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OFFICE OF THE  
SECRETARY

Wisconsin Public Service Corporation  
(a subsidiary of WPS Resources Corporation)  
600 North Adams Street  
P.O. Box 19002  
Green Bay, WI 54307-9002

2006 NOV 30 A 11: 54

November 29, 2006

**ORIGINAL**

Ms. Magalie R. Salas, Secretary  
Federal Energy Regulatory Commission  
Mail Code: DTCA, HL 21.3  
888 First Street, N.E.  
Washington, DC 20426

Dear Secretary Salas:

Results of the Eurasian Watermilfoil Survey for the Grand Rapids Hydroelectric Project  
FERC #2433

As per the July 19, 2006 correspondence from the Federal Energy Regulatory Commission (FERC) to Wisconsin Public Service Corporation (WPSC) granting permission to conduct a Eurasian watermilfoil survey in 2006, to correct an oversight and requesting documentation of the results, WPSC is submitting the Grand Rapids Hydroelectric Project Eurasian watermilfoil results and agencies' comments.

The Eurasian watermilfoil survey was conducted on July 24, 2006. Samples were collected at each of the 15 transects. Eurasian watermilfoil was identified in 5 out of the 15 transects surveyed. Transects #4, #5, #7 and #14 were identified as having a Eurasian watermilfoil population that extends beyond the sampling points of the surveyed transects. Eurasian watermilfoil was identified at Transect #3; however the population did not extend beyond the sample points of Transect #3. The 2006 Eurasian watermilfoil survey results and map including stand perimeters are attached in Appendix A.

The 2006 Eurasian watermilfoil survey identified fewer transects with the presence of Eurasian watermilfoil when compared to the 2004 survey. Nine transects were identified as containing Eurasian watermilfoil in 2004, as compared to five transects in 2006. Also during the 2006 survey, the samples collected indicated that Eurasian watermilfoil was either at the same abundance or below what was identified in the 2004 survey, in all but one transect. In addition, Eurasian watermilfoil was not identified at any new transects not previously accounted for during the 2004 survey.

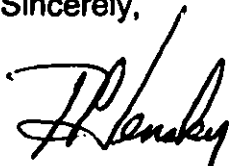
The 2006 survey results identified the same number of transects containing Eurasian watermilfoil as reported during the 2001 survey, and when compared to the 1998 survey, there are two less transects identified with Eurasian watermilfoil.

Ms. Magalie R. Salas, Secretary  
November 29, 2006  
Page 2 of 2

Correspondence was received from the Michigan Department of Natural Resources (MDNR) concerning the 2006 Eurasian watermilfoil survey results. The MDNR's comments and WPSC's response to these comments are included in Appendix B.

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

Sincerely,



Terry P. Jensky  
Assistant Vice President - Energy Supply Operations  
Telephone: (715) 355-2047

syx

Enc.

cc	Ms. Peggy Harding, FERC - Chicago	Mr. Gil Snyder, WPSC - D2
	Ms. Carlisa Linton, FERC - DC	Mr. Ed Brandt, WPSC - CRI
	Ms. Louise Clemency, USFWS	Mr. Robert Martini, WDNR
	Mr. Bruce Crocker, WPSC, D2	Ms. Joan Johaneck, WPSC, D2
	Ms. Jessica Mistak, MDNR	

