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December 27, 2022

VIA Electronic Filing

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

Subject: **Responses to Filing Made Pursuant to 18 CFR § 15.5(c)4**
Gile Flowage Storage Reservoir Project (FERC Project No. 15055-000)

Dear Secretary Bose:

Per 18 CFR § 5.15(c)5, Northern States Power Company – Wisconsin (NSPW), is pleased to submit responses to disagreements concerning NSPW's meeting summary filed with the Commission on October 27, 2022, or requests for modifications to ongoing studies or new studies proposed by licensing participants.

Comments received and NSPW's responses are enclosed as Appendix 1. NSPW responded to the study modifications and new study requests consistent with what is required for requesting study modifications under 18 CFR 5.15(d) or new studies under 18 CFR 5.15(e).

Not all comments received are disagreements with the meeting summary or requests for modified or new studies. However, when necessary, NSPW at its discretion has addressed those comments that were received outside the scope of the requirements of 18 CFR 15.5(c)4.

Based upon review of the comments, and consistent with the information contained in its September 28, 2002 Initial Study Report filing, NSPW remains unconvinced that study modifications or new studies are required for the second study season. NSPW will provide the information requested by Commission staff in the Updated Minimum Flow Habitat Evaluation Study and Shoreline Stability Assessment Report.

A copy of this cover letter is being provided to those agencies and individuals included in the distribution attached herein and indicating that this filing will also be available on the following website: <http://hydrorelicensing.com/gile-flowage/>.

Anyone wishing to receive a hard copy of this filing may contact Matthew Miller at (715) 737-1353 or matthew.j.miller@xcelenergy.com.

Sincerely,

Scott A. Crotty
Senior Hydro Operations Manager

Enclosure

Certificate of Service

I hereby certify that I, on behalf of Northern States Power Company, a Wisconsin corporation, have served by First Class Mail or email a link to the foregoing documents in electronic format upon each person designated on the following distribution list.

Dated this 27th day of December, 2022



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Appendix 1 – Comment Response Table

#	Stakeholder & Description	Comment	NSPW Response
1	FERC Staff Comment #1 11/21/2022	<i>In the Initial Study Report (ISR) meeting summary, Northern States Power Company – Wisconsin (Northern States Power) states that “FERC recommended describing the cause of the erosion in the report.” This description does not include the detail necessary to characterize our question and Northern States Power’s response. At the study meeting we noted the ISR, section 4.6, Shoreline Stability Study, identifies one site1 located along the northwest shoreline near the dam that exhibits significant soil movement and warrants further investigation. We asked Northern States Power when the investigation of site 5 would occur and where the results would be described. We recommended that the results be included in the Minimum Flow Habitat Evaluation Study and Shoreline Stability Assessment report and the updated study report.</i>	The updated information will be incorporated into the updated study report (USR). Thank you for the clarification.
2	FERC Staff Comment #2 11/21/2022	<i>In the ISR meeting summary, Northern States Power states that “FERC recommended an analysis of the erosion and a determination as to whether mitigation is needed should be included in the report.” This description does not include the detail necessary to characterize our question and Northern States Power’s response. At the study meeting we noted the ISR, section 4.6, Shoreline Stability Study, identifies small area in the tailrace adjacent to the dam’s west wingwall that is scheduled for mitigation. We noted that the Minimum Flow Habitat Evaluation Study and Shoreline Stability Assessment report, Study Results, Shoreline Stability Study, does not describe mitigation at this location. We asked Northern States Power to provide a description of the mitigation proposed for the site in the Minimum Flow Habitat Evaluation Study and Shoreline Stability Assessment report and the updated study report.</i>	The updated information will be incorporated into the updated study report (USR). Thank you for the clarification. However, it should be noted, the erosion on the water-retaining earthen structure will be completed prior to the USR under the direction of D2SI because it was previously identified by NSPW staff as requiring attention.
3	Sokaogon Chippewa Community Comment #1 11/01/2022	<i>With regard to the PowerPoint slides used at the public meeting it is inaccurate to say there are no archaeological sites affected by the Hydro. Rather, since a bulk of the shoreline has not had a systematic archaeological survey it is more accurate to say there are no known archaeological sites affected by Hydro operations.</i>	Comment noted.
4	Sokaogon Chippewa Community Comment #2 11/01/2022	<i>The presence of the Flambeau Trail used as an inland travel route suggests the high likelihood of undocumented archaeological sites submerged by the flowage as well as a higher potential of similar sites along the shoreline. Additional consideration must also be given to the River itself which was used as an expedient method of travel further east to the Lac Vieux Desert Community. Thus the SCC THPO recommends that FERC and the Hydro initiate consultation with Ojibwe Bands of Wisconsin and Michigan, but also that Hydro Management be prepared to conduct archaeological surveys for any projects affecting the shoreline, or submerged basin.</i>	Comment noted. NSPW understands this to be a request for consultation and not a formal study request. An archaeological survey of the APE was completed and the historical location of the trail on the existing shoreline was examined by the archaeologist, found to be stable, and is not impacted by the operation of the Project.

#	Stakeholder & Description	Comment	NSPW Response
5	<p>Friends of the Gile Flowage Comment #1 11/25/2022</p>	<p><u>Whitewater Report</u> <i>The Whitewater Study points to the Gile Flowage’s potential for supplying water for both hydro needs as well as water for downstream whitewater recreation. However, the complexity of balancing these uses, while maintaining suitable water levels on the Gile Flowage for habitat, recreational, and safety needs suggests that a watershed approach should be taken with the Saxon-Superior Falls Hydro Relicensing and the new licensing of the Gile Flowage.</i></p> <p><i>We appreciate this would mean modifying FERC timelines, and potentially study needs, but it would ensure a more holistic and equitable approach to the public’s water being used for hydro purposes.</i></p> <p><i>The Friends of the Gile Flowage supports a watershed approach to the licensing and re-licensing of hydro related resources and facilities within the West Branch of the Montreal River.</i></p>	<p>Friends of the Gile (FOG) comments are not in disagreement with the study summary nor do they request a study modification or a new study under 18 CFR § 5.15(c). Therefore, their comments do not require a response under the premise of this filing.</p>
6	<p>Friends of the Gile Flowage Comment #2 11/25/2022</p>	<p><u>Cultural Resources Report</u> <i>The Cultural Resources Report only considers historic archeological resources, such as the Montreal Historic District and the Flambeau Trail, but not use of the Flowage’s resources for contemporary cultural uses by neighboring Ojibwe Indian communities including wild rice (manoomin) harvesting and Treaty Rights fishing, hunting, and gathering. The Gile Flowage is located within the Ojibwe Ceded Territory and use of its cultural resources continue to the present day and into the future.</i></p> <p><i>The Friends of the Gile Flowage supports additional studies be made to include contemporary cultural resources use of the Gile Flowage through deeper consultation with area Tribes and tribal organizations.</i></p>	<p>This comment does not include the required criteria under 18 CFR § 5.15(d) for a study modification because it does not:</p> <ol style="list-style-type: none"> 1) demonstrate the approved studies were not conducted as provided for in the approved study plan; or 2) demonstrate the study was conducted under anomalous environmental conditions or that environmental conditions have changed in a material way. <p>This comment also does not include criteria required under 18 CFR § 5.15(e) for a new study because it does not include appropriate facts and a statement explaining:</p> <ol style="list-style-type: none"> 1) Any material changes in the law or regulations applicable to the information request; 2) Why the goals and objectives of any approved study could not be met with the approved study methodology; 3) Why the request was not made earlier; 4) Significant changes in the project proposal or that significant new information material to the study objectives has become available; and 5) Why the new study request satisfies the study criteria in 18 CFR § 5.9(b). The comment does not provide information on why the study satisfies any of the study criteria in 18 CFR § 5.9(b).


