



Revised Study Plan

Gile Flowage Storage Project
FERC Project No. 15055

Montreal River, Iron County, Wisconsin

Submitted by



Northern States Power Company – Wisconsin
Eau Claire, Wisconsin

Report prepared by



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Appendix I	Water Quality Monitoring Study
Appendix J	Whitewater Recreation Flow Study
Appendix K	Wood Turtle Study
Appendix L	Gile Flowage ER Review
Appendix M	2005 Gile Flowage Littoral Zone Survey
Appendix N	West Branch Montreal River Internet Flow Study

List of Abbreviations

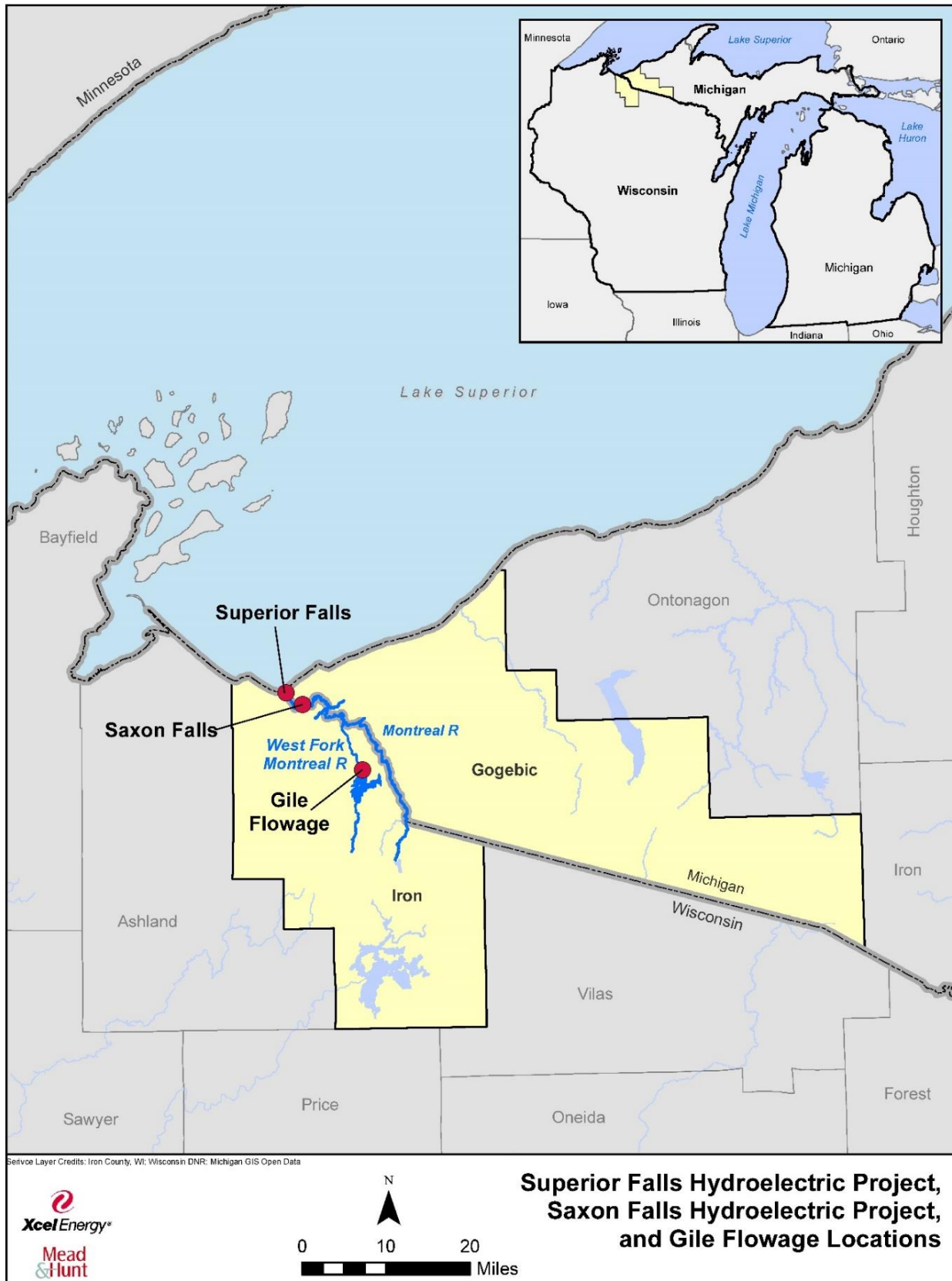
AIR	Additional Information Request
Applicant	Northern States Power Company – Wisconsin, d/b/a Xcel Energy
APE	Area of Potential Effect
CFR	Code of Federal Regulations
cfs	Cubic Feet per Second
Commission	Federal Energy Regulatory Commission
Dam	Gile Flowage dam
DLA	Draft License Application
DO	Dissolved oxygen
EPA	Environmental Protection Agency
FERC	Federal Energy Regulatory Commission
FLA	Final License Application
FOG	Friends of the Gile Flowage
ILP	Integrated Licensing Process
IPaC	Information for Planning and Consultation
ISR	Initial Study Report
NEPA	National Environmental Policy Act
NGVD	National Geodetic Vertical Datum
NHI	National Heritage Inventory
NLEB	Northern long-eared bat
No.	Number
NOI	Notice of Intent
NGO	Non-governmental Organization
NPS	National Park Service
NR 40	Chapter NR 40 of the Wisconsin Administrative Code
NRHP	National Register of Historic Places
NSPW	Northern States Power Company – Wisconsin d/b/a Xcel Energy
PAD	Preliminary Application Document
PLP	Preliminary Licensing Proposal
PM&E Measures	Protection, Mitigation, and Enhancement Measures
Project	Gile Flowage Storage Reservoir Project
PSP	Proposed Study Plan
RAW	River Alliance of Wisconsin
RSP	Revised Study Plan
§	Section
SD1	Scoping Document 1
SD2	Scoping Document 2
SHPO	Wisconsin Historical Society State Historic Preservation Office
SWF	Spiny Water Flea
USC	United States Code
USR	Updated Study Report
USFWS	U.S. Fish and Wildlife Service
USGS	U.S. Geological Survey
WDNR	Wisconsin Department of Natural Resources
WHPD	Wisconsin Historic Preservation Database

1. Introduction

Northern States Power Company-Wisconsin (NSPW or Applicant), d/b/a Xcel Energy, owns and operates the Gile Flowage Storage Project (Gile Flowage or Project). The Project is located on the West Fork of the Montreal River (West Fork) in Iron County, Wisconsin and currently operates under a permit issued by the Public Service Commission of Wisconsin (PSCW). The purpose of the Project is to augment flow in the West Fork during low flow periods for hydroelectric generation at NSPW's downstream Saxon Falls and Superior Falls Hydroelectric Projects. Both projects are licensed by the Federal Energy Regulatory Commission (FERC or Commission). The Commission issued an order on August 19, 2020, determining that the Gile Flowage Storage Project is required to be licensed as it provides a significant contribution to generation for both downstream projects.