**APPENDIX A**

**GRAND RAPIDS HYDROELECTRIC PROJECT**

**2006 EURASIAN WATERMILFOIL SURVEY RESULTS**

Eurasian Milfoil Surveys - 2006

Grand Rapids

Transect #	Results at 0.5 feet	Results at 1.5 feet	Results at 3.0 feet	Results at +3.0 feet	Origin	Perimeter
1A	0	0	0	N/A	45 21.809	
1B	0	0	0	N/A	87 39.562	
1C	0	0	0	N/A		
2A	0	0	0	N/A	45 21.841	
2B	0	0	N/A	N/A	87 39.561	
2C	0	0	N/A	N/A		
3A	0	0	N/A	N/A	45 21.855	
3B	0	0	N/A	N/A	87 39.553	
3C	2	3	N/A	N/A		
4A	0	0	N/A	N/A	45 22.022	5.1 acres
4B	0	1	N/A	N/A	87 39.467	
4C	0	1	N/A	N/A		
5A	0	1	N/A	N/A	45 22.092	6.3 acres
5B	0	1	N/A	N/A	87 39.562	
5C	1	1	N/A	N/A		
6A	0	0	N/A	N/A	45 22.176	
6B	0	0	N/A	N/A	87 38.713	
6C	0	0	N/A	N/A		
7A	0	0	N/A	N/A	45 21.890	3.7 acres
7B	0	0	N/A	N/A	87 39.425	
7C	0	1	2	N/A		
8A	0	0	N/A	N/A	45 21.830	
8B	0	0	N/A	N/A	87 39.608	
8C	0	0	N/A	N/A		
9A	0	0	N/A	N/A	45 21.995	
9B	0	0	N/A	N/A	87 39.216	
9C	0	0	0	N/A		
10A	0	N/A	N/A	N/A	45 22.059	
10B	0	N/A	N/A	N/A	87 38.990	
10C	0	N/A	N/A	N/A		
11A	0	0	N/A	N/A	45 22.174	
11B	0	0	N/A	N/A	87 38.985	
11C	0	0	0	N/A		
12A	0	0	0	N/A	45 22.223	
12B	0	0	0	N/A	87 39.006	
12C	0	0	0	N/A		
13A	0	0	N/A	N/A	45 22.261	
13B	0	0	N/A	N/A	87 39.006	
13C	0	0	N/A	N/A		
14A	2	4	N/A	N/A	45 22.296	0.48 acres
14B	1	4	N/A	N/A	87 39.006	
14C	1	3	N/A	N/A		
15A	0	N/A	N/A	N/A	45 22.275	
15B	0	N/A	N/A	N/A	87 39.223	
15C	0	0	N/A	N/A		

N/A: Not Applicable

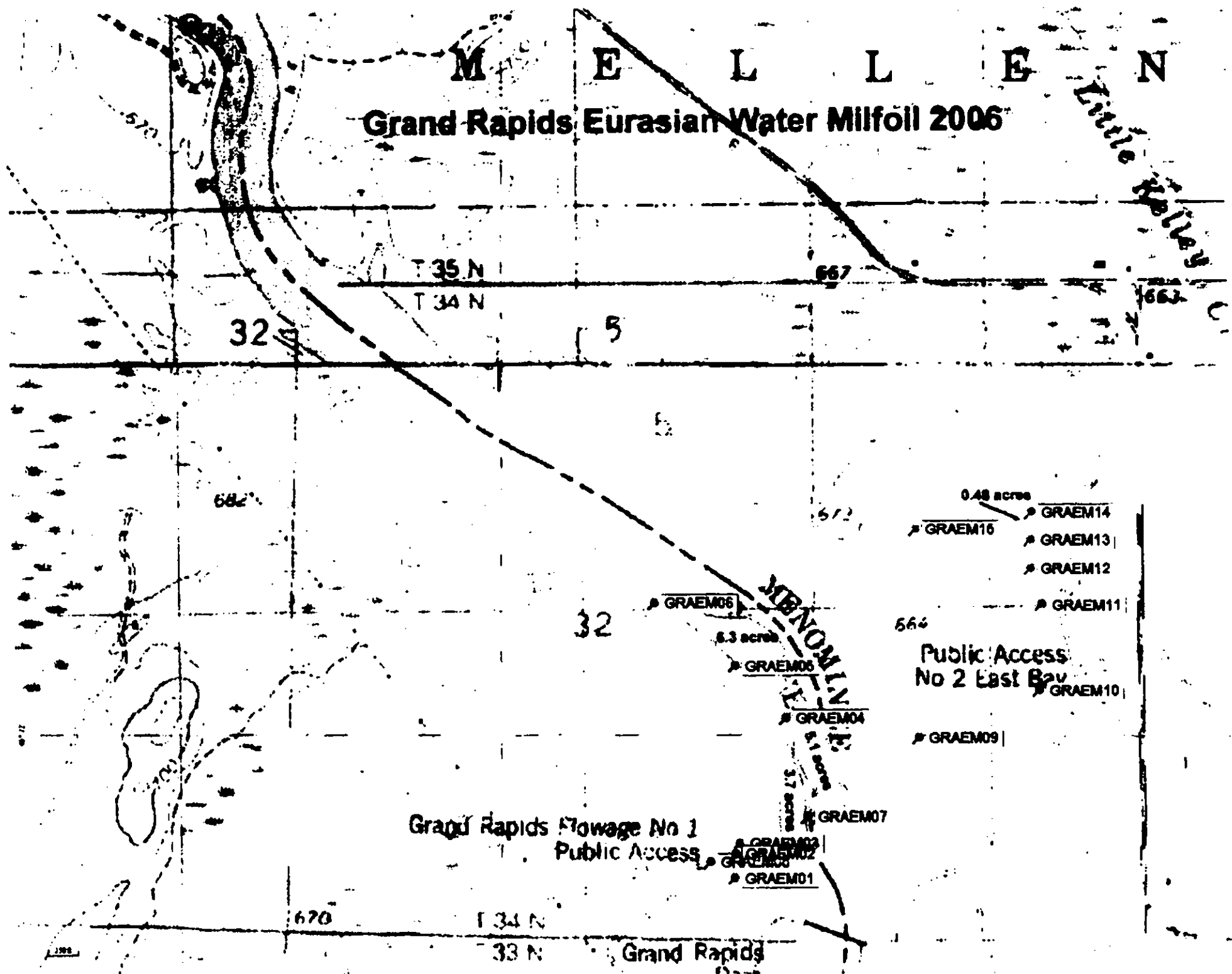
Abundance Scale: 0-Absent, 1-Present, 2-Presence Less Than Half, 3-Equal Presence Compared to Other Species, 4-Dominant Species Present, 5-Total Infestation

