

**Saxon Falls Hydroelectric Project
FERC Project No. 2610**

**Superior Falls Hydroelectric Project
FERC Project No. 2587**

Draft License Application

**Volume 4
Documentation of Consultation**

Prepared for

Northern States Power Company
a Wisconsin Corporation

Prepared by



meadhunt.com

July 2022

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LIST OF ABBREVIATIONS AND TERMS

ACHP	Advisory Council on Historic Preservation
Applicant.....	Northern States Power Company, a Wisconsin Corporation
ATIS	Aquatic and Terrestrial Invasive Species
AW.....	American Whitewater
BIA.....	Bureau of Indian Affairs
BLM.....	Bureau of Land Management
cfs.....	cubic feet per second
DLA	Draft License Application
EGLE.....	Michigan Department of Environment, Great Lakes, and Energy
EPA	Environmental Protection Agency
FEMA	Federal Emergency Management Agency
FERC.....	Federal Energy Regulatory Commission
FLA.....	Final License Application
FOG.....	Friends of the Gile Flowage
GLIFWC	Great Lakes Indian Fish and Wildlife Commission
JAM	Joint Agency Meeting
kW	Kilowatts
Licensee	Northern States Power Company, a Wisconsin Corporation
MDEQ.....	Michigan Department of Environmental Quality
MDNR.....	Michigan Department of Natural Resources
MSHPO	Michigan State Historic Preservation Office
NGVD	National Geodetic Vertical Datum 1929
NMFS	National Marine Fisheries Service
NPS	National Park Service
NOAA	National Oceanic and Atmospheric Administration
NSPW.....	Northern States Power Company, a Wisconsin Corporation
PAD	Pre-Application Document
Project	Saxon Falls or Superior Falls Hydroelectric Project
PSCW.....	Public Service Commission of Wisconsin
RAW	River Alliance of Wisconsin
SPR	Superior Falls Project
SXN	Saxon Falls Project
TLP.....	Traditional Licensing Process
USACE	United States Army Corps of Engineers
USFS.....	United States Forest Service
USFWS	United States Fish and Wildlife Service
UWEX.....	University of Wisconsin Cooperative Extension Office
UWSP WCFU.....	University of WI Stevens Point WI Cooperative Fisheries Unit
WCMP	Wisconsin Coastal Management Program
WDNR	Wisconsin Department of Natural Resources
WSHPO.....	Wisconsin State Historic Preservation Office

1. Listing of Stakeholder/Applicant Contacts

1.1 Listing of Stage 1 Contacts with Stakeholders

Table 1.1-1 presents contacts made between stakeholders and the Applicant beginning with the Applicant's development and submittal of the Preliminary Application Document (PAD) to the stakeholders, continuing to include written study requests.

Contacts were made through meetings and written correspondence (including email). The following presents a summary of the various contacts.

Table 1.1-1 Listing of Stage 1 Contacts with Stakeholders

Person/Agency Contacted	From	Item	Contact Type (Meeting, Letter, Email?)	Date
Marcus Ammesmaki Fond du Lac Band of Lake Superior	Shawn Puzen Mead & Hunt	PAD Questionnaire	Letter	2/22/2019
Gary Bahr Sac and Fox Nation of Missouri in Kansas and Nebraska	Shawn Puzen Mead & Hunt	PAD Questionnaire	Letter	2/22/2019
Larry Balber Red Cliff Band of Lake Superior Chippewa Indians of Wisconsin	Shawn Puzen Mead & Hunt	PAD Questionnaire	Letter	2/22/2019
Brian Bisonette Lac Courte Oreilles Band of Lake Superior Chippewa Indians	Shawn Puzen Mead & Hunt	PAD Questionnaire	Letter	2/22/2019
Michael Blackwolf Fort Belknap Indian Community	Shawn Puzen Mead & Hunt	PAD Questionnaire	Letter	2/22/2019
Johnathon Buffalo Sac & Fox of the Mississippi in Iowa	Shawn Puzen Mead & Hunt	PAD Questionnaire	Letter	2/22/2019
Amy Burnette Leech Lake Band of Lake Superior Chippewa Tribe	Shawn Puzen Mead & Hunt	PAD Questionnaire	Letter	2/22/2019
Mary Ann Gagnon Grand Portage Band of Lake Superior Chippewa Indians	Shawn Puzen Mead & Hunt	PAD Questionnaire	Letter	2/22/2019
David Grignon Menominee Indian Tribe of WI	Shawn Puzen Mead & Hunt	PAD Questionnaire	Letter	2/22/2019
Bonnie Hartley Stockbridge-Munsee Community Band of Mohican Indians	Shawn Puzen Mead & Hunt	PAD Questionnaire	Letter	2/22/2019
Diane Hunter Miami Tribe of Oklahoma	Shawn Puzen Mead & Hunt	PAD Questionnaire	Letter	2/22/2019
Ryan Howell Prairie Island Indian Community	Shawn Puzen Mead & Hunt	PAD Questionnaire	Letter	2/22/2019

Person/Agency Contacted	From	Item	Contact Type (Meeting, Letter, Email?)	Date
Iowa Tribe of Oklahoma	Shawn Puzen Mead & Hunt	PAD Questionnaire	Letter	2/22/2019
Michael LaRonge Forest County Potawatomi Community of Wisconsin	Shawn Puzen Mead & Hunt	PAD Questionnaire	Letter	2/22/2019
Edith Leoso Bad River Band of Lake Superior Tribe of Chippewa Indians	Shawn Puzen Mead & Hunt	PAD Questionnaire	Letter	2/22/2019
James Williams Lac Vieux Desert Band of Lake Superior Chippewa Indians of Michigan	Shawn Puzen Mead & Hunt	PAD Questionnaire	Letter	2/22/2019
Sandra Massey Sac and Fox Nation of OK	Shawn Puzen Mead & Hunt	PAD Questionnaire	Letter	2/22/2019
Wanda McFaggen St. Croix Chippewa Indians of Wisconsin	Shawn Puzen Mead & Hunt	PAD Questionnaire	Letter	2/22/2019
Chris McGeshick Sokaogon Chippewa Community of WI	Shawn Puzen Mead & Hunt	PAD Questionnaire	Letter	2/22/2019
Earl Meshigaud Hannahville Potawatomi Indian Community	Shawn Puzen Mead & Hunt	PAD Questionnaire	Letter	2/22/2019
Cayla Olson White Earth Band of the Minnesota Chippewa Tribe	Shawn Puzen Mead & Hunt	PAD Questionnaire	Letter	2/22/2019
Clinton Parish, Chairman Bay Mills Indian Community	Shawn Puzen Mead & Hunt	PAD Questionnaire	Letter	2/22/2019
Cecil Pavlat, Sr. Sault Ste. Marie Tribe of Chippewa Indians	Shawn Puzen Mead & Hunt	PAD Questionnaire	Letter	2/22/2019
William Quackenbush Ho-Chunk Nation	Shawn Puzen Mead & Hunt	PAD Questionnaire	Letter	2/22/2019
Chris Swartz Keweenaw Bay Indian Community	Shawn Puzen Mead & Hunt	PAD Questionnaire	Letter	2/22/2019
Lewis Taylor St. Croix Chippewa Indians of Wisconsin	Shawn Puzen Mead & Hunt	PAD Questionnaire	Letter	2/22/2019
Adam VanZile Sokaogon Chippewa Community Mole Lake Band	Shawn Puzen Mead & Hunt	PAD Questionnaire	Letter	2/22/2019
Warren Wahweotten, Jr. Prairie Band Potawatomi Nation	Shawn Puzen Mead & Hunt	PAD Questionnaire	Letter	2/22/2019
Natalie Weyaus Mille Lacs Band of Ojibwe	Shawn Puzen Mead & Hunt	PAD Questionnaire	Letter	2/22/2019
Sherry White Stockbridge Munsee Community of WI	Shawn Puzen Mead & Hunt	PAD Questionnaire	Letter	2/22/2019

Person/Agency Contacted	From	Item	Contact Type (Meeting, Letter, Email?)	Date
Corina Williams Oneida Nation of WI	Shawn Puzen Mead & Hunt	PAD Questionnaire	Letter	2/22/2019
Melinda Young Lac du Flambeau Band of Lake Superior Chippewa	Shawn Puzen Mead & Hunt	PAD Questionnaire	Letter	2/22/2019
Senator Tammy Baldwin	Shawn Puzen Mead & Hunt	PAD Questionnaire	Letter	2/22/2019
Congressman Jack Bergman	Shawn Puzen Mead & Hunt	PAD Questionnaire	Letter	2/22/2019
Edward G. Buikema, Director Federal Emergency Management Agency (FEMA)	Shawn Puzen Mead & Hunt	PAD Questionnaire	Letter	2/22/2019
Nick Chevance US Department of the Interior National Park Service (NPS)	Shawn Puzen Mead & Hunt	PAD Questionnaire	Letter	2/22/2019
Director Geological & Natural History Survey University of Wisconsin Extension (UWEX)	Shawn Puzen Mead & Hunt	PAD Questionnaire	Letter	2/22/2019
Director Great Lakes Indian Fish and Wildlife Commission (GLIFWC)	Shawn Puzen Mead & Hunt	PAD Questionnaire	Letter	2/22/2019
Director of Lands, Watersheds, and Minerals Management US Forest Service (USFS)	Shawn Puzen Mead & Hunt	PAD Questionnaire	Letter	2/22/2019
Director of National Oceanic and Atmospheric Administration (NOAA)	Shawn Puzen Mead & Hunt	PAD Questionnaire	Letter	2/22/2019
Director Bureau of Land Management (BLM)	Shawn Puzen Mead & Hunt	PAD Questionnaire	Letter	2/22/2019
Congressman Sean Duffy	Shawn Puzen Mead & Hunt	PAD Questionnaire	Letter	2/22/2019
Endangered Species Specialist US Fish and Wildlife Service (USFWS)	Shawn Puzen Mead & Hunt	PAD Questionnaire	Letter	2/22/2019
FERC Coordinator US Department of the Army Corps of Engineers (USACE)	Shawn Puzen Mead & Hunt	PAD Questionnaire	Letter	2/22/2019
Field Supervisor USFWS	Shawn Puzen Mead & Hunt	PAD Questionnaire	Letter	2/22/2019
John M. Fowler Advisory Council on Historic Preservation (ACHP)	Shawn Puzen Mead & Hunt	PAD Questionnaire	Letter	2/22/2019
Jeff Gosse Regional Energy Coordinator USFWS	Shawn Puzen Mead & Hunt	PAD Questionnaire	Letter	2/22/2019

