



**Wisconsin Public Service Corporation**  
700 North Adams Street  
P.O. Box 19001  
Green Bay, WI 54307-9001  
www.wisconsinpublicservice.com

May 14, 2019

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

Dear Ms. Bose:

**SUBJECT: Invasive Species Management Plan**

<u>Hydro</u>	<u>FERC Project No.</u>	<u>NATDAM No.</u>	<u>License Article</u>
<b>Grandfather Falls</b>	<b>1966</b>	<b>WI00743</b>	<b>409</b>

Wisconsin Public Service (WPS) received the Federal Energy Regulatory Commission (FERC) Order Issuing New License (Order) on May 17, 2018, for the Grandfather Falls Hydroelectric Project. Included in the Order was a requirement under Article 409 for WPS to file with FERC an Invasive Species Management Plan (Plan) within one year of the date of issuance of the license. WPS must allow a minimum of thirty (30) days for the Wisconsin Department of Natural Resources (WDNR) to comment on the Plan before filing with the FERC. If WPS does not adopt a recommendation, the filing must include WPS’s reasons, based on project-specific information.

Prior to providing the Plan to WDNR for comment, WPS and WDNR had a phone conversation on March 7, 2019 to discuss revisions to the Plan. WPS provided the draft Plan to the WDNR on March 25, 2019. The WDNR responded on March 26, 2019, indicating they have no comments on the Plan. Attachment A includes the Grandfather Falls Invasive Species Management Plan. Documentation of consultation is included in Attachment B.

If you have any questions regarding this Plan, please contact Mike Grisar at (414) 221-5426 or e-mail at [mike.grisar@wecenergygroup.com](mailto:mike.grisar@wecenergygroup.com).

Sincerely,

Todd P. Jastremski  
Asset Manager Hydro Operations  
We Energies  
800 Industrial Park Drive  
Iron Mountain, MI 4980

MLG/jr

Enc: Attachment A – Tomahawk Invasive Species Management Plan – 6 pages  
Attachment B – Documentation of Consultation - 4 pages

**ATTACHMENT A**

**GRANDFATHER FALLS INVASIVE SPECIES MANAGEMENT PLAN**

Wisconsin Public Service Corporation

**GRANDFATHER FALLS HYDROELECTRIC  
PROJECT  
FERC NO. 1966**

**INVASIVE SPECIES MANAGEMENT PLAN  
Article 409**

May 2019

## Invasive Species Management Plan – Article 409

**Article 409** *Invasive Species Management Plan.* Within one year of the date of issuance of this license, the licensee must file with the Commission, for approval, a revised Invasive Species Management Plan (ISMP or Plan) that includes the provisions of the Invasive Species Management Plan, filed on October 28, 2016, with the following additional provisions:

- (1) a description of monitoring methods for aquatic invasive plant species;
- (2) the frequency of monitoring for aquatic invasive plant species;
- (3) the criteria to be used to determine when control measures would be implemented; and
- (4) a schedule for filing monitoring reports with Wisconsin Department of Natural Resources.

**Objective** The goal of this Plan is to facilitate compliance with Wisconsin's Invasive Species Rule - Wisconsin Administrative Code (WAC) NR 40. Wisconsin Public Service (Company) will achieve this goal by collaboratively working with the Wisconsin Department of Natural Resources (WDNR) and third party organizations seeking invasive species management outcomes through invasive species monitoring and management. This will be done through cooperative efforts to monitor existing invasive species populations, minimize and prevent the further spread of existing invasive species, identify new invasive species, and maximize habitat and public use benefits of the Project. The Company will implement other management measures which control and prevent the spread of invasive species.

