

November 8, 2024

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Ms. Debbie-Anne Reese, Secretary
Federal Energy Regulatory Commission
888 First Street, NE
Washington, DC 20426

Subject: **Response to National Park Service Comments on Environmental Assessment
Cornell Hydroelectric Project (FERC Project No. 2639-028)**

Dear Secretary Reese:

On October 10, 2024, the National Park Service (NPS) provided comments¹ on the draft Environmental Assessment (EA) for the Cornell Hydroelectric Project (P-2639). The draft EA was issued by the Federal Energy Regulatory Commission (FERC or Commission) on September 10, 2024. NSPW hereby submits its responses to the NPS comments on the draft EA.

NPS Comment 1:

Ice Age National Scenic Trail and Recreation Resource Management Plan Recommendations
The NPS appreciates FERC's inclusion of many of the measures recommended by the NPS, such as expanding the brochure to include the Ice Age National Scenic Trail and consultation on the Recreation Resource Management Plan (RRMP). The NPS would like to be consulted on the RRMP throughout the life of the license, including any future changes or amendments to the project.

NSPW Response:

In Section 8.6 of Exhibit E of the final license application (FLA), NSPW proposed to consult with the City of Cornell, Wisconsin Department of Natural Resources (WDNR), Ice Age Trail Alliance, NPS, and the River Alliance of Wisconsin (RAW) when developing the recreation plan. The plan will include a provision for completing recreation use surveys every five years during the term of the new license. The results of these periodic surveys, which will include a discussion regarding the need for recreation facility improvements, will be sent to the consulting parties for review and comment.

NPS Comment 2:

We recommend that the RRMP include a provision for plan revisions every ten years and periodic assessments of recreation opportunities and needs based on the recreation use and demand over the life of the license.

NSPW Response:

As noted in Section 8.6 of Exhibit E of the FLA, the recreation plan will include a provision to conduct recreation surveys every five years during the term of the license. In addition, as stated in the draft EA, NSPW proposed the following:

¹ [Accession #20241010-5223](#).

Develop a recreation management plan that includes: (1) proposed recreation enhancements and a schedule for their completion; (2) conceptual designs for the enhancements at the 266th Street access, east side tailwater fishing access, the city boat landing, and Mill Yard Park; and (3) a recreation inventory and condition assessment every five years.

As stated in the draft EA, Commission staff also recommended the following:

Modify the proposed recreation management plan to include: (1) a statement that enhancements at Mill Yard Park and the city boat landing are one-time measures; (2) a description of the remaining enhancements to the east side tailwater fishing access shoreline trail; (3) a draft brochure for stakeholder review; (4) a recreation resource report every five years; and (5) consultation with the City of Cornell to determine the location of the Mill Yard Park and city boat landing enhancements.

The results of the recreation inventory and condition assessment will be included in the recreation resource report, which will also include a discussion on whether there is a need for recreation facility improvements. The City of Cornell, WDNR, Ice Age Trail Alliance, NPS, and River Alliance of Wisconsin will be afforded a minimum of 30 days to provide comment on the report. NSPW will respond to or otherwise address agency comments prior to submitting the plan for Commission approval.

Once the recreation enhancements identified in the recreation management plan are completed, there is no need to update the plan. The five-year survey and reporting requirements in the plan will serve to address future recreation needs.

NPS Comment 3:

The NPS would also like to be consulted on the brochure's development, and any use of the NPS or Ice Age National Scenic Trail logo would need NPS approval. Northern State Power representatives can contact Eric Gabriel at 608-798-8690 or eric_gabriel@nps.gov for assistance with this NPS approval process.

NSPW Response:

As discussed in Section 8.5.2 of Exhibit E of the FLA, and as outlined in the draft EA, NSPW will consult with the NPS during the development of the brochure as part of the development of the recreation management plan.

The comment is noted; however, the development of the brochure does not require the use of the Ice Age Trail logo.

NPS Comment 4:

Land and Water Conservation Fund Recommendations

The Brunet State Park has received federal funding from the Land and Water Conservation Fund (LWCF). If the proposed hydropower project or any future changes or amendments may affect this park, please contact the NPS and the state agency that administers the LWCF program for the State of Wisconsin.

*The NPS LWCF contact is: Ms. Andrea Messam LWCF Program Midwest Region National Park Service 601 Riverfront Drive
Omaha, NE 68102
andrea_messam@nps.gov, 402—661—1564*

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*The state contact information is: Ms. Pamela Rood,
Grant Manager
Bureau of Facilities and Land
Wisconsin Department of Natural Resources,
S. Webster St., Madison, WI 53707 pamelaa.rood@wisconsin.gov, 608-333-3718*

NSPW Response:

NSPW has proposed to exclude Brunet Island State Park (park) from the Cornell Project boundary. As such, consultation with NPS regarding the LWCF is unnecessary because the proposed operation of the Cornell Project is not expected to adversely impact the park. However, as noted above, recreation surveys will be completed every five years during the term of the new license.² The results of each survey, including the need for any recreational facility improvements, will be provided to the consulting parties, including the NPS.

Pursuant to Section 5.4 of Exhibit E of the FLA, and as outlined in the draft EA, NSPW has proposed to develop an operations monitoring plan, which will include procedures for reporting planned and unplanned deviations. Although no effects to the park from Project operations have been identified, the WDNR (owner) will be notified of any planned or unplanned deviations to Project operations. The WDNR can then provide this information to their internal LWCF contact in the event of any potential impacts to LWCF grant funded projects.

Should you have any questions regarding this material, please contact Matthew Miller at 715-737-1353 or matthew.j.miller@xcelenergy.com.

Sincerely,

Scott Crotty
Senior Hydro Operations Manager

Enclosure

CC: David Thomson, National Park Service
Alyssa Wethy, National Park Service

² All recreation sites providing access to the Project reservoir, including Brunet Island State Park and those owned by the City of Cornell, will be evaluated during each five-year recreation survey.