Person/Agency Contacted	From	Item	Contact Type (Meeting, Letter, Email?)	Date
Senator Ron Johnson	Shawn Puzen Mead & Hunt	PAD Questionnaire	Letter	2/22/2019
Mary Manydeeds Bureau of Indian Affairs (BIA)	Shawn Puzen Mead & Hunt	PAD Questionnaire	Letter	2/22/2019
Lindy Nelson US Department of the Interior Office of Environmental Policy and Compliance	Shawn Puzen Mead & Hunt	PAD Questionnaire	Letter	2/22/2019
Senator Gary Peters	Shawn Puzen Mead & Hunt	PAD Questionnaire	Letter	2/22/2019
Samuel Rauch National Marine Fisheries Service (NMFS)	Shawn Puzen Mead & Hunt	PAD Questionnaire	Letter	8/17/2018
Senator Debbie Stabenow	Shawn Puzen Mead & Hunt	PAD Questionnaire	Letter	2/22/2019
Angie Tornes NPS	Shawn Puzen Mead & Hunt	PAD Questionnaire	Letter	2/22/2019
Jen Tyler US Environmental Protection Agency (EPA)	Shawn Puzen Mead & Hunt	PAD Questionnaire	Letter	2/22/2019
Nick Utrup USFWS	Shawn Puzen Mead & Hunt	PAD Questionnaire	Letter	2/22/2019
John Zygaj FERC	Shawn Puzen Mead & Hunt	PAD Questionnaire	Letter	2/22/2022
Kathleen Angel Wisconsin Coastal Management Program (WCMP)	Shawn Puzen Mead & Hunt	PAD Questionnaire	Letter	2/22/2019
Senator Janet Bewley	Shawn Puzen Mead & Hunt	PAD Questionnaire	Letter	2/22/2019
Harry L Brown State Historic Preservation Office (WSHPO)	Shawn Puzen Mead & Hunt	PAD Questionnaire	Letter	2/22/2019
Elle Gulotty Michigan Department of Natural Resources (MDNR)	Shawn Puzen Mead & Hunt	PAD Questionnaire	Letter	2/22/2019
Cheryl Laatsch Wisconsin Department of Natural Resources (WDNR)	Shawn Puzen Mead & Hunt	PAD Questionnaire	Letter	2/22/2019
Representative Greg Markkanen	Shawn Puzen Mead & Hunt	PAD Questionnaire	Letter	2/22/2019
Senator Ed McBroom	Shawn Puzen Mead & Hunt	PAD Questionnaire	Letter	2/22/2019
Representative Beth Meyers	Shawn Puzen Mead & Hunt	PAD Questionnaire	Letter	2/22/2019
Michigan State Historic Preservation Office (MSHPO)	Shawn Puzen Mead & Hunt	PAD Questionnaire	Letter	2/22/2019
Amira Oun Michigan Department of Environmental Quality (MDEQ)	Shawn Puzen Mead & Hunt	PAD Questionnaire	Letter	2/22/2019

Person/Agency Contacted	From	Item	Contact Type (Meeting, Letter, Email?)	Date
Public Service Commission of Wisconsin (PSCW)	Shawn Puzen Mead & Hunt	PAD Questionnaire	Letter	2/22/2019
Pamela Stevenson Michigan Attorney General's Office	Shawn Puzen Mead & Hunt	PAD Questionnaire	Letter	2/22/2019
Wisconsin Cooperative Fisheries Research Unit University of WI Stevens Point (UWSP-WCFU)	Shawn Puzen Mead & Hunt	PAD Questionnaire	Letter	2/22/2019
Wisconsin Office of Attorney General	Shawn Puzen Mead & Hunt	PAD Questionnaire	Letter	2/22/2019
Kathryn Brauer Town of Saxon	Shawn Puzen Mead & Hunt	PAD Questionnaire	Letter	2/22/2019
Karen Gullan City of Ironwood	Shawn Puzen Mead & Hunt	PAD Questionnaire	Letter	2/22/2019
Gerry Pelissero Gogebic County	Shawn Puzen Mead & Hunt	PAD Questionnaire	Letter	2/22/2019
Michael Saari Iron County	Shawn Puzen Mead & Hunt	PAD Questionnaire	Letter	2/22/2019
Mary Segalin Charter Township of Ironwood	Shawn Puzen Mead & Hunt	PAD Questionnaire	Letter	2/22/2019
Stacy Wiercinski City of Hurley	Shawn Puzen Mead & Hunt	PAD Questionnaire	Letter	2/22/2019
Scott Crotty Xcel Energy	Shawn Puzen Mead & Hunt	PAD Questionnaire	Letter	2/22/2019
James Fossum River Alliance of Wisconsin (RAW)	Shawn Puzen Mead & Hunt	PAD Questionnaire	Letter	2/22/2019
Matthew Miller Xcel Energy	Shawn Puzen Mead & Hunt	PAD Questionnaire	Letter	2/22/2019
Northwest Regional Planning Commission	Shawn Puzen Mead & Hunt	PAD Questionnaire	Letter	2/22/2019
Thomas O'Keefe American Whitewater (AW)	Shawn Puzen Mead & Hunt	PAD Questionnaire	Letter	2/22/2019
James Zyduck Xcel Energy	Shawn Puzen Mead & Hunt	PAD Questionnaire	Letter	2/22/2019
Shawn Puzen Mead & Hunt	Michael Saari Iron County	Response to Questionnaire	Letter	3/22/2019
Shawn Puzen Mead & Hunt	Amy Burnette, Leech Lake Band of Ojibwe	Response to Questionnaire	Letter	3/22/2019
Shawn Puzen Mead & Hunt	Amy Burnette Leech Lake Band of Ojibwe	Response to SXN Questionnaire	Letter	3/22/2019
Shawn Puzen Mead & Hunt	Kenneth Westlake, US EPA	Response to SPR Questionnaire	Letter	9/18/2018
Shawn Puzen Mead & Hunt	LeRoy Johnson	Response to Questionnaire	Letter	4/11/2019

Person/Agency Contacted	From	Item	Contact Type (Meeting, Letter, Email?)	Date
Shawn Puzen Mead & Hunt	Elle Gulotty MDNR	Response to Questionnaire	Letter	4/11/2019
Shawn Puzen Mead & Hunt	James Fossum RAW	Response to Questionnaire	Letter	4/11/2019
Shawn Puzen Mead & Hunt	Sherry White Stockbridge Munsee Tribe	Response to Questionnaire	Letter	4/11/2019
Shawn Puzen Mead & Hunt	Kenneth Westlake EPA	Response to Questionnaire	Letter	4/22/2019
Shawn Puzen Mead & Hunt	Angela Tornes NPS	Response to Questionnaire	Letter	5/7/2019
Marcus Ammesmaki Fond du Lac Band of Lake Superior Chippewa	James Zyduck Xcel Energy	PAD, NOI, TLP Request	Letter	12/30/2019
Gary Bahr Sac and Fox Nation of Missouri in Kansas and Nebraska	James Zyduck Xcel Energy	PAD, NOI, TLP Request	Letter	12/30/2019
Brian Bisonette Lac Courte Oreilles Band of Lake Superior Chippewa Indians	James Zyduck Xcel Energy	PAD, NOI, TLP Request	Letter	12/30/2019
Michael Blackwolf Fort Belknap Indian Community	James Zyduck Xcel Energy	PAD, NOI, TLP Request	Letter	12/30/2019
Jonathon Buffalo Sac & Fox of the Mississippi in Iowa	James Zyduck Xcel Energy	PAD, NOI, TLP Request	Letter	12/30/2019
Amy Burnette Leech Lake Band of Minnesota Chippewa Tribe	James Zyduck Xcel Energy	PAD, NOI, TLP Request	Letter	12/30/2019
Marvin Defoe Red Cliff Band of Lake Superior Chippewa Indians of WI	James Zyduck Xcel Energy	PAD, NOI, TLP Request	Letter	12/30/2019
Mary Ann Gagnon Grand Portage Band of Chippewa Indians	James Zyduck Xcel Energy	PAD, NOI, TLP Request	Letter	12/30/2019
David Grignon Menominee Indian Tribe of WI	James Zyduck Xcel Energy	PAD, NOI, TLP Request	Letter	12/30/2019
Bonnie Hartley Stockbridge Munsee Community Band of Mohican Indians	James Zyduck Xcel Energy	PAD, NOI, TLP Request	Letter	12/30/2019
Diane Hunter Miami Tribe of Oklahoma	James Zyduck Xcel Energy	PAD, NOI, TLP Request	Letter	12/30/2019
Ryan Howell Prairie Island Indian Community	James Zyduck Xcel Energy	PAD, NOI, TLP Request	Letter	12/30/2019
Iowa Tribe of Oklahoma	James Zyduck Xcel Energy	PAD, NOI, TLP Request	Letter	12/30/2019

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Michael LaRonge Forest County Potawatomi Community of Wisconsin	James Zyduck Xcel Energy	PAD, NOI, TLP Request	Letter	12/30/2019
Edith Leoso Bad River Band of Lake Superior Tribe of Chippewa Indians	James Zyduck Xcel Energy	PAD, NOI, TLP Request	Letter	12/30/2019
Sandra Massey Sac and Fox Nation of OK	James Zyduck Xcel Energy	PAD, NOI, TLP Request	Letter	12/30/2019
Wanda McFaggen St Croix Chippewa Indians of Wisconsin	James Zyduck Xcel Energy	PAD, NOI, TLP Request	Letter	12/30/2019
Chris McGeshick Sokaogon Chippewa Community of Wisconsin	James Zyduck Xcel Energy	PAD, NOI, TLP Request	Letter	12/30/2019
Earl Meshigaud Hannahville Potawatomi Nation	James Zyduck Xcel Energy	PAD, NOI, TLP Request	Letter	12/30/2019
Jamie Arsenault White Earth Band of the Minnesota Chippewa Tribe	James Zyduck Xcel Energy	PAD, NOI, TLP Request	Letter	12/30/2019
Bryan Newland Bay Mills Indian Community of Michigan	James Zyduck Xcel Energy	PAD, NOI, TLP Request	Letter	12/30/2019
Cecil E Pavlat, Sr. Sault Ste. Maire Tribe of Chippewa Indians	James Zyduck Xcel Energy	PAD, NOI, TLP Request	Letter	12/30/2019
William Quackenbush Ho-Chunk Nation	James Zyduck Xcel Energy	PAD, NOI, TLP Request	Letter	12/30/2019
Chris Swartz Keweenaw Bay Indian Community	James Zyduck Xcel Energy	PAD, NOI, TLP Request	Letter	12/30/2019
Lewis Taylor St. Croix Chippewa Indians of Wisconsin	James Zyduck Xcel Energy	PAD, NOI, TLP Request	Letter	12/30/2019
Adam VanZile Sokaogon Chippewa Community Mole Lake Band	James Zyduck Xcel Energy	PAD, NOI, TLP Request	Letter	12/30/2019
Warren Wahweotten, Jr. Prairie Band Potawatomi Nation	James Zyduck Xcel Energy	PAD, NOI, TLP Request	Letter	12/30/2019
Natalie Weyaus Mille Lacs Band of Ojibwe	James Zyduck Xcel Energy	PAD, NOI, TLP Request	Letter	12/30/2019
Sherry White Stockbridge Munsee Community of WI	James Zyduck Xcel Energy	PAD, NOI, TLP Request	Letter	12/30/2019
Stacy Cutbank Oneida Nation of Wisconsin	James Zyduck Xcel Energy	PAD, NOI, TLP Request	Letter	12/30/2019
James Williams Lac Vieux Desert Ban of Lake Superior Chippewa Indians	James Zyduck Xcel Energy	PAD, NOI, TLP Request	Letter	12/30/2019