The Project is located within the towns of Pence and Carey, Iron County, Wisconsin approximately 2.5 miles southwest of the neighboring cities of Hurley, Wisconsin and Ironwood, Michigan and approximately 33 miles southeast of the City of Ashland, Wisconsin. The Applicant is not currently proposing any changes to the operations of the Project as part of licensing.

Figure 1-1: Locations along the Montreal River in Wisconsin and Michigan



1.1 Study Plan Overview

The Applicant filed a Pre-Application Document (PAD), Notice of Intent (NOI), and request to use the Traditional Licensing Process (TLP) with FERC on November 17, 2020 seeking an original license for the Gile Flowage Storage Project. The PAD provides a complete description of the Gile Flowage Storage Project, including its structures, operations, and potential effect on environmental and cultural resources. The Applicant distributed the PAD and NOI simultaneously to federal and state resource agencies, local governments, Native American tribes, members of the public, and others thought to be interested in the licensing proceeding. FERC subsequently issued a letter on January 19, 2021 denying NSPW's request to use the TLP and stated that the ILP must be used.

The National Environmental Policy Act of 1969 (NEPA), FERC regulations, and other applicable statutes require FERC to independently evaluate the environmental effects of issuing an original license for the Project, and to consider reasonable alternatives to licensing. Following the filing of the PAD, FERC prepared and issued Scoping Document 1 (SD1) on January 19, 2021. SD1 was intended to advise resource agencies, Indian Tribes, NGOs, and other stakeholders as to the proposed scope of the NEPA document and to seek additional information pertinent to FERC's analysis. As provided in 18 CFR §5.8(a) and §5.8(b), FERC issued a notice of commencement of the licensing proceeding associated with SD1. Due to concerns with large gatherings regarding COVID-19, FERC waived the requirement to conduct a public scoping meeting and site visit. FERC provided agencies and interested parties an opportunity to file written comments, recommendations, and information on the PAD and SD1 and request studies by March 17, 2021.

FERC's ILP regulations require that stakeholders who provide study requests include specific information in their request in order to allow the Applicant, as well as FERC staff, to determine a requested study's appropriateness and relevancy to the Project and proposed action. As described in 18 CFR §5.9 of FERC's ILP regulations, the required information to be included in a study request is as follows:

1. Describe the goals and objectives of each study proposal and the information to be obtained;
2. If applicable, explain the relevant resource management goals of the agencies or Indian tribes with jurisdiction over the resource to be studied;
3. If the requester is not a resource agency, explain any relevant public interest considerations in regard to the proposed study;
4. Describe existing information concerning the subject of the study proposal, and the need for additional information;
5. Explain any nexus between Project operation and effects (direct, indirect, and/or cumulative) on the resource to be studied, and how the study results would inform the development of license requirements;
6. Explain how any proposed study methodology (including any preferred data collection and analysis techniques, or objectively quantified information, and a schedule including appropriate field season(s) and the duration) is consistent with generally accepted practice in the scientific community or, as appropriate, considers relevant tribal values and knowledge; and
7. Describe considerations of level of effort and cost, as applicable, and why any proposed alternative studies would not be sufficient to meet the stated information needs.

During the comment period, a total of 8 stakeholders, including the FERC, provided comments and study requests. These comments and study requests were discussed in Section 3 of the PSP with the corresponding letters included in Appendix A. Additionally, FERC filed additional information requests (AIRs) which were addressed in Section 6 of the PSP. The ILP required the Applicant to file the PSP within 45 days from the close of the March 17, 2021 comment period.

The Applicant filed the PSP with FERC on April 30 and May 3, 2021. The purpose of the PSP was to present the studies which are being proposed by the Applicant and to address the comments and study requests submitted by resource agencies and other stakeholders. NSPW held a PSP Meeting on May 20, 2021, for the purpose of presenting the proposed studies and responding to any comments or questions.

Pursuant to the ILP schedule, resource agencies and stakeholders were afforded until July 30, 2021 to provide comments on the PSP. During the comment period, NSPW received comments from FERC, River Alliance of Wisconsin (RAW), Michigan Hydro Relicensing Coalition (MHRC), Wisconsin Department of Natural Resources (WDNR), National Park Service (NPS), American Whitewater (AW), and Friends of the Gile Flowage (FOG). In developing the RSP, NSPW carefully considered agency and stakeholder comments and study requests filed in response to the PAD, SD1, SD2, and the PSP and as discussed during the PSP meeting. Appendix B includes comments received on the PSP. NSPW has incorporated or addressed the comments, as appropriate, within the corresponding study plans as discussed in Section 3 of this RSP.

1.2 Applicant's Revised Study Plan

NSPW proposed the following nine studies in the PSP, 5 of which have been modified for this RSP based on agency/stakeholder comments. The studies are as follows:

- Aquatic and Terrestrial Invasive Species (ATIS) Study (Appendix C)
- Cultural Resources Study (Appendix D)
- Minimum Flow Habitat Evaluation Study (Appendix E)
- Mussel Study (Appendix F)
- Recreation Study (Appendix G)
- Shoreline Stabilization Study (Appendix H)
- Water Quality Study (Appendix I)
- Whitewater Recreation Flow Study (Appendix J)
- Wood Turtle Study (Appendix K)

The ATIS, Minimum Flow Habitat Evaluation, Mussel, and Water Quality studies have not been modified. All other studies have been modified based on comments received on the PSP.

The nine study plans are attached as Appendices C through K. Each study plan describes the following:

- The goals and objectives of the study;
- The defined study area;
- A summary of background and existing information pertinent to the study;
- The nexus between Project operations and potential effects on the resources to be studied;
- The proposed study methodology;
- The level of effort, cost, and schedule for conducting the study; and
- Discussion of alternative approaches.