#	Stakeholder & Description	Comment	NSPW Response
7	<p>Friends of the Gile Flowage Comment #3 11/25/2022</p>	<p><u><i>Aquatic and Terrestrial Invasive Species Report</i></u> <i>Ian Schackelford- US Forest Service Invasive Species Specialist and FOG Board member shares the following recommendations on the Aquatic and Terrestrial Invasive Species Report:</i></p> <p><i>“The conclusion of the Invasive Species Study Report should acknowledge the threat of the glossy buckthorn and Eurasian bush honeysuckle. They are much more of a risk to the terrestrial native plant communities than the spotted knapweed and tansy. In the past the Friends of the Gile Flowage have offered to conduct workdays on some of the islands to treat the honeysuckle and glossy buckthorn. Because these species are best treated with herbicide, Xcel Energy declined the offer from FOG. Xcel should prioritize and control the honeysuckle and glossy buckthorn on their property. The purple loosestrife would likewise be easy to control. The cattail should just be monitored.</i></p> <p><i>The invasive plant Japanese barberry (Berberis thunbergii) is also present on Xcel property on the Gile Flowage, as documented here:</i> https://www.inaturalist.org/observations/137586846.</p> <p><i>We feel that this report should also acknowledge the presence of Canadian Yew (Taxus canadensis), a plant status “Special Concern” by the Wisconsin Department of Natural Resources (WDNR) which can be found in dense stands on several Applicant owned islands. This plant may be under threat from invasive species, such as Glossy buckthorn, and as growing recreational pressures on these islands spreads invasives and comprises natural habitats.</i></p> <p><i>FOG recommends that the Aquatic and Terrestrial Invasive Species Report take into consideration the perspectives shared above.</i></p>	<p>This comment does not include the required criteria under 18 CFR § 5.15(d) for a study modification because it does not:</p> <ol style="list-style-type: none"> 1) demonstrate the approved studies were not conducted as provided for in the approved study plan; or 2) demonstrate the study was conducted under anomalous environmental conditions or that environmental conditions have changed in a material way. <p>Thank you for the information on Japanese barberry.</p> <p>The Natural Heritage Inventory (NHI) review completed by WDNR on behalf of NSPW as part of the PAD, and renewed again on December 23, 2022, did not identify the presence of Canadian yew in the Project vicinity. Therefore, NSPW reviewed the Wisconsin Heritage Working List (which contains 336 plant species known or suspected to be rare in the state, including species designated as endangered, threatened, and special concern). Canadian yew is not included on the Wisconsin Heritage Working List and is not designated as a special concern species by the state of Wisconsin.</p>

#	Stakeholder & Description	Comment	NSPW Response
8	<p>Friends of the Gile Flowage Comment #4 11/25/2022</p>	<p><u>Shoreline Stability Assessment</u> <i>We question the conclusion that "each site assessed in the Gile Flowage shoreline stability study ranked in the low energy category." Shoreline Stability Assessment states that erosion features were above the waterline on 5 of 6 sites identified with erosion, implying that erosion is not due to water level fluctuations. Photos supporting this finding appear to be taken when the Flowage water levels were low, hence, erosion appears to be happening above the waterline. Instead, we feel that the photos included in this study show significant erosion of sand and gravel-based islands and impacts of water levels fluctuating from the ordinary high-water mark to the low water level shown on the photos.</i></p> <p><i>This study examined only two types of locations: developed shorelines and islands. We question why erosion on undeveloped shorelines was not examined which has impacts on fish and wildlife near shore habitats.</i></p> <p><i>On page 31, the contractor indicated that they had not consulted with resource agencies regarding erosion or habitat studies. We feel this is an issue that needs to be addressed. It also reflects how the ISR studies are "siloed" and don't holistically take into account cross-cutting issues like erosion and its impacts on other resources. For example, the Recreation Report's "Island Survey" identified human caused erosion on Islands #20 and #35. This was not noted in the Shoreline Stability Report. Likewise, erosion identified in the Shoreline Stability Report on islands should also be noted in the Recreation Report due to its impact on recreation.</i></p>	<p>NSPW followed the protocol in the approved study plan. Any implications on the part of FOG that are not supported by information in the study are inappropriate.</p> <p>FOG's comment stating that only two types of locations were examined during the Shoreline Stability Study is false. Under the "METHODS" Section of the report, it states the following: "The Shoreline Stability Assessment (stability assessment) was conducted on August 9 and 29, 2022. The entire shoreline of the Flowage, including the islands, was assessed via boat..."</p> <p>The approved study plan does not include a requirement for consultation with the resource agencies nor is FOG a resource agency. NSPW is following the Integrated Licensing Process (ILP) as advocated by FOG. The ILP requires a formal consultation process that is being followed by NSPW. The stated goal and objective of the Shoreline Stability Study is as follows: "The objective of this study is to identify areas of erosion, mass soil movement, slumping, or other forms of instability of the shoreline of the Project reservoir and the West Fork downstream of the Project."</p> <p>The approved study plan does not include a requirement to identify the cause of erosion.</p>

#	Stakeholder & Description	Comment	NSPW Response
9	<p>Friends of the Gile Flowage Comment #5 11/25/2022</p>	<p><u><i>Minimum Flow Habitat Study</i></u> <i>This study concentrated on outflow impacts to habitats downstream. FOG is concerned about impacts of a outflows, including an allowable 15-foot drawdown, on Flowage habitats particularly impacts on fisheries.</i></p> <p><i>The WDNR’s Gile Flowage, Montreal River Watershed summary https://dnr.wi.gov/water/waterdetail.aspx?wbic=2942300 cites that in 1999 the WDNR asked the FERC to analyze the effects of winter drawdowns as part of the cumulative impacts analysis for the Superior Falls Hydro licensing decision. FERC denied the request citing that it had no authority at the Gile Flowage. Northern States Power declined to participate in the study, citing economic concerns, regulatory uncertainties, and increased liabilities as a result of flooding, and has suggested the fingerling survival might be related to other factors such as entrainment in the works of the dam.</i></p> <p><i>The Minimum Flow Habitat Study stated that that there had been “no direct consultation with the resource agencies regarding either the erosion or habitat studies at Gile Flowage.” In their comments on the proposed study plan, filed July 29, 2021, WDNR “highly recommend that Xcel and/or their consultant review the final study plans with the WDNR, to answer any final questions related to field conditions, study methods, and communications.” FOG is concerned that due to the lack of consultation the WDNR and resource agencies and individuals, the findings of the shoreline stability and habitat study may not be complete.</i></p> <p><i>Now that FERC has authority over the Gile Flowage, FOG recommends that will the impacts of water drawdowns on fish resources should completed in consultation of WDNR and other agencies, tribal and non-tribal organizations, and individuals with specific knowledge of the affected resources.</i></p>	<p>FERC currently does not have authority over water levels on the Gile Flowage. FOG stated its case for studies in its initial request for studies. Under the ILP, the study plans were approved and NSPW followed them accordingly as described in the ISR.</p> <p>As explained in response to FOG’s Comment #2, there is a formal process detailed in the ILP and FOG is not following that process. Specifically, they have not provided any convincing information required under the process, even informally, to justify study modifications or new studies. Furthermore, FOG has not demonstrated that NSPW is not following the approved study plan.</p> <p>NSPW respectfully requests the Commission hold FOG accountable to the ILP process, which they advocated for, when requesting modifications to existing studies or new studies, or at the very minimum direct FOG to provide the information required under 18 CFR § 5.15(d) or § 5.15(e). As a participant in the licensing process, FOG has the responsibility to follow the ILP process and use the tools available through the Commission to participate in the process. NSPW is unconvinced that study modifications or new studies are required under FOG’s current approach. More specifically, they have provided unsupported requests, and in some cases, made statements that are not supported by any information in the reports or the approved plans.</p>