### 1. Methods for Aquatic Invasive Plant Species (AIS)

- 1.1. Monitoring for aquatic invasive species will be conducted using ocular meander surveys along shorelines and in water depths where aquatic vegetation populations are visible. Methods will be consistent with the currently accepted WDNR survey methodology. All appropriate and accessible reservoir areas will be surveyed from a boat, scanning for emergent and semi-aquatic invasive species. Generally, meander surveys will occur in water depths that are at the edge of and within submerged beds of aquatic vegetation. This is conducive to efficiently survey for aquatic vegetation at the same time. This method will maximize the area surveyed with potential to detect early infestations of invasive species, for both submerged and shoreline AIS.
- 1.2. Survey results will provide information on the location and extent of invasive aquatic plant species in the Project area to assist with AIS management decisions.
- 1.3. The Company will discuss ongoing survey methodology with WDNR during consultation in conjunction with discussions on management activities (see 3.1 below).
- 1.4. The Company will obtain frequency and distribution information for existing populations of relevant AIS when meander surveys are completed. A focus will be on early detection of newly identified invasive species, state listed prohibited species, and/or outlying populations of commonly observed AIS to the Project area.

**2. Monitoring & Reporting Frequency for AIS**

- 2.1. AIS surveys will be conducted every three years for the term of the license, beginning within one year after plan approval.
- 2.2. If, based on future consultation, survey methods are desired to be modified, the Company will consult with WDNR on a mutually agreeable change in monitoring frequency.
- 2.3. Survey results will be provided to WDNR in the Invasive Species Management Plan report submitted each survey year. The report format will follow currently accepted WDNR standards for AIS data collection and monitoring.

**3. Criteria for Determining Control Measures**

- 3.1. The Company will consult the WDNR on AIS management options, management goals, and parties responsible for conducting AIS management. Responsible parties could include the Company, WDNR, or third party organizations that may collaborate with the Company and WDNR to carry out AIS management activities. Consensus with reasonable compromise by the Company and WDNR will be sought by March 1 following each monitoring year to allow adequate time to prepare for subsequent AIS management, and or follow up monitoring that may be prudent and reasonable to carry out in the following year. If consensus cannot be attained, the Company will consult FERC for resolution.
  - 3.1.1. Control measures may include: biological control, mechanical control, chemical control, use of other proven effective control methods, or funding aquatic invasive control programs.
  - 3.1.2. The basis for when control is needed will be based off of past data collected and consultation with the WDNR.
  - 3.1.3. The WDNR will work with the Company to identify and provide AIS funding opportunities.
- 3.2. The Company and WDNR may also conduct control activities within the project boundary of invasive plant species listed as prohibited by NR40 or other future WDNR regulations or guidelines. Any Company control activities for prohibited invasive Species will be conducted in consultation with the WDNR.

**4. Schedule for Filing Monitoring Reports**

An Invasive Species Management Plan report will be provided to WDNR by November 30<sup>th</sup> and to FERC by January 31<sup>st</sup> each year a survey is completed. The report will include a description of invasive species monitoring and control activities completed that year, and any changes to the Plan, as appropriate. The WDNR will be provided 30 days to comment on each report. The Company will include any comments by the WDNR in the report to FERC. The Company will incorporate the WDNR comments or provide specific reasons why comments were not incorporated.

**5. Terrestrial Invasive Plant Species Monitoring Methods and Frequency for Forest Management Activities**

Ocular meander surveys for terrestrial invasive species will occur in conjunction with planned timber management activities. The Company will conduct surveys for terrestrial invasive species listed as prohibited or restricted in NR40 for all lands proposed to have

commercial timber management activities. Surveys will occur prior to undertaking any harvest activities. If invasive terrestrial invasive species are identified, the Company will implement reasonable precautions as outlined in the WDNR's Wisconsin's Forestry Best Management Practices (BMPs) For Invasive Species to prevent spreading the species during management activities. A description of invasive species BMPs that may be used is listed in Section 7.

#### **6. Terrestrial Invasive Species Monitoring Frequency for Forest Management Activities**

The frequency of terrestrial invasive plant surveys will vary, depending upon the schedule of commercial timber management activities within the Project boundary. When surveys take place, documented occurrences of prohibited species will be provided to WDNR in the annual Invasive Species Management Plan report.

