

**FEDERAL ENERGY REGULATORY COMMISSION**  
Washington, D. C. 20426

**OFFICE OF ENERGY PROJECTS**

Project No. 2433-098—Michigan  
Grand Rapids Hydroelectric Project  
Wisconsin Public Service Corporation

**May 15, 2012**

Mr. Terry P. Jensky  
Wisconsin Public Service Corporation  
700 North Adams Street  
Green Bay, WI 54307-9001

Re: Comprehensive Monitoring Report & Future Plan for Eurasian watermilfoil

Dear Mr. Jensky:

This letter responds to the comprehensive Eurasian watermilfoil control measures and the proposed Eurasian watermilfoil monitoring and control plan for future measures filed on December 5, 2011, pursuant to ordering paragraph (C) of the Order Modifying and Approving Eurasian Watermilfoil Control Plan (2009 Order)<sup>1</sup>. The 2009 Order compliments the Order Modifying and Approving Purple Loosestrife and Eurasian Watermilfoil Monitoring Plan (1998 Order)<sup>2</sup> for the Grand Rapids Project license<sup>3</sup>.

Background

Ordering paragraph (C) of the 2009 Order requires the licensee to submit a determination of what surveys and what activities will be conducted the following year to the Michigan Department of Natural Resources (MI DNR), Wisconsin Department of Natural Resources (WDNR), U.S. Fish and Wildlife Service (FWS) and the Commission by March 31, 2009, March 31, 2010, and March 31, 2011. The licensee is also required to submit a letter detailing the status of the objectives to the resource agencies by October 31 and to the Commission by December 31, 2009 and 2010. Any comments received from the resource agencies are required

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<sup>1</sup> See 127 FERC ¶ 62,125 (issued May 11, 2009).

<sup>2</sup> See 82 FERC ¶ 62,001 (issued January 2, 1998).

<sup>3</sup> See Order Issuing New License (Major Project), 79 FERC ¶ 62,098 (issued May 7, 1997).

to be addressed prior to filing the results with the Commission. After the 2010 field season, the licensee is required to consult with the resource agencies on an appropriate control and/or monitoring schedule and to file a new plan with the resource agencies by October 31, 2011, and with the Commission by December 31, 2011. The 2011 plan is required to include information on the quantity of the Eurasian watermilfoil population in 2009, 2010, and 2011 in both text form and depicted on a project map, so that the Commission may make a determination on the best course of action in regard to future monitoring and control methods.

According to your December 5, 2011 filing, the five components of the objectives for the 2009 Eurasian watermilfoil control plan are as follows:

- (1) Determine if native milfoil weevils are present;
- (2) Work with other stakeholders within the Upper Menominee River Basin Watershed to exchange information about Eurasian watermilfoil presence and control strategies and to obtain information on the genetic characteristics of the Eurasian watermilfoil populations;
- (3) Implement measures to help control the spread of Eurasian watermilfoil to other water bodies;
- (4) Compliance with the Order Modifying and Approving Purple loosestrife and Eurasian watermilfoil Monitoring Plan issued January 2, 1998; and
- (5) Provide a New Plan for future monitoring and/or control of Eurasian watermilfoil by December 31, 2011.

#### 1. Determine if Native Weevils are Present

According to your filing, you retained EnviroServices to evaluate the existing indigenous weevil population throughout the reservoir over the past 3 years. You determined that the critical density of native weevil needed to affect the noxious Eurasian watermilfoil population is greater than 0.5 weevil/per stem. Based on your study results, in 2009 there were 1.10 weevils per stem. In 2010, the density ranged from 0.03 to 5.60 weevils/per stem depending on the area surveyed, making the system-wide average 2.5 weevils/per stem. In 2011, the average was 0.56 weevils/per stem, just over the critical density.

#### 2. Work with Other Stakeholders

You state that in 2010, the presence of noxious Eurasian watermilfoil was confirmed at six of the seven sample locations. Hybrid species of Eurasian watermilfoil and the native water milfoils were observed at four of the seven sample locations. Due to the lack of Eurasian watermilfoil at all seven sample locations, you conducted genetic analysis at only four sample locations in 2011. Eurasian watermilfoil was identified at three of the sample locations and the

hybrid species was identified at two of the sample locations in 2011. Populations of weevils were recorded at all sites regardless of whether it was noxious Eurasian watermilfoil, native water milfoils or the hybrid species.

### 3. Implement Measures to Help Control the Spread of Eurasian Watermilfoil

In 2009, no Eurasian watermilfoil was observed at the Michigan or Wisconsin boat landing. Subsequently, a follow-up survey was conducted at the Michigan boat landing and its surrounding one acre on September 9, 2009, and no Eurasian watermilfoil plants were observed; therefore, a fall herbicidal treatment was not conducted.