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Melinda Young Lac du Flambeau Band of Lake Superior Chippewa Indians of WI	James Zyduck Xcel Energy	PAD, NOI, TLP Request	Letter	12/30/2019
Senator Tammy Baldwin	James Zyduck Xcel Energy	PAD, NOI, TLP Request	Letter	12/30/2019
Congressman Jack Bergman	James Zyduck Xcel Energy	PAD, NOI, TLP Request	Letter	12/30/2019
Edward Buikema FEMA	James Zyduck Xcel Energy	PAD, NOI, TLP Request	Letter	12/30/2019
Tokey Boswell NPS	James Zyduck Xcel Energy	PAD, NOI, TLP Request	Letter	12/30/2019
Geological and Natural History Survey-UWEX	James Zyduck Xcel Energy	PAD, NOI, TLP Request	Letter	12/30/2019
Director GLIFWC	James Zyduck Xcel Energy	PAD, NOI, TLP Request	Letter/Email	12/30/2019
Director PSCW	James Zyduck Xcel Energy	PAD, NOI, TLP Request	Letter	12/30/2019
Director of Lands, Watersheds, and Minerals Mgmt. USFS	James Zyduck Xcel Energy	PAD, NOI, TLP Request	Letter	12/30/2019
Director NOAA	James Zyduck Xcel Energy	PAD, NOI, TLP Request	Letter	12/30/2019
Director BLM	James Zyduck Xcel Energy	PAD, NOI, TLP Request	Letter	12/30/2019
Wisconsin Seventh Congressional District Representative	James Zyduck Xcel Energy	PAD, NOI, TLP Request	Letter	12/30/2019
Endangered Species Specialist USFWS	James Zyduck Xcel Energy	PAD, NOI, TLP Request	Letter	12/30/2019
FERC Coordinator USACE	James Zyduck Xcel Energy	PAD, NOI, TLP Request	Letter	12/30/2019
Field Supervisor USFWS	James Zyduck Xcel Energy	PAD, NOI, TLP Request	Letter	12/30/2019
John Fowler ACHP	James Zyduck Xcel Energy	PAD, NOI, TLP Request	Letter	12/30/2019
Jeff Gosse USFWS	James Zyduck Xcel Energy	PAD, NOI, TLP Request	Letter	12/30/2019
Senator Ron Johnson	James Zyduck Xcel Energy	PAD, NOI, TLP Request	Letter	12/30/2019
Mary Manydeeds BIA	James Zyduck Xcel Energy	PAD, NOI, TLP Request	Letter	12/30/2019
Lindy Nelson USDOJ Office of Environmental Policy and Compliance	James Zyduck Xcel Energy	PAD, NOI, TLP Request	Letter	12/30/2019
Senator Gary Peters	James Zyduck Xcel Energy	PAD, NOI, TLP Request	Letter	12/30/2019

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Samuel Rauch NMFS	James Zyduck Xcel Energy	PAD, NOI, TLP Request	Letter	12/30/2019
Senator Debbie Stabenow	James Zyduck Xcel Energy	PAD, NOI, TLP Request	Letter	12/30/2019
Angie Tornes NPS	James Zyduck Xcel Energy	PAD, NOI, TLP Request	Letter	12/30/2019
Jen Tyler EPA	James Zyduck Xcel Energy	PAD, NOI, TLP Request	Letter	12/30/2019
Nick Utrup USFWS	James Zyduck Xcel Energy	PAD, NOI, TLP Request	Letter	12/30/2019
John Zygaj FERC	James Zyduck Xcel Energy	PAD, NOI, TLP Request	Letter	12/30/2019
Kathleen Angel WCMP	James Zyduck Xcel Energy	PAD, NOI, TLP Request	Letter	12/30/2019
Senator Janet Bewley	James Zyduck Xcel Energy	PAD, NOI, TLP Request	Letter	12/30/2019
Tyler Howe WSHPO	James Zyduck Xcel Energy	PAD, NOI, TLP Request	Letter	12/30/2019
Elle Gulotty MDNR	James Zyduck Xcel Energy	PAD, NOI, TLP Request	Letter	12/30/2019
Cheryl Laatsch WDNR	James Zyduck Xcel Energy	PAD, NOI, TLP Request	Letter	12/30/2019
Representative Greg Markkanen	James Zyduck Xcel Energy	PAD, NOI, TLP Request	Letter	12/30/2019
Senator Ed McBroom	James Zyduck Xcel Energy	PAD, NOI, TLP Request	Letter	12/30/2019
Representative Beth Meyers	James Zyduck Xcel Energy	PAD, NOI, TLP Request	Letter	12/30/2019
MSHPO	James Zyduck Xcel Energy	PAD, NOI, TLP Request	Letter	12/30/2019
Gary Kolhepp Michigan Department of Environment, Great Lakes, and Energy (EGLE)	James Zyduck Xcel Energy	PAD, NOI, TLP Request	Letter	12/30/2019
Amira Oun EGLE	James Zyduck Xcel Energy	PAD, NOI, TLP Request	Letter	12/30/2019
PSCW	James Zyduck Xcel Energy	PAD, NOI, TLP Request	Letter	12/30/2019
Pamela Stevenson Michigan Attorney General's Office	James Zyduck Xcel Energy	PAD, NOI, TLP Request	Letter	12/30/2019
UWSP-CFRU	James Zyduck Xcel Energy	PAD, NOI, TLP Request	Letter	12/30/2019
Wisconsin Office of Attorney General	James Zyduck Xcel Energy	PAD, NOI, TLP Request	Letter	12/30/2019
Kathryn Brauer Town of Saxon	James Zyduck Xcel Energy	PAD, NOI, TLP Request	Letter	12/30/2019

Person/Agency Contacted	From	Item	Contact Type (Meeting, Letter, Email?)	Date
Caren Gullan City of Ironwood	James Zyduck Xcel Energy	PAD, NOI, TLP Request	Letter	12/30/2019
LeRoy Johnson Charter Township of Ironwood	James Zyduck Xcel Energy	PAD, NOI, TLP Request	Letter	12/30/2019
Gerry Pelissero Gogebic County	James Zyduck Xcel Energy	PAD, NOI, TLP Request	Letter	12/30/2019
Heather Palmquist Iron County Conservationist	James Zyduck Xcel Energy	PAD, NOI, TLP Request	Letter	12/30/2019
Eric Peterson Iron County Forest Administrator	James Zyduck Xcel Energy	PAD, NOI, TLP Request	Letter	12/30/2019
Michael Saari Iron County	James Zyduck Xcel Energy	PAD, NOI, TLP Request	Letter	12/30/2019
Stacy Wiercinski City of Hurley	James Zyduck Xcel Energy	PAD, NOI, TLP Request	Letter	12/30/2019
Ronald Ahonen Town of Kimball	James Zyduck Xcel Energy	PAD, NOI, TLP Request	Letter	12/30/2019
Lori Genisot Town of Pence	James Zyduck Xcel Energy	PAD, NOI, TLP Request	Letter	12/30/2019
Susan Lesky City of Montreal	James Zyduck Xcel Energy	PAD, NOI, TLP Request	Letter	12/30/2019
Tori Ashbrock Town of Carey	James Zyduck Xcel Energy	PAD, NOI, TLP Request	Letter	12/30/2019
Scott Crotty Xcel Energy	James Zyduck Xcel Energy	PAD, NOI, TLP Request	Letter	12/30/2019
Matthew Miller Xcel Energy	James Zyduck Xcel Energy	PAD, NOI, TLP Request	Letter	12/30/2019
James Fossum RAW	James Zyduck Xcel Energy	PAD, NOI, TLP Request	Letter	12/30/2019
Gary Hopp Friends of the Gile Flowage (FOG)	James Zyduck Xcel Energy	PAD, NOI, TLP Request	Letter	12/30/2019
Cathy Techtman FOG	James Zyduck Xcel Energy	PAD, NOI, TLP Request	Letter	12/30/2019
Northwest Regional Planning Commission	James Zyduck Xcel Energy	PAD, NOI, TLP Request	Letter	12/30/2019
Raj Skuhlka or Allison Warner RAW	James Zyduck Xcel Energy	PAD, NOI, TLP Request	Letter	12/30/2019
Thomas O'Keefe AW	James Zyduck Xcel Energy	PAD, NOI, TLP Request	Letter	12/30/2019
Marcus Ammesmaki Fond du Lac Band of Lake Superior Chippewa	James Zyduck Xcel Energy	JAM Notification	Letter	3/10/2020
Gary Bahr Sac and Fox Nation of Missouri in Kansas and Nebraska	James Zyduck Xcel Energy	JAM Notification	Letter	3/10/2020

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Brian Bisonette Lac Courte Oreilles Band of Lake Superior Chippewa Indians	James Zyduck Xcel Energy	JAM Notification	Letter	3/10/2020
Michael Blackwolf Fort Belknap Indian Community	James Zyduck Xcel Energy	JAM Notification	Letter	3/10/2020
Jonathon Buffalo Sac & Fox of the Mississippi in Iowa	James Zyduck Xcel Energy	JAM Notification	Letter	3/10/2020
Amy Burnette Leech Lake Band of Minnesota Chippewa Tribe	James Zyduck Xcel Energy	JAM Notification	Letter	3/10/2020
Marvin Defoe Red Cliff Band of Lake Superior Chippewa Indians of WI	James Zyduck Xcel Energy	JAM Notification	Letter	3/10/2020
Mary Ann Gagnon Grand Portage Band of Chippewa Indians	James Zyduck Xcel Energy	JAM Notification	Letter	3/10/2020
David Grignon Menominee Indian Tribe of WI	James Zyduck Xcel Energy	JAM Notification	Letter	3/10/2020
Bonnie Hartley Stockbridge Munsee Community Band of Mohican Indians	James Zyduck Xcel Energy	JAM Notification	Letter	3/10/2020
Diane Hunter Miami Tribe of Oklahoma	James Zyduck Xcel Energy	JAM Notification	Letter	3/10/2020
Ryan Howell Prairie Island Indian Community	James Zyduck Xcel Energy	JAM Notification	Letter	3/10/2020
Iowa Tribe of Oklahoma	James Zyduck Xcel Energy	JAM Notification	Letter	3/10/2020
Michael LaRonge Forest County Potawatomi Community of Wisconsin	James Zyduck Xcel Energy	JAM Notification	Letter	3/10/2020
Edith Leoso Bad River Band of Lake Superior Tribe of Chippewa Indians	James Zyduck Xcel Energy	JAM Notification	Letter	3/10/2020
Sandra Massey Sac and Fox Nation of OK	James Zyduck Xcel Energy	JAM Notification	Letter	3/10/2020
Wanda McFaggen St Croix Chippewa Indians of Wisconsin	James Zyduck Xcel Energy	JAM Notification	Letter	3/10/2020
Chris McGeshick Sokaogon Chippewa Community of Wisconsin	James Zyduck Xcel Energy	JAM Notification	Letter	3/10/2020
Earl Meshigaud Hannahville Potawatomi Nation	James Zyduck Xcel Energy	JAM Notification	Letter	3/10/2020

