

* 2019 surveys were conducted at Brule and Chalk Hill due to the presence of purple loosestrife in 2018.

Please call me at (906) 779-4099 if you have any questions concerning this filing.

Sincerely,



Todd P. Jastremski
 Asset Manager Hydro Operations

Attachments – Purple Loosestrife Survey Report (22 Pages)

cc: John Zygaj – FERC – CRO
 Cheryl Laatsch – WDNR
 Elle Gulotty – MDNR
 Nicholas Utrup – FWS
 James Fossum – RAW
 Bob Stuber – MHRC

We Energies
2019 Annual Report - Nuisance Plant Control Survey
White Rapids Reservoir
FERC Project #2357

Background and Methods

We Energies Environmental Department staff, Mr. Mike Grisar and Mr. Scott Horzen, conducted a survey from a boat of the entire shoreline at the White Rapids project on August 16, 2019. All waters and appropriate wetlands accessible from the boat were evaluated for the presence of purple loosestrife (*Lythrum salicaria*).

If any occurrences of purple loosestrife were observed, they were mapped using a Trimble XH GPS unit. Each location was identified as a stand and the number of plants, stems per plant, and relative age of the plants were recorded. Any plants observed were removed by hand including flowers, stems, and roots.

Results and Discussion

In 2010, purple loosestrife was observed for the first time on the White Rapids reservoir. It was a relatively small population of six plants found on the west point along the south side of the channel bisecting the large island in the middle of the reservoir. This population returned each of the next two years in 2011 and 2012, and all plants were removed. While the entire reservoir was monitored in subsequent years for the presence of purple loosestrife, particular attention was given to the location where purple loosestrife was observed between 2010 through 2012. No purple loosestrife has been observed at White Rapids since 2012, including in 2019.

Conclusions

It was discouraging that a new location of purple loosestrife was observed in White Rapids for the first time in 2010. By removing the plants in this stand for three consecutive years, the stand was effectively managed and absent between 2013 through 2019. Manually removing individual plants that were encountered during previous years was effective in eliminating the stand.

An influx of purple loosestrife occurring along public roadways leading to several of the reservoirs was first reported in 2010. Since, purple loosestrife infestations were documented to be increasing exponentially along CTH K leading easterly toward the Menominee River between the Chalk Hills and White Rapids project areas. These populations have periodically been managed, although have not been eliminated. Continued management by other parties is necessary to reduce the potential for purple loosestrife to spread in the Menominee River system.

We Energies
2019 Annual Report - Nuisance Plant Control Survey
Chalk Hill Reservoir
FERC Project #2394

Background and Methods

We Energies Environmental Department staff, Mr. Scott Horzen and Mr. Mike Al-wathiqui, conducted a survey from a boat of the entire shoreline at the Chalk Hill project on August 14, 2019. All waters and appropriate wetlands accessible from the boat were evaluated for the presence of purple loosestrife (*Lythrum salicaria*).

If any occurrences of purple loosestrife were observed, they were mapped using a Trimble XH GPS unit. Each location was identified as a stand and the number of plants, stems per plant, and relative age of the plants were recorded. Any plants observed were removed by hand including flowers, stems, and roots.

Results and Discussion

Prior to 2010, a very small population of purple loosestrife had been observed and managed for at the south end of Miscauno Island. In 2010, a single plant was located in the back of a secluded bay along the west side immediately adjacent to a wood duck house that was installed by a third party. Previously observed plants were removed including the flowering heads, stems, and root mass, and the plants were effectively managed.

While the entire reservoir has been monitored for the presence of purple loosestrife, particular attention has been given to the locations where it had been previously observed. No purple loosestrife has been observed at these previous locations. A single plant was observed at a new location in 2017, and two plants were observed in the same vicinity in 2018. The location occurred approximately 0.4-mile south of the CTH Z bridge on the west bank of the river. The entire plants were removed. The area was monitored for the presence of purple loosestrife in 2019, and no purple loosestrife was observed..

Conclusions

It is discouraging that new locations of purple loosestrife have occasionally been observed in Chalk Hill since monitoring began in the late 1990's. By removing previously observed plants, the population encroachment has been effectively managed early in its infestation within the project boundary. Continued active removal of observed purple loosestrife will continue to prevent the infestation from spreading further within Chalk Hill.

An influx of purple loosestrife occurring along public roadways leading to several of the reservoirs was first reported in 2010. Since, purple loosestrife infestations were documented to be increasing exponentially along CTH K leading easterly toward the Menominee River between the Chalk Hill and White Rapids project areas. These populations have periodically been managed, although have not been eliminated. Continued management by other parties is necessary to reduce the potential for purple loosestrife to spread in the Menominee River system.

We Energies
2019 Annual Report - Nuisance Plant Control Survey
Pine Reservoir
FERC Project #2486

Background and Methods

We Energies Environmental Department staff, Mr. Mike Grisar and Mr. Scott Horzen, conducted a survey from a boat of the entire shoreline at the Pine project on July 26, 2019. All waters and appropriate wetlands accessible from the boat were evaluated for the presence of purple loosestrife (*Lythrum salicaria*).

If any occurrences of purple loosestrife were observed, they were mapped using a Trimble XH GPS unit. Each location was identified as a stand and the number of plants, stems per plant, and relative age of the plants were recorded. Any plants observed were removed by hand including flowers, stems, and roots.

Results and Discussion

No purple loosestrife plants were observed along the shores of the Pine Reservoir project area.

Conclusions

Purple loosestrife has yet to be observed at the Pine project area since the nuisance plant surveys began. Diligent monitoring will continue to prevent an invasion of this species.

We Energies
2019 Annual Report - Nuisance Plant Control Survey
Brule Reservoir
FERC Project #2431

Background and Methods

We Energies Environmental Department staff, Mr. Mike Grisar and Mr. Scott Horzen, conducted a survey from a boat of the entire shoreline at the Brule Reservoir project on July 21, 2019. All waters and appropriate wetlands accessible from the boat were evaluated for the presence of purple loosestrife (*Lythrum salicaria*).

If any occurrences of purple loosestrife were observed, they were mapped using a Trimble XH GPS unit. Each location was identified as a stand and the number of plants, stems per plant, and relative age of the plants were recorded. Any plants observed were removed by hand including flowers, stems, and roots.

Results & Discussion

In 2009, a single plant was observed in the eastern bay east of the confluence of the Paint and Brule Rivers. The entire plant was removed and management of this encroaching stand appeared to be completely successful. No new plants were observed there, or anywhere else at Brule, from 2009 through 2017.

In 2018, a single plant was observed in very close proximity to the location of where the plant was removed in 2009. This new plant was removed entirely. The area was monitored for the presence of purple loosestrife in 2019, and no purple loosestrife was observed.

Conclusions

It was discouraging that purple loosestrife was first observed in the Brule Reservoir in 2009, and again in 2018. The removal of the plant observed in 2018 was successful with no reoccurrence of this stand in 2019. Continued active removal of observed purple loosestrife will continue to prevent the infestation from spreading further within Brule Reservoir.

**We Energies
2019 Annual Report - Nuisance Plant Control Survey
Michigamme Falls Reservoir
FERC Project #2073**

Background and Methods

We Energies Environmental Department staff, Mr. Mike Grisar and Mr. Scott Horzen, conducted a survey from a boat of the entire shoreline at the Michigamme Falls project on August 15, 2019. All waters and appropriate wetlands accessible from the boat were evaluated for the presence of purple loosestrife (*Lythrum salicaria*).

If any occurrences of purple loosestrife were observed, they were mapped using a Trimble XH GPS unit. Each location was identified as a stand and the number of plants, stems per plant, and relative age of the plants were recorded. Any plants observed were removed by hand including flowers, stems, and roots.

Results and Discussion

No purple loosestrife plants were observed along the shores of the Michigamme Falls Reservoir project area.

Conclusions

Purple loosestrife has yet to be observed at the Michigamme Falls project area since the nuisance plant surveys began. Diligent monitoring will continue to prevent an invasion of this species.

We Energies
2019 Annual Report - Nuisance Plant Control Survey
Peavy Falls Reservoir
FERC Project #11830

Background and Methods

We Energies Environmental Department staff, Mr. Mike Grisar and Mr. Scott Horzen, conducted a survey from a boat of the entire shoreline at the Peavy Falls project on July 25, 2019. All waters and appropriate wetlands accessible from the boat were evaluated for the presence of purple loosestrife (*Lythrum salicaria*).

If any occurrences of purple loosestrife were observed, they were mapped using a Trimble XH GPS unit. Each location was identified as a stand and the number of plants, stems per plant, and relative age of the plants were recorded. Any plants observed were removed by hand including flowers, stems, and roots.

Results and Discussion

In 2013, one purple loosestrife stand was observed along the Peavy Falls shorelines. This was the first time purple loosestrife was encountered at this project site, and it was observed within a few feet of the west side of the boat launch at Recreation Area #10. The entire plant, including roots, stems, and flowers were removed. Purple loosestrife has not been observed since, including in 2019.

Conclusions

It was discouraging that purple loosestrife was observed for the first time in 2013 at the Peavy Falls project area since the nuisance plant surveys began. As no plants have been observed since, the manual removal was successful. Diligent monitoring will continue to prevent further invasion of this species.

**We Energies
2019 Annual Report - Nuisance Plant Control Survey
Hemlock Falls
Project #2074-007**

Background and Methods

We Energies Environmental Department staff, Mr. Mike Grisar and Mr. Scott Horzen, conducted a survey from a boat of the entire shoreline at the Hemlock Falls project on August 11, 2019. All waters and appropriate wetlands accessible from the boat were evaluated for the presence of purple loosestrife (*Lythrum salicaria*).

If any occurrences of purple loosestrife were observed, they were mapped using a Trimble XH GPS unit. Each location was identified as a stand and the number of plants, stems per plant, and relative age of the plants were recorded. Any plants observed were removed by hand including flowers, stems, and roots.

Results and Discussion

No purple loosestrife plants were observed along the shores of the Hemlock Falls Reservoir project area.

Conclusions

Purple loosestrife has yet to be observed at the Hemlock Falls project area since the nuisance plant surveys began. Diligent monitoring will continue to prevent an invasion of this species.

We Energies
2019 Annual Report - Nuisance Plant Control Survey
Way Dam & Michigamme Reservoir
FERC Project #1759

We Energies Environmental department staff, Mr. Mike Grisar, Mr. Mike Al-wathiqui, Mr. Scott Horzen, and Mr. Tyson Schreiner conducted two separate surveys from a boat at the Way Dam and Michigamme Reservoir project on July 23 & 24, and August 13 & 14, 2019. All waters and appropriate wetlands accessible from the boat were evaluated for the presence of purple loosestrife (*Lythrum salicaria*).

Additionally, We Energies and NRCS Dickinson County Conservation District staff surveyed the Michigamme River from the Highway 95 bridge north of Channing, MI downstream to Newberg Road at the Way Dam project boundary. These surveys occurred on July 22 and August 12, 2018. This is an approximate 5-mile stretch of the river that We Energies committed to surveying during the annual agency meeting in fall 2008. The effort was done to determine the extent of purple loosestrife immediately upstream of the Way Dam project, and to attempt to minimize the potential for a prolific invasion within the project limits and further down through the Menominee system.

If any occurrences of purple loosestrife were observed, they were mapped using a Trimble XH GPS unit. Each location was identified as a stand and the number of plants, stems per plant, and relative age of the plants were recorded. Any plants observed were removed by hand including flowers, stems, and roots.

Way Dam and Michigamme Reservoir Project Area

Purple loosestrife has been observed in the Michigamme Reservoir each year since 2006. Several years prior to 2006, it had been documented at a single location and as a single plant. Each year, every plant found has been removed. From 2006 through 2010 a rapid invasion occurred resulting in significant increases in the number of locations (i.e. stands), total plants, and total stems observed. Plants were found primarily in the east portions of the reservoir and upstream of where the Michigamme River outlets into the main reservoir basin. In 2010, it was the first time purple loosestrife had been observed beyond the mouth of the river and in the main basin, which was in two locations.

Dramatic declines in the number of locations, plants, and total stems were observed in 2011. However, the population spiked in 2012 when the highest recorded levels in the total number of plants and stems were observed. As a result of the 2012 spike, it was decided to conduct two separate surveys for purple loosestrife in an attempt to better locate plants that were developing later in the season and reduce the potential to find multi-year plants the following year. This also would reduce seed production and dispersal by plants not detected during the first survey. It has been noted that the flowering period for purple loosestrife in Way Dam has been variable. By conducting the two surveys each year from 2013 through 2019, it is evident that there is not a distinct peak flowering period, but rather the flowering of individual plants is spread out between mid-July and the end of August.