Note: All transects are 40 feet in length and proceed away from shore in a direction perpendicular to the shoreline

# M E L L E N

## Grand Rapids Eurasian Water Milfoil 2006

Little Rapids



- 0.48 acres
- GRAEM14
- GRAEM16
- GRAEM13
- GRAEM12
- GRAEM11
- Public Access
- No 2 East Bay
- GRAEM10
- GRAEM09

Grand Rapids Flowage No 1  
Public Access

Grand Rapids

**APPENDIX B**

**GRAND RAPIDS HYDROELECTRIC PROJECT**

**MDNR COMMENTS AND WPSC RESPONSE**



STATE OF MICHIGAN

DEPARTMENT OF NATURAL RESOURCES  
LANSING

JENNIFER M. GRANHOLM  
GOVERNOR

REBECCA A. HUMPHRIES  
DIRECTOR

Refer to: 4202.2.41

October 12, 2006

Mr. Jaime Nuthals  
Wisconsin Public Service Corporation  
700 North Adams Street  
P.O. Box 19002  
Green Bay, WI 54307-9002

Dear Mr. Nuthals:

Subject: Control of Eurasian Water Milfoil at the Grand Rapids Hydroelectric Project (FERC No. 2433)

According to Article 411 of the Grand Rapids Hydroelectric Project license and the Order Amending Approved Noxious Plants Monitoring Plans, Wisconsin Public Service Corporation (WPSC) is to cooperate with the resource agencies to control Eurasian watermilfoil.

In 2006, WPSC conducted an additional Eurasian watermilfoil survey aimed at collecting data on mat density, mat thickness, and stand perimeter that was missing from previous surveys. This information was needed to better quantify changes in the plant population and make recommendations on the most appropriate control methods.

Based on survey data, Eurasian watermilfoil is currently very abundant, covering over 15 acres of the project. It is obvious that control efforts are warranted to not only prevent the spread of Eurasian watermilfoil in Grand Rapids Reservoir, but also prevent the transfer of this invasive plant to other water bodies. The DNR again requests that, within 30 days, WPSC submit a Eurasian watermilfoil control plan for agency review. Please contact us if you need technical assistance in developing the plan.

If you have any questions about this matter, please contact me at 906-249-1611 ext 308 or [mistakjl@michigan.gov](mailto:mistakjl@michigan.gov). If you wish to contact me in writing, my address is:

Marquette Fisheries Station  
Michigan Department of Natural Resources  
484 Cherry Creek Rd  
Marquette, MI 49855

Sincerely,

Jessica Mistak, Senior Fisheries Biologist

- cc: Magalie Salas, FERC
- Bob Martini, WDNR
- Mike Donofrio, WDNR
- Louise Clemency, FWS
- Mike Herman, DNR
- Chris Freiburger, DNR



Wisconsin Public Service Corporation  
(a subsidiary of WPS Resources Corporation)  
700 North Adams Street  
P.O. Box 19002  
Green Bay, WI 54307-9002

November 6, 2006

FERC No. 2433

Ms. Jessica Mistak  
Michigan Department of Natural Resources  
488 Cherry Creek Road  
Marquette, MI 49855-8999

Dear Ms. Mistak:

Grand Rapids Hydroelectric Project  
Control of Eurasian Watermilfoil

Per your letter submitted October 13, 2006, Wisconsin Public Service Corporation (WPSC) is in agreement with the Michigan Department of Natural Resources (MDNR) that WPSC is to cooperate with the resource agencies to control Eurasian watermilfoil if the need for specific elimination measures are demonstrated, per the Federal Energy Regulatory Commission (FERC) Order Amending the Approved Noxious Plants Monitoring Plan, Article 411 of the Grand Rapids Hydroelectric Project license. However, WPSC does not feel that the need for specific elimination measures has been demonstrated.

