

ORIGINAL



We Energies
800 Industrial Park Drive
Iron Mountain, MI 49801

www.we-energies.com

January 22, 2014

Ms. Kimberly Bose
Federal Energy Regulatory Commission
Division of Licensing and Compliance
888 First Street NE Washington, DC 20426

Dear Ms. Bose

RE: 2013 Reports on Purple Loosestrife and Eurasian Water Milfoil Control Surveys AND License Order Amendment Request

Way Dam – FERC No. 1759, Article 413
Hemlock Falls – FERC No. 2074, Article 412
Lower Paint – FERC No. 2072, Article 411
Peavy Falls – FERC No. 11830, Article 411
Michigamme Falls – FERC No. 2073, Article 412
Brule – FERC No. 2431, Article 412
Twin Falls – FERC No. 11831, Article 412
Pine – FERC No. 2486, Article 413
Kingsford – FERC No. 2131, Article 412
Big Quinnesec Falls – FERC No. 1980, Article 412
Chalk Hill – FERC No. 2394, Article 410
White Rapids – FERC No. 2357, Article 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 7.

This submittal is being made after the November 30th due date for several reasons: unusually high workload in our environmental department, the focus of the data being presented is shifting from Eurasian Water Milfoil to placing a greater emphasis on Purple Loosestrife, more data than required by the plan was collected and analyzed (Hemlock Falls & Way Dam), and the retirement of a key administrative person in the Hydroelectric Operations Division workgroup. These issues have been worked through, including hiring new staff, and we expect to meet filing dates in the future. We

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REGULATORY COMMISSION

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January 22, 2014

Ms. Kimberly Bose

appreciate your understanding.

Table 1 clarifies what is being reported on with this submittal and what we propose to report on in the future assuming the "Nuisance Plant Monitoring Plan" submitted for approval is in fact approved.

Table 1: Comparison of 2013 AIS Data Collected vs Approved Plan Requirements

	Currently Approved Plan				Proposed New Plan			
	2013		2014		Actual 2013		2014	2015
	EWM	PL	EWM	PL	EWM	PL	PL	PL
Way Dam			x	x	x	x	x	See schedule in the proposed Nuisance Plant Monitoring Plan
Hemlock Falls			x	x	x	x		
Lower Paint			x	x			x	
Peavy Falls	x	x			x	x		
Michigamme Falls	x	x			note 1	note 1		
Brule	x	x	x	x	x	x	x	
Twin Falls			x	x			x	
Pine	x	x	x	x	x	x		
Kingsford	x	x			x	x	x	
Big Quinnesec Falls	x	x			x	x	x	
Chalk Hill	x	x	x	x	x	x		
White Rapids	x	x	x	x	x	x	x	

EWM = Eurasian Water Milfoil

PL = Purple Loosestrife

Note 1: AIS work unable to be completed at Michigamme Falls in 2013 due to lack of impoundment access resulting from an approved maintenance drawdown.

Report of 2013 AIS Monitoring

Please find attached a detailed report of the AIS monitoring activities completed in 2013 consistent with what is described in Table 1. The results were presented by Mike Grisar of our environmental staff at our Annual Land Management Meeting held on October 22, 2013, with representatives from the Wisconsin and Michigan DNRs as well as some county and local agency representatives that work on tracking and controlling invasive species. Hard copies of the survey summaries of each project were offered to the resource agencies at the meeting. A CD that contains the electronic files of the same is attached for the FERC's review, as well as for the agencies copied on this letter.

License Order Amendment Request

Wisconsin Electric Power Company dba We Energies is hereby requesting that the license articles noted in the subject line of this letter for our (12) FERC licensed hydroelectric projects be amended to accept the "We Energies Hydro Operations – Nuisance Plant Monitoring Plan, Revision 0: May 16, 2013" attached. You can see that we began implementation of this plan in 2013 while still meeting the requirements of the currently approved plan. We would like to fully implement the new plan in 2014 and abandon the old.

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Ms. Kimberly Bose

Amending the plan has been a topic of discussion with our agency partners for a couple of years. The discussion concluded when we agreed on February 1, 2013 to develop a plan focusing and ramping-up efforts on Purple Loosestrife and eliminating formal work on Eurasian Water Milfoil. Consultation Completion Forms showing this agreement are attached. In this meeting Mike Grisar, from We Energies' environmental group, summarized all of the tests, studies, and field work We Energies has accomplished from 2006-2012 and all agreed that We Energies has exhausted every practical measure for controlling or eliminating EWM and that it was time to spend our limited money and resources on PL. A draft of the plan was circulated for agency review and approval. Proof of agency acceptance of the plan is attached.