From the beginning of the recorded surveys in 2006, the total number of stands observed peaked in 2017. New high values for the total number of plants, stems, and multi-year plants were documented in 2019. These new highs are entirely attributed to a single location where a very large population was observed, which was recorded as six stands (606-611). This population is found to occur in an area that is dominated by cattail along the shoreline. A pocket

of cattails did not grow in 2019 presenting much better visibility to the shoreline at this location. The improved visibility allowed the field biologists to observe and manage the population in 2019. This one population accounted for 87% of the total plants, 91% of the total stems, and 83% of the total multi-year plants recorded in 2019. Despite this large population, the total number of stands observed decreased for two consecutive years following the peak number of stands recorded in 2017.

Another analysis conducted is reviewing the annual data results of only the July survey. This is due to prior to 2013, only one survey was completed at Way Dam at the end of July each year. Analyzing only the July survey data allows for a direct annual comparison throughout the thirteen year monitoring period. Through this analysis, the data show the total number of plants, stems, and multi-year plants observed in 2019 increased slightly over 2018, which had the fewest plants and stems recorded since 2008 and 2009 during the July survey.

Since the 2013 survey year when two annual surveys began, the data strongly support the effort to conduct two surveys annually. Excluding the large stand observed in 2019, the results indicate that approximately two to three times more plants and stems have been removed from the reservoir annually by conducting the second survey in August. In doing so, the reproduction potential of purple loosestrife within the reservoir has been substantially decreased.

Another measure of analyzing the management effectiveness is by removing the largest stands observed from the analysis. In each year since 2012, just a few stands have accounted for a large percentage of the total plants and stems observed, particularly when evaluating only the July surveys. Statistically, with these stands removed from the calculations, the purple loosestrife population was on a consistent downward trend between 2010 and 2014. Between 2014 and 2019, the population has had slight increases and decreases. In removing the largest stands from the calculations, the purple loosestrife population decreased from 2018 levels, and yielded the lowest recorded population in number of stands observed since 2014, number of plants and stems observed since 2009, and number of multi-year plants since 2011. Overall, there has been a very positive trend from 2010 through 2019.

One additional measure to determine management effectiveness is how many of the locations where purple loosestrife is found in a given year are locations where it was found in any previous year. Purple loosestrife has been found at 611 total locations in the past 13 years. Of these, only 48 (approximately 8%) stands documented between 2006 and 2018 were at locations where the purple loosestrife returned in 2019. This has been a consistent trend since 2010.

While a majority of the stand locations are centralized around the Weber Lake area and upstream, purple loosestrife occurrences expanded further downstream in 2012 into the main reservoir. This was beyond where it had been previously documented prior to 2010. Up until 2010, the furthest downstream observations occurred about ½-mile upstream of where the Michigamme River enters the main reservoir basin. By 2012, purple loosestrife had been observed throughout much of the main reservoir basin; however, it was widely distributed and in relatively few locations. In 2013, many of the stands documented to have spread through the main basin between 2010 through 2012 were no longer present. Through 2018, purple loosestrife has been observed at 12 locations in the main basin, only three of which were observed in 2019. There was a congregation of 12 stands observed in 2018 just upstream of where the river enters main basin in 2018, seven of which were newly recorded stands. None of these were observed to be present in 2019. Additionally, 36% (26 stands) of the new stands recorded in 2018 occurred from the Weber Lake area to the mouth of the river into the main basin. In 2019, 25% (13 stands) of the new stands were observed in this same stretch, six of which included the very large stand described above. This trend will need to be monitored very

closely in future monitoring years to try to minimize the potential for purple loosestrife to spread further downstream into the main basin.

When considering all factors including the trends in reduced plants and stems as well as the relatively small proportion of the total stands reoccurring from one year to the next, the management technique of manual removal of all plant material has been successful. While it is very labor intensive to conduct these manual removals, it is successful at least at those locations where the loosestrife can be observed.

Two primary objectives will continue to drive the management plan for controlling purple loosestrife within Way Dam. These include early detection of new infestation locations as well as finding and thoroughly managing the larger stands. By implementing the second survey strategy since 2013, the 2019 results suggest these goals are being achieved. By not conducting the second survey and removing the reproduction potential of these additional plants, the purple loosestrife population would likely have continued to increase exponentially as was being observed between 2006 and 2012.

We Energies plans to continue surveying and managing purple loosestrife at the Way Dam & Michigamme Reservoir project site annually to minimize the potential for mature plants setting and releasing seed into the reservoir.

Michigamme River – Highway 95 to Newberg Road

The increase in purple loosestrife within the Way Dam project lands is concerning as there is a viable purple loosestrife population occurring upstream of the Way Dam project area. In agreeing to conduct a survey on the Michigamme River further upstream from the project area, the Company is developing a better understanding of the extent to which purple loosestrife occurs upstream of the reservoir system. We Energies has been collaborating with the NRCS Dickinson County Conservation District office and the Wild Rivers Invasive Species Coalition, to combat the purple loosestrife infestation on the Michigamme River.

In 2009, surveys commenced along that stretch of the Michigamme River from the north end of the Way Dam project area up to the first road crossing at M-95 near the Dickinson and Marquette County line. Surveys have continued in this river stretch through 2019, and two distinct surveys were conducted each year from 2013 through 2019.

Similar to the population explosion that occurred in Way Dam, a dramatic increase in the purple loosestrife population occurred between 2009 and 2012. Similar to the trends between 2011 and 2012 on Way Dam, the river stretch experienced a substantial decline in the documented population in 2013. Then a spike in the population on the river stretch occurred again in 2014. Survey results between 2015 and 2017 showed declines in the number of stands, plants, and stems observed from the 2014 peak. Slight increases in these population values were observed in 2018, but the values remain well below the 2014 recorded data.

Comparing the July 2014 results to 2013 data as a more direct comparison to the initial survey beginning in 2009, the number of stands, total plants, and stems observed increased substantially over the July 2013 observations. When comparing July 2015 through 2018 to July 2014, a substantial decrease was observed in each of the population categories. Similar to the total values observed, slight increases were observed between 2017 and 2018. In 2019, substantial declines were observed in the number of stands, plants, and stems when compared to 2018. The 2019 data show the 2019 population was observed to have the fewest stands since 2013 and fewest plants since 2010.

To further improve the management effectiveness, the second survey conducted in each of the past seven years has resulted in a significantly more thorough removal of purple loosestrife from the river stretch surveyed below M-95. The August 2019 survey resulted in the removal of an additional 44% of all the stands, 46% of all the plants, and 48% of all the stems detected in 2019 that would not have been removed from the system with the second survey.

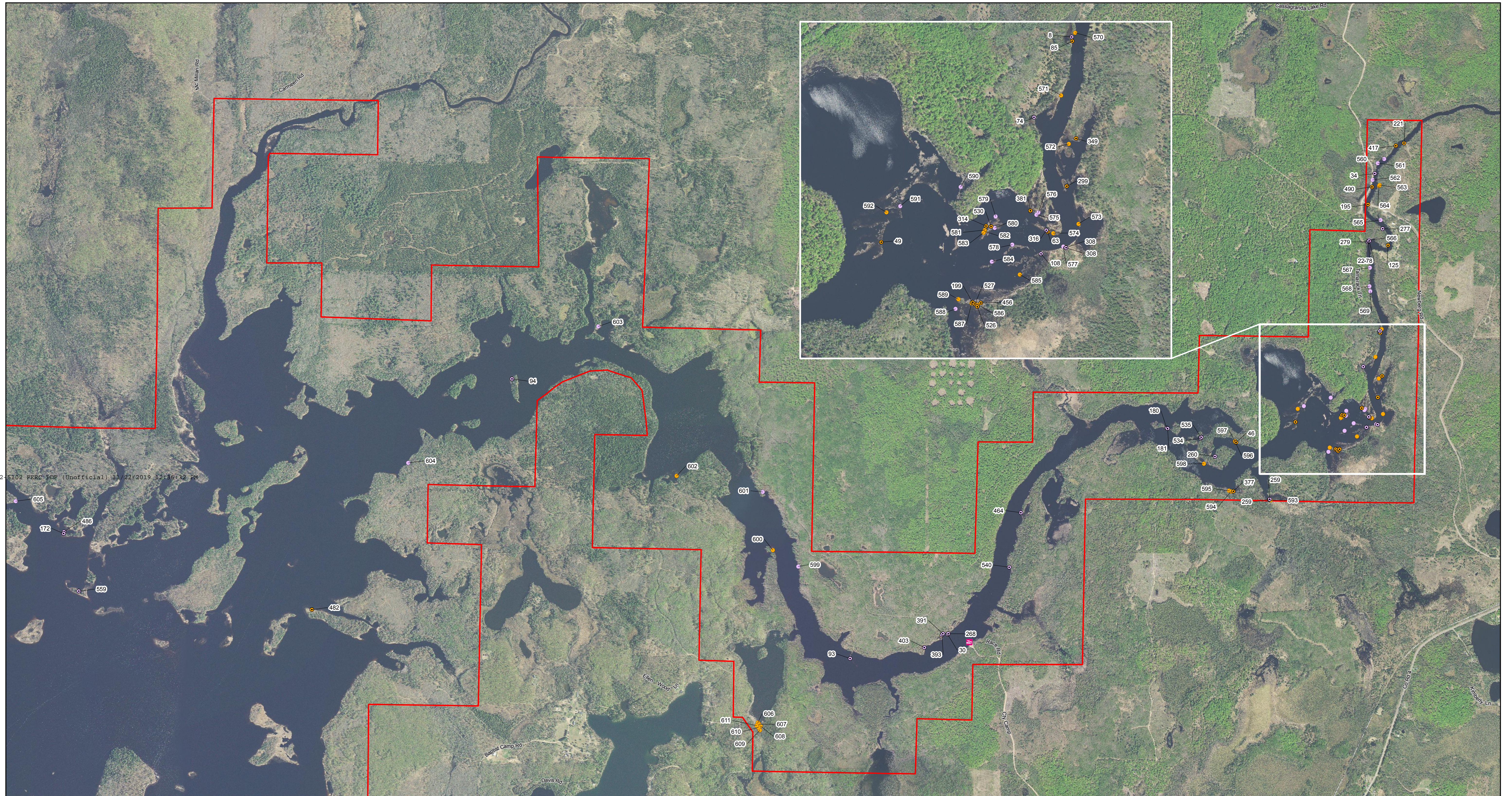
Additionally, purple loosestrife has been found at 1337 total locations in the past 11 years. Of these, 176 (approximately 13%) stands documented between 2009 and 2018 were locations where the purple loosestrife returned in 2019.

The effort to expand our understanding of source populations upstream of the Way Dam project area expanded in 2010 by further collaboration with Ms. Ann Hruska. Ms. Hruska was awarded a Wilderness Shores Mitigation Enhancement Fund (MEF) grant for conducting purple loosestrife management along the Michigamme River upstream of the Way Dam project area. In preparation for implementing this grant, Ms. Hruska conducted road surveys in August 2010 along access points from the M-95 crossing up to and north of Republic. Ms. Hruska found numerous dense monotypic stands of purple loosestrife along the shores of the Michigamme River in and around the Republic, MI area. Some of these stands were several acres in size. Many other small stands were observed along the Michigamme River banks at road vantage points from the M-95 crossing at the Marquette and Dickinson County line upstream to Republic. It was quite evident the source population(s) for the loosestrife occurring in the Way Dam project area is from the area in and around Republic, MI.

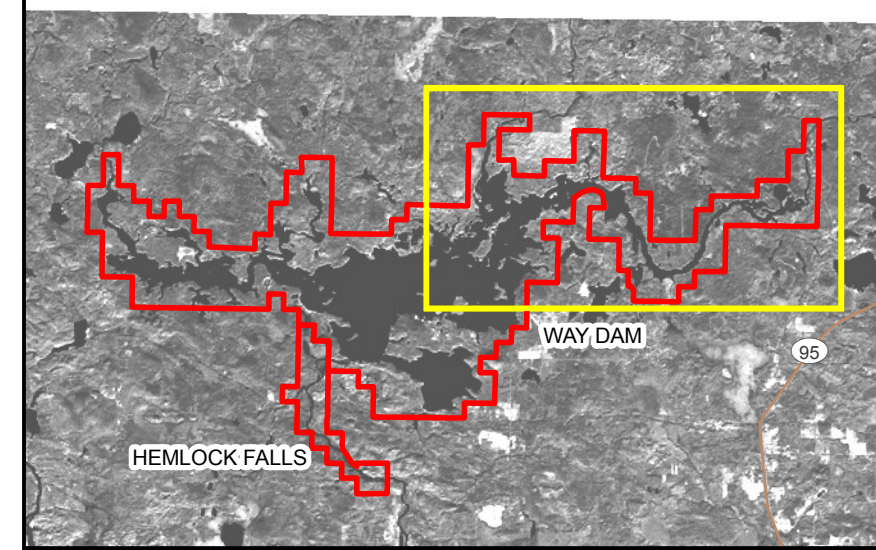
In 2011 and 2012, Ms. Hruska continued the purple loosestrife management efforts upstream of Way Dam by conducting a more detailed survey in the Republic area and on portions of the Michigamme River up and downstream of Republic. She also began implementing a biological control management program for purple loosestrife targeting the most problematic stands documented in the presence/absence surveys she conducted. Further monitoring and biological control measures continued to be implemented in 2013. Results indicated the prior releases of beetles had been effective in reducing the extent and productivity of the source populations upstream of Way Dam. Unfortunately, there was very minimal evidence the released beetles survived the winter of 2013-14. Evidence the beetle populations recovered from the cold winter was observed in 2015. Additional beetles were reared and released with the long-term goal to establish a viable population of beetles that will be able to manage the purple loosestrife population as a self-sustaining biological control agent for the Michigamme River system.