#	Stakeholder & Description	Comment	NSPW Response
10	<p>Friends of the Gile Flowage Comment #6 11/25/2022</p>	<p><u>Recreation Report - Low Water and Recreation</u> <i>The Recreation Report states that many respondents who were interviewed stated that low water levels had impacted their recreation experience in past years, but few said it was currently a small problem. FOG questions the study’s overall conclusion that low water levels present few difficulties of boaters given it “currently” wasn’t an issue for surveyed boaters. Low water can create safety issues with boat launching and navigational hazards posed for Flowage boaters.</i></p> <p><i>As presented in the report, Table 5-12 labelled “Dock Measurements” is difficult to understand as only Gile Park and County C boat landings have docks, plus they include a concrete launch ramp that extends into the Flowage, whereas Pence and Sucker Hole landings have only concreted ramp pads but are included in the table.</i></p> <p><i>Because the health of Flowage habitats, as well as recreation and safety, are tied to its water levels, FOG recommends this report consider the multiplier effect impact of low water levels have on habitat, invasives, private property, etc. which directly affect recreational use.</i></p> <p><i>FOG suggests formatting the data in Table 5-12 into two tables, one to show the comparisons by date of Gile Park and County C landing water depths at the end of the dock and at the end of concrete ramp and a second table comparing by same date the water depths at the end Pence and Sucker Hole landings.</i></p>	<p>It should be noted that NSPW devoted significant time and money to study recreation on the flowage according to the approved study plan.</p> <p>The objective of the approved recreation study is as follows: <i>“The purpose of this study is to obtain a subjective assessment of recreation facility conditions and needed enhancements; determine capacity of existing facilities to address current and future user demand; and provide sufficient information for making recreation enhancement recommendations. The evaluation of whitewater boating flows is a separate effort independent of this study plan.”</i></p> <p>The recreation report documented the opinions obtained by interviewing recreationists according to the requirements of the approved study plan. FOG may question the reported results; however, they do not provide any information to contradict the reported information such that it should be questioned as inaccurate.</p> <p>In the approved study plan, the following deliverable was to be provided: <i>“Discussion of whether proposed project operation would lower the reservoir level below the minimum water elevation at which existing public boat ramps, piers, docks or landing points within the project reservoir and its islands would be accessible and operable, and if so, how often and how long these features or sites would be inaccessible or inoperable”</i> Table 5-12 provides the information and NSPW is not interested in reformatting Table 5-12 at the request of FOG.</p> <p>The “multiplier effect”, as requested by FOG, is not required under the approved study plan nor has FOG provided any information to support this requested modification.</p>

<p>10</p> <p>Friends of the Gile Flowage</p> <p>Comment #6</p> <p>11/25/2022</p>	<p><u>Recreation Report - Island Camping, Garbage, and Human Waste</u></p> <p><i>The Recreation Report does not mention the Applicant's stated policy is that it does not allow camping on its property, including the Gile Flowage islands, yet camping was observed. However, this policy has never been enforced. Overnight and multi-day island camping within the project boundary is growing in popularity without any management of trash, human waste, or environmental damage.</i></p> <p><i>FOG member the late Jim Kaffine started island cleanups prior to 2006 to address this issue. Since then, FOG has held Island Clean-Ups each October after island camping has subsided. FOG members volunteer time and the use of their boats for the Clean-Up.</i></p> <p><i>FOG has only qualitative information on the amount and types of garbage collected each year. Most recently, amounts range from a high of an estimated 400 pounds collected in 2016 to approximately 50 pounds in 2022. Cleanup collection amounts are not indicative of island use, but rather the number of volunteers that are available for the Cleanup and weather conditions. Not all of the island or mainland camping sites can be cleaned in a given year. If not for the annual island cleanup events done by FOG that are keeping garbage from accumulating, the environmental impact from litter and human waste would have been more apparent during the Recreation Survey.</i></p> <p><i>The Recreation Report fails to mention the issue of human waste on the islands. Wedding Island (Island #28), has a makeshift pit toilet that FOG has not removed due to sanitary issues. FOG has removed other portable and bucket-type toilets from islands and finds evidence of uncontained human waste on the islands each year during Island Clean-Ups.</i></p>  <p><i>2017 FOG Island Clean-Up (left to right): FOG volunteer boat with collected garbage, a toilet removed from one island, total of 400 pounds of bagged garbage disposed of in the City of Montreal dumpster.</i></p>  <p><i>Left: In 2018, approximately 200 pounds of garbage collected and placed in a pickup truck for proper disposal including a "bucket toilet," full sized BBQ grill, and approximately 100 pounds of trash, bottles, and cans. Middle photo: FOG volunteer Ian Shackleford collected a room sized carpet from an island during the 2021 Clean-Up. Right: FOG volunteer Gary Hopp's boat with garbage collected during the 2021 Clean-Up including sections of a large canopy tent.</i></p>	<p>If this is a study modification request, no information has been provided by FOG to support the modification.</p> <p>Regarding the accuracy of the study report, NSPW's report goes to great length and expense to illustrate the conditions observed during the site visits with numerous photographs as outlined in the approved study plan.</p>
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#	Stakeholder & Description	Comment	NSPW Response
		 <p><i>FOG volunteer Cathy Techtmann disposing of garbage collected during 2022 Island Cleanup. Only two FOG volunteer boats were available to conduct the cleanup in 2022, hence the smaller amount of garbage collected.</i></p> <p><i>If island camping continues to be allowed, FOG recommends that the Applicant develop policies for such use that minimizes environmental and users impacts including installing and maintaining wilderness latrines on their properties designated for camping, providing active recreational use administration and enforcement, and supporting Leave No Trace education for Gile Flowage users.</i></p>	
11	Friends of the Gile Flowage Comment #7 11/25/2022	<p><i>The Recreation Study survey used to collect data and generate study findings did not differentiate between Flowage kayakers/canoers and motorized boaters. While the survey provided a category for “rafter/tubers”, based on our local knowledge rafting/tubing is a minor use of the Flowage compared to kayaking. Kayakers and motorized uses have much different recreation needs which should be addressed in this study.</i></p>	<p>NSPW followed the approved study plan. FOG has not provided any information to justify modification to the approved study plan.</p>
12	Friends of the Gile Flowage Comment #8 11/25/2022	<p><i>As FOG has noted before, with the presence of the invasive Spiny Water Flea (<i>Bythotrephus longimanus</i>) has been documented in the Gile Flowage and is acknowledged in the Recreation Report. Due to the potential for introduction this and other aquatic invasives into and out of the Gile Flowage by recreational uses; we support Xcel Energy implementing an Invasive Species Mitigation Strategy. The establishment of a Mitigation and Enhancement Fund, like exists for other hydropower projects (such as Bond Falls in the western Upper Peninsula) would provide a way to address some of the natural resource, human health, and habitat issues within the Gile Flowage and downstream.</i></p>	<p>This is not a request for a study modification or new study.</p>