In 2010, Eurasian watermilfoil was observed along with other *Dicotylodonea* aquatic plants at both boat landings. In consultation with the resource agencies, herbicide treatment was not completed because of possible adverse effects of herbicides on other *Dicotylodonea* aquatic plants and rare mussel species that are known to be present in the reservoir.

In 2011, Eurasian watermilfoil was observed near the Michigan boat launch and fishing pier (but not at the Wisconsin site). You report that the Eurasian watermilfoil patches were sporadic and the dominant species consisted of native aquatic plants.

In addition, invasive species signs have been checked annually and are present and up-to-date at the boat landings. You report that each boat landing provides information on proper cleaning of watercrafts and boat trailers to avoid spreading invasive species.

### 4. Compliance with the 1998 Order

The 1998 Order requires surveys every three years for Eurasian watermilfoil, with the next survey to be completed during the summer of 2012. You report that in 2009, Eurasian watermilfoil transect surveys occurred as required in the 1998 Order. Eurasian watermilfoil was observed in 3 of 15 transects and the noxious plants were extremely sparse and in poor condition. The 2009 survey found 1.36 acres of Eurasian watermilfoil, which is far less than the 39 acres observed in 2007 and significantly less than the 81 acres observed in 2008.

The 1998 Order requires annual monitoring of purple loosestrife. Since 1998, purple loosestrife has never been observed. The last purple loosestrife survey occurred July 11, 2011, and the next will occur summer 2012.

**5. Provide New Plan for Monitoring and/or Control of Eurasian watermilfoil**

After the 2010 field season, the licensee was required to consult with the resource agencies on an appropriate control and/or monitoring schedule and to file a new plan for future efforts to the resource agencies by October 31, 2011, and to the Commission by December 31, 2011.

The results of the three year study (see Table below) show that the Eurasian watermilfoil perimeter has significantly decreased since the 81 acres observed in 2008.

Stand Perimeter of Eurasian Water Milfoil:

Year of Survey	Stand Perimeter
2006	15.6 acres
2007	47.8 acres
2008	81. acres
2009	1.6 acres
2010	2.0 acres
2011	10.9 acres

In addition, you state that stands of Eurasian watermilfoil in 2011, range from sparse to very sparse, with only one stand having a moderately dense population of Eurasian watermilfoil. Also, every stand of Eurasian watermilfoil observed includes native plant species (coontail, elodea, flat-stem pondweed, Sago pondweed and water lily) intermixed and not just monocultures of noxious weeds.

Therefore, the licensee proposes to only continue with the survey methods contained in the 1998 Order Modifying and Approving Purple loosestrife and Eurasian watermilfoil Monitoring Plan. Measures for Eurasian watermilfoil in the 1998 Order include monitoring by boat and conducting rake samples from ten transects every three years. You propose that the next survey would be in the summer of 2014 (instead of 2012 because the last survey occurred in 2011) and every three years thereafter. Control measures would continue to depend on the native weevil (*Euhrychiopsis lecontei*), which is currently at the reservoir at a density shown to control Eurasian watermilfoil. In accordance with the 1998 Order, the licensee would provide documentation of the required monitoring by October 31 to the resource agencies and to the Commission by December 31 for each year the survey is completed. Purple loosestrife would continue to be surveyed on an annual basis with reporting to the resource agencies by October 31 and to the Commission by December 31, including any comments by the resource agencies.

Agency Consultation

The licensee submitted the 2011 comprehensive study and proposed Eurasian watermilfoil monitoring plan to the WDNR, MI DNR and the FWS on October 7, 2011, as required. The resource agencies did not provide response comments. On November 7, 2011, the licensee submitted a follow-up electronic mail correspondence with the WDNR concerning comments; however, agency comments were not provided.

Staff Recommendations

We concur with the licensee's proposal to revert back to the monitoring established in the 1998 Order, as well as, implementing the control measures of the 2009 Order for Eurasian watermilfoil. The above stand perimeter table indicates that the native weevil, used as a biological control for Eurasian watermilfoil since 2009 has reduced this noxious weed population.

This comprehensive report satisfies your filing requirements with the Commission for the 2009 Order. You are reminded that your next annual purple loosestrife monitoring report is due to the Commission by December 31, 2012. Your next Eurasian watermilfoil report is due to the Commission on December 31, 2014.

Thank you for your report. If you have any questions concerning this matter, please contact me at (202) 502-8416 or [Carlisa.linton-peters@ferc.gov](mailto:Carlisa.linton-peters@ferc.gov).

Sincerely,



Carlisa Linton

Ecologist

Division of Hydropower Administration  
and Compliance

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