An MEF grant has been awarded to the NRCS Dickinson County Conservation District office and the Wild Rivers Invasive Species Coalition in 2019. For this grant, they have partnered with Lake2Lake CISMA, the Marquette County Conservation District, the Western Peninsula Invasives Coalition, and the Iron-Baraga Conservation District to carry out a five-year (2020-2024) project to manage purple loosestrife on the Michigamme River from the source population near Republic down to Way Dam. Their project will incorporate the same methods as has been conducted on the river stretch from M-95 to Way Dam for the past 11 years. This will allow for directly comparable data and trends analysis. With this effort, the trends in reduced purple loosestrife populations occurring on the Michigamme River stretch from M-95 to Way Dam and within Way Dam are expected to continue over the five-year project.

The management activities that have occurred both within the Way Dam project area and the approximate 5-mile stretch of the Michigamme River upstream have had a direct and positive impact on keeping the purple loosestrife infestation within Way Dam in check. We Energies intends to continue collaborating with the NRCS Dickinson County Conservation District office, the Wild Rivers Invasive Species Coalition, and the other partners in further investigating source populations and management for purple loosestrife upstream of the Way Dam project area.

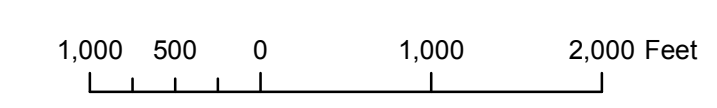


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- Purple Loosestrife: Reoccurring Sites July 2019*
- Purple Loosestrife: Reoccurring Sites August 2019*
- Purple Loosestrife: New Sites July 2019
- Purple Loosestrife: New Sites August 2019
- Public Boat Launch
- FERC Hydro Project Boundary

* Reoccurring sites are those that have been mapped in previous years



Way Dam Hydro Project - Year 2019 Purple Loosestrife Survey

Source: UMERG Imagery, 2018
GPS field data collected: 7/22/2019, 7/23/2019, 7/24/2019,
8/12/2019, 8/13/2019, 8/14/2019

**We Energies Hydroelectric Operations
Way Dam Purple Loosestrife Monitoring Summary (2006-2019)**

July Survey Only

	2006	2007	2008	2009	2010	2011	2012	2013	2014	2015	2016	2017	2018	2019
# of Observed Stands	4	6	30	28	68	53	65	39	39	55	69	50	61	51
# of Plants Observed	4	9	57	94	558	176	1239	240	275	159	297	130	112	131
# of Stems Observed	51	128	160	271	1732	397	1863	497	521	338	524	258	225	249
Stems Observed per Plant	12.75	14.22	2.81	2.88	3.1	2.26	1.50	2.07	1.89	2.13	1.76	1.98	2.01	1.90
Multi-year Plants Observations	2	4	9	31	314	110	429	190	254	132	230	101	93	122

Total (July & August Surveys Combined)

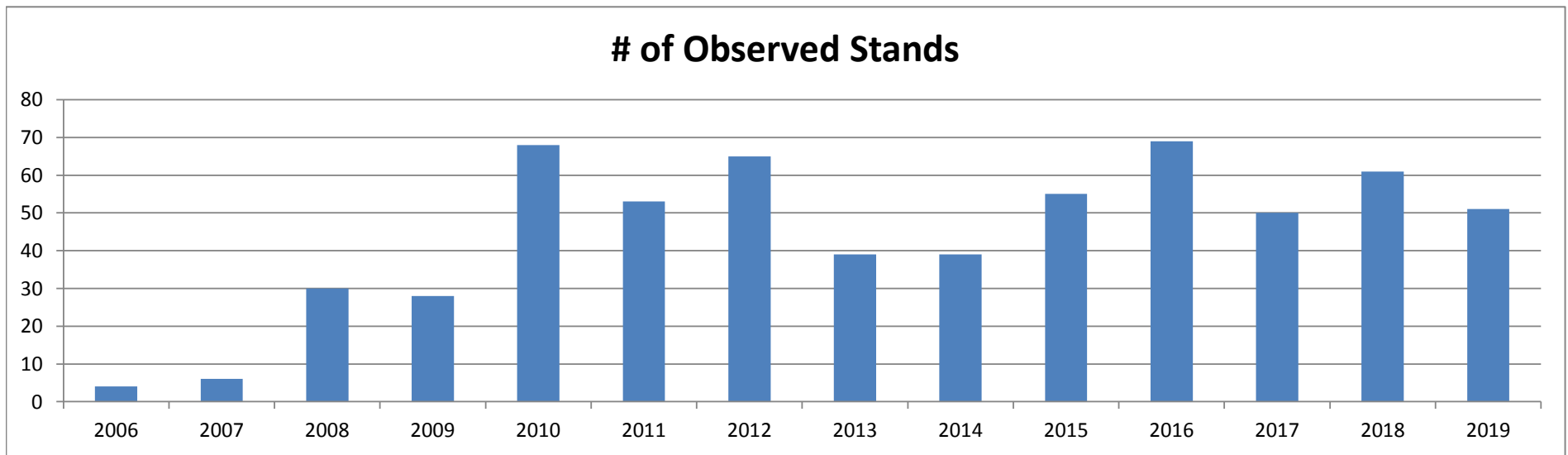
	2006	2007	2008	2009	2010	2011	2012	2013	2014	2015	2016	2017	2018	2019
# of Observed Stands	4	6	30	28	68	53	65	61	93	106	130	141	123	102
# of Plants Observed	4	9	57	94	558	176	1239	290	720	347	890	339	224	1536
# of Stems Observed	51	128	160	271	1732	397	1863	680	1247	686	1714	588	463	4288
Stems Observed per Plant	12.75	14.22	2.81	2.88	3.1	2.26	1.50	2.34	1.73	1.98	1.93	1.73	2.07	2.79
Multi-year Plants Observations	2	4	9	31	314	110	429	233	565	269	756	285	184	1102

July Survey with Largest Stands Removed

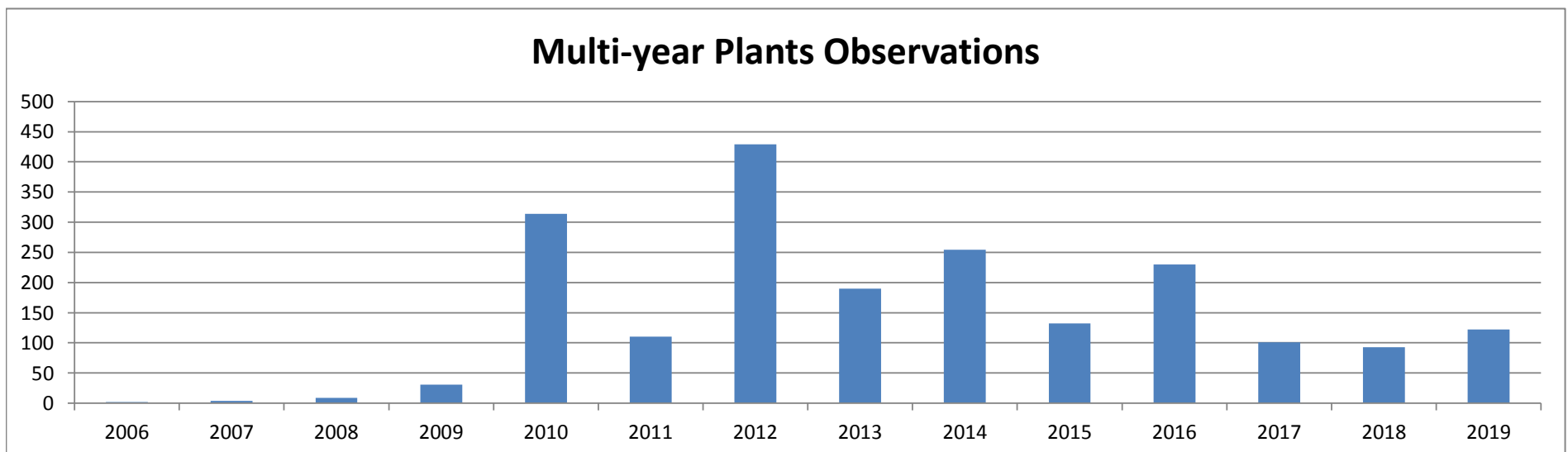
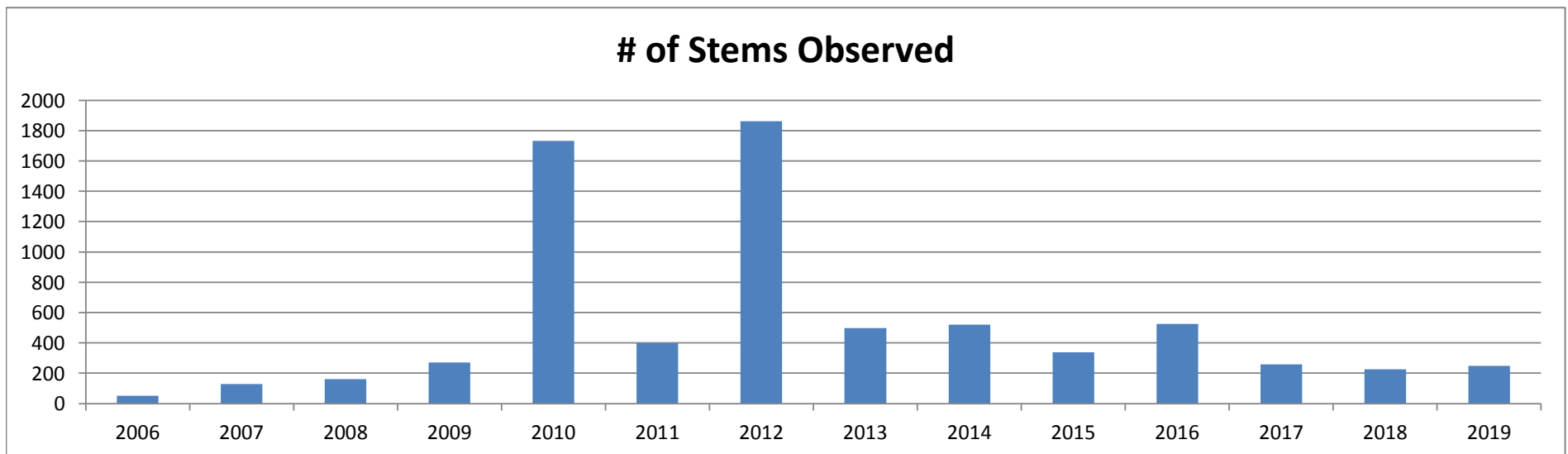
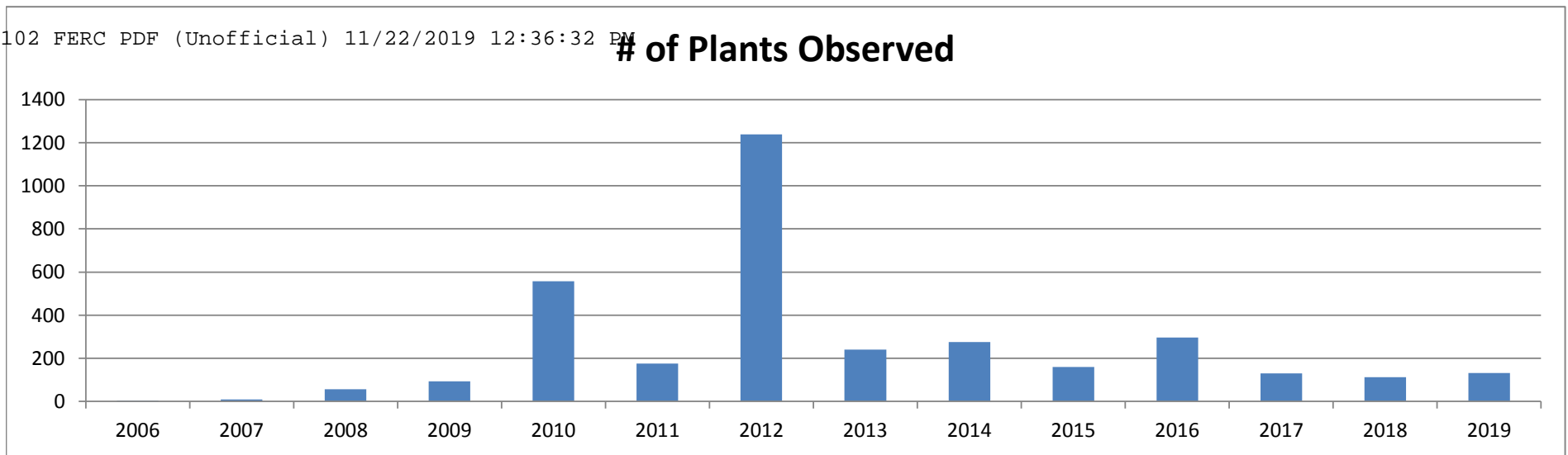
	2006	2007	2008	2009	2010	2011	2012	2013	2014	2015	2016	2017	2018	2019
# of Observed Stands	4	6	30	28	68	53	61	62	36	52	57	47	60	50
# of Plants Observed	4	9	57	94	558	176	111	93	86	113	132	71	91	87
# of Stems Observed	51	128	160	271	1732	397	358	248	247	277	259	185	202	171
Stems Observed per Plant	12.75	14.22	2.81	2.88	3.10	2.26	1.50	2.67	2.87	2.45	1.96	2.61	2.22	1.97
Multi-year Plants Observations	2	4	9	31	314	110	170	88	81	97	107	65	87	82