1.2.1 Comments on the Revised Study Plan

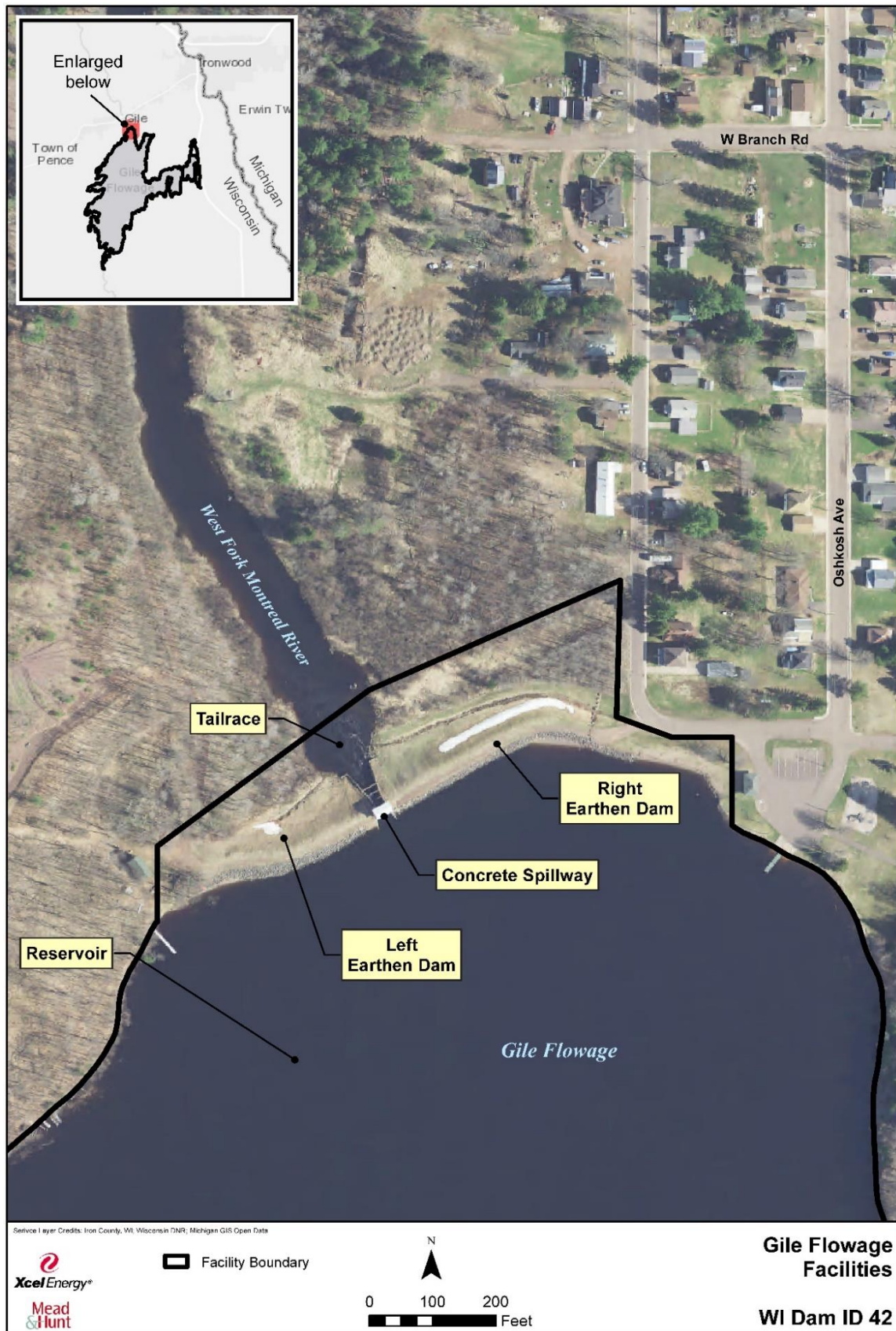
Comments on this RSP, including any additional or revised study requests, must be filed within 15 days of the filing date of this RSP (i.e., no later than September 13, 2021).

1.3 Project Description and Location

The Gile Flowage Storage Project is a headwater storage reservoir located on the West Fork in the Towns of Carey and Pence in Iron County, Wisconsin. The Project consists of (1) a 3,317-acre reservoir with a usable storage capacity of 37,064 acre-feet at a water surface elevation of 1,490.0 feet NGVD; (2) a 30 foot-high by 899 foot-long dam consisting of, from west to east: (a) a 300 foot-long, 30 foot-high earthen embankment with a crest elevation of 1,495 feet NGVD; (b) a 24 foot-long, 30 foot-high concrete spillway section with a crest elevation of 1,495 feet NGVD, a 6 foot-wide, 6 foot-high sluice gate with an invert elevation of 1,465.5 feet NGVD, and a 16 foot-wide by 12 foot-high Tainter gate with a crest elevation of 1,478 feet NGVD; and (c) a 575 foot-long, 30 foot-high earthen embankment with a crest elevation of 1,495 feet NGVD; and (3) appurtenant facilities. The Project does not feature any generating facilities. Existing Project facilities are shown in Figure 1.3-1.

The Project is operated to augment flows in the Montreal River during summer and winter low-flow periods for hydroelectric power generation at the downstream Saxon Falls (P-2610) and Superior Falls (P-2587) Projects. The Project has a maximum allowable drawdown of 15 feet; however, it typically operates with a summer drawdown that averages 5.2 feet and a winter drawdown that averages 6.8 feet.

Figure 1.3-1: Project Facilities



2. Execution of the Study Plan

As required by Section 5.15 of FERC’s ILP regulations, the Applicant must file an Initial Study Report (ISR), hold a meeting with stakeholders and FERC staff to discuss the initial study results (ISR Meeting), prepare and file an Updated Study Report (USR), and convene an associated USR Meeting, if required. All study documents which require filing with the Commission will be submitted by the Applicant via FERC’s e-Filing system.

2.1 Process Plan and Schedule

The Process Plan and Schedule is presented in Table 2.1-1. Gray shaded milestones are unnecessary if there are no formal study disputes. If the due date coincides with a weekend or holiday, the official due date shall be the following business day. Early filings or issuances will not result in changes to these deadlines.

Table 2.1-1: ILP Process Plan and Schedule

Responsible Party	Pre-filing Milestone	Date ¹	FERC Regulation
Applicant	Issue Public Notice for NOI/PAD	11/17/2020	5.3(d)(2)
Applicant	File NOI/PAD with FERC	11/17/2020	5.5, 5.6
FERC	Tribal Meetings	17/17/2020	5.7
FERC	Issue Notice of Commencement of Proceeding; Issue SD1	1/16/2021	5.8
FERC	Environmental Site Review and Scoping Meeting	Waived	5.8(b)(vii)
All Stakeholders	PAD/SD1 Comments and Study Requests Due	3/17/2021	5.9
FERC	Issue Scoping Document 2	5/1/2021	5.10
Applicant	File PSP	5/1/2021	5.11(a)
All Stakeholders	PSP Meeting	5/31/2021	5.11(e)
All Stakeholders	PSP Comments Due	7/30/2021	5.12
Applicant	File RSP	8/29/2021	5.13(a)
All Stakeholders	RSP Comments Due	9/13/2021	5.13(b)
FERC	Director’s Study Plan Determination	9/28/2021	5.13(c)
Mandatory Conditioning Agencies	Any Study Disputes Due	10/18/2021	5.14(a)
Dispute Panel	Third Dispute Panel Member Selected	11/2/2021	5.14(d)
Dispute Panel	Dispute Resolution Panel Convenes	11/7/2021	5.14 (d)(3)

¹ Documents or meetings are due no later than the indicated date. If the due date falls on a weekend or holiday, the deadline is the following business day.