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Bryan Newland Bay Mills Indian Community of Michigan	James Zyduck Xcel Energy	JAM Notification	Letter	3/10/2020
Cecil E Pavlat, Sr. Sault Ste. Maire Tribe of Chippewa Indians	James Zyduck Xcel Energy	JAM Notification	Letter	3/10/2020
William Quackenbush Ho-Chunk Nation	James Zyduck Xcel Energy	JAM Notification	Letter	3/10/2020
Chris Swartz Keweenaw Bay Indian Community	James Zyduck Xcel Energy	JAM Notification	Letter	3/10/2020
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Adam VanZile Sokaogon Chippewa Community Mole Lake Band	James Zyduck Xcel Energy	JAM Notification	Letter	3/10/2020
Warren Wahweotten, Jr. Prairie Band Potawatomi Nation	James Zyduck Xcel Energy	JAM Notification	Letter	3/10/2020
Natalie Weyaus Mille Lacs Band of Ojibwe	James Zyduck Xcel Energy	JAM Notification	Letter	3/10/2020
Sherry White Stockbridge Munsee Community of WI	James Zyduck Xcel Energy	JAM Notification	Letter	3/10/2020
Stacy Cutbank Oneida Nation of Wisconsin	James Zyduck Xcel Energy	JAM Notification	Letter	3/10/2020
James Williams Lac Vieux Desert Ban of Lake Superior Chippewa Indians	James Zyduck Xcel Energy	JAM Notification	Letter	3/10/2020
Melinda Young Lac du Flambeau Band of Lake Superior Chippewa Indians of WI	James Zyduck Xcel Energy	JAM Notification	Letter	3/10/2020
Senator Tammy Baldwin	James Zyduck Xcel Energy	JAM Notification	Letter	3/10/2020
Congressman Jack Bergman	James Zyduck Xcel Energy	JAM Notification	Letter	3/10/2020
Edward Buikema FEMA	James Zyduck Xcel Energy	JAM Notification	Letter	3/10/2020
Tokey Boswell NPS	James Zyduck Xcel Energy	JAM Notification	Letter	3/10/2020
Geological and Natural History Survey-UWEX	James Zyduck Xcel Energy	JAM Notification	Letter	3/10/2020
Director GLIFWC	James Zyduck Xcel Energy	JAM Notification	Letter	3/10/2020

Person/Agency Contacted	From	Item	Contact Type (Meeting, Letter, Email?)	Date
Director PSCW	James Zyduck Xcel Energy	JAM Notification	Letter	3/10/2020
Director of Lands, Watersheds, and Minerals Mgmt. USFS	James Zyduck Xcel Energy	JAM Notification	Letter	3/10/2020
Director NOAA	James Zyduck Xcel Energy	JAM Notification	Letter	3/10/2020
Director BLM	James Zyduck Xcel Energy	JAM Notification	Letter	3/10/2020
Wisconsin Seventh Congressional District Representative	James Zyduck Xcel Energy	JAM Notification	Letter	3/10/2020
Endangered Species Specialist USFWS	James Zyduck Xcel Energy	JAM Notification	Letter	3/10/2020
FERC Coordinator USACE	James Zyduck Xcel Energy	JAM Notification	Letter	3/10/2020
Field Supervisor USFWS	James Zyduck Xcel Energy	JAM Notification	Letter	3/10/2020
John Fowler ACHP	James Zyduck Xcel Energy	JAM Notification	Letter	3/10/2020
Jeff Gosse USFWS	James Zyduck Xcel Energy	JAM Notification	Letter	3/10/2020
Senator Ron Johnson	James Zyduck Xcel Energy	JAM Notification	Letter	3/10/2020
Mary Manydeeds BIA	James Zyduck Xcel Energy	JAM Notification	Letter	3/10/2020
Lindy Nelson USDOJ Office of Environmental Policy and Compliance	James Zyduck Xcel Energy	JAM Notification	Letter	3/10/2020
Senator Gary Peters	James Zyduck Xcel Energy	JAM Notification	Letter	3/10/2020
Samuel Rauch NMFS	James Zyduck Xcel Energy	JAM Notification	Letter	3/10/2020
Senator Debbie Stabenow	James Zyduck Xcel Energy	JAM Notification	Letter	3/10/2020
Angie Tornes NPS	James Zyduck Xcel Energy	JAM Notification	Letter	3/10/2020
Jen Tyler EPA	James Zyduck Xcel Energy	JAM Notification	Letter	3/10/2020
Nick Utrup USFWS	James Zyduck Xcel Energy	JAM Notification	Letter	3/10/2020
John Zygaj FERC	James Zyduck Xcel Energy	JAM Notification	Letter	3/10/2020
Kathleen Angel WCMP	James Zyduck Xcel Energy	JAM Notification	Letter	3/10/2020

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Senator Janet Bewley	James Zyduck Xcel Energy	JAM Notification	Letter	3/10/2020
Tyler Howe WSHPO	James Zyduck Xcel Energy	JAM Notification	Letter	3/10/2020
Elle Gulotty MDNR	James Zyduck Xcel Energy	JAM Notification	Letter	3/10/2020
Cheryl Laatsch WDNR	James Zyduck Xcel Energy	JAM Notification	Letter	3/10/2020
Representative Greg Markkanen	James Zyduck Xcel Energy	JAM Notification	Letter	3/10/2020
Senator Ed McBroom	James Zyduck Xcel Energy	JAM Notification	Letter	3/10/2020
Representative Beth Meyers	James Zyduck Xcel Energy	JAM Notification	Letter	3/10/2020
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Amira Oun EGLE	James Zyduck Xcel Energy	JAM Notification	Letter	3/10/2020
PSCW	James Zyduck Xcel Energy	JAM Notification	Letter	3/10/2020
Pamela Stevenson Michigan Attorney General's Office	James Zyduck Xcel Energy	JAM Notification	Letter	3/10/2020
UWSP-CFRU	James Zyduck Xcel Energy	JAM Notification	Letter	3/10/2020
Wisconsin Office of Attorney General	James Zyduck Xcel Energy	JAM Notification	Letter	3/10/2020
Kathryn Brauer Town of Saxon	James Zyduck Xcel Energy	JAM Notification	Letter	3/10/2020
Karen Gullan City of Ironwood	James Zyduck Xcel Energy	JAM Notification	Letter	3/10/2020
LeRoy Johnson Charter Township of Ironwood	James Zyduck Xcel Energy	JAM Notification	Letter	3/10/2020
Gerry Pelissero Gogebic County	James Zyduck Xcel Energy	JAM Notification	Letter	3/10/2020
Heather Palmquist Iron County Conservationist	James Zyduck Xcel Energy	JAM Notification	Letter	3/10/2020
Eric Peterson Iron County Forest Administrator	James Zyduck Xcel Energy	JAM Notification	Letter	3/10/2020
Michael Saari Iron County	James Zyduck Xcel Energy	JAM Notification	Letter	3/10/2020
Stacy Wiercinski City of Hurley	James Zyduck Xcel Energy	JAM Notification	Letter	3/10/2020

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Ronald Ahonen Town of Kimball	James Zyduck Xcel Energy	JAM Notification	Letter	3/10/2020
Lori Genisot Town of Pence	James Zyduck Xcel Energy	JAM Notification	Letter	3/10/2020
Susan Lesky City of Montreal	James Zyduck Xcel Energy	JAM Notification	Letter	3/10/2020
Tori Ashbrock Town of Carey	James Zyduck Xcel Energy	JAM Notification	Letter	3/10/2020
Scott Crotty Xcel Energy	James Zyduck Xcel Energy	JAM Notification	Letter	3/10/2020
Matthew Miller Xcel Energy	James Zyduck Xcel Energy	JAM Notification	Letter	3/10/2020
James Fossum RAW	James Zyduck Xcel Energy	JAM Notification	Letter	3/10/2020
Gary Hopp Friends of the Gile Flowage (FOG)	James Zyduck Xcel Energy	JAM Notification	Letter	3/10/2020
Northwest Regional Planning Commission	James Zyduck Xcel Energy	JAM Notification	Letter	3/10/2020
Raj Skuhlka or Allison Warner RAW	James Zyduck Xcel Energy	JAM Notification	Letter	3/10/2020
Thomas O'Keefe AW	James Zyduck Xcel Energy	JAM Notification	Letter	3/10/2020
Elle Gulotty, MDNR Nick Utrup, USFWS Cheryl Laatsch, WDNR Tyler Howe, WSHPO Amira Oun, EGLE Angela Tornes, NPS Matthew Miller, Xcel Energy Scott Crotty, Xcel Energy James Zyduck, Xcel Energy Shawn Puzen, Mead & Hunt Arianna Schmidt, Mead & Hunt	Darrin Johnson Mead & Hunt	Invitation to JAM	Email	3/17/2020
Darrin Johnson Mead & Hunt	Cheryl Laatsch WDNR	Invitation to JAM Response	Email	3/18/2018
Cheryl Laatsch WDNR	Darrin Johnson Mead & Hunt	Invitation to JAM Response	Email	3/18/2018
Darrin Johnson Mead & Hunt	Cheryl Laatsch WDNR	Invitation to JAM	Email	3/18/2020
Jim Fossum RAW	Darrin Johnson Mead & Hunt	Invitation to JAM	Email	3/18/2020
Marcus Ammesmaki Fond du Lac Band of Lake Superior Chippewa	James Zyduck Xcel Energy	JAM Notification Update	Letter	3/18/2020
Gary Bahr Sac and Fox Nation of Missouri in Kansas and Nebraska	James Zyduck Xcel Energy	JAM Notification Update	Letter	3/18/2020

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Brian Bisonette Lac Courte Oreilles Band of Lake Superior Chippewa Indians	James Zyduck Xcel Energy	JAM Notification Update	Letter	3/18/2020
Michael Blackwolf Fort Belknap Indian Community	James Zyduck Xcel Energy	JAM Notification Update	Letter	3/18/2020
Jonathon Buffalo Sac & Fox of the Mississippi in Iowa	James Zyduck Xcel Energy	JAM Notification Update	Letter	3/18/2020
Amy Burnette Leech Lake Band of Minnesota Chippewa Tribe	James Zyduck Xcel Energy	JAM Notification Update	Letter	3/18/2020
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David Grignon Menominee Indian Tribe of WI	James Zyduck Xcel Energy	JAM Notification Update	Letter	3/18/2020
Bonnie Hartley Stockbridge Munsee Community Band of Mohican Indians	James Zyduck Xcel Energy	JAM Notification Update	Letter	3/18/2020
Diane Hunter Miami Tribe of Oklahoma	James Zyduck Xcel Energy	JAM Notification Update	Letter	3/18/2020
Ryan Howell Prairie Island Indian Community	James Zyduck Xcel Energy	JAM Notification Update	Letter	3/18/2020
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Director of Lands, Watersheds, and Minerals Mgmt. USFS	James Zyduck Xcel Energy	JAM Notification Update	Letter	3/18/2020
Director NOAA	James Zyduck Xcel Energy	JAM Notification Update	Letter	3/18/2020
Director BLM	James Zyduck Xcel Energy	JAM Notification Update	Letter	3/18/2020
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FERC Coordinator USACE	James Zyduck Xcel Energy	JAM Notification Update	Letter	3/18/2020
Field Supervisor USFWS	James Zyduck Xcel Energy	JAM Notification Update	Letter	3/18/2020
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Jeff Gosse USFWS	James Zyduck Xcel Energy	JAM Notification Update	Letter	3/18/2020
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John Zygaj FERC	James Zyduck Xcel Energy	JAM Notification Update	Letter	3/18/2020
Kathleen Angel WCMP	James Zyduck Xcel Energy	JAM Notification Update	Letter	3/18/2020