We Energies - Purple Loosestrife Monitoring 2006-2019 on Way Dam Reservoir

July Survey Only

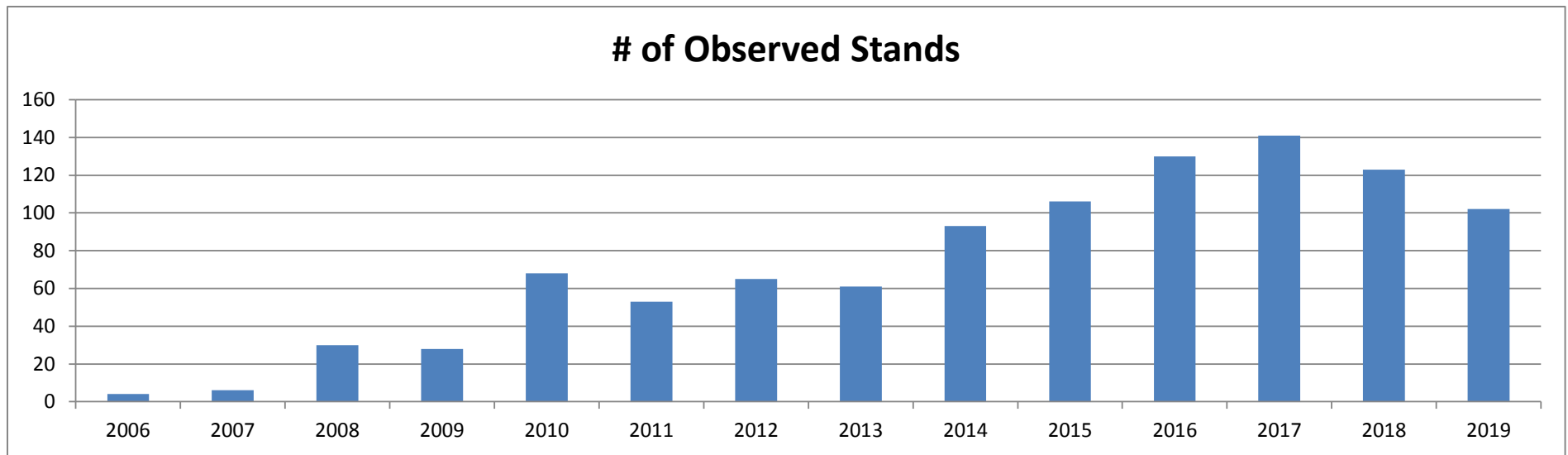


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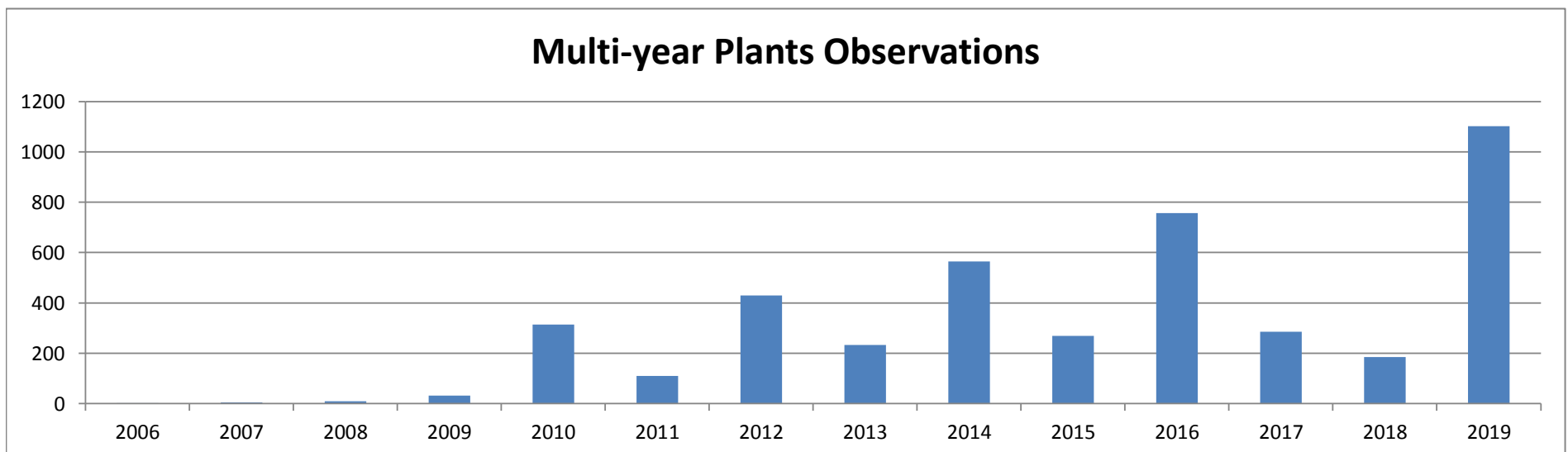
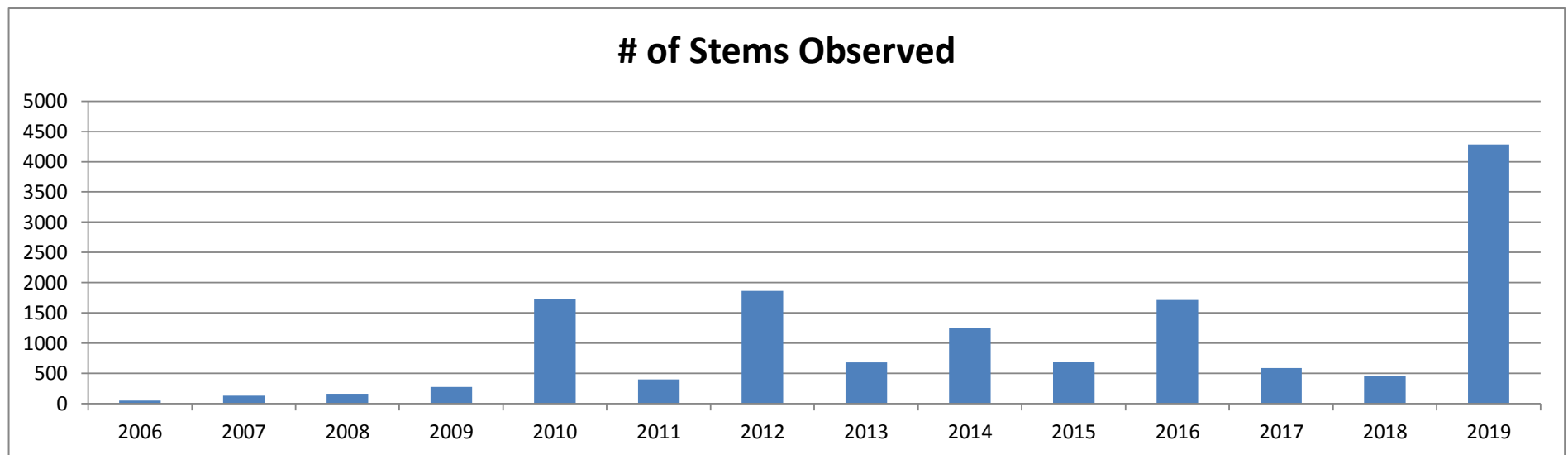
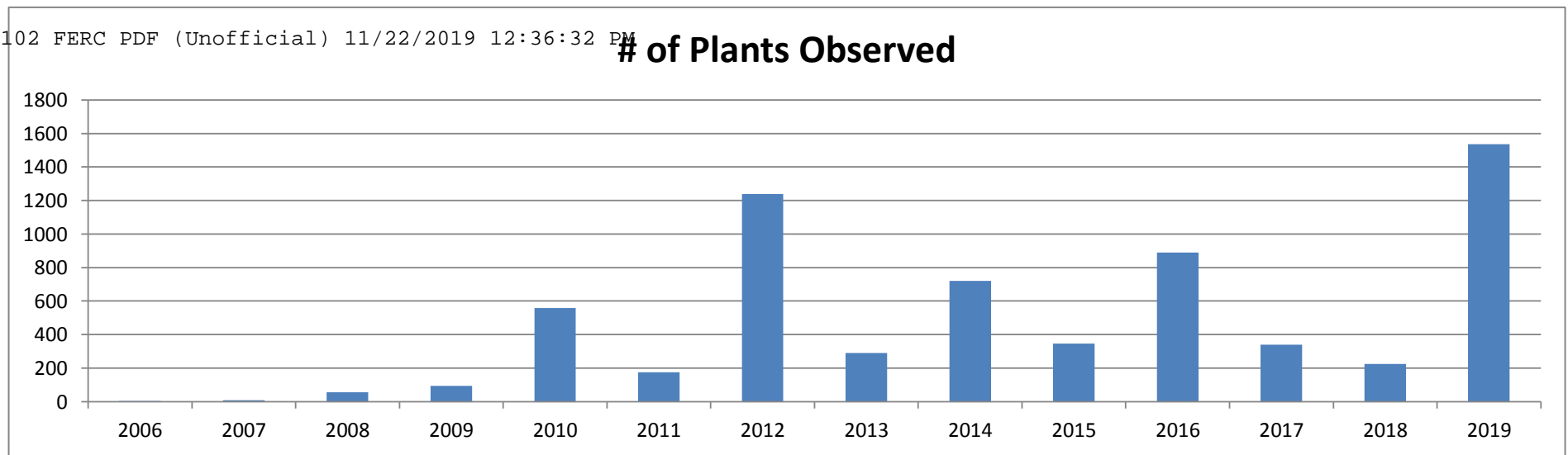