#	Stakeholder & Description	Comment	NSPW Response
13	Friends of the Gile Flowage Comment #9 11/25/2022	<p><i>The Recreation Report concludes that “based on population growth for Iron County suggests that use will remain below capacity for the foreseeable future.” For many years, the Gile Flowage was hidden recreational gem used mostly to local residents. This is no longer the case. From 2021-2022, Iron County experienced a 21.7% increase in direct visitor sales, according to a Wisconsin Department of Administration-Travel Wisconsin Study https://www.industry.travelwisconsin.com/research/economic-impact/.</i></p> <p><i>The Whitewater Study points to new recreational opportunities for both the Flowage and downstream users which will attract new users. FERC licensing of the Gile Flowage will only bring more notoriety and additional recreation use demands. All of these factors will contribute to growing recreation use of the Gile Flowage that we are already experiencing.</i></p>	<p>Please note that the population study was conducted for all of Iron County and during the period of COVID restrictions. Many outdoor recreation areas received a marked increase in use as a direct result of the implications from the COVID restrictions. Therefore, there is not enough information to support a claim this trend of increase recreational use, or even the short-term increase, will continue into the future.</p>
14	Friends of the Gile Flowage Comment #10 11/25/2022	<p><i>FOG recommends that the Recreation Report consider not just immediate uses of the Flowage, but also the impacts of increasing Flowage use on sanitary issues and environmental impacts such as the spread of invasive species. Further, differentiation should be made between recreational perspectives and needs of motorized and non-motorized boat users, particularly growing number of Flowage kayak users.</i></p>	<p>This comment does not include the required criteria under 18 CFR § 5.15(d) for a study modification because it does not:</p> <ol style="list-style-type: none"> 1) demonstrate the approved studies were not conducted as provided for in the approved study plan; or 2) demonstrate the study was conducted under anomalous environmental conditions or that environmental conditions have changed in a material way.
15	Friends of the Gile Flowage Comment #11 11/25/2022	<p><i>FOG recommends that the Recreation Report consider recreational demands on the Gile Flowage not solely based on projections of local Iron County population numbers, but on increasing numbers of non-local visitors who are discovering and recreating on the Flowage.</i></p>	<p>This comment does not include the required criteria under 18 CFR § 5.15(d) for a study modification because it does not:</p> <ol style="list-style-type: none"> 1) demonstrate the approved studies were not conducted as provided for in the approved study plan; or 2) demonstrate the study was conducted under anomalous environmental conditions or that environmental conditions have changed in a material way.

Initial Study Report Comments and NSPW Responses

#	Stakeholder & Description	Comment	NSPW Response
16	American Whitewater Comment #1 11/28/2022	<p><u>Whitewater Flow Study - Section 4.2.1, American Whitewater 2007 Study</u> The Initial Study Report discusses the American Whitewater 2007 Study and its relevance to understanding instream flow needs for whitewater recreation. As we have previously noted, in meetings and email correspondence, this study was based on individuals who self-reported their runs and was not a controlled flow study as was conducted by the Applicant in 2022. For the 2007 Study individuals likely estimated flows from past runs and we did not ask the date of their runs as part of the survey. It is also possible that individuals scored flows that they may not have actually experienced. The result is we do not have additional data for when individual users boated the river and are not able to verify the precision with which they scored flows or compare them to historic flow data. Our 2007 study was intended to initiate a conversation on flows for whitewater recreation and provide a useful starting point for a controlled flow study as was conducted in 2022. We regard the controlled flow study conducted in 2022 by the Applicant to be a more robust and comprehensive evaluation of instream flow needs for recreation than the report our organization published in 2007.</p>	Thank you for the confirmation.
17	American Whitewater Comment #2 11/28/2022	<p><u>Whitewater Flow Study - Section 4.2.4 Level 2 Assessment Summary</u> For reasons described above, and the fact that flow evaluations were self reported, American Whitewater was not able to provide study dates for the 2007 study as requested by the Applicant.</p>	Thank you for the confirmation.

#	Stakeholder & Description	Comment	NSPW Response
18	<p>American Whitewater Comment #3 11/28/2022</p>	<p><u>Whitewater Flow Study - Section 5.1.6 Whitewater Study Overall Evaluation and Discussion</u> <i>American Whitewater concurs with the finding that boater preferred flow ranged from 800 to 2,000 cfs, with the average and median nearly identical at 1,220 cfs and 1,200 cfs, respectively. These data can be used to inform discussion on potential protection, mitigation, and enhancement measures and various trade offs that need to be evaluated.</i></p> <p><i>American Whitewater concurs with the finding that a whitewater opportunity in June, July, or August would be preferred and appreciates the acknowledgement of an interest in a late summer or early fall flow release when few opportunities are available in the area/region. Our members who participated in the flow study reported that there is a reservoir drawdown that occurs in fall and many other projects provide a whitewater opportunity when drawdowns occur. During the study plan meeting the Applicant clarified that this drawdown is at a substantially lower flow than would be optimal for whitewater recreation but American Whitewater has an interest in further understanding whether this flow could be supplemented, or the drawdown could be scheduled to occur over a shorter period of time, to provide a viable whitewater opportunity.</i></p> <p><i>Although the report states that “one boater commented that a flow release should be coordinated so it does not overlap with other whitewater boating opportunities in the Midwest,” many of our members in the region have expressed an interest in coordinating opportunities to ensure they do not conflict. In the Draft License Application and in any future license, American Whitewater recommends a consultation requirement for an annual meeting to be held for purposes of scheduling whitewater opportunities at this Project and the Saxon Falls Project downstream.⁴</i></p> <p>⁴ The Bear River Project (P-20), Henry M. Jackson Project (P-2157), Mokelumne Project (P-137), Pit 3, 4, 5 Hydroelectric (P-233), and Upper American River Hydroelectric Project (P-2101) are all examples of projects with consultation requirements with American Whitewater for timing of whitewater opportunities as license conditions or their associated recreation plans.</p>	<p>Thank you for the concurrence. However, this is not a request for a modified study or comments on the study summary in following with the requirements of the proceedings under 18 CFR § 5.15 (c)4. Therefore, it will not be addressed by NSPW herein.</p>
19	<p>American Whitewater Comment #4 11/28/2022</p>	<p><u>Whitewater Flow Study - Section 6 Impacts of Whitewater Boating on Generation</u> <i>The report states that “The extent to which the reservoir elevation would decrease would be dependent on the amount of flow released and the duration of said release,” and quantifies the impact of a 300 acre feet of water being released at different elevations. Any social and environmental impacts of a 0.1 foot drawdown vs. a 0.16 foot drawdown are not evaluated and should be further considered in subsequent environmental analysis.</i></p>	<p>Comment Noted.</p>