The 2006 Eurasian watermilfoil survey identified fewer transects with the presence of Eurasian watermilfoil when compared to the 2004 survey. Nine transects were identified as containing Eurasian water in 2004 as compared to five transects in 2006. Also during the 2006 survey, in all but one transect, the samples collected indicated that Eurasian watermilfoil was either at the same abundance or below what was identified in the 2004 survey. In addition, Eurasian watermilfoil was not identified at any new transects not previously accounted for during the 2004 survey.

The 2006 survey results have the same number of transects identified as containing Eurasian watermilfoil as report during the 2001 survey, and two less transects identified with Eurasian watermilfoil when compared to the 1998 survey.

It is the opinion of WPSC that the Eurasian watermilfoil population at the Grand Rapids Hydroelectric Project is being controlled by natural features, such as the native weevil (*euhrhychiopsis lecontei*).

The survey results do not exhibit an increase in the Eurasian watermilfoil population over the past eight years of surveying. WPSC is to conduct a Eurasian watermilfoil survey again in 2007, if the results indicate that the Eurasian watermilfoil population has increased, WPSC will cooperate with the resource agencies to control Eurasian watermilfoil, provided the need for specific elimination measures are demonstrated.

If you should you have any questions, please do not hesitate to contact me at (920) 433-1460.

Sincerely,

James D. Nuthals  
Environmental Consultant  
Wisconsin Public Service Corporation  
Telephone: (920) 433-1460

syx

cc: Ms. Joan Johaneck, WPSC - D2  
Mr. Gil Snyder, WPSC - D2  
Ms. Louise Clemency, USFWS

Mr. Edward Brandt, WPSC - Crivitz  
Ms. Magalie R. Salas, FERC - DC  
Mr. Robert Martini, WDNR





STATE OF MICHIGAN

JENNIFER M. GRANHOLM  
GOVERNOR

DEPARTMENT OF NATURAL RESOURCES  
LANSING

REBECCA A. HUMPHRIES  
DIRECTOR

Refer to: 4202.2.41

November 14, 2006

Ms. Magalie Salas, Secretary  
Federal Energy Regulatory Commission  
888 First Street, N.E.  
Washington, DC 20426

Dear Ms. Salas:

**Subject: Request for FERC Assistance- Control of Eurasian Water Milfoil at the Grand Rapids Hydroelectric Project (FERC No. 2433)**

According to Article 411 of the Grand Rapids Hydroelectric Project license and the Order Amending Approved Noxious Plants Monitoring Plans, Wisconsin Public Service Corporation (WPSC) is to cooperate with the resource agencies to control Eurasian watermilfoil.

In 2006, WPSC conducted an additional Eurasian watermilfoil survey aimed at collecting data on mat density, mat thickness, and stand perimeter that was missing from previous surveys. This information was needed to better quantify changes in the plant population and make recommendations on the most appropriate control methods.

Based on survey data, Eurasian watermilfoil is currently very abundant, covering over 15 acres of the project. It is obvious that control efforts are warranted to not only prevent the spread of Eurasian watermilfoil in Grand Rapids Reservoir, but also prevent the transfer of this invasive plant to other water bodies. In a letter to WPSC dated October 12, 2006, we asked for a control plan and offered our technical assistance. In response, in a letter dated November 6, 2006, WPSC stated that control was unnecessary at this time, since Eurasian watermilfoil was identified in fewer transects than in 2004 and is likely being controlled by natural features such as the native weevil. While this may be the case, owing to the lack of complete data collection in previous years, the DNR is unable to determine for certain if this nuisance plant is being naturally controlled. Therefore, we continue to assert that control efforts of Eurasian watermilfoil are needed at the Grand Rapids project.

**Since we are no longer able to move forward with WPSC in a productive manner regarding the control Eurasian watermilfoil, the DNR requests FERC's assistance in resolving this issue.**

Ms. Magalie Salas

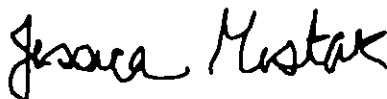
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November 14, 2006

If you have any questions about this matter, please contact me at 906-249-1611 ext 308 or [mistakjl@michigan.gov](mailto:mistakjl@michigan.gov). If you wish to contact me in writing, my address is:

Marquette Fisheries Station  
Michigan Department of Natural Resources  
484 Cherry Creek Rd  
Marquette, MI 49855

Sincerely,



Jessica Mistak, Senior Fisheries Biologist

cc: George Taylor, FERC  
Carlisa Linton, FERC  
Bob Martini, WDNR  
Mike Donofrio, WDNR  
Louise Clemency, FWS  
Mike Herman, DNR  
Chris Freiburger, DNR