We Energies - Purple Loosestrife Monitoring 2006-2019 on Way Dam Reservoir

Total Observations

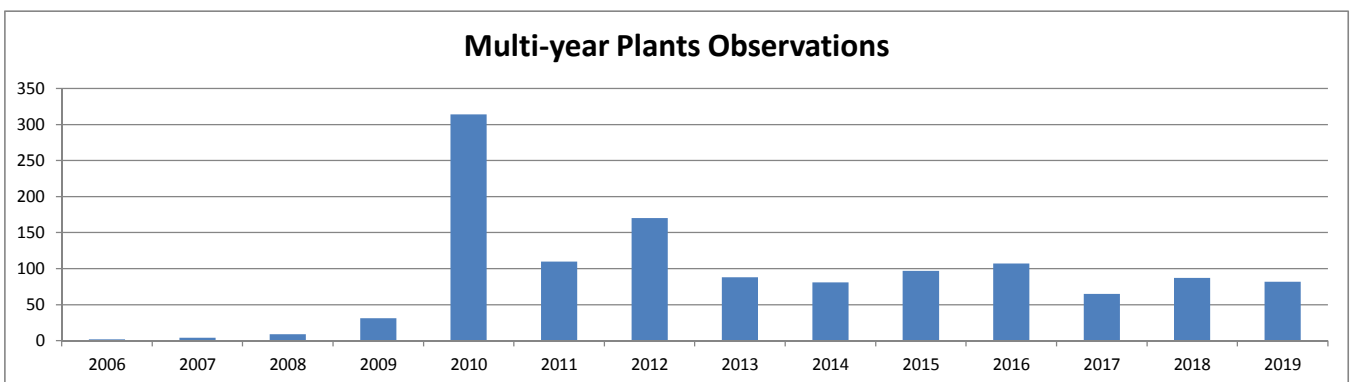
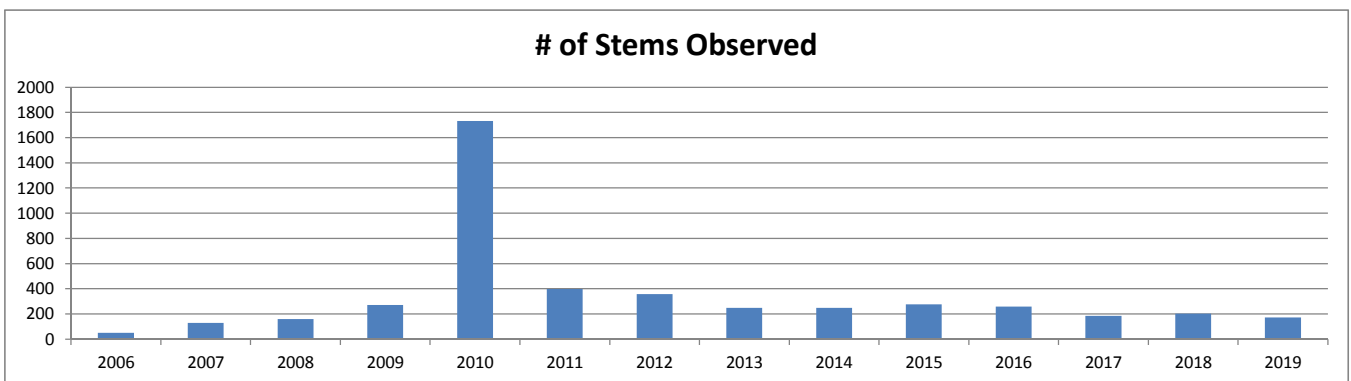
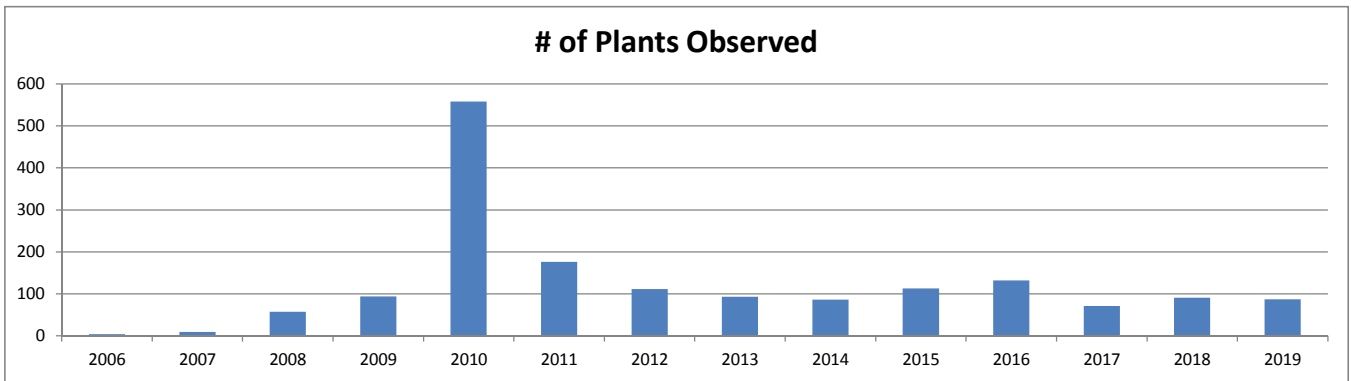
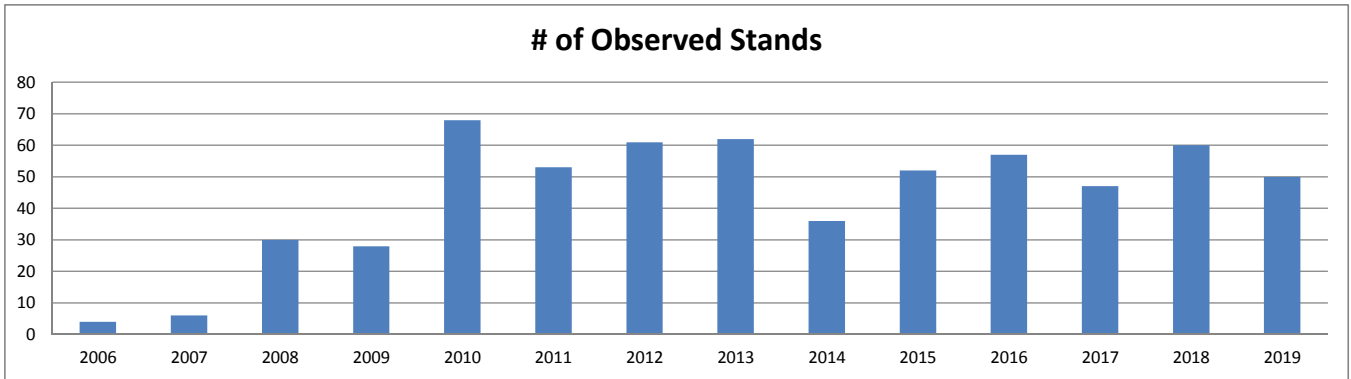


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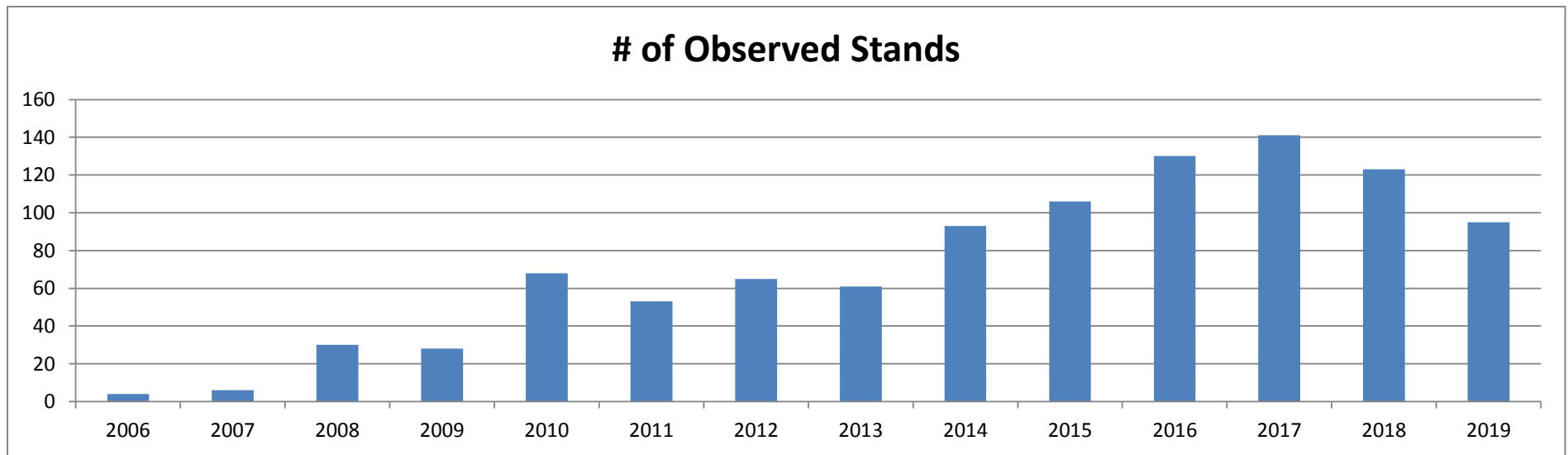
We Energies - Purple Loosestrife Monitoring 2006-2019 on Way Dam Reservoir

July survey only minus largest 2012-2019 stands

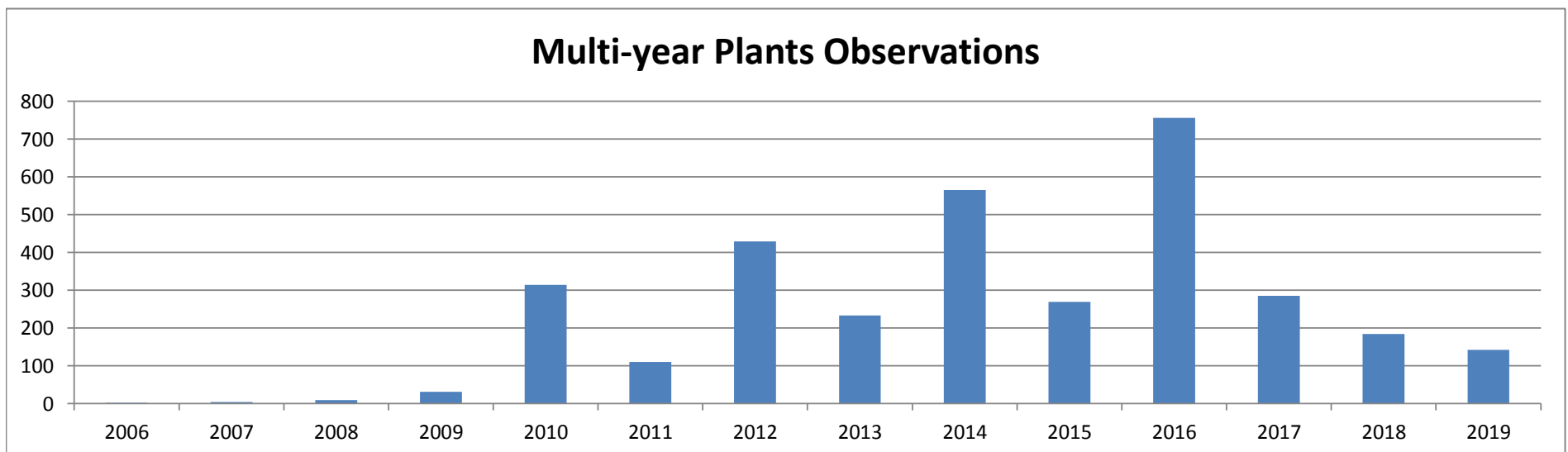
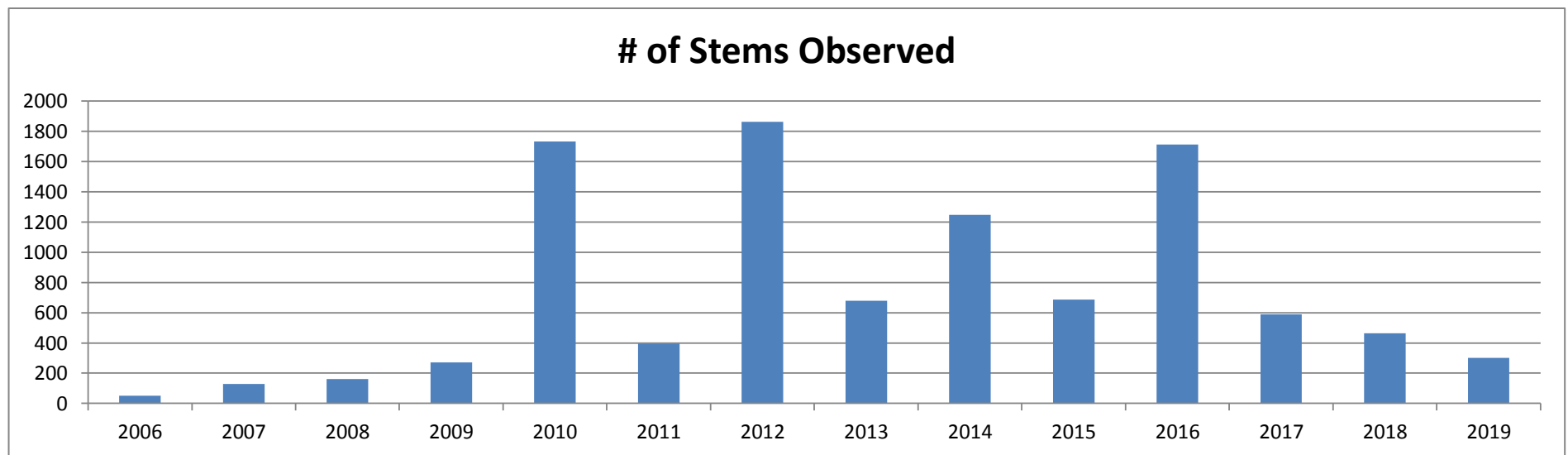
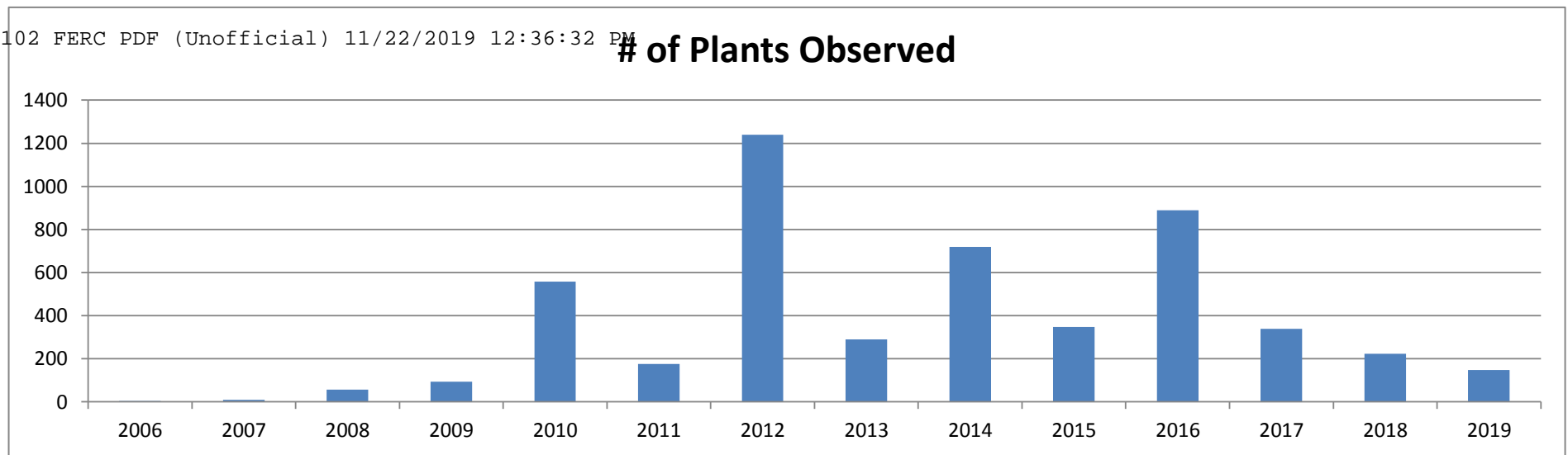