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

Sincerely,



Mr. Todd P. Jastremski, Manager
Hydroelectric Operations Division

cc: Kyle Kruger – MDNR
Nicholas Utrup – FWS
Michael Donofrio – WDNR
Cheryl Laatsch – WDNR
James Fossum – MHRC/RAW
John Zygaj – FERC CRO

Attachments:

CD containing 2013 Annual Report – Nuisance Plant Control Survey (23 pages)
Consultation Completion Forms dated 2-1-2013 (3 pages)
Nuisance Plant Monitoring Plan dated 5-16-13 (2 pages)
Email consultation & approval of Nuisance Plant Monitoring plan (7 pages)

Consultation Completion Form

To be filed with requests for FERC license amendments. Signature on form represents concurrence with issue proposed for amendment and the corresponding amendment of the applicable sections of the Wilderness Shores Settlement Agreement.

FERC Project No. : 1759, 2074, 2072, 11830, 2073, 2431, 11831, 2486, 2131, 1980, 2394, 2357

Date: February 1st, 2013

FERC Project Name: Way, Hemlock Falls, Lower Paint, Peavy Falls, Michigamme Falls, Brule, Twin Falls, Pine, Kingsford, Big Quinnesec Falls, Chalk Hill, White Rapids

FERC License Article for Proposed Amendment: 413, 412, 411, 411, 412, 412, 412, 413, 412, 412, 410, 410

Consultation Issue: Eliminate monitoring of Eurasian Water Milfoil, increase focus on Purple Loosestrife, change required monitoring frequency to biennial for Chalk Hill, White Rapids, Brule, & Pine, and develop an adaptive management plan to be completed by May 1, 2013 and implemented in the 2013 season that will apply to all 12 projects.

Consultation required with (check those that apply):

X = Consultation required per license article

√ = Consultation desirable / supplemental

X	MDNR	X	WDNR
X	USFWS		NPS
√	MHRC	√	RAW
	MDEQ	X	WEPCO

Michigan Department of Natural Resources



Wisconsin Department of Natural Resources




U.S. Fish & Wildlife Service

National Park Service

Michigan Hydro Relicensing Coalition

River Alliance of Wisconsin

Michigan Department of Environmental Quality



Wisconsin Electric Power Co. dba We Energies

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X	MDNR	X	WDNR
X	USFWS		NPS
√	MHRC	√	RAW
	MDEQ	X	WEPCO

Michigan Department of Natural Resources

Wisconsin Department of Natural Resources

U.S. Fish & Wildlife Service

National Park Service

James D. Fossum
 Consultant for the
 Michigan Hydro Relicensing Coalition

James D. Fossum
 Consultant for the
 River Alliance of Wisconsin

Michigan Department of Environmental Quality

Wisconsin Electric Power Co. dba We Energies

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Wisconsin Electric Power Co. dba We Energies

We Energies Hydro Operations – Nuisance Plant Monitoring Plan

Revision 0: May 16, 2013

We Energies will conduct Nuisance Plant Surveys on all twelve licensed projects, including Way Dam (Michigamme Reservoir), Hemlock Falls, Peavy Falls, Michigamme Falls, Lower Paint, Brule, Twin Falls, Kingsford, Big Quinnesec Falls, Pine, Chalk Hill, and White Rapids. Surveys will specifically target observing all PL occurring on the shorelines within the projects' boundaries. Incidental observations and documentation of other AIS may also occur, but will not be targeted.

Methods

Purple loosestrife (PL) surveys will occur from a boat within a reasonable distance of the shore for adequate visual inspection of the shores and near shore areas. All observed PL occurrences will be located using a GPS, and analyzed for the approximate age of the plant(s) observed, number of plants observed, and number of stems occurring per plant. Representative photographs will be taken to document the relative condition of PL infestation on project lands.

Survey Frequency & Schedule

All projects will be surveyed for PL biennially at a minimum. For those projects where PL has been observed, surveys will be conducted a minimum of two consecutive years following the last known observation. For example, if PL was observed in 2012 and not in 2013, surveys will again be conducted in 2014, and then resume biennially if no PL is encountered for two consecutive years.

