



Upper Peninsula Power Company

700 North Adams Street
P.O. Box 19001
Green Bay, WI 54307-9001
www.uppco.com

June 25, 2008

FERC Project No. 10855

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

Dear Secretary Bose:

Silver Lake Reservoir Rebuild-Temporary Nuisance Plant Control Plan Measures

According to the Notice of Availability of Environmental Assessment dated June 3, 2008, Upper Peninsula Power Company (UPPCO) is required to consult with the Michigan Department of Natural Resources (MDNR) and the U.S. Fish and Wildlife Service (FWS) regarding any temporary measures that should be added to the Project's Nuisance Plant Control Plan as approved under license article 412, or the use of other temporary measures to address the Proposed Action, as appropriate.

UPPCO provided a draft plan including measures it believed to be appropriate to the MDNR and FWS for comment. The MDNR responded with comments and the FWS concurred with the MDNR comments (See Documentation of Consultation Appendix 1). The draft plan has been modified to incorporate the MDNR comments. However, regarding the last MDNR request that UPPCO monitor and control for newly identified species as recommended by the MDNR and/or FWS, UPPCO has added a time limit of five years (through the end of year 2013). UPPCO believes the time limit to be appropriate because any introduction of invasive species as a result of the rebuild construction would most-likely occur within five years of the completion of construction.

The final proposed plan is enclosed in Appendix 2.

Should you have any questions please do not hesitate to contact Shawn Puzen at (920) 433-1094.

Sincerely,

A handwritten signature in black ink, appearing to read "T. Jensky".

Terry P. Jensky
Vice President - Energy Supply Operations
for Wisconsin Public Service Corporation
Telephone: (920) 433-2900

syx

Enc.

cc: Mr. Ben Trotter, WPSC - REG Mr. Jamie Nuthals, IBS - D2
Mr. Jeff Krueger, WPSC - REG Mr. Pat Fulsher, UPPCO - UISC
Mr. Gil Snyder, WPSC - D2 Mr. Robert Meyers, UPPCO - UISC
Ms. Jessica Mistak, MDNR Ms. Christie Deloria, FWS
Ms. Peggy Harding, FERC - CHI Ms. Joan Johaneck, WPSC - D2

Appendix 1

Documentation of Consultation

Appendix 1
Documentation of Consultation



STATE OF MICHIGAN
DEPARTMENT OF NATURAL RESOURCES
LANSING



Refer to: 4202.2.7

June 24, 2008

Shawn Puzen
Upper Peninsula Power Company
P.O. Box 19002
Green Bay, WI 54307

Dear Mr. Puzen:

SUBJECT: Silver Lake Invasive Species Management Plan Comments (P-10855)

The Michigan Department of Natural Resources (DNR) has reviewed the Invasive Species Management Plan associated with the rebuild of Silver Lake. We have the following comments:

- To reduce the transfer of fish diseases such as Viral Hemorrhagic Septicemia (VHS), we recommend that you follow a process similar to that proposed for zebra mussels and rusty crayfish whereby all watercraft are thoroughly dried for at least five days prior to use or rinsed with a solution of chlorine bleach.
- To prevent non-native plant species from entering the site, construction equipment should be washed and free of soil from other sites.
- Over time, it may become necessary to monitor and control for newly established invasive species not identified in the Invasive Species Management Plan. To resolve this concern, we request that UPPCO monitor and control for newly identified species as recommended by the DNR and/or U.S. Fish and Wildlife Service.

If you have any questions about this matter, please contact me at 906-249-1611 ext 308 or 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: Christie Deloria, FWS
George Madison, DNR
Chris Freiburger, DNR

NATURAL RESOURCES COMMISSION
Keith J. Charters, Chair • Mary Brown • Hurley J. Coleman, Jr. • Darnell Earley • John Madigan • J. R. Richardson • Frank Wheatlake
STEVENS T. MASON BUILDING • P.O. BOX 30026 • LANSING, MICHIGAN 48909-7528
www.michigan.gov/dnr • (517) 373-2329

Great Lakes, Great Times, Great Outdoors!

Appendix 1
Documentation of Consultation

Puzen, Shawn C

From: Christie_Deloria@fws.gov
Sent: Tuesday, June 24, 2008 12:28 PM
To: Puzen, Shawn C
Cc: Freiburger, Chris; Madison, George; mistakjl@michigan.gov
Subject: Re: Silver Lake Rebuild Invasive Species Management Plan
Attachments: Silver Lake Invasive Species Mgmt_Plan 6-2008.doc



Silver Lake Invasive
Species M...

The Service concurs with the MDNR comments.

Christie

Christie Deloria-Sheffield
Fish & Wildlife Biologist

U.S. Fish & Wildlife Service
Upper Peninsula Sub-Office
Ecological Services
3090 Wright Street
Marquette, MI 49855
(906) 226-1240 Telephone
(906) 226-3632 FAX
(906) 360-1811 Mobile

"Jessica Mistak"
<mistakjl@michigan.gov>

06/24/2008 01:22 PM

Christie_Deloria@fws.gov, "Puzen,
Shawn C"
<SCPuzen@integrysgroup.com>

"Freiburger, Chris"
<FREIBURG@michigan.gov>, "Madison,
George" <MADISONG@michigan.gov>
Subject
Re: Silver Lake Rebuild Invasive
Species Management Plan

Hi Shawn,
DNR comments are attached.
Jess

>>> "Puzen, Shawn C" <SCPuzen@integrysgroup.com> 06/05/2008 2:47 PM >>>

Appendix 1
Documentation of Consultation

Peggy-

Per the Environmental Assessment, attached is an Invasive Species Management Plan for the rebuild of the Silver Lake Reservoir. By this same email, I am providing it to the MDNR and FWS for official comment before it is filed with the Commission as a temporary amendment to the plan.