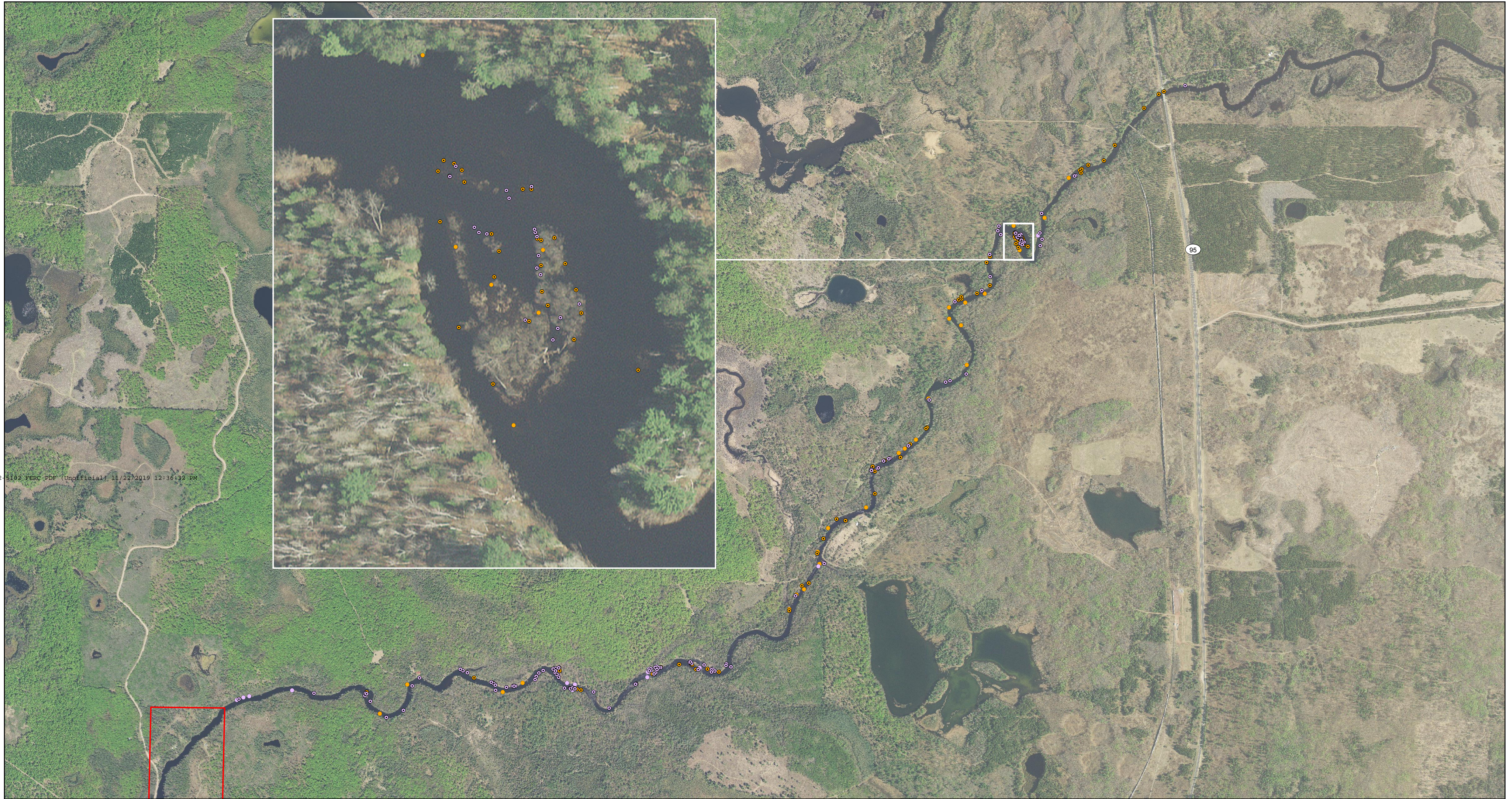
We Energies - Purple Loosestrife Monitoring 2006-2019 on Way Dam Reservoir

Total (July & August Surveys Combined minus 2019 stands 607-611)

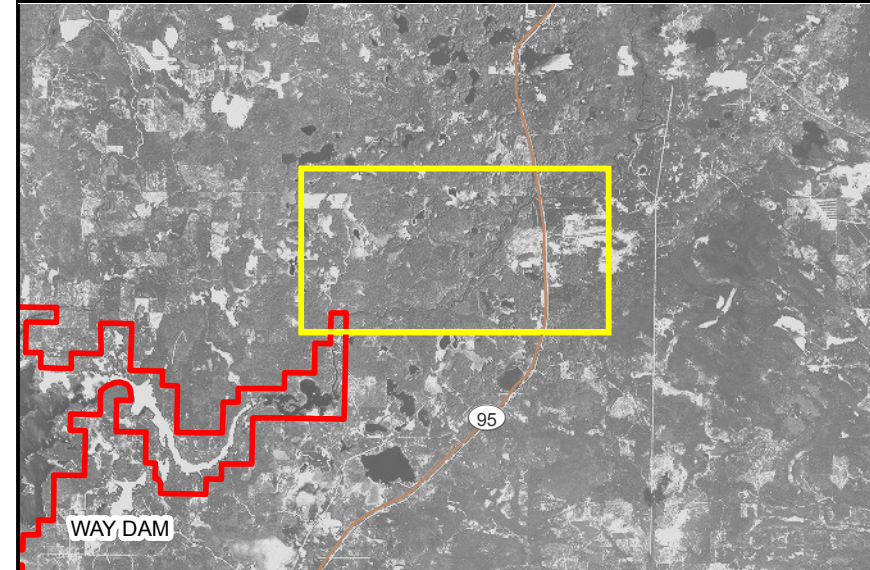


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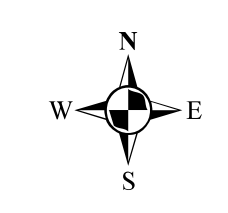
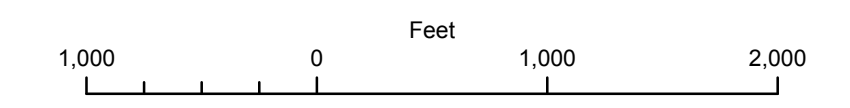


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- Purple Loosestrife: Reoccurring Sites July 2019*
- Purple Loosestrife: Reoccurring Sites August 2019*
- Purple Loosestrife: New Sites July 2019
- Purple Loosestrife: New Sites August 2019
- Public Boat Launch
- FERC Hydro Project Boundary

* Reoccurring sites are those that have been mapped in previous years



Michigamme River - Year 2019 Purple Loosestrife Survey

Source: UMERI Imagery, 2018
GPS field data collected 7/22/2019 & 8/12/2019

**We Energies Hydroelectric Operations
Michigamme River Purple Loosestrife Monitoring (2009-2019)**

July Survey Only

	2009	2010	2011	2012	2013	2014	2015	2016	2017	2018	2019
# of Observed Stands	56	140	149	217	99	221	168	157	125	142	132
# of Plants Observed	113	362	592	915	361	535	292	352	260	275	241
# of Stems Observed	361	1234	1149	1732	585	873	487	584	413	491	472
Stems Observed per Plant	3.19	3.41	1.94	1.89	1.62	1.63	1.67	1.66	1.59	1.79	1.96
Multi-year Plants Observations	79	317	282	525	280	451	230	278	179	217	173

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Total (July & August Surveys Combined)

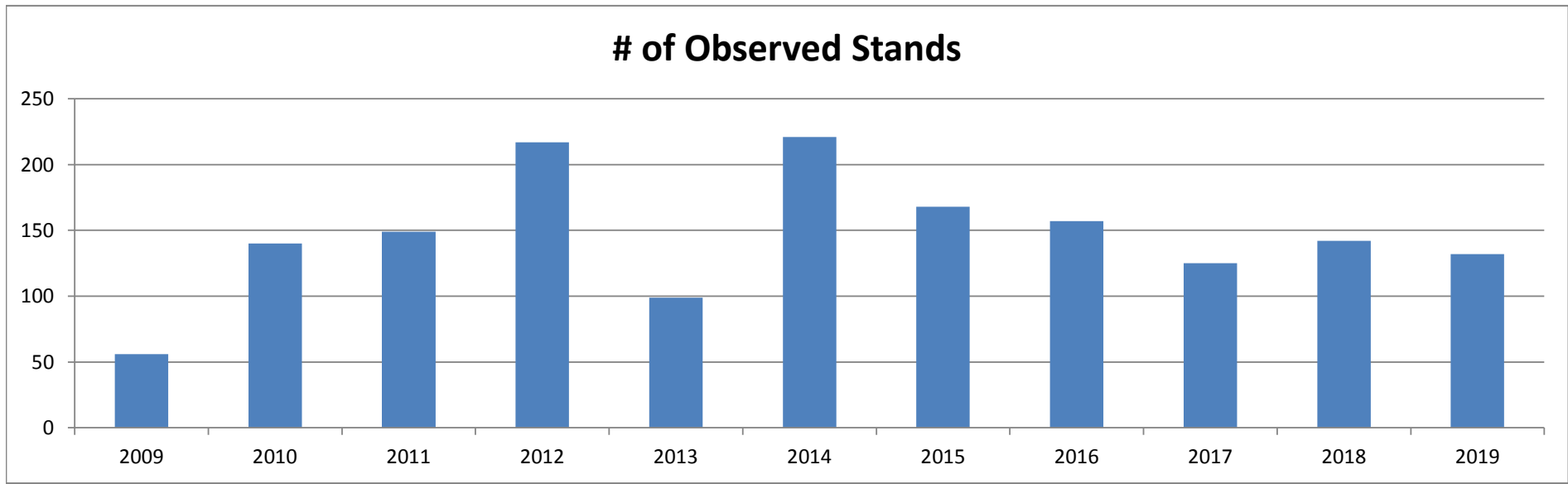
	2009	2010	2011	2012	2013	2014	2015	2016	2017	2018	2019
# of Observed Stands	56	140	149	217	192	384	328	354	248	278	238
# of Plants Observed	113	362	592	915	686	994	755	859	483	552	445
# of Stems Observed	361	1234	1149	1732	1132	1750	1473	1470	772	1023	901
Stems Observed per Plant	3.19	3.41	1.94	1.89	1.65	1.76	1.95	1.71	1.60	1.85	2.02
Multi-year Plants Observations	79	317	282	525	524	832	636	653	364	435	331

July Survey with Largest Stands Removed (2013-2019)