Nuisance Plant Survey Schedule:

Project	2013	2014	2015	2016	2017
Way Dam – 1759	X	X	X	X	X
Hemlock Falls – 2074	X		X		X
Peavy Falls – 11830	X		X		X
Michigamme Falls – 2073	X		X		X
Lower Paint – 2072		X		X	
Brule – 2431		X		X	
Twin Falls – 11831		X		X	
Kingsford – 2131		X		X	
Big Quinnesec Falls – 1980		X		X	
Pine – 2486	X		X		X
Chalk Hill – 2394	X		X		X
White Rapids – 2357	X	X	X		X

PL was observed in 2012 at only Way Dam (numerous locations) and White Rapids (one location). Surveys at both sites will occur every year, until PL is no longer present, or another monitoring and management strategy is developed. While the Way Dam PL will likely not be completely eradicated in the foreseeable future, it is expected the White Rapids population will be successfully managed and surveys will be able to be resumed at an every other year frequency.

We Energies Hydro Operations – Nuisance Plant Monitoring Plan

Revision 0: May 16, 2013

Other sites where PL has been documented include Chalk Hill, Brule, and Lower Paint. However, the last observation at these three sites occurred three or more years ago. These sites will be surveyed on the every other year frequency.

Surveys will be conducted over the course of two weeks, separated by at least one week in between. A second survey will afford a more comprehensive removal of PL annually, which will result in more effective overall management for PL. Based on past observations at Way Dam, many individual plants have not been detected during the monitoring due to the variability of when individual PL plants flower. The first survey will occur between July 24 and August 7, during the average peak flowering period. A second follow up survey will be conducted at least seven days following the end of the first survey and be finished no later than August 25. The timing of the second survey will be determined based on the plant growth stage observed during the initial survey.

Management

All observed PL will be managed through manual removal. Efforts will be made to remove all roots, stems, and flowering heads. Removed plant material will be bagged and appropriately disposed as general waste.

Other management techniques including herbicide treatment and / or biological controls may be utilized depending on the extent of any infestations detected. If circumstances change, We Energies will appropriately adjust the management to be as successful as possible at controlling PL.

Other Aquatic Invasive Species (AIS)

Since 2006, We Energies documented Eurasian water milfoil (EWM) in eleven of the twelve project sites. We Energies conducted and was a part of numerous management studies including EWM hybridization, biological controls, milfoil weevil population surveys, fish predation on milfoil weevils, chemical treatments, and EWM manual removal to determine the feasibility and efficacy of tested management treatments. *It has been concluded, there are no reasonable and long-term management strategies that can be implemented to have an effect on the existing populations of EWM within the projects.*

The EWM populations and densities have exhibited significant annual fluctuations. These fluctuations trend to be consistent with annual milfoil weevil populations. It has been concluded that the indigenous populations of milfoil weevils are having a positive effect on managing EWM populations. While EWM population and density studies will no longer be conducted, casual observations will continue to note whether previously recorded trends continue.

Incidental observations for other AIS occurring in the project waters and/or shorelines will also occur while conducting PL surveys. If other AIS populations are detected, they will be reported at the annual land management agency meeting.

Jastremski.Todd

From: Jastremski.Todd
Sent: Tuesday, June 04, 2013 10:14 AM
To: Kruger, Kyle (DNR); Utrup, Nick; Donofrio, Michael C - DNR
(Michael.Donofrio@wisconsin.gov); James Fossum
Cc: Grisar.Mike
Subject: Modified
Attachments: 2013-02-01 AIS Consultation Completion Form.pdf; 2013-05-16 Nuisance Plant Survey Monitoring Plan DRAFT.docx

Importance: High

The primary focus of our February 1st 2013 WSIT meeting was to discuss what We Energies has done in the past 12+ years implementing the IS concerns in our current licenses and what makes the most sense moving forward. The discussion reviewed the extensive effort that we've put into Eurasian Water Milfoil and that maybe we have exhausted options for control in that area and that shifting additional efforts to Purple Loosestrife would be more environmentally beneficial. We Energies agreed to put a draft together of a modified plan. Though a month late per our attached consultation form, it is now attached for your review and comment. Mike did the majority of the work on this. He tried to keep it simple, focused on PL, yet flexible enough to address other concerns as they may arise and to utilize the annual land management meeting as the means for discussing if adjustments need to be made.

Please review and comment by July 8th. It would be desirable to have a fully agreed upon plan for FERC submittal yet this summer. As agreed to in the meeting, though we do not yet have FERC approval of this new plan, we are going to begin implementation of it this year. So, Mike will NOT be doing extensive EWM work this year.

Thanks for your time on this issue and we look forward to your comments.