UPPCO's intent is to implement these measures contained in this draft plan during construction. UPPCO will follow up on a filing with the Commission once the agency comments are received.

Also, please note, all archaeological sites within the construction area have been flagged with a five meter buffer for avoidance.

Lastly, per our conversation, about the dam tenders cabin where John Voelker is believed to have written the story "Anatomy of a Murder" the cabin along with the two historic scatters (Archaeological Site MQ83) will not be disturbed as part of the construction. Even though the cabin, was determined to not be eligible for the National Register of Historic Places, the cabin and two historic scatters will not be disturbed as part of the construction.

Please let me know if you have any questions...

Thanks,
<<Silver LAke Invasive Species Control and Monitrong Plan.pdf>> Shawn C. Puzen
Environmental Consultant Integrys Business Support, LLC
(920) 433-1094
scpuzen@integrysgroup.com
PLEASE NOTE EMAIL ADDRESS CHANGE ABOVE

Providing support for Integrys Energy Group, Integrys Energy Services, Michigan Gas Utilities, Minnesota Energy Resources, North Shore Gas, Peoples Gas, Upper Peninsula Power, Wisconsin Public Service, and Wisconsin River Power Company

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Appendix 2

Proposed Nuisance Plant Control Measures

Appendix 2
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**SILVER LAKE REBUILD
INVASIVE SPECIES MANAGEMENT PLANS**

Appendix 2
Proposed Nuisance Plant Control Measures

Upper Peninsula Power Company (UPPCO) has been conducting purple loosestrife (*Lythrum salicaria*) surveys on Silver Lake Basin annually since 2003. To date, no purple loosestrife has been identified on the basin. UPPCO is also required to survey for eurasian water milfoil (*Myriophyllum spicatum*) every three years on the Silver Lake Basin, with the last survey being completed in 2005.

A majority of the construction area lies within the part of the reservoir that will be inundated after the refill of Silver Lake Basin. It is unlikely that any of the construction activities will result in the introduction of Eurasian water milfoil because the majority of the construction will occur in the dry areas of the reservoir. Therefore, UPPCO will rely on the requirements of the current Nuisance Plant Control Plan approved on May 17, 2005 under Article 412 of the License for future monitoring and control of any Eurasian water milfoil.

Zebra Mussels (*Dreissena polymorpha*) have been identified on the Great Lakes. Therefore, they may pose a threat for possible introduction into the Silver Lake Reservoir. In an effort to reduce the potential for introduction, UPPCO will thoroughly inspect any watercraft or barges that may be utilized as part of the construction process prior to use. The inspection will be for mature mussels and bilge or standing water within the watercraft or barges. Any barges or watercraft will be either thoroughly dried for at least five days prior to use or rinsed with a solution of chlorine bleach if they contain wet areas within the bilge hold or standing water. Any barges or watercraft with attached mature mussels will be prohibited from use on this project.

Rusty Crayfish (*Orconectes rusticus*) have been identified on the Great Lakes and in many lakes throughout the Upper Peninsula. Therefore, they may pose a threat for possible introduction into the Silver Lake Reservoir. In an effort to reduce the potential for introduction, UPPCO will thoroughly inspect any watercraft or barges that may be utilized as part of the construction process prior to use. The inspection will be for mature crayfish and bilge or standing water within the watercraft or barges. Any barges

Appendix 2
Proposed Nuisance Plant Control Measures

or watercraft will be either thoroughly dried for at least five days prior to use or rinsed with a solution of chlorine bleach if they contain wet areas within the bilge hold or standing water.

After construction is complete, UPPCO will routinely survey the previously disturbed areas within the construction area for terrestrial invasive species such as, garlic mustard (*Alliaria petiolata*) and purple loosestrife. Each year, one survey will occur in mid-June for garlic mustard and one survey in late July for purple loosestrife. Any garlic mustard that is identified will be pulled before the seeds are set and disposed of in an appropriate manner to eliminate the potential for the spread of the plant. If any purple loosestrife is identified, it will be cut and sprayed with an appropriate aquatic herbicide before the plant produces seeds.

To prevent non-native plant species from entering the site, construction equipment should be washed and free of soil from other sites.

UPPCO will file annual reports on the results of the surveys and any control activities that have taken place by August 31 of each year. The first report will be submitted prior to August 31, 2009 and the last report (third year report) will be submitted before August 31, 2011.

If any of these species persist beyond that time period, UPPCO will consult with the Michigan Department of Natural Resources (MDNR) and the U.S. Fish and Wildlife Service (FWS) in proceeding with the survey and control protocol. If this consultation occurs, UPPCO will revise the Silver Lake Rebuild Invasive Species Control plan in consultation with the MDNR and FWS and submit it to the Commission for approval. Until end of year 2013, UPPCO will monitor and control for newly identified species as recommended by the MDNR and/or FWS.

Document Content(s)

20080625 FERC Invasive Species Plan.PDF.....1-9