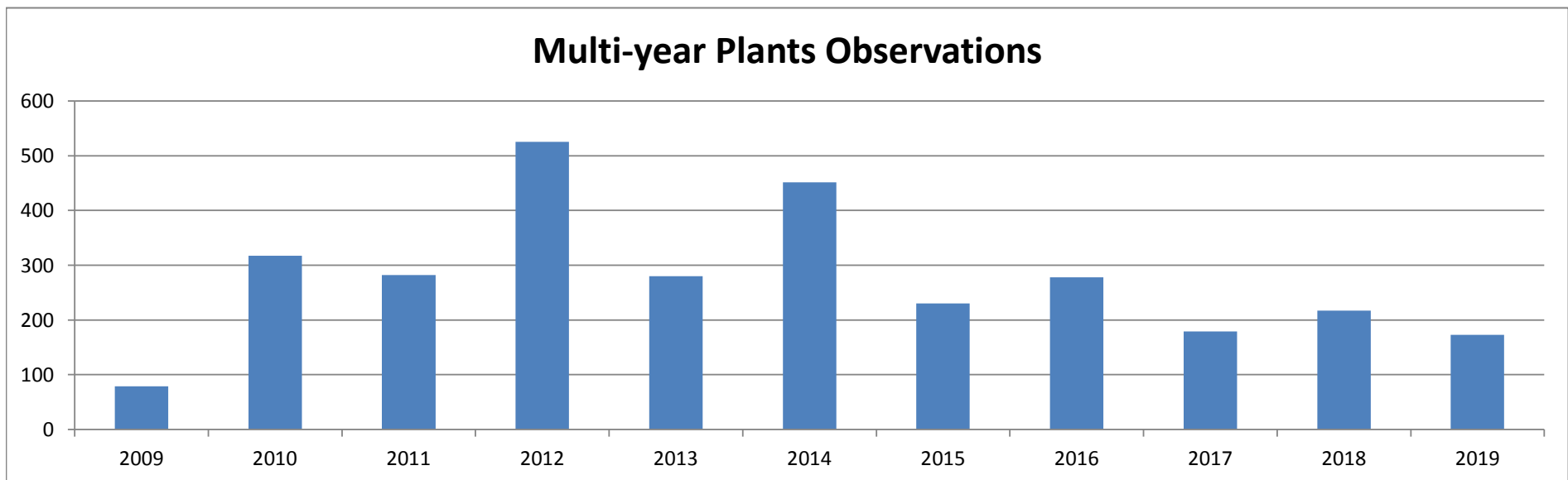
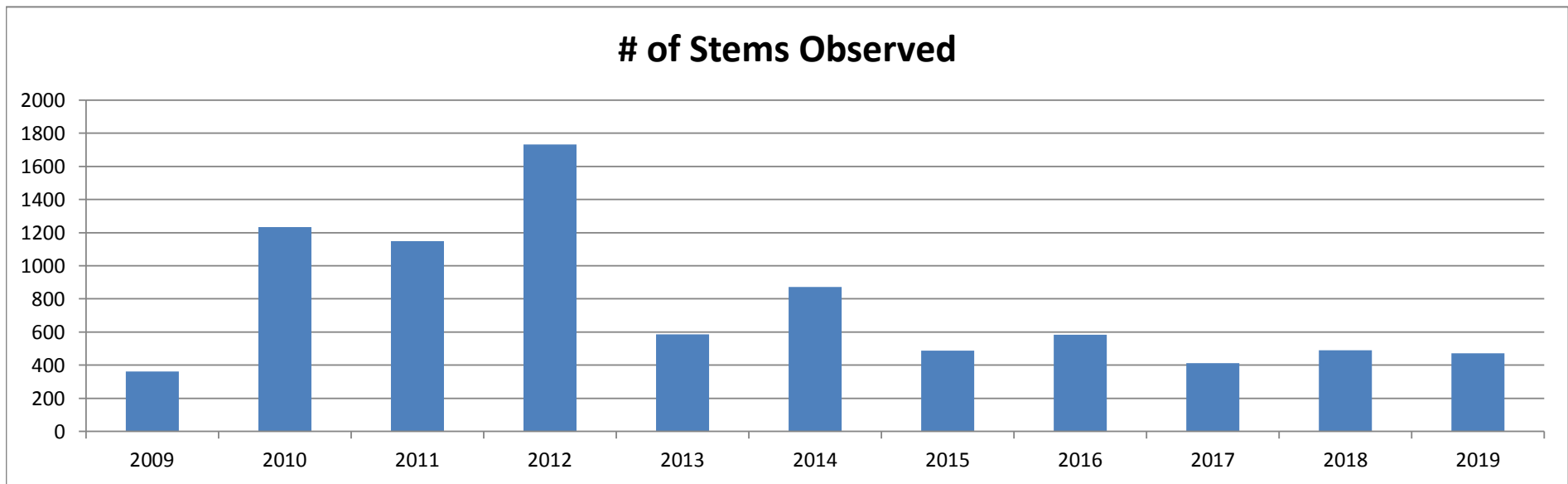
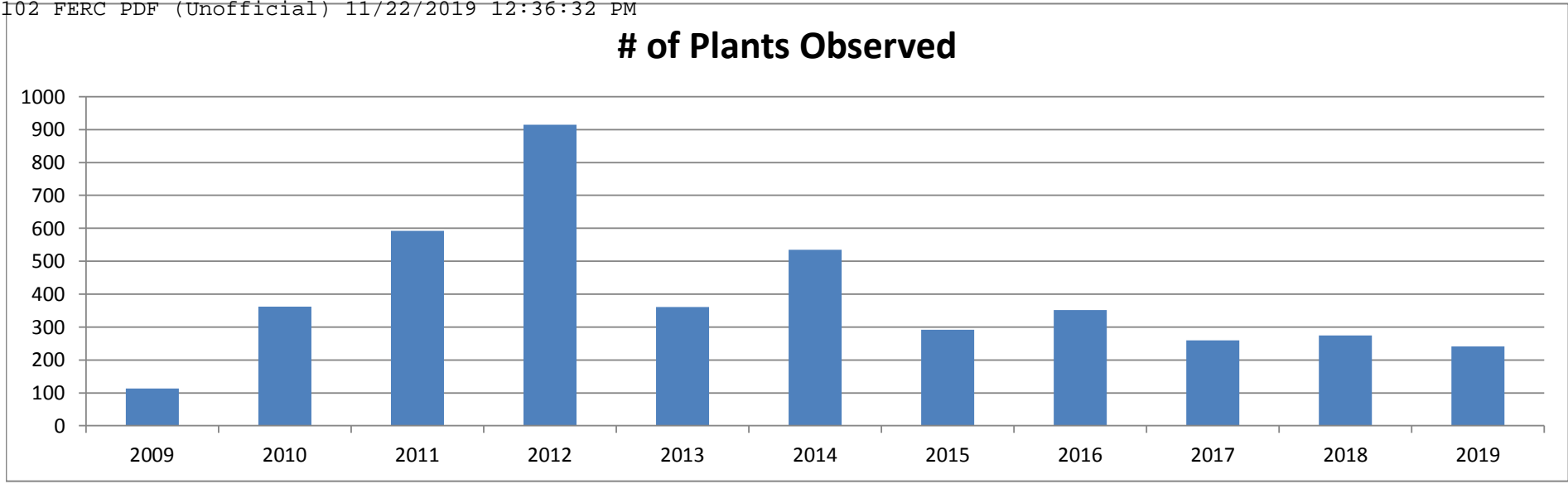
	2009	2010	2011	2012	2013	2014	2015	2016	2017	2018	2019
# of Observed Stands	56	140	149	217	96	219	166	156	124	139	131
# of Plants Observed	113	362	592	915	242	498	257	324	248	239	230
# of Stems Observed	361	1234	1149	1732	399	817	436	529	396	443	439
Stems Observed per Plant	3.19	3.41	1.94	1.89	1.65	1.64	1.70	1.63	1.60	1.85	1.91
Multi-year Plants Observations	79	317	282	525	192	417	202	255	171	206	164

We Energies - Purple Loosestrife Monitoring 2009-2019 on Michigamme River

July Survey Only

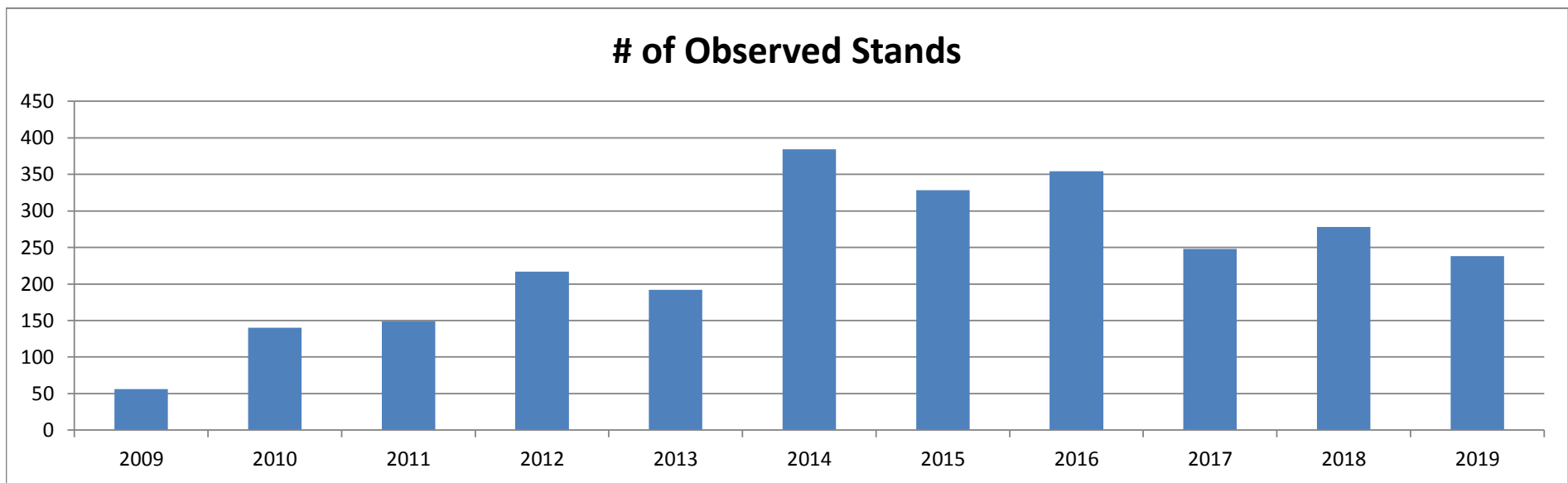


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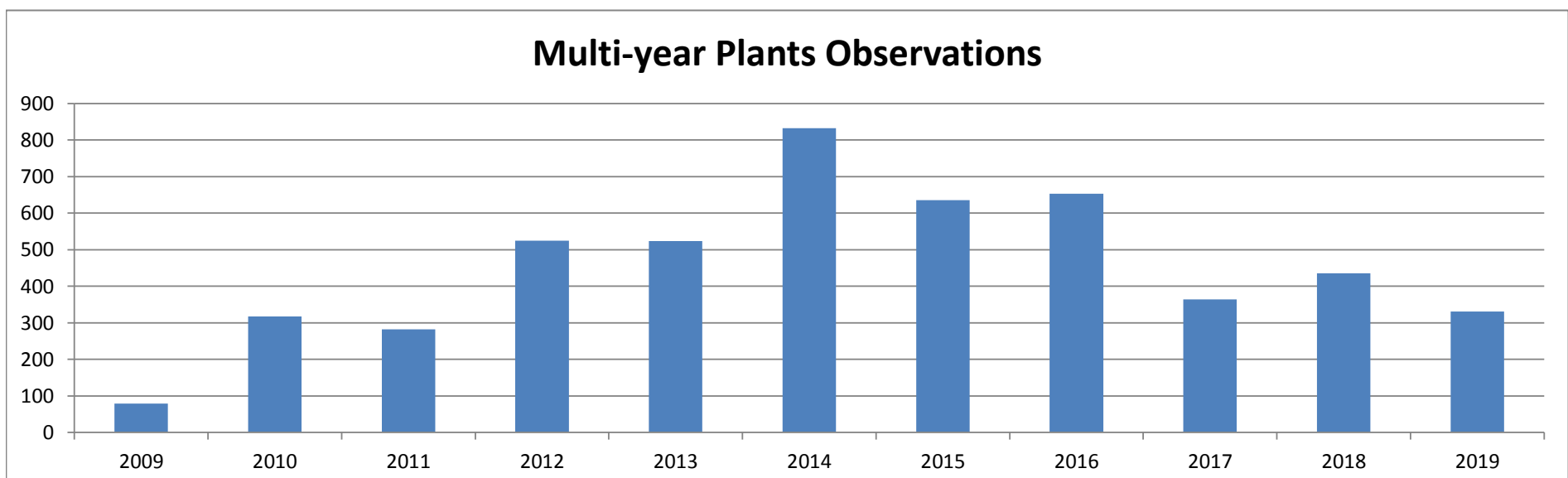
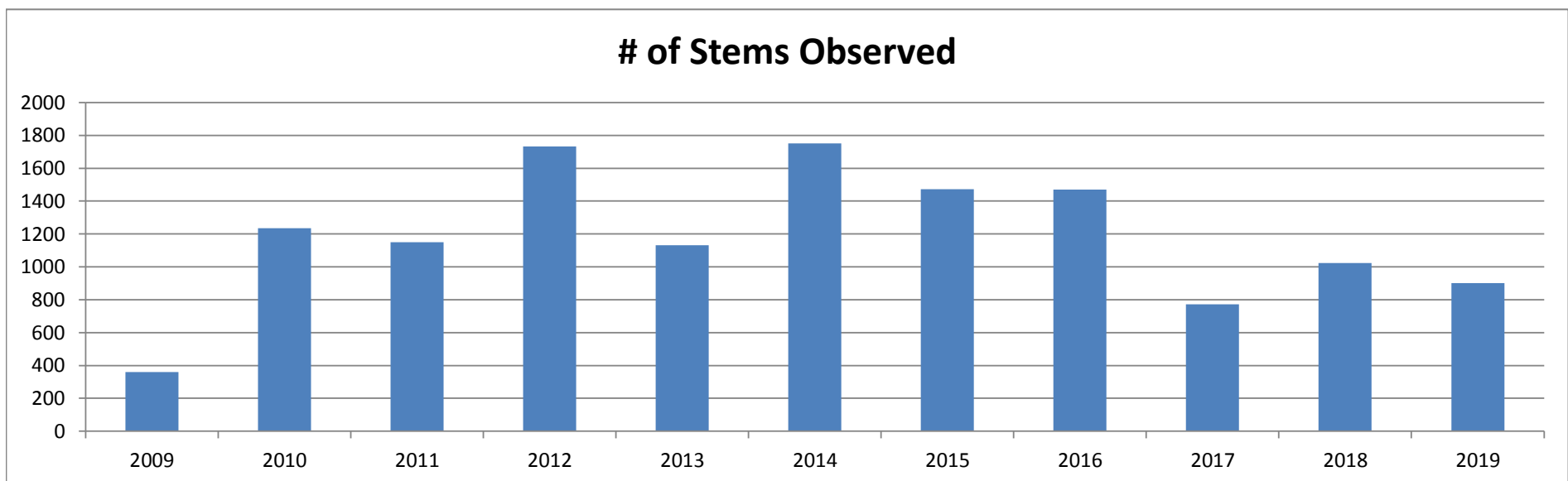
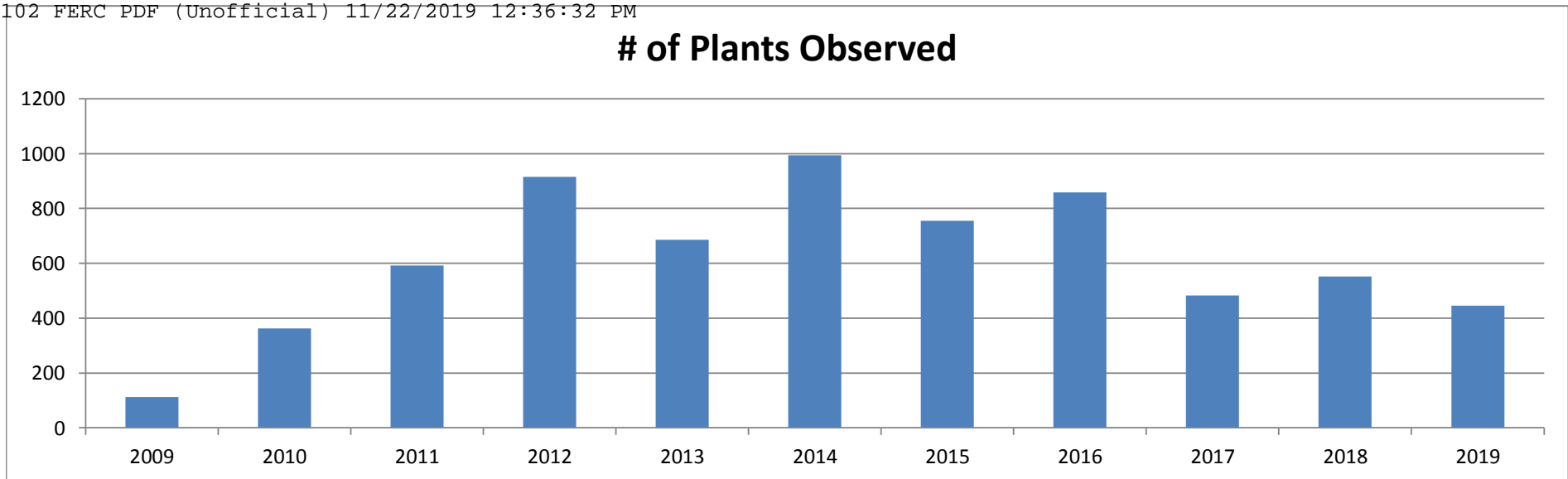