Responsible Party	Pre-filing Milestone	Date¹	FERC Regulation
Applicant	Applicant Comments on Study Disputes Due	11/12/2021	5.14(j)
Dispute Panel	Dispute Resolution Panel Technical Conference	11/17/2021	5.14(j)
Dispute Panel	Dispute Resolution Panel Findings Issued	12/7/2021	5.14(k)
FERC	Director's Study Dispute Determination	12/27/2021	5.14(l)
Applicant	First Study Season	2022	5.15(a)
Applicant	File ISR	9/28/2022	5.15(c)(1)
All Stakeholders	ISR Meeting	10/13/2022	5.15(c)(2)
Applicant	ISR Meeting Summary	10/28/2022	5.15(c)(3)
All Stakeholders	Any Disputes/Requests to Amend Study Plan Due	11/27/2022	5.15(c)(4)
All Stakeholders	Responses to Disputes/Amendment Requests Due	12/27/2022	5.15(c)(5)
FERC	Director's Determination on Disputes/Amendments	1/26/2023	5.15(c)(6)
Applicant	Second Study Season	2023	5.15(a)
Applicant	USR Due	9/28/2023	5.15(f)
All Stakeholders	USR Meeting	10/13/2023	5.15(f)
Applicant	USR Meeting Summary	10/28/2023	5.15(f)
All Stakeholders	Any Disputes/Requests to Amend Study Plan Due	11/27/2023	5.15(f)
All Stakeholders	Responses to Disputes/Amendment Requests Due	12/27/2023	5.15(f)
FERC	Director's Determination on Disputes/Amendments	1/26/2024	5.15(f)
Applicant	File Preliminary Licensing Proposal (PLP) or Draft License Application (DLA)	3/21/2023	5.16(a)
All Stakeholders	PLP/DLA Comments Due	6/19/2023	5.16(e)
Applicant	File Final License Application	8/18/2023	5.17
FERC	Issue Public Notice of License Application Filing	9/1/2023	5.17(d)(2)

3. Responses to Stakeholder Comments on the PSP

Stakeholder comments on the PSP were due July 30, 2021. The following five letters were filed on the Project docket in response to the Applicant's filing of the PSP:

- MHRC letter dated July 21, 2021.
- RAW letter dated July 21, 2021.
- FOG letter filed July 29, 2021.
- WDNR letter dated July 29, 2021.
- NPS letter dated July 30, 2021.
- AW letter dated July 30, 2021.

The MHRC, RAW, FOG, WDNR, NPS, and AW letters are discussed below.

3.1 Midwest Hydro Relicensing Coalition Letter of July 21, 2021

The MHRC filed comments on the PSP in their letter dated July 21, 2021. MHRC provided comments on two studies. This section documents the Applicant's responses to MRHC's comments.

3.1.1 Mussel Study

MHRC recommended expanding the mussel study to include sampling within the reservoir, stating that the operation of the project could influence freshwater mussel populations located within the impoundment. They also recommended that the surveys within the reservoir be conducted twice, once during maximum pond elevation and once during minimum pond elevation. This would allow for a comparison between mussel populations in the littoral areas, which are subject to water levels fluctuations, with those that are permanently inundated.

MHRC's request to conduct reservoir sampling during minimum reservoir elevations does not follow WDNR protocol regarding preferred water temperatures during mussel sampling activities. WDNR indicated that ***"mussel sampling should be conducted when water temperatures exceed 50 °F to minimize thermal stress to the resource. This period will allow mussels disturbed during sampling to re-establish themselves into the substrate."*** A review of reservoir elevations from 1994 through 2016 indicated that minimum reservoir elevations occur in early spring; ranging from late-February to mid-April in most years. In the remaining years, the minimum reservoir elevation occurred in the months of October or November. Water temperatures during any of these timeframes would be less than those recommended by WDNR and sampling during these times may be detrimental to the resource.

NSPW believes that the proposed sampling protocol, which includes one area downstream of the reservoir and one within the reservoir, when combined with substrate information collected via the ATIS Study, will provide sufficient information to determine potential impacts to mussels from continuing Project operations. The information will also help inform FERC with the development of license conditions, if necessary. Therefore, no revisions to the Mussel Study are proposed.

3.1.2 Macroinvertebrate Study

MHRC requested that the macroinvertebrate study be expanded to include sampling within the impoundment for the same reasons given for the mussel study in Section 3.1.1. In the PSP, the Applicant did not propose conducting any macroinvertebrate studies within the reservoir or the river. In their March 5, 2021 study request, WDNR requested that a Macroinvertebrate Study be conducted as a measure to determine water quality in the river downstream of the Project. No other requests for macroinvertebrate sampling were received. There is existing macroinvertebrate sampling information available from two sites on the West Fork downstream of the dam and from four sites on tributaries entering the Gile Flowage. The Water Quality Monitoring Study includes monitoring for 17 different water quality parameters and includes sampling sites within the reservoir and downstream of the dam.

The Applicant believes that the data to be collected from the Water Quality Monitoring Study, when combined with the existing macroinvertebrate information already available, will provide sufficient information to determine water quality within and downstream of the Gile Flowage. Therefore, the Applicant is not proposing to conduct a Macroinvertebrate Study.

3.2 River Alliance of Wisconsin Letter Dated July 21, 2021

RAW filed comments regarding two studies included in the PSP via their letter dated July 21, 2021. This section documents the Applicant's responses to those comments.

3.2.1 Reservoir/Flow Routing Model

RAW requested that a drawdown study with a Reservoir/Flow Routing Model be conducted in their study request letter dated March 17, 2021. In their July 21, 2021 letter comments, RAW indicated that several of the studies included in the PSP will address impacts of daily and seasonal drawdowns on recreation and fish and wildlife habitat. However, they noted that no study was proposed which would specifically evaluate how the various drawdown levels affect the operation of the downstream Saxon Falls and Superior Falls Projects.

In order to provide information regarding how drawdown levels affect downstream generation, the Applicant proposes to develop an operations model. Since both downstream Projects are operated in a run-of-river mode, the model will consist of a spreadsheet-based mass balance tool. For Superior Falls and Saxon Falls, the mass balance calculations in the spreadsheet will be developed using the last 10 years of inflow data and will assume the operation of the Gile will remain the same as it has operated over the last 10 years. For the Gile Flowage, the mass balance calculations will be completed using the same 10 years of inflow data; however, the minimum flows and reservoir elevations will be varied to better understand their effect on downstream generation and the environment. The operations model will be developed as part of the analysis that will evaluate the effects of proposed water levels and minimum flow releases on downstream generation.

3.2.2 Minimum Flows and Habitat Evaluation Study

RAW also provided comments on the proposed Minimum Flow and Habitat Evaluation Study. They indicated that it was not clear which criteria would be used to determine what discharge flow is

considered “suitable” to protect aquatic habitat. They noted that in the US Fish and Wildlife Service’s Instream Flow Incremental Methodology, evaluation elements such as fish or mussel species are often selected. In follow up conversations with RAW, they acknowledged the WDNR should be providing this information to the Licensee regarding its management objectives for this stretch of the river. If the WDNR does not provide the management objectives, the Applicant will utilize existing fisheries data to identify what it believes are the appropriate species to be reviewed as part of any future analysis on minimum flows.

3.3 National Park Service Letter Dated July 28, 2021

NPS filed comments regarding two studies included in the PSP via their letter dated July 28, 2021. This section documents the Applicant’s responses their comments.

3.3.1 Recreation Use Study Instrument (Recreation Interview Form)

The NPS requested that the Applicant revise the recreation survey instrument to better capture recreation experiences and needs. NPS indicated that the recreation use questionnaire does not provide an opportunity for visitors to express any potential concerns over the current conditions and future possibilities for recreation and recreation facilities in the Project area.

The existing Recreation Interview Form has a question allowing additional comments regarding recreation. Should participants wish to comment on additional recreation needs, condition of facilities, opinions about the amount and types of recreation, or any other concerns, they have the opportunity to do so. To address some of NPS concerns, the Applicant has revised the Recreation Interview Form to include the condition of recreation amenities and provide an opportunity to identify any necessary improvements. The Applicant does not propose to form a stakeholder focus group to develop a new Recreation Interview Form.