#### **7. Minimization and Prevention of Spreading Invasive Species**

Continued operation of the Project is not anticipated to contribute to the spread of aquatic or terrestrial invasive species. To ensure maintenance of Project-related facilities minimizes, and to the extent practicable avoids the introduction of invasive species to the Project or transport them away from the Project, the Company will utilize the WDNR manuals for invasive species Best Management Practices and implement the following measures:

- 7.1. Company hydroelectric crews will be trained on the identification of up to five invasive plant species commonly observed in Lincoln County.
- 7.2. Invasive terrestrial plant species surveys and monitoring will be conducted in areas where maintenance activities are regularly conducted including embankments, penstocks, access roads, and recreation sites (Figure 6.1-1). Although the survey and monitoring would include sites where maintenance activities are regularly conducted, this would not preclude personnel from identifying invasive species at other sites within the Project Boundary. Prior to beginning ground-disturbing activities, Company hydroelectric crews will review the area affected for the presence of these invasive terrestrial plant species. Avoidance of the plant species will be the first option. Avoidance may include blocking off the affected areas so personnel and equipment do not come into contact with the invasive species.
- 7.3. If the terrestrial invasive plant species cannot be avoided during the maintenance or construction activities, field personnel will clean off any soil, vegetation, or aquatic matter prior to leaving an infested area and moving to a non-infested area, to the extent practical.
- 7.4. For projects in or adjacent to wetlands or waterways, inspection for and removal of all plant material and draining of all waters from equipment will be done when equipment is moved from one body of water to another. All equipment that comes in contact with infested waters or wetlands including, but not limited to, tracked vehicles, tires, boats and motors, sheet piling, pumps and hoses, sandbags, and boots will be thoroughly cleaned. The following inspection and removal procedures will be used:
  - 7.4.1. Inspect boat hulls, propellers, trailers, tires, boots, and other surfaces and remove any aquatic plants (fragments, stems, leaves, or roots), animals, or mud, and dispose of debris in a garbage container prior to leaving the water access area;

- 7.4.2. Drain all water from boats, trailers, bilges, live wells, coolers, buckets, engine compartments, pumps/hoses and any other areas where water may be trapped when leaving one water body and entering another.
- 7.5. Cleaning of equipment which does not come into contact with the water will primarily be conducted by brush, broom, or other hand tools. However, the Company may require equipment to be cleaned offsite at the Company's and/or contractor's workshop, if the standard cleaning method will not suffice.
- 7.6. Drain water-related equipment, such as boat ballast or drain bilge, before launch and after trailering. Keep drain plugs open while transporting watercraft.
- 7.7. All maintenance and construction equipment being brought onsite clean and free of invasive species.
- 7.8. Seed used for revegetation activities will be free of invasive species.

## **8. Public Awareness**

Public awareness about invasive species will be increased by displaying invasive species signage supplied by the WDNR. The Company will work with WDNR to ensure that educational signage is placed, as appropriate, at boat landings owned or managed by the Company.

## **9. Plan Review**

Each year following monitoring, the Company and WDNR will evaluate the current status of the Plan in conjunction with the consultation that will be completed before March 1 following monitoring years. The primary goal of reviewing the Plan will be to ensure the Plan remains in compliance and is consistent with current state regulatory requirements. The Company and WDNR will discuss AIS monitoring and management goals. Goals may include monitoring and management strategies to be carried out as efficiently and effectively as possible to gain the most value from the measures being employed.

**ATTACHMENT B**  
**DOCUMENTATION OF CONSULTATION**



## Grisar, Mike L

---

**From:** Laatsch, Cheryl - DNR <Cheryl.Laatsch@wisconsin.gov>  
**Sent:** Tuesday, March 26, 2019 10:42 AM  
**To:** Grisar, Mike L; Nuthals, James D; Roloff, Jessica R  
**Subject:** FW: Response Requested: FW: Invasive Species Management Plans - GFF and TOM - 30 day consultation

See below. Good to go.

**We are committed to service excellence.**

Visit our survey at <http://dnr.wi.gov/customersurvey> to evaluate how I did.

Cheryl Laatsch  
Statewide FERC Coordinator  
Bureau of Environmental Analysis and Sustainability  
Wisconsin Dept of Natural Resources  
N7725 Hwy 28  
Horicon WI 53032  
(T) 920-387-7869 (Fax) 920-387-7888  
[Cheryl.laatsch@wisconsin.gov](mailto:Cheryl.laatsch@wisconsin.gov)



---

**From:** Wirt, Alan W - DNR  
**Sent:** Tuesday, March 26, 2019 9:42 AM  
**To:** Laatsch, Cheryl - DNR <Cheryl.Laatsch@wisconsin.gov>  
**Subject:** RE: Response Requested: FW: Invasive Species Management Plans - GFF and TOM - 30 day consultation

Cheryl

I have reviewed both the plans submitted as drafts from WPS. I see nothing of concern with either and they follow all the points covered with the conversation we had with Mike. They look good and I have not further comments at this time.