We Energies - Purple Loosestrife Monitoring 2009-2019 on Michigamme River

Total Observations

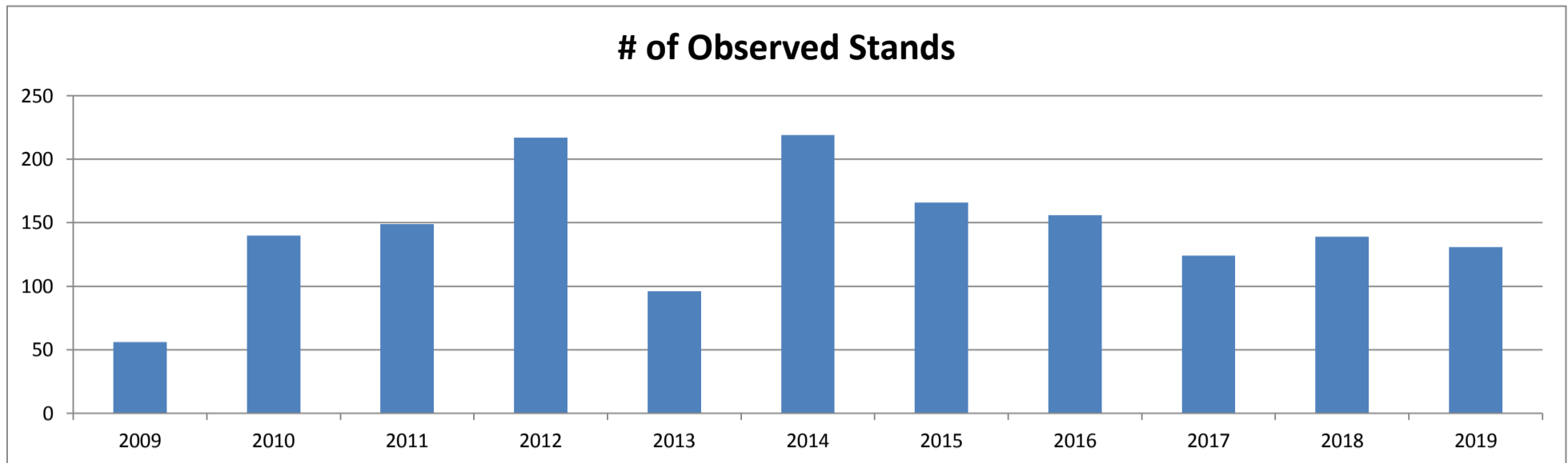


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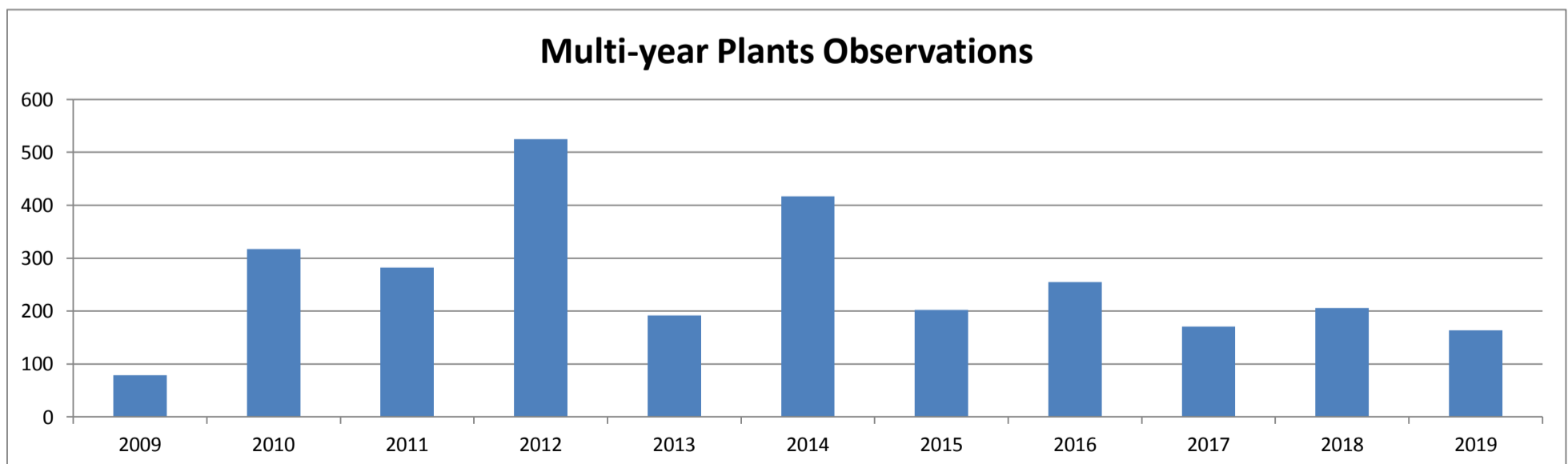
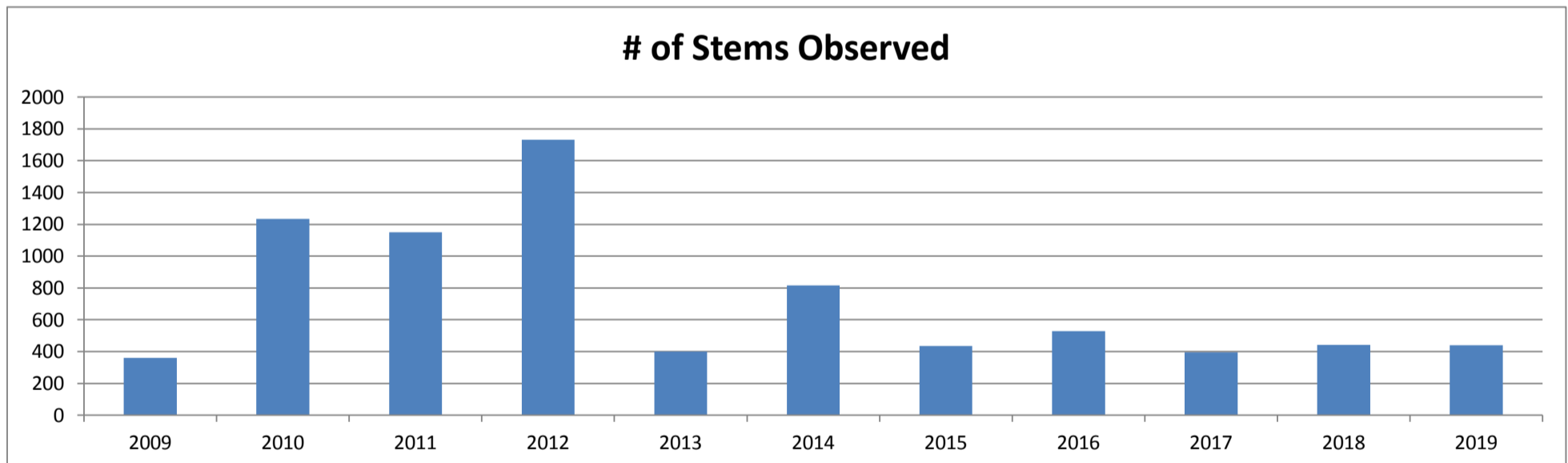
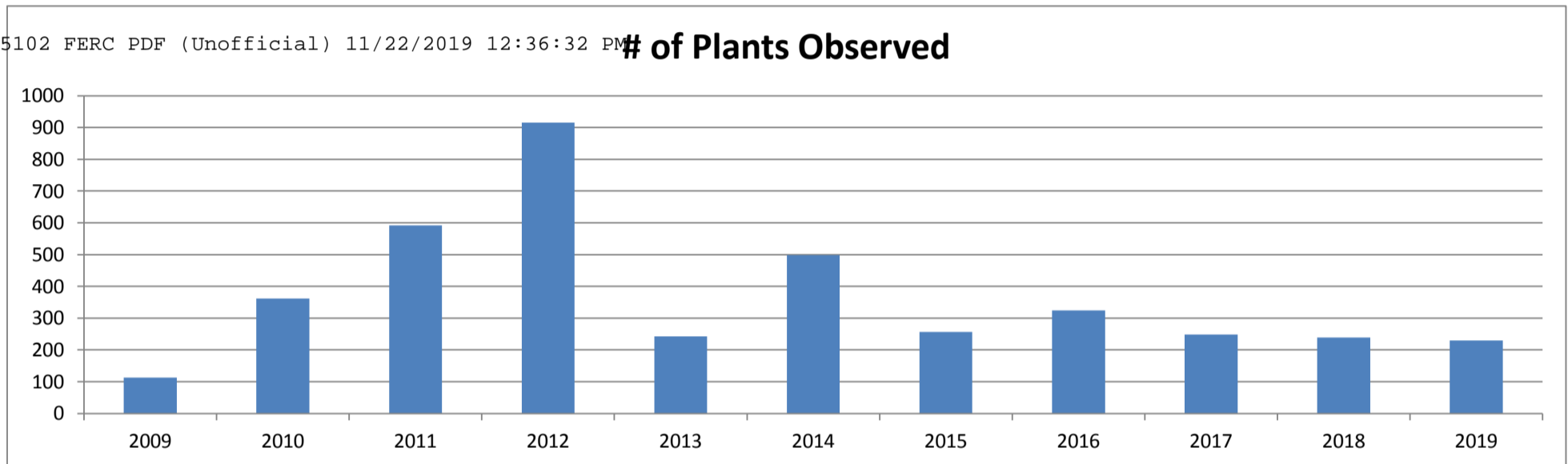


We Energies - Purple Loosestrife Monitoring 2009-2019 on Michigamme River

July survey only minus largest 2013-2019 stands



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