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Cheryl Laatsch WDNR	James Zyduck Xcel Energy	JAM Notification Update	Letter	3/18/2020
Representative Greg Markkanen	James Zyduck Xcel Energy	JAM Notification Update	Letter	3/18/2020
Senator Ed McBroom	James Zyduck Xcel Energy	JAM Notification Update	Letter	3/18/2020
Representative Beth Meyers	James Zyduck Xcel Energy	JAM Notification Update	Letter	3/18/2020
MSHPO	James Zyduck Xcel Energy	JAM Notification Update	Letter	3/18/2020
Gary Kolhepp EGLE	James Zyduck Xcel Energy	JAM Notification Update	Letter	3/18/2020
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PSCW	James Zyduck Xcel Energy	JAM Notification Update	Letter	3/18/2020
Pamela Stevenson Michigan Attorney General's Office	James Zyduck Xcel Energy	JAM Notification Update	Letter	3/18/2020
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Wisconsin Office of Attorney General	James Zyduck Xcel Energy	JAM Notification Update	Letter	3/18/2020
Kathryn Brauer Town of Saxon	James Zyduck Xcel Energy	JAM Notification Update	Letter	3/18/2020
Caren Gullan City of Ironwood	James Zyduck Xcel Energy	JAM Notification Update	Letter	3/18/2020
LeRoy Johnson Charter Township of Ironwood	James Zyduck Xcel Energy	JAM Notification Update	Letter	3/18/2020
Gerry Pelissero Gogebic County	James Zyduck Xcel Energy	JAM Notification Update	Letter	3/18/2020
Heather Palmquist Iron County Conservationist	James Zyduck Xcel Energy	JAM Notification Update	Letter	3/18/2020
Eric Peterson Iron County Forest Administrator	James Zyduck Xcel Energy	JAM Notification Update	Letter	3/18/2020
Michael Saari Iron County	James Zyduck Xcel Energy	JAM Notification Update	Letter	3/18/2020
Stacy Wiercinski City of Hurley	James Zyduck Xcel Energy	JAM Notification Update	Letter	3/18/2020

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Tori Ashbrock Town of Carey	James Zyduck Xcel Energy	JAM Notification Update	Letter	3/18/2020
Scott Crotty Xcel Energy	James Zyduck Xcel Energy	JAM Notification Update	Letter	3/18/2020
Matthew Miller Xcel Energy	James Zyduck Xcel Energy	JAM Notification Update	Letter	3/18/2020
James Fossum RAW	James Zyduck Xcel Energy	JAM Notification Update	Letter	3/18/2020
Gary Hopp Friends of the Gile Flowage (FOG)	James Zyduck Xcel Energy	JAM Notification Update	Letter	3/18/2020
Cathy Techtman FOG	James Zyduck Xcel Energy	JAM Notification Update	Letter	3/18/2020
Northwest Regional Planning Commission	James Zyduck Xcel Energy	JAM Notification Update	Letter	3/18/2020
Raj Skuhlka or Allison Warner RAW	James Zyduck Xcel Energy	JAM Notification Update	Letter	3/18/2020
Thomas O'Keefe AW	James Zyduck Xcel Energy	JAM Notification Update	Letter	3/18/2020
Matthew Miller Xcel Energy	Gary Hopp FOG	RSVP	Email	3/24/2020
Gary Hopp FOG	Darrin Johnson Mead & Hunt	RSVP	Email	3/24/2020
Amira Oun, EGLE Elle Gulotty, MDNR Nick Utrup, USFWS Cheryl Laatsch, WDNR Gary Hopp, FOG Jim Fossum, RAW Jim Clement, Xcel Energy Randy Volbrecht, Xcel Energy Matthew Miller, Xcel Energy Scott Crotty, Xcel Energy James Zyduck, Xcel Energy Shawn Puzen, Mead & Hunt	Darrin Johnson Mead & Hunt	Final JAM Details	Email	4/3/2020
Angela Tornes, NPS Tyler Howe, WSHPO	Darrin Johnson Mead & Hunt	Final JAM Details	Email	4/3/2020
Matthew Miller Xcel Energy	Thomas O'Keefe AW	JAM Details	Email	4/8/2020
Cathy Techtman FOG	Darrin Johnson Mead & Hunt	RSVP	Email	4/3/2020

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Darrin Johnson	Cathy Techtman FOG	RSVP	Email	4/3/2020
Shawn Puzen Mead & Hunt	Michael LaRonge Forest County Potawatomi	JAM Correspondence	Email	4/8/2020
Shawn Puzen Mead & Hunt	Thomas O'Keefe AW	RSVP	Email	4/9/2020
FERC	James Zyduck Xcel Energy	Proof of JAM Notice Publication	Letter	4/13/2020
Darrin Johnson Mead & Hunt	Elle Gulotty MDNR	Post JAM Correspondence	Email	4/24/2020
Elle Gulotty MDNR	Darrin Johnson Mead & Hunt	Post JAM Correspondence	Email	4/27/2020
Darrin Johnson Mead & Hunt	Elle Gulotty MDNR	Post JAM Correspondence	Email	4/27/2020
Tom O'Keefe, AW Cathy Techtman, FOG Jake Ring, Local Boater Megan Easterling, Boater Elle Gulotty, MDNR Kyle Kruger, MDNR Amira Oun, EGLE Jim Fossum, RAW Angel Tornes, NPS Cheryl Laatsch, WDNR Connie Antonuk, WDNR James Zyduck, Xcel Energy Scott Crotty, Xcel Energy Randy Volbrecht, Xcel Energy Matthew Miller, Xcel Energy Shawn Puzen, Mead & Hunt Jen Schuetz, Mead & Hunt	Darrin Johnson Mead & Hunt	Post JAM Correspondence	Email	5/4/2020
Darrin Johnson Mead & Hunt	Elle Gulotty MDNR	Post JAM Correspondence	Email	5/11/2020
Elle Gulotty MDNR	Darrin Johnson Mead & Hunt	Post JAM Correspondence	Email	5/11/2020
Darrin Johnson Mead & Hunt	Elle Gulotty MDNR	Post JAM Correspondence	Email	5/11/2020
Darrin Johnson Mead & Hunt	Elle Gulotty MDNR	Post JAM Correspondence	Email	5/11/2020
Elle Gulotty MDNR	Darrin Johnson Mead & Hunt	Post JAM Correspondence	Email	5/12/2020
Darrin Johnson Mead & Hunt	Elle Gulotty MDNR	Post JAM Correspondence	Email	5/12/2020
Elle Gulotty MDNR	Darrin Johnson Mead & Hunt	Post JAM Correspondence	Email	5/12/2020
Darrin Johnson Mead & Hunt	Elle Gulotty MDNR	Post JAM Correspondence	Email	5/12/2020

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James Zyduck Xcel Energy	Robert Stuber Midwest Hydro Coalition	Post JAM Correspondence	Email/Letter	5/20/2020
FERC	Blake Cazier Boater	Post JAM Correspondence	Letter	5/20/2020
Robert Stuber MHRC	Matthew Miller Xcel Energy	Post JAM Correspondence	Email	5/20/2020
FERC	Brian Bulbransen Boater	PAD Comments/Study Requests	Letter	6/1/2020
FERC	Christopher O'Brien Boater	PAD Comments/Study Requests	Letter	6/1/2020
FERC	Kraig Lund Boater	PAD Comments/Study Requests	Letter	6/1/2020
FERC	Thomas Hagerty Boater	PAD Comments/Study Requests	Letter	6/1/2020
FERC	Neal Schroeter Boater	PAD Comments/Study Requests	Letter	6/2/2020
FERC	Ryan Whipple Boater	PAD Comments/Study Requests	Letter	6/3/2020
FERC	Greg Weiss Boater	PAD Comments/Study Requests	Letter	6/3/2020
FERC	Cathy Techtman FOG	PAD Comments/Study Requests	Letter	6/8/2020
FERC	Karen Frank Boater	PAD Comments/Study Requests	Letter	6/8/2020
FERC	Paul Lange Boater	PAD Comments/Study Requests	Letter	6/5/2020
FERC	Todd Leigh Boater	PAD Comments/Study Requests	Letter	6/8/2020
FERC	Thomas O'Keefe AW	PAD Comments/Study Requests	Letter	6/9/2020
FERC	Jacob Ring Boater	PAD Comments/Study Requests	Letter	6/9/2020
FERC	Elle Gulotty MDNR	PAD Comments/Study Requests	Letter	6/9/2020
FERC	Robert Stuber MHRC	PAD Comments/Study Requests	Letter	6/9/2020

Person/Agency Contacted	From	Item	Contact Type (Meeting, Letter, Email?)	Date
FERC	Angela Tornes NPS	PAD Comments/Study Requests	Letter	6/9/2020
FERC	Raj Shukla RAW	PAD Comments/Study Requests	Letter	6/9/2020
FERC	Sam Schank Boater	PAD Comments/Study Requests	Letter	6/9/2020
FERC	Cheryl Laatsch WDNR	PAD Comments/Study Requests	Letter	6/9/2020
FERC	Andrew Wians Boater	PAD Comments/Study Requests	Letter	6/9/2020
FERC	Don Heym Boater	PAD Comments/Study Requests	Letter	6/10/2020
FERC	David Skriba Boater	PAD Comments/Study Requests	Letter	6/20/2020
FERC	Linda Nicholson Boater	PAD Comments/Study Requests	Letter	6/20/2020
FERC	John Burton Boater	PAD Comments/Study Requests	Letter	6/22/2020
FERC	David Wehnes Boater	PAD Comments/Study Requests	Letter	6/22/2020
FERC	Edward Bilek Boater	PAD Comments/Study Requests	Letter	6/25/2020
FERC	Lynn Wallace Boater	PAD Comments/Study Requests	Letter	7/4/2020
Marcus Ammesmaki Fond du Lac Band of Lake Superior Chippewa	James Zyduck Xcel Energy	Site Visit Notification	Letter	9/4/2020
Gary Bahr Sac and Fox Nation of Missouri in Kansas and Nebraska	James Zyduck Xcel Energy	Site Visit Notification	Letter	9/4/2020
Brian Bisonette Lac Courte Oreilles Band of Lake Superior Chippewa Indians	James Zyduck Xcel Energy	Site Visit Notification	Letter	9/4/2020
Michael Blackwolf Fort Belknap Indian Community	James Zyduck Xcel Energy	Site Visit Notification	Letter	9/4/2020
Jonathon Buffalo Sac & Fox of the Mississippi in Iowa	James Zyduck Xcel Energy	Site Visit Notification	Letter	9/4/2020