3.3.2 Evaluation of Existing Recreation on Undeveloped Islands

NPS requested that recreation use counts be conducted on islands when they are surveyed, that they be sampled more frequently, and be surveyed on days other than holidays. NPS also recommended that the recreation questionnaire (Recreation Interview Form) be administered to island users encountered during the island surveys.

The highest recreational use on islands occurs on holiday weekends. Due to the logistics of monitoring the 43 islands located within the Gile Flowage, the Applicant is proposing to survey each island only once, when recreationists are most likely to be present. To address NPS comments, the Applicant has revised the Recreation interview form to include islands. The Recreation Interview Form will be distributed to recreationists encountered when the islands are surveyed. The Applicant has also revised the Recreation Observation Form to include islands, such that recreation counts will take place when islands are surveyed. The revised Recreation Study is located in Appendix G.

3.3.3 Recreational Flow Study

NPS commented that it does not agree that the study should begin with a Level 3 controlled flow study. They believe that Level 1, literature review, and Level 2, site visits, be conducted prior to the proposed Level 3 controlled flow study.

A literature review was conducted by the Applicant, and it identified the 2007 American Whitewater Internet Flow Study, among other information. The study identified suitable recreation flows as a starting point for a controlled flow study. There is also local interest in conducting a controlled flow study. Therefore, NSPW does not propose to include Level 1 and Level 2 protocols into the proposed Whitewater Flow Study.

NPS indicated that having only 3-5 boaters participate in the study was insufficient for evaluating whitewater flows and recommended that the Applicant consider contacting other participants. More specifically, they recommended coordinating with American Whitewater or other groups to post a message to their website or send messages to their group's members.

The Whitewater Recreation Flow Study Plan has been revised to include a minimum of 5 boaters in the study. The 5-boater minimum is not a restriction on the maximum participants. The Applicant will continue working with local paddler Jake Ring to seek additional participants. The Applicant will also inform AW and NPS at least two weeks prior to the scheduled event, so they can help publicize the event and request volunteers to participate. Due to variable weather conditions and river flows in the spring, a two-week notice is anticipated to be the maximum notice that will be able to be provided. All participants intending to participate in the study are requested to RSVP to the Applicant. Participants are also expected to provide their own transportation to and from the put-in/take-out.

The revised Whitewater Recreation Flow Study Plan is located in Appendix J.

3.4 Friends of the Gile Letter Efiled July 29, 2021

FOG e-filed comments on the PSP via their letter dated July 28, 2021. FOG provided general comments regarding all studies and specific comments regarding nine studies. This Section documents the Applicants responses to their comments.

3.4.1 Overall Comment on all Studies

FOG indicated that the organization supports *“that all studies include and evaluation of the impacts from the potential range of water levels in the Gile Flowage. We understand the water level fluctuations could range from the Probable Maximum Flood (PMF) level elevation and /or the 1495’ elevation which the licensee has stated they will retain flooding rights to, to a low of 15-foot allowable drawdown from the 1490.0’ elevation as cited in the Gile Flowage Storage Facility Preliminary Application Document, Section 3.31. This considerable range of water levels would significantly impact recreation uses and access, shoreline stability, fish and wildlife habitats, aquatic and terrestrial invasive species, mussels and wood turtles and cultural resources and should be addressed in the studies.”*

Section 3.3.1 of the Preliminary Application Document (PAD) did not discuss reservoir fluctuation outside of the 15-foot operational range (1,475.0 feet - 1,490.0 feet NGVD). Likewise, the PAD did not include any information discussing flowage rights owned by the Applicant. The Applicant did, however, provide information in the PSP regarding land ownership within the proposed Project boundary and the status of flowage rights on those lands to satisfy FERC's additional information request. This information, included in Appendix M of the PSP, shows that NSPW owns flowage rights to various elevations, ranging from 1,490.0 feet to 1,500.0 feet NGVD. Typically, when dams were originally developed, hydropower owners purchased flowage rights in excess of those necessary to operate the project, often for entire land parcels or sections, rather than to a specific elevation. That does not mean that operation of the Project will necessarily impact those lands². To date, there has been no PMF established for the Gile Flowage. The Project is currently undergoing initial licensing. Prior to initiating this licensing process, the Gile Flowage was not subject to FERC jurisdiction.

The Applicant is not proposing to operate the Project outside the operational range discussed above (1475.0 feet - 1490.0 feet NGVD). A study of the potential impacts outside of this elevation range should not be considered under 18 CFR 5.9(b)(5)³. Indeed, a request to study inflow events up to the PMF would not provide meaningful data in the development of license conditions as the return interval for the PMF is so infrequent. Therefore, NSPW is only proposing to study potential impacts within the 15-foot operational range.

3.4.2 Shoreline Stability Study

FOG indicated that the Shoreline Stability Study would help address their organization's request for a study of water level fluctuation and impacts on habitat, water quality, riparian land property values, and cultural resources. FOG further requested that the study address the impacts of allowable PMF levels to allowable drawdown levels.

As identified in Section 3.4.1 above, there is no PMF currently established for the Gile Flowage. NSPW proposes to operate the reservoir within the 15-foot operational band as discussed above. NSPW is not aware of any inflow events that have caused the reservoir to exceed an elevation of 1,490 feet NGVD, such that unstable erosion areas would be visible. Therefore, the FOG's request to evaluate operational impacts on the environment above 1490.0 feet is unfounded and the Applicant has not proposed additional changes to the Shoreline Stabilization Study.

3.4.3 Historic/Cultural/Geological/Aesthetics Study

FOG supports the Applicant's response to conduct this study. FOG also provided documentation to the Wisconsin State Historical Society (WSHS) on the existence of the Flambeau Trail portage route. The portage route was used by Native Americans and fur traders, crossed the Gile Flowage, and is cited in 1862 Wisconsin public land surveys.

The proposed Cultural Resources Study Plan includes a literature review of the existing information contained within the Wisconsin Historic Preservation Database (WHPD). Therefore, any

³ Retaining flowage rights as an additional protection outside of the proposed operating range is a land rights issue separate from the license and is not a reason, on its own, to study project effects outside of the proposed operation range.

archaeological resources remaining from the Flambeau Trail that are within the Area of Potential Effect (APE) can be identified under the current study plan. The Cultural Resources Study has been revised to extend the APE further downstream of the Gile Dam to address FERC's comments in the PSP Meeting. No other revisions to the Cultural Resources Study are proposed.

3.4.4 Minimum Flow Habitat Evaluation Study

FOG supports NSPW's Minimum Flow Habitat Evaluation Study which will help address FOG's concerns on the impacts of water level fluctuations on aquatic resources. NSPW acknowledges FOG's support for the study.

3.4.5 Aquatic and Terrestrial Invasive Species (ATIS) Study

FOG supports NSPW's proposed Aquatic and Terrestrial Invasive Species Study which will help address FOG's concerns on the impacts of water level fluctuations on invasive species and aquatic resources. FOG also indicated that they plan to continue working with the Applicant to implement project mitigation and enhancement measures as part of the new license.

NSPW acknowledges FOG's support for the study and notes that PM&E measures, if the ATIS study shows they are warranted, will be addressed in the Draft License Application.