20	<p>American Whitewater Comment #5 11/28/2022</p>	<p><u>General Process Comment and Need for Integrated Environmental Review</u> <i>Regarding the potential for whitewater recreation on the West Fork as a condition of a future Project license, American Whitewater supports coordination of license requirements for the Project with the Saxon Falls Project (P-2610). In past comments we have noted the importance of taking an integrated approach to the licensing of the Superior Falls Project, Saxon Falls Project, and the Gile Flowage Storage Reservoir Project;⁵ such an approach is necessary for purposes of developing a basinwide plan and associated measures with an outcome that is best adapted to a comprehensive plan for improving or developing a waterway or waterways for all beneficial public uses including recreation.⁶ Given the interrelated nature of operations of the three projects in the Montreal River watershed, and the fact that all are undergoing licensing simultaneously, American Whitewater believes it would be in the public interest to evaluate all three projects and the proposed protection, mitigation, and enhancement measures in a single environmental review document.</i></p> <p><i>As we further evaluate and consider the number, timing, and volume of the releases from Gile Flowage, this review should also consider potential beneficial impacts on river-based recreational opportunities in the Montreal River Canyon which is being evaluated as part of the Saxon Falls relicensing proceeding. We believe that by properly timing any license-conditioned boating flow releases on the West Fork Montreal, whitewater boating opportunities can also be created downstream in the Montreal Canyon. The 10-hour water travel time presents some challenges, but there may be opportunities for an early morning release on the West Fork Montreal that allows for an evening boating opportunity in the Montreal Canyon. The opportunities and the various tradeoffs, including any environmental or social impacts of various scenarios, can be most effectively evaluated through a coordinated environmental review and a basinwide approach to licensing of the three projects in the watershed.</i></p> <p><i>The Commission should provide direction for how integration and coordination between these three projects, for both recreational and environmental measures, can be best achieved. We believe that reviewing all three projects through a single environmental review document would be most efficient for all stakeholders, lead to better environmental outcomes, and be in the public interest. This approach would allow for a comprehensive understanding of individual project effects and cumulative effects and provide an efficient means of evaluating interrelated issues associated with all three projects in the basin; it would enhance the ability of the Commission to issue license decisions that are best adapted to a comprehensive plan for the waterway consistent with 16 U.S. Code § 803(a).</i></p> <p>⁵ Comments of American Whitewater on Request To Use Traditional Licensing Process For Gile Flowage Storage Reservoir Project under P-15055, FERC eLibrary Submittal 20201217-5163, <https://elibrary.ferc.gov/eLibrary/docinfo?accession_number=20201217-5163>; and American Whitewater submits Comments on Draft License Application for Superior Falls Project, et al. under P-2587, et al., FERC eLibrary Accession Number: 20221004-5152, <https://elibrary.ferc.gov/eLibrary/docinfo?accession_number=20221004-5152>.</p> <p>⁶ 16 U.S. Code § 803(a).</p>	<p>This is not a request for a modified study or comments on the study summary in following with the requirements of the proceeding under 18 CFR § 5.15 (c)4. Therefore, it will not be addressed by NSPW herein.</p>
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<p>21</p>	<p>National Park Service Comment #1 11/28/2022</p>	<p><u>DRAFT RECREATION REPORT (APPENDIX 7)</u> <u>Gile Dam Canoe Portage</u> Under Section 3 Descriptions of Recreational Facilities at Gile Flowage, Gile Dam Canoe Portage is described as follows:</p> <p style="padding-left: 40px;"><i>The canoe portage take-out is located just east of the dam spillway. Upon disembarking, paddlers cross over the low rise of the earthen dam approximately 115 feet to the downstream put-in on the West Fork of the Montreal River. (p 3-1)</i></p> <p><i>The majority of boaters involved in the Draft Whitewater Boating Flow Report (Appendix 9) stated that 600 cfs was insufficient for boating the West Fork Montreal River below the dam; however, the river was boatable at this level. According to Figure 4.1.2.2-1 Average Daily Gile Flowage Discharge Rates in the boating flow study, flow levels of 600 cfs or above occur one to two days a year on average.¹ It is thus unlikely that during those few days of “opportunistic” boating each year boaters would use the Gile Dam “Canoe Portage” as an actual portage, where they would paddle across the reservoir, disembark above the dam, carry their boats over the dam and then down to the river put-in directly below the dam. It is much more likely that individuals planning to boat West Fork Montreal River below Gile Dam would park at Gile Park or along Park Street and Nimikon Avenue and carry their gear to the put-in directly below the dam. The NPS suggests that “Gile Dam Canoe Portage” be divided into “Gile Dam” (where bank and wildlife watching occurs) the “Run 1 Whitewater Put-in” for the West Fork Montreal River.</i></p> <p><i>Under Section 4 Results of Recreation Inventory and Condition Assessments, Gile Dam Canoe Portage amenities (signage) were evaluated as needing maintenance:</i></p> <p style="padding-left: 40px;"><i>Canoe portage signage consists of a sign identifying the waterbody as Gile Flowage as well as a directional sign upstream of the dam that guides paddlers to the take-out. The take-out is immediately east of the spillway. While the existing signage is in good condition, a lack of directional signage for paddlers resulted in a “in need of maintenance” rating. (p. 4-1)</i></p> <p><i>The above description of the condition of signage is confusing since it first identifies that there is a directional sign upstream of the dam, but then states that there is a lack of directional signage for paddlers. The Recreation Inventory and Assessment raw datasheets identifies that there are two directional signs in good condition. As indicated in Photo #38, one sign reading “Take Out” with an arrow is located directly above the intake and flanked by two “Danger” signs. The other directional sign is shown in Photo #46, which consists of a green sign with arrow, but the words are not readable so the purpose of the sign is not clear. A large, Project/interpretative sign is next to the green directional sign that faces the reservoir. There are two additional shown in Picture #35 (warning sign at west side of the intake) and Picture #45 (sign at gate that is unreadable).</i></p> <p><i>The Recreation Inventory and Assessment raw datasheet for Gile Dam Canoe Portage identifies that the trail to the put-in needs maintenance and that the site “could</i></p>	<p>This is not a request for a modified study or comments on the study summary in following with the requirements of the proceeding under 18 CFR § 5.15 (c)4. Therefore, it will not be addressed by NSPW herein.</p>
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#	Stakeholder & Description	Comment	NSPW Response
		<p><i>use an easier/better path to get to base of the dam on the west side.” This trail leads to “Run 1 Whitewater Put-in” and additional details on trail maintenance needs is necessary for stakeholders to develop recommendations on how to address such needs.</i></p> <p><i>The NPS requests that the Applicant address the above identified issues with the description of Gile Dam Canoe Portage, including providing a more accurate description of the site, how it is used by recreationists, and existing signage. In addition, please provide details on any additional safety features other than the directional sign and two warning/danger signs directly above the intake, such as safety cables with grab lines/buoys upstream from the intake.</i></p> <p><i>¹ This is a rough estimate based on looking at the figure, which does not provide real numbers of average boatable days per year.</i></p>	
22	<p>National Park Service Comment #2 11/28/2022</p>	<p><u>DRAFT RECREATION REPORT (APPENDIX 7)</u> <u>Gile Park</u> <i>Section 4 Results of Recreation Inventory and Condition Assessments identifies that the amenities assessed at Gile Park are in good condition. This is not an accurate statement since the condition of the boat launch and bathrooms were not assessed in the Recreation Inventory and Assessment raw datasheet. The facility assessment was completed in early May when bathrooms were not yet open.</i></p>	<p>Gile Park is not a site that is owned or maintained by NSPW. However, NSPW was present at Gile Park and used the bathrooms during the Whitewater Study. At that time, NSPW did not identify any conditions that would contradict the statement in the report. Furthermore, in viewing the 30 pictures provided in the report in the Appendix 2 photolog, one can view for themselves that the Gile Park is in good condition. Furthermore, when viewing the 30 photographs provided in Appendix 2 of the recreation report, one can determine for themselves whether or not the Gile Park is in good condition.</p>
23	<p>National Park Service Comment #3 11/28/2022</p>	<p><u>DRAFT RECREATION REPORT (APPENDIX 7)</u> <u>Sucker Hole Landing</u> <i>Section 4 Results of Recreation Inventory and Condition Assessments identifies that the amenities assessed Sucker Hole Landing are in good condition. However, the only amenities assessed in the Recreation Inventory and Assessment raw datasheet were the boat landing and signage. While the boat landing was identified as in good condition, it is also noted that there is water erosion near the boat ramps. This erosion needs to be described in more detail. Section 4 also states that “the signage was assessed as being in need of maintenance because a lack of directional signage from Spring Camp Road makes it difficult to locate the boat launch.” However, the raw datasheets identify that the directional sign was in good condition, but the two regulations signs need maintenance and the one interpretative sign need repair. This is counter to the study report’s overall assessment of Sucker Hole Landing amenities being in good condition.</i></p>	<p>Sucker Hole Landing is not a site that is owned or maintained by NSPW. None of the signage at the site was installed by NSPW. While the regulation signs and the interpretive signs may need minor repair, and while other minor maintenance may be needed, these factors do not compromise the function of the boat landing. Furthermore, when viewing the 12 photographs provided in Appendix 2 of the recreation report, one can determine for themselves whether or not the Sucker Hole Landing is in good condition.</p>
24	<p>National Park Service Comment #4 11/28/2022</p>	<p><u>DRAFT RECREATION REPORT (APPENDIX 7)</u> <u>Town of Pence Landing</u> <i>Section 4 Results of Recreation Inventory and Condition Assessments identifies that the amenities assessed at the Town of Pence Landing are in good condition. However, the Recreation Inventory and Assessment raw datasheet identifies that a regulation sign either needs management or replacement.</i></p>	<p>Town of Pence Landing is not a site that is owned or maintained by NSPW. None of the signage at the site was installed by NSPW. Although the regulation signs and the interpretive signs may need repair or minor maintenance, NSPW does not believe the function of the boat landing is jeopardized to which it cannot function and justifies the need of repair designation as is explained in the report. Furthermore, when viewing the 10 photographs provided in Appendix 2 of the recreation report, one can determine for themselves whether or not the Town of Pence Landing is in good condition.</p>