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Mary Ann Gagnon Grand Portage Band of Chippewa Indians	James Zyduck Xcel Energy	Site Visit Notification	Letter	9/4/2020
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Bonnie Hartley Stockbridge Munsee Community Band of Mohican Indians	James Zyduck Xcel Energy	Site Visit Notification	Letter	9/4/2020
Diane Hunter Miami Tribe of Oklahoma	James Zyduck Xcel Energy	Site Visit Notification	Letter	9/4/2020
Ryan Howell Prairie Island Indian Community	James Zyduck Xcel Energy	Site Visit Notification	Letter	9/4/2020
Iowa Tribe of Oklahoma	James Zyduck Xcel Energy	Site Visit Notification	Letter	9/4/2020
Michael LaRonge Forest County Potawatomi Community of Wisconsin	James Zyduck Xcel Energy	Site Visit Notification	Letter	9/4/2020
Edith Leoso Bad River Band of Lake Superior Tribe of Chippewa Indians	James Zyduck Xcel Energy	Site Visit Notification	Letter	9/4/2020
Sandra Massey Sac and Fox Nation of OK	James Zyduck Xcel Energy	Site Visit Notification	Letter	9/4/2020
Wanda McFaggen St Croix Chippewa Indians of Wisconsin	James Zyduck Xcel Energy	Site Visit Notification	Letter	9/4/2020
Chris McGeshick Sokaogon Chippewa Community of Wisconsin	James Zyduck Xcel Energy	Site Visit Notification	Letter	9/4/2020
Earl Meshigaud Hannahville Potawatomi Nation	James Zyduck Xcel Energy	Site Visit Notification	Letter	9/4/2020
Jamie Arsenault White Earth Band of the Minnesota Chippewa Tribe	James Zyduck Xcel Energy	Site Visit Notification	Letter	9/4/2020
Bryan Newland Bay Mills Indian Community of Michigan	James Zyduck Xcel Energy	Site Visit Notification	Letter	9/4/2020
Cecil E Pavlat, Sr. Sault Ste. Marie Tribe of Chippewa Indians	James Zyduck Xcel Energy	Site Visit Notification	Letter	9/4/2020

Person/Agency Contacted	From	Item	Contact Type (Meeting, Letter, Email?)	Date
William Quackenbush Ho-Chunk Nation	James Zyduck Xcel Energy	Site Visit Notification	Letter	9/4/2020
Warren Swartz Keweenaw Bay Indian Community	James Zyduck Xcel Energy	Site Visit Notification	Letter	9/4/2020
Lewis Taylor St. Croix Chippewa Indians of Wisconsin	James Zyduck Xcel Energy	Site Visit Notification	Letter	9/4/2020
Adam VanZile Sokaogon Chippewa Community Mole Lake Band	James Zyduck Xcel Energy	Site Visit Notification	Letter	9/4/2020
Warren Wahweotten, Jr. Prairie Band Potawatomi Nation	James Zyduck Xcel Energy	Site Visit Notification	Letter	9/4/2020
Natalie Weyaus Mille Lacs Band of Ojibwe	James Zyduck Xcel Energy	Site Visit Notification	Letter	9/4/2020
Sherry White Stockbridge Munsee Community of WI	James Zyduck Xcel Energy	Site Visit Notification	Letter	9/4/2020
Stacy Cutbank Oneida Nation of Wisconsin	James Zyduck Xcel Energy	Site Visit Notification	Letter	9/4/2020
James Williams Lac Vieux Desert Ban of Lake Superior Chippewa Indians	James Zyduck Xcel Energy	Site Visit Notification	Letter	9/4/2020
Melinda Young Lac du Flambeau Band of Lake Superior Chippewa Indians of WI	James Zyduck Xcel Energy	Site Visit Notification	Letter	9/4/2020
Senator Tammy Baldwin	James Zyduck Xcel Energy	Site Visit Notification	Letter	9/4/2020
Congressman Jack Bergman	James Zyduck Xcel Energy	Site Visit Notification	Letter	9/4/2020
Edward Buikema FEMA	James Zyduck Xcel Energy	Site Visit Notification	Letter	9/4/2020
Tokey Boswell NPS	James Zyduck Xcel Energy	Site Visit Notification	Letter	9/4/2020
Ken Bradbury Geological and Natural History Survey-UWEX	James Zyduck Xcel Energy	Site Visit Notification	Letter	9/4/2020
Director GLIFWC	James Zyduck Xcel Energy	Site Visit Notification	Letter	9/4/2020
Director PSCW	James Zyduck Xcel Energy	Site Visit Notification	Letter	9/4/2020
Director of Lands, Watersheds, and Minerals Mgmt. USFS	James Zyduck Xcel Energy	Site Visit Notification	Letter	9/4/2020
Director NOAA	James Zyduck Xcel Energy	Site Visit Notification	Letter	9/4/2020

Person/Agency Contacted	From	Item	Contact Type (Meeting, Letter, Email?)	Date
Northeastern States District Manager BLM	James Zyduck Xcel Energy	Site Visit Notification	Letter	9/4/2020
Representative Tom Tiffany	James Zyduck Xcel Energy	Site Visit Notification	Letter	9/4/2020
Endangered Species Specialist USFWS	James Zyduck Xcel Energy	Site Visit Notification	Letter	9/4/2020
Nannette Bischoff FERC Coordinator USACE	James Zyduck Xcel Energy	Site Visit Notification	Letter	9/4/2020
Field Supervisor USFWS	James Zyduck Xcel Energy	Site Visit Notification	Letter	9/4/2020
John Fowler ACHP	James Zyduck Xcel Energy	Site Visit Notification	Letter	9/4/2020
Jeff Gosse USFWS	James Zyduck Xcel Energy	Site Visit Notification	Letter	9/4/2020
Senator Ron Johnson	James Zyduck Xcel Energy	Site Visit Notification	Letter	9/4/2020
Mary Manydeeds BIA	James Zyduck Xcel Energy	Site Visit Notification	Letter	9/4/2020
Lindy Nelson USDOJ Office of Environmental Policy and Compliance	James Zyduck Xcel Energy	Site Visit Notification	Letter	9/4/2020
Senator Gary Peters	James Zyduck Xcel Energy	Site Visit Notification	Letter	9/4/2020
Samuel Rauch NMFS	James Zyduck Xcel Energy	Site Visit Notification	Letter	9/4/2020
Senator Debbie Stabenow	James Zyduck Xcel Energy	Site Visit Notification	Letter	9/4/2020
Angie Tornes NPS	James Zyduck Xcel Energy	Site Visit Notification	Letter	9/4/2020
Jen Tyler EPA	James Zyduck Xcel Energy	Site Visit Notification	Letter	9/4/2020
Nick Utrup USFWS	James Zyduck Xcel Energy	Site Visit Notification	Letter	9/4/2020
John Zygaj FERC	James Zyduck Xcel Energy	Site Visit Notification	Letter	9/4/2020
Kathleen Angel WCMP	James Zyduck Xcel Energy	Site Visit Notification	Letter	9/4/2020
Senator Janet Bewley	James Zyduck Xcel Energy	Site Visit Notification	Letter	9/4/2020
Tyler Howe WSHPO	James Zyduck Xcel Energy	Site Visit Notification	Letter	9/4/2020
Elle Gulotty MDNR	James Zyduck Xcel Energy	Site Visit Notification	Letter	9/4/2020

Person/Agency Contacted	From	Item	Contact Type (Meeting, Letter, Email?)	Date
Cheryl Laatsch WDNR	James Zyduck Xcel Energy	Site Visit Notification	Letter	9/4/2020
Representative Greg Markkanen	James Zyduck Xcel Energy	Site Visit Notification	Letter	9/4/2020
Senator Ed McBroom	James Zyduck Xcel Energy	Site Visit Notification	Letter	9/4/2020
Representative Beth Meyers	James Zyduck Xcel Energy	Site Visit Notification	Letter	9/4/2020
MSHPO	James Zyduck Xcel Energy	Site Visit Notification	Letter	9/4/2020
Gary Kolhepp EGLE	James Zyduck Xcel Energy	Site Visit Notification	Letter	9/4/2020
Amira Oun EGLE	James Zyduck Xcel Energy	Site Visit Notification	Letter	9/4/2020
Director PSCW	James Zyduck Xcel Energy	Site Visit Notification	Letter	9/4/2020
Pamela Stevenson Michigan Attorney General's Office	James Zyduck Xcel Energy	Site Visit Notification	Letter	9/4/2020
UWSP-CFRU	James Zyduck Xcel Energy	Site Visit Notification	Letter	9/4/2020
Kathryn Brauer Town of Saxon	James Zyduck Xcel Energy	Site Visit Notification	Letter	9/4/2020
Caren Gullan City of Ironwood	James Zyduck Xcel Energy	Site Visit Notification	Letter	9/4/2020
LeRoy Johnson Charter Township of Ironwood	James Zyduck Xcel Energy	Site Visit Notification	Letter	9/4/2020
Gerry Pelissero Gogebic County	James Zyduck Xcel Energy	Site Visit Notification	Letter	9/4/2020
Heather Palmquist Iron County Conservationist	James Zyduck Xcel Energy	Site Visit Notification	Letter	9/4/2020
Eric Peterson Iron County Forest Administrator	James Zyduck Xcel Energy	Site Visit Notification	Letter	9/4/2020
Michael Saari Iron County	James Zyduck Xcel Energy	Site Visit Notification	Letter	9/4/2020
Stacy Wiercinski City of Hurley	James Zyduck Xcel Energy	Site Visit Notification	Letter	9/4/2020
Ronald Ahonen Town of Kimball	James Zyduck Xcel Energy	Site Visit Notification	Letter	9/4/2020
Lori Genisot Town of Pence	James Zyduck Xcel Energy	Site Visit Notification	Letter	9/4/2020
Susan Lesky City of Montreal	James Zyduck Xcel Energy	Site Visit Notification	Letter	9/4/2020
Tori Ashbrock Town of Carey	James Zyduck Xcel Energy	Site Visit Notification	Letter	9/4/2020

Person/Agency Contacted	From	Item	Contact Type (Meeting, Letter, Email?)	Date
Deb Lewis City of Ashland	James Zyduck Xcel Energy	Site Visit Notification	Letter	9/4/2020
Matthew Lehto Town of White River	James Zyduck Xcel Energy	Site Visit Notification	Letter	9/4/2020
Scott Crotty Xcel Energy	James Zyduck Xcel Energy	Site Visit Notification	Letter	9/4/2020
Matthew Miller Xcel Energy	James Zyduck Xcel Energy	Site Visit Notification	Letter	9/4/2020
James Fossum RAW	James Zyduck Xcel Energy	Site Visit Notification	Letter	9/4/2020
Gary Hopp FOG	James Zyduck Xcel Energy	Site Visit Notification	Letter	9/4/2020
Cathy Techtman FOG	James Zyduck Xcel Energy	Site Visit Notification	Letter	9/4/2020
Rita Franzoi Hurley Chamber of Commerce	James Zyduck Xcel Energy	Site Visit Notification	Letter	9/4/2020
Meagan Easterling Local Boater	James Zyduck Xcel Energy	Site Visit Notification	Letter	9/4/2020
Jake Ring Local Boater	James Zyduck Xcel Energy	Site Visit Notification	Letter	9/4/2020
Northwest Regional Planning Commission	James Zyduck Xcel Energy	Site Visit Notification	Letter	9/4/2020
Raj Skuhlka or Allison Warner RAW	James Zyduck Xcel Energy	Site Visit Notification	Letter	9/4/2020
Thomas O'Keefe AW	James Zyduck Xcel Energy	Site Visit Notification	Letter	9/4/2020
Matthew Miller Xcel Energy	Cathy Techtman FOG	Site Visit RSVP	Email	9/25/2020
Cathy Techtman FOG	Matthew Miller Xcel Energy	Site Visit RSVP	Email	9/30/2020
Cathy Techtman FOG	Matthew Miller Xcel Energy	Site Visit RSVP	Email	9/30/2020
FERC	James Zyduck Xcel Energy	Proof of Publication for Site Visit Notice	Letter	10/2/2020

1.2 Listing of Stage 2 Contacts with Stakeholders

Table 1.2-1 presents contacts made between stakeholders and the Applicant, beginning after receipt of the written study requests, and ending with the filing of the Draft License Application (DLA). Contacts were made through meetings and written correspondence. The following table presents a summary of the various contacts. Any comments received on the DLA will be included in this section of the Final License Application (FLA).