3.4.6 Recreation and Facility Use Study

FOG encouraged NSPW to examine the relationship between Gile Flowage water levels and discharge flows in regard to providing adequate recreational experiences for downstream whitewater kayaking. More specifically, the impact of proposed recreation flow releases should be evaluated to determine an adequate balance between reservoir and downstream recreational uses as well as impacts to fish and wildlife habitat. NSPW notes that the data collected during both the Recreation Study and the Whitewater Flow Study will be used to analyze the impacts such that appropriate mitigation measures can be proposed in the license application.

FOG also expressed a desire for recreation use on company-owned islands and shoreline be monitored for camping and other uses in addition to the on-water recreation use assessments proposed. They note that recreation use of NSPW owned shorelines and islands is increasing despite the prohibition of camping and the lack of recreation facilities. In response to the increased recreational use, FOG has increased their voluntary clean-up of the Gile Flowage shoreline from annually to twice per summer. NSPW notes that the proposed Recreation Study Plan incorporates an evaluation of recreational use of the Gile Flowage Islands. This evaluation includes monitoring for camping. The plan limits the monitoring of recreational use along the shoreline to existing designated recreational sites.

FOG supports that the Recreation Study includes an evaluation of existing and future recreational use of both on-water and on-shore recreation while protecting habitat, public safety, and water quality. They plan to continue working with NSPW to evaluate these issues as part of the new license. NSPW would like to emphasize that with the limited number of recreational access sites and shoreline owners, overuse from on-water activities is not expected. Regardless, the Applicant does not have regulatory control or enforcement over recreational uses on the water. Such control and enforcement are the responsibility of the state and local governments.

3.4.7 Fisheries Study

FOG deferred to the WDNR regarding the fisheries study and noted that they intend to collaborate with NSPW and WDNR to support measures that address fisheries management opportunities.

3.4.8 Whitewater Recreation Flow Study

FOG supports NSPW's Whitewater Recreation Flow Study and encouraged that the study include an evaluation of how optimal recreation flows released from the Gile Flowage impact aquatic habitat, recreation, and public safety within the flowage itself.

NSPW acknowledges FOG's support for the Whitewater Recreation Flow Study and notes that the studies included in this RSP will provide sufficient information to determine the impacts regarding aquatic habitat and recreation both on the Gile Flowage and in the West Fork of the Montreal River downstream of the Project.

3.4.9 Water Quality Monitoring Study

FOG supports NSPW's Proposed Water Quality Monitoring Study and notes that the organization conducts 3-4 water quality samplings on the Gile Flowage each May to September as part of WDNR's Citizen Lake Monitoring Program.

NSPW acknowledges FOG's support for the Water Quality Study and notes that Citizen Lake Monitoring information was provided in the PAD. Additional Citizen Lake Monitoring information collected since that time will be provided in the DLA when it is submitted.

3.4.10 Mussel and Wood Turtle Studies

FOG supports the Mussel and Wood Turtle Studies and defers to the state and federal agencies with greater expertise to provide comments. NSPW acknowledges FOG's support for the Wood Turtle Study.

3.5 Wisconsin Department of Natural Resources Letter Dated July 29, 2021

WDNR filed several comments on the PSP in their letter dated July 29, 2021. This section documents the Applicant's responses their comments.

3.5.1 Comment on PSP Project Description and Location

WDNR requested a definition of "low-flow" in the *Project Description and Location* section of the PSP. They requested that NSPW identify what criteria is used to determine if there is "low flow", and how decisions are made on when and to what degree the Applicant augments flow in the river.

The terms are intended to be subjective in the Project Description and Location section of the PSP. They require no further clarification for the purposes of providing comments on the PSP.

3.5.2 Recreational Flow Study

WDNR noted that changes to flows during certain times of the year can have adverse impacts on the resource, especially if the flows are above or below normal conditions. They requested that the Recreational Flow Study be coordinated with WDNR to minimize the impacts to the resources and to try to replicate natural conditions as much as practical.

From a comprehensive view of all resource concerns, including recreation, the Whitewater Flow Study must occur when flows are available and when impacts to reservoir elevations are minimal. Based on the Applicant's knowledge of Project operations, the study is proposed to occur after spring runoff, but before the low flow summer months. This approach already meets WDNR's concern that whitewater releases try to replicate natural conditions. Spring precipitation events typically, and often times significantly, increase flows in the West Fork of the Montreal River when the study is planned to occur. Therefore, NSPW has not revised the study plan to consult with WDNR regarding the exact timing of the study.

3.5.3 Aquatic and Terrestrial Invasive Species Study:

WDNR noted that the purpose of stocking bluegill is to provide a recreational fishery and food source for walleye. While bluegill may be a predator of spiny water flea, the stocking of bluegill should not be considered a control mechanism and that regardless of control, data is needed to document baseline conditions of all aquatic invasive species.

The proposed ATIS study plan incorporates the WDNR's study methodology regarding spiny water flea as requested in their original study request letter dated March 5, 2021. The methodology section states: ***"Detection protocols for spiny water flea do not need to be conducted, since their presence is known."*** Since the study already incorporates WDNR's requested methodology, the Applicant is not proposing any changes to the ATIS study plan.

3.5.4 Minimum Flow, Drawdown, and Resource Impacts Study

WDNR noted the fishery surveys conducted in 2017 downstream of the Gile Dam were not for the same purpose as assessing resource impacts from operations. WDNR noted that while they can document the expected diversity of the fishery, impacts from operations are not understood.

The 2017 survey documents the fish species that are present in the river downstream of the dam. Therefore, the information required for evaluating minimum flow releases is already available and no additional fish sampling is being proposed by NSPW as part of the Minimum Flow Habitat Evaluation Study.

3.5.5 Comment on Gile Flowage Fish Management Plan

WDNR noted that the Fisheries Management Plan for the Gile Flowage (2005) is important for assisting with directing management efforts for the fishery. The plan provides a compilation of measurable objectives for fish populations, which were derived from public input/preferences for opportunities provided by the resource. WDNR indicates that fisheries science and local knowledge have advanced substantially since the plan was developed and while measurable objectives may still be pertinent, other information and suggestions in the plan may no longer be relevant or accurate.

The resource agency is responsible for updating their management plan and providing resource management goals to guide the Applicant's studies. No such information has been provided to the Applicant other than the 2005 management plan.

3.5.6 Fish Movement Study

WDNR reiterated their request for a fish movement study. They indicated that the study was recommended to better understand impacts to the fishery as a result of operational drawdowns and changes in available habitat. Specifically, WDNR is requesting more information regarding walleye/musky immigration to or emigration from the Gile Flowage and if these movements are directly or indirectly related to dam operations, drawdowns, and habitat availability during various life cycles. WDNR indicates that this type of assessment is best suited for long-term observation and evaluation and that while a one-year study may start to provide meaningful information, the need for information extends beyond the study timeline allotted in the licensing process.

Significant fisheries data is currently available for the Gile Flowage and the upstream and downstream reaches of the West Fork of the Montreal River. The ATIS Study and Shoreline Stabilization Study proposed in this RSP will address habitat conditions within the reservoir independent of any fish movement study. The Minimum Flow Habitat Evaluation Study will assess habitat conditions downstream of the project. Although the WDNR states their study purpose is to understand the impacts of operational drawdowns, their primary concern (available habitat during operational drawdowns) is already proposed to be studied through other effective studies discussed herein.