#	Stakeholder & Description	Comment	NSPW Response
25	National Park Service Comment #5 11/28/2022	<p><u>DRAFT RECREATION REPORT (APPENDIX 7)</u> <u>County Highway C Landing</u> Section 4 Results of Recreation Inventory and Condition Assessments identifies that the amenities assessed at County Highway C Landing are in good condition. However, the Recreation Inventory and Assessment raw datasheet identifies that the boat launch needs maintenance. This need is reflected in Table 5-13 Summary of Comments Received from Interviews, Gile Flowage (January, May-August 2022). The most frequent comments received during the recreation use survey “were in regard to the boat ramp and dock at County Highway C landing, the need for maintenance, repair, and replacement of the ramp and dock, as well as removal or marking of hazards near the boat landing.”</p>	<p>County Highway C Landing is not a site that is owned or maintained by NSPW. None of the signage at the site has been installed NSPW. While the regulation signs and the interpretive signs may need minor repair, and while other minor maintenance may be needed, these factors do not compromise the function of the boat landing. Furthermore, when viewing the 14 photographs provided in Appendix 2 of the recreation report, one can determine for themselves whether or not the County Highway C Landing is in good condition and regularly maintained.</p>
26	National Park Service Comment #6 11/28/2022	<p><u>DRAFT RECREATION REPORT (APPENDIX 7)</u> Section 4.6 Summary The summary of the facility assessment states the following:</p> <p style="padding-left: 40px;"><i>The existing amenities of the five surveyed recreation resources on Gile Flowage were generally rated as in good condition (Appendix 3). The two exceptions were associated with Gile Dam Canoe Portage and Sucker Hole landing. Both facilities received a rating of “in need of maintenance” due to a lack of directional signage.</i></p> <p><i>Based on the discrepancies between the study report and raw data identified above, this facility assessment summary is inaccurate and needs to be updated. In addition, the facility assessment was conducted early in the season on May 9, 2022, where water levels in the reservoir were relatively high and boat docks submerged. As the reservoir levels lowered, the end of ramp depths declined, which reduced functionality. Conducting the facility inventory later in the season may have resulted in lower rating for ramps and allowed for more accurate assessment of other facilities, such as the bathroom at Gile Park which was not opened for assessment in early May.</i></p>	<p>NSPW disagrees with the NPS comment and has explained the “good” ratings in response to the NPS’s previous five comments. The assessment completed is more than adequate to fulfill the data needs during the licensing process. In addition, NSPW is unconvinced that the data provided by the NPS supports the requested study modification and therefore, we believe it does not warrant the collection of additional data.</p>

#	Stakeholder & Description	Comment	NSPW Response
27	<p>National Park Service Comment #7 11/28/2022</p>	<p><u>DRAFT RECREATION REPORT (APPENDIX 7)</u> <u>Dock and Landing Depth Measurements</u> <i>In the facility condition assessments for the four recreation sites that include a boat ramp and/or dock (Gile Park, Sucker Hole Landing, County Highway C Landing, and Town of Pence Landing), the reader is referred to Table 5-12 for information on “the minimum water elevation necessary for adequate recreation use.” However, Table 5-12 only identifies the water depth that was measured from the end of the docks at both Gile Park and County Highway C landing and at the end of each landing/ramp at the four recreation sites. No discussion is provided that explains how this depth information can be used to determine the minimum water elevation necessary for adequate recreation use.</i></p> <p><i>In response to the Project’s Pre-Application Document, the NPS requested the Applicant conduct a Reservoir Level Assessment Study. The propose of the study was to examine how fluctuating Gile Flowage water levels impact reservoir recreation, including the functionality of all boat ramps at Gile Flowage. Considering that boat trailers need to be submerged on the ramp to launch, the functional limit of the boat ramp elevations should be based on an elevation that is 4 vertical feet higher than the end of the ramp, with 3 vertical feet being the bare minimum.² To better understand the reservoir level on recreationists’ ability to use the boat rams, a more detailed discussion is needed on how reservoir levels presented in Table 5-12 affect boat ramp functionality.</i></p> <p>² <i>Layout & Design Guidelines for Boat Launching Facilities (California Department of Parks and Recreation, 2021; Facilities Development Manual/Boat Ramps (Wisconsin Department of Transportation 2019)</i></p>	<p>Although the approved study plan did not describe the protocol required for the dock and landing depth measurements, NSPW provided information that gives the depth of the water measured as the end of the ramp or the existing dock, the date the depth was measured and the water elevation at the dam at the time of the measurement. From this information, and information obtained from the numerous recreation survey forms completed during the recreation study, it can be determined how much of the landing is exposed during allowable operating levels. What cannot be determined purely from the measurements and specifications provided by the NPS is whether or not the ramp is actually usable. Gile Storage Reservoir is very undeveloped and many of the boat ramps cannot be reached with any vehicle and are remote. Therefore, remote launch standards should be applied. If it is possible to launch a boat during water levels without harming the boat, trailer or vehicle, the boat ramp is usable, and this is reflected in the user surveys where specific questions about low water were asked. As stated in the discussion in the report, from the survey responses, it was determined that low water conditions at County Highway C landing have the most effect and users often use other landings during low water times indicating other landings remain usable during low water conditions. Some of the concerns, however, is submerged hazards in the launch area during low water.</p>