Table 1.2-1 Listing of Stage 2 Contacts with Stakeholders

Person/Agency Contacted	From	Item	Contact Type (Meeting or Letter/Email?)	Date
Kimberly Bose FERC	James Zyduck Xcel Energy	Study Summary	Letter	9/1/2020
Thomas O'Keefe, AW Cathy Techtman, FOG Elle Gulotty, MDNR Angie Tornes, NPS Jim Fossum, RAW Cheryl Laatsch, WDNR	Matthew Miller Xcel Energy	Study Summary	Email	9/1/2020
Cheryl Laatsch WDNR	Darrin Johnson Mead & Hunt	Invasive Study Discussions	Email	1/7/2021
Darrin Johnson Mead & Hunt	Macaulay Haller WDNR	Invasive Study Discussions	Email	1/7/2021
Cheryl Laatsch WDNR	Darrin Johnson Mead & Hunt	Mussel Study Discussions	Email	1/7/2021
Darrin Johnson Mead & Hunt	Cheryl Laatsch Mead & Hunt	Mussel Study Discussions	Email	1/7/2021
Cheryl Laatsch WDNR	Shawn Puzen Mead & Hunt	Mussel Study Discussions	Email	1/7/2021
Darrin Johnson Mead & Hunt	Macaulay Haller WDNR	Mussel Study Discussions	Email	1/7/2021
Thomas O'Keefe AW	Darrin Johnson Mead & Hunt	Whitewater Study Discussions	Email	4/28/2021
Darrin Johnson Mead & Hunt	Thomas O'Keefe AW	Whitewater Study Discussions	Email	4/28/2021
Thomas O'Keefe AW	Darrin Johnson Mead & Hunt	Whitewater Study Discussions	Email	4/28/2021
Darrin Johnson Mead & Hunt	Thomas O'Keefe AW	Whitewater Study Discussions	Email	4/29/2021
Thomas O'Keefe AW	Shawn Puzen Mead & Hunt	Whitewater Study Discussions	Email	4/29/2021
Thomas O'Keefe AW	Shawn Puzen Mead & Hunt	Whitewater Study Discussions	Email	5/4/2021
Darrin Johnson Mead & Hunt	Angie Tornes NPS	Whitewater Study Discussions	Letter	4/28/2021
Angie Tornes NPS	Shawn Puzen Mead & Hunt	Whitewater Study Discussions	Email	4/29/2021
Shawn Puzen Mead & Hunt	Angie Tornes NPS	Whitewater Study Discussions	Email	4/29/2021
Shawn Puzen Mead & Hunt	Angie Tornes NPS	Whitewater Study Discussions	Email	4/29/2021

Person/Agency Contacted	From	Item	Contact Type (Meeting or Letter/Email?)	Date
Shawn Puzen Mead & Hunt	Angie Tornes NPS	Whitewater Study Discussions	Email	4/30/2021
Shawn Puzen Mead & Hunt	Angie Tornes NPS	Whitewater Study Discussions	Email	4/30/2021
Shawn Puzen Mead & Hunt	Angie Tornes NPS	Whitewater Study Discussions	Email	4/30/2021
Kathleen Angel WCMP	Matthew Miller Xcel Energy	Coastal Management Zone Coordination	Letter	4/15/2022
Rhonda Wuycheck EGLE	Matthew Miller Xcel Energy	Coastal Management Zone Coordination	Letter	4/15/2022
Matthew Miller Xcel Energy	Rhonda Wuycheck EGLE	Coastal Management Zone Coordination	Email	4/18/2022
Matthew Miller Xcel Energy	Matt Smar EGLE	Coastal Management Zone Coordination	Email	4/18/2022
Matt Smar EGLE	Matthew Miller Xcel Energy	Coastal Management Zone Coordination	Email	4/18/2022
Matt Smar EGLE	Matthew Miller Xcel Energy	Coastal Management Zone Coordination	Email/Letter	4/21/2022
Matt Smar EGLE	Matthew Miller Xcel Energy	Coastal Management Zone Coordination	Email/Letter	6/15/2022
Matthew Miller Xcel Energy	Matt Smar EGLE	Coastal Management Zone Coordination	Email	4/29/2022
Cheryl Laatsch WDNR	Darrin Johnson Mead & Hunt	Water Quality Temperature Standard Discussions	Email	4/4/2022
Darrin Johnson Mead & Hunt	Cheryl Laatsch WDNR	Water Quality Temperature Standard Discussions	Email	4/4/2022
Darrin Johnson Mead & Hunt	Ashley Beranek WDNR	Water Quality Temperature Standard Discussions	Email	4/21/2022

Person/Agency Contacted	From	Item	Contact Type (Meeting or Letter/Email?)	Date
Darrin Johnson Mead & Hunt	Doug Clement EGLE	Water Quality Temperature Standard Discussions	Email	4/29/2022
Edith Leoso Bad River Band of Lake Superior Tribe of the Chippewa	Scott Crotty Xcel Energy	DLA	Letter	7/6/2022
Bryan Newland Bay Mills Indian Community of Michigan	Scott Crotty Xcel Energy	DLA	Letter	7/6/2022
Jill Hoppe Fond du Lac Band of the Minnesota Chippewa Tribe	Scott Crotty Xcel Energy	DLA	Letter	7/6/2022
Benjamin Rhodd Forest County Potawatomi Community of WI	Scott Crotty Xcel Energy	DLA	Letter	7/6/2022
Michael Blackwolf Fort Belknap Indian Community of the Fort Belknap Reservation of Montana	Scott Crotty Xcel Energy	DLA	Letter	7/6/2022
Maryann Gagnon Grand Portage Band of the MN Chippewa Tribe	Scott Crotty Xcel Energy	DLA	Letter	7/6/2022
Earl Meshigaud Hannahville Potawatomi Indian Community	Scott Crotty Xcel Energy	DLA	Letter	7/6/2022
William Quackenbush Ho-Chunk Nation of WI	Scott Crotty Xcel Energy	DLA	Letter	7/6/2022
Iowa Tribe of Oklahoma	Scott Crotty Xcel Energy	DLA	Letter	7/6/2022
Warren Swartz Keweenaw Bay Indian Community	Scott Crotty Xcel Energy	DLA	Letter	7/6/2022
Brian Bisonette Lac Courte Oreilles Band of Chippewa Indians	Scott Crotty Xcel Energy	DLA	Letter	7/6/2022
Melinda Young Lac du Flambeau Band of Lake Superior Chippewa Indians	Scott Crotty Xcel Energy	DLA	Letter	7/6/2022
Alina Shively Lac Vieux Desert Band of Lake Superior Chippewa Indians	Scott Crotty Xcel Energy	DLA	Letter	7/6/2022

Person/Agency Contacted	From	Item	Contact Type (Meeting or Letter/Email?)	Date
James Williams Lac Vieux Desert Band of Lake Superior Chippewa Indians	Scott Crotty Xcel Energy	DLA	Letter	7/6/2022
Amy Burnette Leech Lake Band of Chippewa Indians	Scott Crotty Xcel Energy	DLA	Letter	7/6/2022
David Grignon Menominee Indian Tribe of WI	Scott Crotty Xcel Energy	DLA	Letter	7/6/2022
Diane Hunter Miami Tribe of Oklahoma	Scott Crotty Xcel Energy	DLA	Letter	7/6/2022
Natalie Weyaus Mille Lacs Band of Ojibwe	Scott Crotty Xcel Energy	DLA	Letter	7/6/2022
Stacy Cutbank Oneida Nation of Wisconsin	Scott Crotty Xcel Energy	DLA	Letter	7/6/2022
Ryan Howell Prairie Island Indian Community	Scott Crotty Xcel Energy	DLA	Letter	7/6/2022
Hattie Mitchell Prairie Band Potawatomi Nation	Scott Crotty Xcel Energy	DLA	Letter	7/6/2022
Marvin Defoe Red Cliff Band of Lake Superior Chippewa	Scott Crotty Xcel Energy	DLA	Letter	7/6/2022
Jonathon Buffalo Sac and Fox of the Mississippi in Iowa	Scott Crotty Xcel Energy	DLA	Letter	7/6/2022
Gary Bahr Sac and Fox Nation of Missouri in KS and NB	Scott Crotty Xcel Energy	DLA	Letter	7/6/2022
Sandra Massey Sac and Fox Nation of Oklahoma	Scott Crotty Xcel Energy	DLA	Letter	7/6/2022
Cecil Pavlat, Sr. Sault Ste Marie Tribe of Chippewa Indians	Scott Crotty Xcel Energy	DLA	Letter	7/6/2022
Chris McGeshick Sokaogon Chippewa Community Mole Lake Band	Scott Crotty Xcel Energy	DLA	Letter	7/6/2022
Michael LaRonge Sokaogon Chippewa Community Mole Lake Band	Scott Crotty Xcel Energy	DLA	Letter	7/6/2022
Lewis Taylor St. Croix Band of Lake Superior Chippewa	Scott Crotty Xcel Energy	DLA	Letter	7/6/2022
Wanda McFaggen St. Croix Band of Lake Superior Chippewa	Scott Crotty Xcel Energy	DLA	Letter	7/6/2022
Nathan Allison Stockbridge Munsee Community	Scott Crotty Xcel Energy	DLA	Letter	7/6/2022