WDNR indicated that the proposed study would require the installation of 4 pit tag readers at a cost of \$50,000 each, approximately \$25,000 for pit tags, and approximately \$60,000 for labor (assuming 20 field days for three staff at a rate of \$125 per hour). The WDNR has not demonstrated a need for this expensive study when the same data to address their concerns is already proposed to be collected.

NSPW believes that a \$285,000 study, in addition to the numerous studies already proposed in this RSP, is cost prohibitive for a storage project that augments flow for only 3.15 MW of installed capacity at the downstream Saxon Falls (1.50 MW) and Superior Falls (1.65 MW) Hydroelectric Projects.

In summary, a one-year fish movement study will not likely provide the information needed to inform the development of license conditions. Furthermore, significant fisheries information is currently available, habitat conditions will be identified through other proposed studies, and the WDNR-proposed study is cost prohibitive. Therefore, NSPW has not proposed a Fish Movement Study as part of this RSP.

3.5.7 Water Quality Study

WDNR supports the removal of the cyanobacteria and methyl mercury from the Water Quality Study. However, they are still recommending a single macroinvertebrate kick sample from below the Gile Dam (Hwy. 77).

NSPW acknowledges WDNR's support for their decision to remove sampling for cyanobacteria and methyl mercury from the proposed Water Quality Monitoring Study. WDNR indicated in their study request letter dated March 5, 2021, that their objective was to conduct a macroinvertebrate study to

assess the water quality downstream of the dam. NSPW does not believe that the WDNR has provided specific additional information on why the 17 different water quality parameters, which will be monitored under the Water Quality Study within the reservoir and downstream of the dam, are not sufficient to assess water quality. Furthermore, they have not justified that macroinvertebrate sampling is necessary to provide sufficient information for FERC to determine the impacts of continuing project operations as well as develop license conditions.

3.5.8 Wildlife and Wildlife Habitat Study

WDNR indicated that assessment of wildlife diversity and habitat are needed to understand baseline conditions. They reiterated the need to adequately identify baseline wildlife conditions of all public lands, islands, and lands under ownership/operation/lease by the Applicant.

NSPW believes that the studies proposed in this RSP will adequately address the current state of wildlife and wildlife habitat and any potential impacts caused by continued Project operations. The ATIS Study will identify aquatic plant species and bed substrates within the reservoir and characterize the vegetation along the shorelines of the project, including islands. In addition to vegetation studies, the Applicant has agreed to conduct a minimum flow habitat evaluation study to evaluate aquatic habitat downstream of the dam. The Applicant has also proposed specific shoreline stabilization, mussel, and wood turtle studies that will provide additional information on the Project's potential impacts on wildlife and wildlife habitat.

No changes to Project operations are being proposed the Applicant. The current operational regime began in the 1940's and wildlife species within the Project vicinity have adapted to this long-standing operating regime. Many wildlife species are mobile and able to move to more suitable areas in the event that habitat conditions within the Project are not favorable. Habitat for immobile species will be addressed during the ATIS Study when bed substrates are identified.

Iron County is relatively undeveloped and has extensive public lands managed, in part, for wildlife habitat. The Iron County Forestry Department alone is responsible for managing over 173,000 acres of county forest lands, some of which are immediately adjacent to the Project reservoir. WDNR has not provided additional detailed information on why the studies proposed by the Applicant will not provide sufficient information to inform FERC in their evaluation of the impact of continued Project operations on wildlife and wildlife habitat as well as developing license conditions.

3.5.9 Comments on Dam Operations and Gate Changes

WDNR requested a detailed explanation of how the sluice gate and radial gate are operated at flows greater than 1,000 cfs and less than 1,000 cfs. They also requested how flows from the West Fork and main branch of the Montreal River are calculated when determining inflow to Saxon Falls. Finally, they requested the minimum flow necessary to operate the two downstream hydroelectric projects as well as information regarding run of river flows versus peaking flows.

NSPW believes the WDNR's above-requests regarding dam operations and gate changes are outside the scope of the PSP as well as the Integrated Licensing Process. Furthermore, much of the information requested has already been provided. Minimum flows to operate the downstream projects were included in the Saxon Falls and Superior Falls Pre-Application Document in Sections 3.2.1.5 and 3.4.1.5, respectively. Both downstream Projects are operated in run-of-river mode. The

storage volume in the Gile Flowage is used to augment flows in the West Fork during low-flow periods, not for daily peaking.

NSPW provided additional information to FERC on July 14, 2021, regarding the following: gate operations, how combined flows of the Montreal River and West Fork are determined at the downstream Saxon Falls Project, how storage volume in the Gile Flowage is allocated, how input parameters are incorporated into the operational rules, how storage volume in the project reservoir varies between normal/wet/dry years, operations during freezing conditions, and how the Applicant will develop new flow duration curves for inflow into the Gile Flowage. WDNR was provided a hard copy of this information via USPS mail and the information is also available via the FERC's e-Library system.

3.5.10 Comments on Other Regulatory Requirements

WDNR requested that NSPW provide a summary of the 2021 WDNR Dam Safety Inspection, including any requirements for repairs, operational changes and/or reporting. They also requested that NSPW identify whether the proposed project boundary is a mapped FEMA floodplain. The WDNR inspection was completed on July 21, 2021, just 8 days prior to the receipt of the WDNR's July 29, 2021 letter, and as of that date, a copy of the inspection report had not yet been provided to NSPW. WDNR should note that dam inspection reports for FERC licensed projects are considered Critical Energy Infrastructure Information (CEII) and may not be publicly released. Once WDNR provides a copy of the inspection report, it will be filed with FERC as a CEII document.

NSPW also notes that WDNR was sent GIS shapefiles of the proposed Project boundary on January 29, 2021. Those files may be referenced if there are any questions as to the precise location of the proposed boundary relative to the FEMA floodplain.

3.5.11 Wood Turtle Study

NSPW and WDNR held a meeting on July 21, 2021, to discuss WDNR's concerns regarding the Wood Turtle Study. WDNR requested that one of the three proposed study areas be eliminated, and a different area be added to the study. The study areas were revised as requested by WDNR. The WDNR also had concerns that the presence/absence surveys may be conducted too early to effectively observe turtle nesting. They requested that if the presence/absence surveys identified suitable wood turtle nesting habitat, that the remaining surveys (presence/absence and nesting) for that study area be delayed so they occur during the turtle nesting season. NSPW revised the study accordingly. Since WDNR's concerns were addressed prior to submittal of WDNR's comments on the PSP, no comments were provided regarding the Wood Turtle Study.

3.6 American Whitewater Letter Dated July 30, 2021

AW filed comments on the PSP in their letter dated July 30, 2021. AW filed several comments on the proposed Whitewater Recreation Flow Study. This section documents the Applicant's responses to AW's comments.

3.6.1 Comments on Section 3.2 of Whitewater Recreation Flow Study

AW clarified that their study request outlined a format that followed FERC requirements and that it provided a peer reviewed, clear methodology that has been used in 100 proceedings before the Commission. NSPW has noted AW's comment.