Todd Jastremski
Manager – Hydroelectric Operations
We Energies
800 Industrial Park Drive
Iron Mountain, MI 49801
(906) 779-4099
todd.jastremski@we-energies.com

Jastremski.Todd

From: Donofrio, Michael C - DNR <Michael.Donofrio@wisconsin.gov>
Sent: Wednesday, June 05, 2013 1:54 PM
To: Jastremski.Todd; Kruger, Kyle (DNR); Utrup, Nick; James Fossum
Cc: Grisar.Mike
Subject: RE: Modified 3

I agree with the proposals as written

From: Jastremski.Todd [<mailto:todd.jastremski@we-energies.com>]
Sent: Tuesday, June 04, 2013 10:14 AM
To: Kruger, Kyle (DNR); Utrup, Nick; Donofrio, Michael C - DNR; James Fossum
Cc: Grisar.Mike
Subject: Modified
Importance: High

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Jastremski.Todd

From: Utrup, Nick <nick_utrup@fws.gov>
Sent: Wednesday, June 05, 2013 2:27 PM
To: Jastremski.Todd
Cc: Kruger, Kyle (DNR); Donofrio, Michael C - DNR (Michael.Donofrio@wisconsin.gov); James Fossum; Grisar.Mike
Subject: Re: Modified 2

Todd,

I have reviewed the modified plant survey monitoring plan and have no comments.

Thanks,

Nick

Nicholas J. Utrup
U.S. Fish and Wildlife Service
Wisconsin Ecological Services Office
2661 Scott Tower Drive
New Franken, WI 54229

Office: (920) 866-1736
Cell: (920) 530-9937
FAX: (920) 866-1710
Email: Nick_Utrup@fws.gov

On Tue, Jun 4, 2013 at 10:13 AM, Jastremski.Todd <todd.jastremski@we-energies.com> wrote:

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Todd Jastremski

Manager – Hydroelectric Operations

We Energies

800 Industrial Park Drive

Iron Mountain, MI 49801

(906) 779-4099

todd.jastremski@we-energies.com

Jastremski.Todd

From: Kruger, Kyle (DNR) <KRUGERK@michigan.gov>
Sent: Wednesday, July 10, 2013 9:51 AM
To: Jastremski.Todd
Subject: RE: Modified 5

Hi Todd, No comments, I'm good with the changes. Thanks for checking. Kyle

From: Jastremski.Todd [<mailto:todd.jastremski@we-energies.com>]
Sent: Tuesday, July 09, 2013 10:23 AM
To: Kruger, Kyle (DNR)
Subject: FW: Modified
Importance: High

Hi Kyle,

I've received concurrence from the rest of the WSIT that the plan is acceptable as written. Do you have any comments or concerns?

Thanks,

Todd

From: Jastremski.Todd
Sent: Tuesday, June 04, 2013 10:14 AM
To: 'Kruger, Kyle (DNR)'; 'Utrup, Nick'; Donofrio, Michael C - DNR (Michael.Donofrio@wisconsin.gov); 'James Fossum'
Cc: Grisar.Mike
Subject: Modified
Importance: High

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Iron Mountain, MI 49801
(906) 779-4099

Jastremski.Todd

From: James Fossum <jfbio@yahoo.com>
Sent: Thursday, June 06, 2013 4:19 PM
To: Jastremski.Todd
Cc: Nick Utrup; Michael C - DNR Donofrio; Cheryl - DNR Laatsch; Angie Tormes; Kyle Kruger; Denny Caneff; Jim Schramm
Subject: Re: Modified 4

Todd:

The River Alliance of WI and Michigan Hydro Relicensing Coalition concur with We-Energies Nuisance Plant Monitoring Plan to conduct Purple Loosestrife surveys on all twelve FERC licensed projects in We-Energies hydro system.

The opportunity to comment is appreciated.

Jim Fossum

Consultant for the RAW and MHRC

n Tue, 6/4/13, Jastremski.Todd <todd.jastremski@we-energies.com> wrote:

From: Jastremski.Todd <todd.jastremski@we-energies.com>
Subject: Modified
To: "Kruger, Kyle (DNR)" <KRUGERK@michigan.gov>, "Utrup, Nick" <nick_utrup@fws.gov>, "Donofrio, Michael C - DNR (Michael.Donofrio@wisconsin.gov)" <Michael.Donofrio@wisconsin.gov>, "James Fossum" <jfbio@yahoo.com>
Cc: "Grisar.Mike" <Mike.Grisar@we-energies.com>
Date: Tuesday, June 4, 2013, 3:13 PM

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