If any further question come up please feel free to contact me.

**We are committed to service excellence.**

Visit our survey at <http://dnr.wi.gov/customersurvey> to evaluate how I did.

Alan W. Wirt  
Water Resource Management Specialist  
Wisconsin Department of Natural Resources  
Rhineland, Wisconsin 54501  
Office: 715-365-8905  
Cell Phone: 715-892-5413  
Email: [Alan.Wirt@wisconsin.gov](mailto:Alan.Wirt@wisconsin.gov)



---

**From:** Laatsch, Cheryl - DNR  
**Sent:** Monday, March 25, 2019 4:31 PM  
**To:** Wirt, Alan W - DNR <[Alan.Wirt@wisconsin.gov](mailto:Alan.Wirt@wisconsin.gov)>  
**Subject:** Response Requested: FW: Invasive Species Management Plans - GFF and TOM - 30 day consultation  
**Importance:** High

Hi – Here are the plans that were discussed with WPS. Please review and have comments back to me by April 12<sup>th</sup> at the latest, so we can meet our consultation requirements. Thanks for the help.

**We are committed to service excellence.**

Visit our survey at <http://dnr.wi.gov/customersurvey> to evaluate how I did.

Cheryl Laatsch  
Statewide FERC Coordinator  
Bureau of Environmental Analysis and Sustainability  
Wisconsin Dept of Natural Resources  
N7725 Hwy 28  
Horicon WI 53032  
(T) 920-387-7869 (Fax) 920-387-7888  
[Cheryl.laatsch@wisconsin.gov](mailto:Cheryl.laatsch@wisconsin.gov)



---

**From:** Grisar, Mike L <[mike.grisar@wecenergygroup.com](mailto:mike.grisar@wecenergygroup.com)>  
**Sent:** Monday, March 25, 2019 4:18 PM  
**To:** Laatsch, Cheryl - DNR <[Cheryl.Laatsch@wisconsin.gov](mailto:Cheryl.Laatsch@wisconsin.gov)>  
**Cc:** Jastremski, Todd P <[todd.jastremski@we-energies.com](mailto:todd.jastremski@we-energies.com)>; Roloff, Jessica R <[jessica.roloff@wecenergygroup.com](mailto:jessica.roloff@wecenergygroup.com)>; Nuthals, James D <[james.nuthals@wecenergygroup.com](mailto:james.nuthals@wecenergygroup.com)>  
**Subject:** Invasive Species Management Plans - GFF and TOM - 30 day consultation

Good afternoon, Cheryl,

Please find attached our Invasive Species Management Plans for our Grandfather Falls and Tomahawk hydro projects. We want to thank you and the other WDNR staff for our conversations leading up to this. We believe we have addressed everything we have discussed most recently in the revised plans. Both plans are nearly identical, with one exception. The Tomahawk project has less information regarding monitoring and BMP implementation for forestry practices simply due to the fact that there is almost no harvestable forest area at Tomahawk.

Please consider this electronic submittal the initiation of the formal 30-day consultation period. Our plan remains to try to file these with the FERC by the first week of May to be able to file them in advance of the deadlines we have for both plans later in May.

I will be on vacation this week and Jes is on leave as you may recall. Any questions you may have, we'll look forward to communicating on them in the next several weeks.

Sincerely,

Mike

***Mike Grisar***

Principal Ecologist

WPS - Environmental

333 W. Everett Street - Rm. A231

Milwaukee, WI 53203

(414) 221-5426

WARNING: This email was sent from an external address. Exercise caution when opening links or attachments.

Document Content(s)

20190514 GFF Env out - IS MGNT PLAN.PDF.....1-1

20190514 GFF Attach A and Attach B.PDF.....2-11