#	Stakeholder & Description	Comment	NSPW Response
28	<p>National Park Service Comment #8 11/28/2022</p>	<p><u>DRAFT RECREATION REPORT (APPENDIX 7)</u> <u>Island Surveys</u> <i>During the Fourth of July weekend, the Applicant surveyed the 43 islands in Gile Flowage for past and active recreational use, other uses, and human-caused erosion and compiled a photolog of the surveys. The surveys identified signs of past or present recreation use in roughly half the islands. The islands that showed no signs of recreation use were either too small to accommodate use, had no appropriate boat landing area, were overgrown with no open areas or flat ground, or a mix of conditions that were not conducive to being visited by recreationists. Although only one individual was identified recreating on an island during the weekend study period, the islands that have the physical characteristics amenable to visitor use have experienced such use. While the amount of garbage identified in the photolog of the island study seems to be minimal, Friends of the Gile Flowage (FOG) have conducted voluntary island cleanups since 2006 and have gathered up to 200 lbs. of garbage during their annual cleanups. It is likely that the island surveys conducted by the Applicant would have identified considerably more garbage at the islands if not for the FOG cleanup efforts. Based on these garbage levels, along with the documentation of recreation activity on half of the islands, consideration needs to be given to managing the islands to allow for public recreation while, at the same time, protecting natural resources on the islands.</i></p>	<p>This is not a request for a modified study or comments on the study summary that are in accordance with the requirements under 18 CFR § 5.15 (c)4. NPS has not provided any information that the current study was not completed according to the approved plan. Therefore, it is not going to be currently addressed by NSPW. Providing this type of information during this phase of the process outside of when it is appropriate will not guarantee it would be addressed in the license application.</p>

#	Stakeholder & Description	Comment	NSPW Response
29	National Park Service Comment #9 11/28/2022	<p><u>DRAFT WHITEWATER BOATING FLOW REPORT (APPENDIX 9)</u> <u>Impacts of Whitewater Boating Releases on Reservoir Levels</u> Section 6 <i>Impacts of Whitewater Boating Releases on Generation</i> provides a brief discussion of the relationship between potential whitewater flow releases and reservoir levels:</p> <p style="padding-left: 40px;"><i>The extent to which the reservoir elevation would decrease would be dependent on the amount of flow released and the duration of said release. For example, if the Gile Flowage elevation was between 1,490.0 to 1,485.0 feet National Geodetic Vertical Datum of 1929 (NGVD) during a release of 1,200 cfs for a period of three hours (approximately 300 acre-feet released), the reservoir would be expected to drop approximately 0.1 feet. At a starting elevation of 1,480.0 feet NGVD, the elevation would be reduced by approximately 0.16 feet with the same 1,200 cfs release. (p. 40)</i></p> <p><i>Under Section 4.1.5 Recreation and Land Use in Scoping Document-2, filed by FERC on April 1, 2021, the “effects of proposed reservoir fluctuations on land use and recreation access” is identified as an environmental issue to be addressed in the NEPA document. Additional details are needed on the impacts of 0.1-foot reservoir drop compared to 0.16-foot reservoir drop on both public land use (e.g., recreation and access) and private land use (e.g., homeownership abutting to the reservoir). Although it needs further analysis, some of the data on the impacts of reservoir levels on recreation was collected in the form of relationship between reservoir levels and dock and ramp depths (Table 5-12 in Appendix 7). However, the Applicant provides no data on how reservoir levels affect land use surrounding the reservoir, including the use of private property that abuts the reservoir. Understanding the relationship between flow releases, reservoir levels, and impacts of drawdowns on reservoir recreation and land use is essential to determine the tradeoff between providing whitewater flows and impacts on reservoir recreation and land use. This relationship should be included in the Draft License Application, which would allow stakeholders to consider impacts on reservoir recreation and land use when making recommendations on timing and duration of whitewater boating releases.</i></p>	<p>This is not a request for a modified study or comments on the study summary that are in accordance with the requirements under 18 CFR § 5.15 (c)4. NPS has not provided any information that the current study was not completed according to the approved plan. Therefore, this comment will not be addressed by NSPW herein. Providing this type of information during this phase of the process, and outside of when it is appropriate, will not guarantee it will be addressed in the license application.</p>

#	Stakeholder & Description	Comment	NSPW Response
30	<p>National Park Service Comment #10 11/28/2022</p>	<p><u><i>DRAFT WHITEWATER BOATING FLOW REPORT (APPENDIX 9) Relationship Between Gile Flowage, Saxon Falls, and Superior Falls Projects</i></u> <i>In NPS's comments on the Saxon Falls (P-2610) and Superior Falls (P-2587) Projects that we filed on October 3, 2022, we noted their interdependence with the Gile Flowage Project. Due to this interdependence, the Applicants for the two downstream Projects stated that they could not determine "the number of releases, the timing of releases, and volume of each release" for proposed whitewater boating flows until FERC issues a license for Gile Flowage. Based on the current schedule for Gile Flowage, it is not likely that the Gile Flowage would be licensed before Saxon Falls and Superior Falls enters the environmental review phase.³ As a result, it would not be possible for stakeholders to review the proposed boating flow releases downstream of the Saxon Falls Project in the Montreal River Canyon and draft related recommendations or conditions for this licensing effort when flow releases cannot be established until Gile Flowage is licensed. This need to wait on the licensing of Gile Flowage also applies to other flow-affected resource of the two downstream Projects.</i></p> <p><i>Due to the dependance of Saxon Falls and Superior Falls Projects on releases from Gile Flowage for power generation, and the impacts of those releases on flow-dependent recreation on the West Fork Montreal River and Montreal River below Saxon Falls, and water-level-affected recreation and land use at Gile Flowage, assessing impacts on recreation at all three projects would be best accomplished through a single environmental review process. The single process would also address impacts to other resources that are affected by flows and reservoir levels stemming from the interconnected project operations. This approach would allow for a comprehensive understanding of individual project effects and cumulative effects and provide an efficient means of evaluating interrelated issues associated with all three projects in the Montreal River Basin. This, in turn, would enhance the ability of FERC to issue license decisions that are best adapted to a comprehensive plan for the waterway consistent with 16 U.S. Code § 803(a).</i></p> <p>³ <i>The PAD for Gile Flowage was filed on December 19, 2020, over a year after the filing of the Saxon Falls and Superior Falls PAD on November 17, 2020. According to the Project Plan and Schedule found in Scoping Document 2 (issued April 1, 2021), the DLA for Gile Flowage will not be filed until March 21, 2023. Finally, Gile Flowage is undergoing the Integrated Licensing Process compared to the Traditional Licensing Process for Saxon and Superior Falls, with the latter process generally being more expeditious.</i></p>	<p>This is not a request for a modified study or comments on the study summary in following with the requirements of the proceeding under 18 CFR § 5.15 (c)4. Therefore, it will not be addressed by NSPW herein.</p>

