



Wisconsin Public Service Corporation

700 North Adams Street

P.O. Box 19001

Green Bay, WI 54307-9001

December 15, 2011

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

Dear Secretary Bose:

Peshtigo River Hydroelectric Projects – Six-Year Update FERC Approved Comprehensive Land & Wildlife Management Plan, Project No. 2525, No. 2595, No. 2522, No. 2546, No. 2560 and No. 2581

As per the Federal Energy Regulatory Commission (FERC) Order Approving Updated Comprehensive Land and Wildlife Management Plan (CLWMP) for the Caldron Falls Project (FERC Project No. 2525), High Falls Project (FERC Project 2595), Johnson Falls Project (FERC Project 2522), Sandstone Rapids Project (FERC Project No. 2546) and Potato Rapids Project (FERC Project No. 2560), collectively named the (Peshtigo River Hydroelectric Projects) issued March 29, 2006, Wisconsin Public Service Corporation (WPS) is to update the CLWMP every six years, with the next update submittal due to the FERC by March 29, 2012.

WPS is to provide a draft updated CLWMP to the Wisconsin Department of Natural Resources (WDNR), U.S. Fish & Wildlife Service (FWS) and Marinette County Land and Water Conversation Department (MCLWCD) and is to provide thirty (30) days for comment.

The draft CLWMP is similar to the approved CLWMP dated March 29, 2006 with a few changes. WPS has updated the Fire Control to remove WPS involvement from fire control activities. WPS has included forest management type and activities in the project facilities land category for overall forest health and timber stand improvement. WPS has also updated the CLWMP to include the completed WDNR Peshtigo State Forest Master Plan and changes to the purple loosestrife survey protocol. The draft CLWMP is provided in Appendix 1.

As per the FERC approved CLWMP, WPS is to survey and report purple loosestrife survey information on an annual basis. Additionally, as per the Order Approving Supplement to Comprehensive Land and Wildlife Management Plan for the Peshtigo Hydroelectric Project (FERC Project No. 2581) issued on July 30, 2009, WPS is to control purple loosestrife by releasing *Gallerucella sp.* Beetles (beetles) for a period of five years or until each purple loosestrife colony has established beetle populations. If after five years the population is controlled, or the population is reduced, WPS would reduce the frequency of surveying to once every three years, in conjunction with the Eurasian water milfoil survey.

WPS has surveyed the Peshtigo River Hydroelectric Projects for purple loosestrife since 1999. During the first survey at the Peshtigo project, purple loosestrife populations were well established and totaled 58 colonies. The approved method of control since 1999 had been to cut and hand pull small colonies (1 to 5 plants) of purple loosestrife. This method of control had shown varying success from year to year. A comparison of annual surveys since 2006 showed either an increase in overall purple loosestrife colonies or in colony size. For instance, the total number of colonies had shown a reduction from the 2007 to 2008 survey results (54 colonies in 2007 to 43 colonies in 2008), however the relative population of those colonies has increased (8 colonies of 6-50 plants in 2007, compared to 19 colonies of 6-50 plants in 2008). Also, since 2006, the number of colonies and relative population of those colonies had shown an increase (34 colonies of which 3 colonies containing 6-50 plants in 2006 to 43 colonies of which 19 containing 6-50 plants in 2008).

Because of this, WPS had provided a plan to control the purple loosestrife by releasing beetles. The resource agencies agreed with this approach and FERC approved the Supplement to Comprehensive Land and Wildlife Management Plan for the Peshtigo Hydroelectric Project issued on July 30, 2009.

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Since 2009, WPS has been controlling the purple loosestrife colonies by releasing beetles. WPS has released approximately 10,000 beetles a year, for a total of approximately 30,000 beetles over a three-year period.

The purple loosestrife survey results indicated that purple loosestrife has been reduced from 25 colonies in 2010 to 20 colonies in 2011. In addition, 6 of the 20 colonies were hand pulled leaving a total of 14 colonies remaining at the project. Also, an increase in beetle feeding was observed from 2010 to 2011. In 2010, feeding was observed at only 8 of the 25 sites. In 2011, feeding was observed at all 14 colonies. The success of the beetle feeding is even more significant when compared to the first year of beetle release in 2009, results from the 2009 survey indicated beetle feeding on only one site. In addition, the overall plant vigor average for the purple loosestrife colonies was reduced from 10.6 in 2010 to 7.3 in 2011.

Since the beginning of the surveying activities in 1999, WPS has reduced the purple loosestrife populations from 58 to 14 colonies, with beetle feeding observed on every colony. WPS does not foresee the need to continue to release beetles and anticipates a continuing trend in the reduction of purple loosestrife colonies, colony size and overall plant vigor at the Peshtigo Hydroelectric Project.

Since the first purple loosestrife survey completed in 1999, purple loosestrife has only been observed at two other hydroelectric projects. One single plant was pulled and removed off-site at the Sandstone Rapids Project in 2004, and one small colony was pulled and removed off-site at the Potato Rapids Project in 2011.

The Sandstone Rapids Project has been surveyed annually for purple loosestrife since 2004. Purple loosestrife has not been observed during any of those surveys.

To ensure that the purple loosestrife population has been controlled at the Potato Rapids Project, WPS recommends continuing monitoring and if necessary control purple loosestrife at the Potato Rapids Project for the next three years.

Based on the survey results since 1999, WPS recommends reducing the monitoring of purple loosestrife from an annual commitment to once every three years to coincide with the Eurasian water milfoil surveys for all but the Potato Rapids Project.

A copy of the CLWMP was provided to the Resource Agencies on October 7, 2011. The WDNR provided comments November 4, 2011. The documentation of submittal, the WDNR comment letter and WPS responses to the comments are included in Appendix E.

Should you have any questions relative to this material, please do not hesitate to contact Jamie Nuthals, at (920) 433-1460.

Sincerely,



Terry P. Jensky
Vice President - Energy Supply Operations
for Wisconsin Public Service Corporation

Enc.

cc: Mr. Ed Brandt, WPS
Mr. Bruce Crocker, WPS

Mr. Howard Giesler, WPS
Mr. Gil Snyder, WPS

APPENDIX 1

PESHTIGO RIVER HYDROELECTRIC PROJECTS

COMPREHENSIVE LAND AND WILDLIFE MANAGEMENT PLAN

WISCONSIN PUBLIC SERVICE CORPORATION

**PESHTIGO RIVER
HYDROELECTRIC PROJECTS**

**COMPREHENSIVE LAND & WILDLIFE
MANAGEMENT PLAN**

(FERC PROJECT NOS. 2525, 2595, 2522, 2546, 2560, and 2581)

**PESHTIGO RIVER HYDROELECTRIC PROJECTS COMPREHENSIVE
LAND & WILDLIFE MANAGEMENT PLAN**

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LAND & WILDLIFE MANAGEMENT PLAN**

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WDNR Peshtigo River State Forest Master Plan

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