3.6.2 Comments on Section 2.1 of Whitewater Recreation Flow Study

AW requested, under the goals and objectives of the Whitewater Recreation Flow Study, that when river flows equal or exceed optimal whitewater flows, that the duration of these flows be based on hourly gage data and not average daily flows.

NSPW notes that typically there is one gate adjustment per day and that daily flow data is sufficient to analyze river flows. There is no hourly gage flow data available at the Project.

3.6.3 Comments on Section 2.7.1 of Whitewater Recreation Flow Study

AW supports working with local paddler Jake Ring and requests that NSPW coordinate with AW to work with the local paddling community to assemble a team of 10-12 paddlers to participate in an evaluation of three different flow releases.

NSPW has revised the study to indicate that it will include a minimum of 5 boating participants. NSPW will continue to work with local paddler, Jake Ring, to recruit boaters for the event. NSPW will also provide a notification to AW and NPS at least two weeks prior to the study. If desired, AW and NPS can publicize the event to paddling groups, requesting volunteers to participate in the study. There will be no maximum number of participants; however, NSPW requests that all participants RSVP for logistical reasons to ensure that parking is sufficient and that enough survey forms are available for all participants.

AW also requested a more direct role in scheduling and study timing and requested that NSPW revise the study plan to require coordination with AW and NPS to schedule the event.

NSPW notes that from a comprehensive view of all resources, including recreation, that the Whitewater Flow Study needs to occur when flows are available and impacts to the Gile Flowage elevation are minimal. Based on the Applicant's knowledge of Project operations, the study is proposed to occur after spring runoff, but prior to the low flows typically experienced during the summer months. Due to rapidly changing weather and river flow conditions in the spring, NSPW believes a two-week notice is the longest advanced notice it can provide.

AW requested that the Applicant use the three-step process outlined in Shelby, Whittaker, and Gangemi (2005) to determine which flows should be studied. They were not comfortable that the actual flows to be studied were not identified in the study plan. NSPW notes that the 2007 AW Internet Flow Study identified suitable flows on the West Fork as being between 400 cfs and 1000 cfs with the optimal flow being listed as 600 cfs. The study reached the following conclusion: "**The data strongly suggest that a minimum release level should be 600 cfs, as this flow level was found to be acceptable to the greatest variety of river users**" (American Whitewater, 2007). Therefore,

NSPW has proposed to begin the study with a 600 cfs flow release with additional study flows increasing beyond that but not exceeding 1000 cfs.

The actual flow releases will be determined by consensus after participants have had an opportunity to experience the initial run at 600 cfs, rather than by arbitrarily selecting flows prior to the event. In many whitewater studies there is no existing information available to help identify suitable flows. In those cases, a Level 1 and Level 2 analysis may be warranted. Since the generally acceptable flows for the West Fork have already been identified, NSPW does not believe that the Level 1 or Level 2 analysis are warranted. Therefore, the study has not been revised to incorporate said analyses.

3.6.4 Comments on Section 2.7.2 of Whitewater Recreation Flow Study

AW recommends that photos from pre-established locations be acquired as they are important to illustrate key sites and their conditions at different flows.

NSPW has revised the study plan to collect photos of each flow tested at four easily accessible sites along the river. The sites include the Highway 77 Bridge, South Drive Bridge, Center Street Bridge, and Kimball Falls Park Bridge. Photos will be taken looking upstream and downstream from each bridge for each tested flow and will be included in the final report.

AW expressed concerns that the proposed 15-minute discussion to discuss the optimal flow range is not sufficient and that additional information needs to be collected.

NSPW would like to clarify that the 15-minute discussion is not meant to be a maximum. The discussion will be allowed to proceed as long as necessary. The discussion topics identified by AW are topics that are typically discussed when evaluating whitewater releases; however, they were just not all listed individually in the plan. The plan has been revised to indicate that a summary of the discussion will be provided in the final report.

3.6.5 Comments on Section 2.9 of Whitewater Recreation Flow Study

AW recommends the report include a variety of additional information.

NSPW has revised the study plan to indicate that the final report will include the minimum optimal flow, data and forms from the study including photos, survey forms and flow data, a list of participants, a discussion of access considerations, and a summary of the boater group discussion.

3.6.6 Comments on Whitewater Recreation Flow Study Summary Boater Evaluation Form

AW recommended adding a question to quantify a technical trip, in addition to the standard and high challenge trip.

NSPW has revised the Boater Evaluation form to include a question to quantify a technical trip.

4. Study Reports

The Applicant plans to report the results of the proposed studies within the framework afforded by the ISR and associated ISR Meeting, as well as the USR and Associated USR Meeting, if required. At this time, the Applicant is proposing to file technical study reports with FERC and provide stakeholders access to the study reports consistent with the schedule presented in Table 4-1. If any study reports are not finalized and included in the ISR, progress reports will be filed quarterly with FERC until the final USR is filed. The Applicant would like to emphasize that adverse weather conditions or other circumstances may necessitate modifications to this schedule. The Applicant will notify stakeholders of any changes in the schedule through the quarterly progress reports, as necessary.

Table 4-1 Preliminary Schedule for Study Reporting

Study	Anticipated Date of Study Report
Aquatic and Terrestrial Invasive Species Study (ATIS)	September 28, 2022
Cultural Resources Study	September 28, 2022
Mussel Study	September 28, 2022
Minimum Flow Habitat Evaluation Study	September 28, 2022
Mussel Study	September 28, 2022
Recreation Study	September 28, 2022
Shoreline Stability Study	September 28, 2022
Water Quality Study	September 28, 2022
Whitewater Recreation Flow Study	September 28, 2022
Wood Turtle Study	September 28, 2022

5. Additional Information

During the PSP meeting, FERC requested that the Applicant file a copy of the endangered resources review (ER Log #19-734) conducted for the Project. The document is located in Appendix L. NSPW has filed Appendix L separately as a privileged document following WDNR's guidelines not to publicly release rare species location information.

FOG has provided the Applicant with a copy of the 2005 Gile Flowage Littoral Zone Survey. The study report has been included in Appendix M.

NSPW is providing a copy of American Whitewater's West Branch Montreal River Internet Flow Study for the record. It is located in Appendix N.

6. Literature Cited

American Whitewater. 2007. West Branch Montreal River Internet Flow Study, October 2007.

Friends of the Gile Flowage. 2005. Gile Flowage Littoral Zone Survey, 2005.

https://docs.google.com/file/d/0B75MzL2b1_KCaWtGN0UxSFhKbTQ/edit. Accessed October 6, 2020.

Appendix A – Comments on NOI, PAD, SD1, and Study Requests

Appendix B – PSP Comments

Appendix C – Aquatic and Terrestrial Invasive Species Study

Appendix D – Cultural Resources Study

Appendix E – Minimum Flow Habitat Evaluation Study

Appendix F – Mussel Study

Appendix G – Recreation Study

Appendix H – Shoreline Stability Study

Appendix I – Water Quality Monitoring Study

Appendix J – Whitewater Recreation Flow Study

Appendix K – Wood Turtle Study

Appendix L – Gile Flowage ER Review - Privileged

Appendix M – 2005 Gile Flowage Littoral Zone Survey

Appendix N – West Branch Montreal River Internet Flow Study