#	Stakeholder & Description	Comment	NSPW Response
31	National Park Service Comment #11 11/28/2022	<p><u>DRAFT MINIMUM FLOW HABITAT EVALUATION STUDY AND SHORELINE STABILITY ASSESSMENT (APPENDIX 5)</u></p> <p><i>Under Agency Consultation of Appendix 5, the Applicant's consultant who prepared the study stated that they "had no direct consultation with the resource agencies regarding either the erosion or habitat studies at Gile Flowage." Consultation with agencies who are charged with management of the resources studied is crucial in both data collection and analysis efforts. In their comments on the proposed study plan, filed July 29, 2021, Wisconsin Department of Natural Resources (WDNR) stated they "highly recommend that Xcel and/or their consultant review the final study plans with the WDNR, to answer any final questions related to field conditions, study methods, and communications. WDNR staff may be onsite for various studies." Due to the lack of this type of consultation that the WDNR was willing to engage in, the data provided in the shoreline stability and habitat study may need to be refined, or additional data collected. Such efforts would need to be completed in consultation of WDNR and other agencies or non-government organizations (NGOs) and individuals with specific knowledge of the affected resources.</i></p>	<p>Although the WDNR may have requested to review final study plans in their comments on the PSP, it is not required in the approved study plan. This comment does not include the required criteria under 18 CFR § 5.15(d) for a study modification because it does not:</p> <ol style="list-style-type: none"> 1) demonstrate the approved studies were not conducted as provided for in the approved study plan; or 2) demonstrate the study was conducted under anomalous environmental conditions or that environmental conditions have changed in a material way.
32	Kayla Sturgeon Comment #1 11/28/2022	<p><i>During post-evaluation discussion, there was general agreement between the 10 boaters that coming back at a higher flow level would be most appealing. As stated on page 38, "Boaters asked NSPW to consider a late summer or early fall flow release since few opportunities are available in the area/region at that time." Additionally, page 35 states, "All ten boaters would return during the summer months of June, July, and August. Nine boaters stated they would return in September, six in October, five in May, and three in both April and November. One boater commented that a flow release should be coordinated so it does not overlap with other whitewater boating opportunities in the Midwest, such as the Wausau Whitewater Park, Paddlemania and Charles City Challenge, as boaters are likely to attend these larger events-." For this final comment, I would emphasize that while one boater may have stated this, there was general agreement of this sentiment throughout the group.</i></p>	<p>Thank you for the information.</p>

#	Stakeholder & Description	Comment	NSPW Response
33	<p>Kayla Sturgeon Comment #2 11/28/2022</p>	<p><i>Given the conclusion on page 39 that, "May would likely provide the best opportunity for whitewater boating recreation opportunities on the West Fork", I would like to highlight why May would not be as ideal as the data presented in this report would suggest and why greater consideration of additional events happening throughout the region would be advised.</i></p> <ul style="list-style-type: none"> • <i>Several of the 10 boaters have commitments (teaching or otherwise) to a midwest yearly whitewater kayak and canoe training course (CanoeU). This course occurs over the weekend before and after Memorial Day, with an additional Sunday class earlier in May. This would severely hamper an ability to attend a recreational release in May. It also limits the ability to introduce students (particularly more advanced students) from these classes to post-class boating opportunities.</i> • <i>Prime spring whitewater boating season in the Midwest (WI, MI, MN, etc.) usually continues into May. Many of the individuals who would be attracted to this release would find it a difficult decision to attend if there were rivers flowing on the North Shore or the South Shore during a May release of the Gilage Flowage.</i> <p><i>Additional whitewater boating opportunities of note should also include other scheduled releases including the St. Louis (a primary draw for this boater level) and Jim Falls (not as much of a draw for this boater level) which have releases throughout the summer. Additionally, the Grandfather Falls releases (May/June). Of course, some of the draw for one river over the other is distance to travel, for which many of the individuals attending this flow study traveled quite far. Therefore, while page 39 states, ..."All ten boaters would travel to the West Fork if optimal flow releases were available during the summer months of June, July, and August", this statement needs to be considered in context of other events happening at that time period, particularly when those events represent a shorter drive, more agreeable logistics (including overnight camping, bathrooms, and access to restaurants and food), and opportunities for recreation both for boaters of other skill levels as well as for party members who do not paddle and would prefer to swim, mountain bike, fish, or hike, among other non-boating activities. Looking at regional whitewater releases from 2019 through 2022, whitewater opportunities that would draw this level of boater were more lacking in June. This would suggest a June release would actually be more likely to draw boater attendance and associated economic benefits to the area.</i></p> <p><i>I highly suggest analysis of other whitewater paddling opportunities in the region and strategic coordination with those opportunities. I ask this consideration be included in the revised report and Draft License Application.</i></p>	<p>Thank you for the information. NSPW does not intend to update the report with the new information; however, we will attempt to consider it in the development of the license application.</p>

#	Stakeholder & Description	Comment	NSPW Response
34	<p>Kayla Sturgeon Comment #3 11/28/2022</p>	<p><i>Germaine to the conversation around timing of a whitewater release is also the consideration for the impact to reservoir elevation. At its most basic level, it is understandable there is more water available for non-power generating releases earlier in the season than there is later in the season and therefore, there is a tradeoff between flow and timing. Table 6-1 on page 39(Appendix 9) suggests natural flow occurrences are most common in May, followed by April and June. I understand the need and desire for the highest probability of water availability. However, we are looking at 2 days of whitewater releases. Therefore, I agree with the sentiment on page40 wherein, "...flow release outside of natural spring runoff events would need to be planned. "Given a known schedule for planned releases, I suggest some element of reservoir level management to enable a release for 2 days, outside the month with the highest natural flow occurrences, with reasonable consideration given for impacts to other users and interested parties in this flowage.</i></p> <p><i>Page 40 also states, "...For example, if the Gile Flowage elevation was between 1,490.0 to1,485.0 feet National Geodetic Vertical Datum of 1929 (NGVD) during a release of 1,200 cfs fora period of three hours (approximately 300 acre-feet released),the reservoir would be expected to drop approximately 0.1 feet. At a starting elevation of 1,480.0 feet NGVD, the elevation would be reduced by approximately 0.16 feet with the same 1,200 cfs release."(emphasis added). I request additional documentation of the social and environmental effects of a 0.1 or 0.16 drop (or more) in reservoir elevation at various starting reservoir elevation levels. Particularly given the following comment from Appendix 7 Recreation Study Report, Page 6-1, "Lastly, while assessment of low water impacts on recreational experiences will continue through the end of the study in October, based on interview respondents, a majority stated that low water was no problem or only a small problem with regard to their recreational experience." Additionally, I would like to see more scrutiny on how reservoir management could mitigate some of these concerns.</i></p>	<p>Thank you for the information. NSPW does not intend to update the report with the new information; however, we will attempt to consider it in development of the license application.</p>
35	<p>Kayla Sturgeon Comment #4 11/28/2022</p>	<p><i>On a different note, in talking with the dam operator and additional personnel in attendance at the whitewater flow study, it was suggested the dam may perform unscheduled reservoir run-downs in the fall in order to prepare for winter and spring runoff. I see no discrete mention of this in this section of the report. However, that feels like it would be critical information to learn more about if we were to pursue a fall release timing. I suspect the October data from Table 6-1reflects these run-downs.</i></p> <p><i>I understand there is a preference to release at 200 cfs during fall drawdown as that is the amount that can be used for hydropower. I request these fall drawdowns be better documented in the revised report and Draft License Application. Additionally, I would like to see reference of when there may be less sensitivity by reservoir landowners and other interested parties to a drop in reservoir elevation, such as after their docks are pulled as they are less engaged in reservoir recreation.</i></p>	<p>Thank you for the information.</p>

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#	Stakeholder & Description	Comment	NSPW Response
36	<p>Kayla Sturgeon Comment #5 11/28/2022</p>	<p><i>Finally, discussion during the post-evaluation for the whitewater study highlighted a desire by boaters to promote this river throughout the whitewater community in the midwest. This is not mentioned in the report. This especially revolved around the idea of a release that can be organized into an event by itself, including through highlighting opportunities on other sections of this river not included in this flow study, that may appeal to other skill levels. Part of the appeal of an event is both weather as well as additional logistics and alternative recreational opportunities, as mentioned above. While I understand that may be outside the scope of this particular report, it does feel like it should be a factor in promoting a particular release schedule.</i></p>	<p>Thank you for the information.</p>