Person/Agency Contacted	From	Item	Contact Type (Meeting or Letter/Email?)	Date
Sherry White Stockbridge Munsee Tribe of Mohican Indians	Scott Crotty Xcel Energy	DLA	Letter	7/6/2022
Jamie Arsenault White Earth Band of the MN Chippewa	Scott Crotty Xcel Energy	DLA	Letter	7/6/2022
John Fowler ACHP	Scott Crotty Xcel Energy	DLA	Letter	7/6/2022
Edward Buikema FEMA	Scott Crotty Xcel Energy	DLA	Letter	7/6/2022
John Zygaj FERC	Scott Crotty Xcel Energy	DLA	Letter	7/6/2022
Director GLIFWC	Scott Crotty Xcel Energy	DLA	Letter	7/6/2022
Samuel Rauch NOAA	Scott Crotty Xcel Energy	DLA	Letter	7/6/2022
Director Geological and History Survey-UWEX	Scott Crotty Xcel Energy	DLA	Letter	7/6/2022
USFS Director of Lands, Watersheds and Minerals USFS	Scott Crotty Xcel Energy	DLA	Letter	7/6/2022
Nannette Bischoff USACE	Scott Crotty Xcel Energy	DLA	Letter	7/6/2022
Director NOAA	Scott Crotty Xcel Energy	DLA	Letter	7/6/2022
Mary Manydeeds BIA	Scott Crotty Xcel Energy	DLA	Letter	7/6/2022
Tammy Poitra BIA	Scott Crotty Xcel Energy	DLA	Letter	7/6/2022
District Manager BLM	Scott Crotty Xcel Energy	DLA	Letter	7/6/2022
Jeff Gosse USFWS	Scott Crotty Xcel Energy	DLA	Letter	7/6/2022
Darin Simkins FWS	Scott Crotty Xcel Energy	DLA	Letter	7/6/2022
Field Supervisor USFWS	Scott Crotty Xcel Energy	DLA	Letter	7/6/2022
Endangered Species Specialist USFWS	Scott Crotty Xcel Energy	DLA	Letter	7/6/2022
Jeff Duncan NPS	Scott Crotty Xcel Energy	DLA	Letter	7/6/2022
Angie Tornes NPS Consultant	Scott Crotty Xcel Energy	DLA	Letter	7/6/2022
Lillian Jonas NPS Consultant	Scott Crotty Xcel Energy	DLA	Letter	7/6/2022
Susan Rosebrough NPS	Scott Crotty Xcel Energy	DLA	Letter	7/6/2022

Person/Agency Contacted	From	Item	Contact Type (Meeting or Letter/Email?)	Date
David Thomson NPS	Scott Crotty Xcel Energy	DLA	Letter	7/6/2022
Lindy Nelson USDOJ Office of Env. Policy and Compliance	Scott Crotty Xcel Energy	DLA	Letter	7/6/2022
Jen Tyler EPA	Scott Crotty Xcel Energy	DLA	Letter	7/6/2022
Representative Thomas Tiffany Wisconsin District 7	Scott Crotty Xcel Energy	DLA	Letter	7/6/2022
Representative Jack Bergman Michigan District 1	Scott Crotty Xcel Energy	DLA	Letter	7/6/2022
Senator Tammy Baldwin US Senator from WI	Scott Crotty Xcel Energy	DLA	Letter	7/6/2022
Senator Ron Johnson US Senator from WI	Scott Crotty Xcel Energy	DLA	Letter	7/6/2022
Senator Debbie Stabenow US Senator from MI	Scott Crotty Xcel Energy	DLA	Letter	7/6/2022
Pamela Stevenson MI Attorney General's Office	Scott Crotty Xcel Energy	DLA	Letter	7/6/2022
Gary Kohlhepp EGLE	Scott Crotty Xcel Energy	DLA	Letter	7/6/2022
Amira Oun EGLE	Scott Crotty Xcel Energy	DLA	Letter	7/6/2022
Habitat Management Unit- Fisheries Division MDNR	Scott Crotty Xcel Energy	DLA	Letter	7/6/2022
Rhonda Wuycheck EGLE	Scott Crotty Xcel Energy	DLA	Letter	7/6/2022
Matt Smar EGLE	Scott Crotty Xcel Energy	DLA	Letter	7/6/2022
Doug Clements EGLE	Scott Crotty Xcel Energy	DLA	Letter	7/6/2022
Elle Gulotty MDNR	Scott Crotty Xcel Energy	DLA	Letter	7/6/2022
Kyle Kruger MDNR	Scott Crotty Xcel Energy	DLA	Letter	7/6/2022
Michigan SHPO	Scott Crotty Xcel Energy	DLA	Letter	7/6/2022
Director PSCW	Scott Crotty Xcel Energy	DLA	Letter	7/6/2022
WCFRU-UWSP	Scott Crotty Xcel Energy	DLA	Letter	7/6/2022
Kathleen Angel WCMP	Scott Crotty Xcel Energy	DLA	Letter	7/6/2022
Cheryl Laatsch WDNR	Scott Crotty Xcel Energy	DLA	Letter	7/6/2022

Person/Agency Contacted	From	Item	Contact Type (Meeting or Letter/Email?)	Date
Tyler Howe WSHPO	Scott Crotty Xcel Energy	DLA	Letter	7/6/2022
Representative Beth Meyers Wisconsin District 74	Scott Crotty Xcel Energy	DLA	Letter	7/6/2022
Representative Greg Markkanen Michigan District 110	Scott Crotty Xcel Energy	DLA	Letter	7/6/2022
Senator Ed McBroom Michigan District 38	Scott Crotty Xcel Energy	DLA	Letter	7/6/2022
Senator Janet Bewley Wisconsin District 2	Scott Crotty Xcel Energy	DLA	Letter	7/6/2022
Stacy Wiercinski City of Hurley	Scott Crotty Xcel Energy	DLA	Letter	7/6/2022
Karen Gullan City of Ironwood	Scott Crotty Xcel Energy	DLA	Letter	7/6/2022
Susan Lesky City of Montreal	Scott Crotty Xcel Energy	DLA	Letter	7/6/2022
Gary Pelissero Gogebic County	Scott Crotty Xcel Energy	DLA	Letter	7/6/2022
Greg Ryskey Gogebic Co Parks and Forestry Dept.	Scott Crotty Xcel Energy	DLA	Letter	7/6/2022
Torey Aschbrock Town of Cary	Scott Crotty Xcel Energy	DLA	Letter	7/6/2022
Heather Palmquist Iron County	Scott Crotty Xcel Energy	DLA	Letter	7/6/2022
Eric Peterson Iron Co. Forest Administrator	Scott Crotty Xcel Energy	DLA	Letter	7/6/2022
Michael Saari Iron County	Scott Crotty Xcel Energy	DLA	Letter	7/6/2022
Ron Ahonen Town of Kimball.	Scott Crotty Xcel Energy	DLA	Letter	7/6/2022
Lori Genisot Town of Pence	Scott Crotty Xcel Energy	DLA	Letter	7/6/2022
Kathryn Brauer Town of Saxon	Scott Crotty Xcel Energy	DLA	Letter	7/6/2022
LeRoy Johnson Charter Township of Ironwood	Scott Crotty Xcel Energy	DLA	Letter	7/6/2022
Thomas O'Keefe AW	Scott Crotty Xcel Energy	DLA	Letter	7/6/2022
Gary Hopp FOG	Scott Crotty Xcel Energy	DLA	Letter	7/6/2022
Cathy Techtman FOG	Scott Crotty Xcel Energy	DLA	Letter	7/6/2022
Heritage Chapter of the North Country Trail Assn.	Scott Crotty Xcel Energy	DLA	Letter	7/6/2022

Person/Agency Contacted	From	Item	Contact Type (Meeting or Letter/Email?)	Date
Rita Franzoi Hurley Chamber of Commerce	Scott Crotty Xcel Energy	DLA	Letter	7/6/2022
Ironwood Chamber of Commerce	Scott Crotty Xcel Energy	DLA	Letter	7/6/2022
Megan Easterling Boater	Scott Crotty Xcel Energy	DLA	Letter	7/6/2022
Travis Patterson Boater	Scott Crotty Xcel Energy	DLA	Letter	7/6/2022
Jake Ring Boater	Scott Crotty Xcel Energy	DLA	Letter	7/6/2022
Robert Stuber MHRC	Scott Crotty Xcel Energy	DLA	Letter	7/6/2022
James Fossum RAW	Scott Crotty Xcel Energy	DLA	Letter	7/6/2022
Allison Werner RAW	Scott Crotty Xcel Energy	DLA	Letter	7/6/2022
Northwest Regional Planning Commission	Scott Crotty Xcel Energy	DLA	Letter	7/6/2022
Matthew Miller Xcel Energy	Scott Crotty Xcel Energy	DLA	Letter	7/6/2022

1.3 Listing of Stage 3 Contacts with Stakeholders

Table 1.3-1 will present a list of correspondence from the Applicant to the stakeholders transmitting copies of the FLA as submitted to the Federal Energy Regulatory Commission.

Table 1.3-1 Listing of Stage 3 Contacts with Stakeholders

Person/Agency Contacted	From	Item	Contact Type (Meeting, Letter, Email?)	Date
TO	BE	INCLUDED	IN	FLA

2. Consultation Summary

The following sections present a summary of stakeholder comments, recommendations, and concerns and applicant responses and positions relating to consultation following the submittal of the PAD to the stakeholders and ending in the filing of the FLA. A brief Project description is provided below for a basis for subsequent discussions. A detailed Project description is provided in Exhibit A in Volume 1 of this DLA.

Saxon Falls Project Description

The Saxon Falls Project is located on the Montreal River approximately 4.3 miles upstream of its confluence with Lake Superior in Iron County, Wisconsin, and Gogebic County Michigan. Project works include a dam, downstream conduit, surge tank, penstocks, powerhouse, tailrace, transmission equipment, reservoir, and appurtenant equipment. The dam consists of a right spillway abutment section, overflow spillway section, gated spillway section, non-overflow concrete gravity dam section, minimum flow release outlet, intake structure section, non-overflow mass concrete dam section, and left earthen dam section.

The Project is operated in a run of river mode where discharge measured immediately downstream of the Project tailrace approximates the sum of inflows into the Project reservoir. A minimum flow of 5 cfs, or inflow, whichever is less, is released between ice-out and October 31 into the bypassed reach to maintain aesthetic flows and protect downstream aquatic resources. In order to minimize reservoir fluctuations, a minimum reservoir elevation of 997.0 feet National Geodetic Vertical Datum 1929 (NGVD) is required to be maintained between spring ice-out and June 1. Between June 1 and spring ice-out the reservoir is required to be maintained between elevations 996.5 feet NGVD and 997.0 feet NGVD. The Project has a combined total rated capacity of 1,500 kilowatts (kW). Other than minor changes to minimum flow releases to the bypassed reach to improve aesthetics, the Licensee is not proposing to change the operation of the Project.

Superior Falls Project Description

The Superior Falls Project is located on the Montreal River approximately 0.4 miles upstream of its confluence with Lake Superior in northern Iron County, Wisconsin and Gogebic County, Michigan. Project works include a dam, conduit, surge tank, penstocks, powerhouse, tailrace, transmission equipment, reservoir, and appurtenant equipment. The main structures of the dam consist of a right non-overflow dam section and intake structure; a spillway with four sections, a right radial gate section, middle overflow section, left radial gate, and a left overflow weir section.

The Project is operated in a run-of-river mode where discharge measured immediately downstream of the Project tailrace approximates the sum of inflows to the Project reservoir with a minimum reservoir elevation of 739.7 feet NGVD as measured immediately upstream from the Project dam. A minimum flow of 8 cfs is required to be released into the bypassed reach of the Montreal River between the Saturday before Memorial Day to October 15 for enhancement of scenic resources. A minimum flow of 20 cfs is required to be released into the bypassed reach from 8 am to 8 pm on weekends and holidays during the same timeframe. The Project has a combined total rated capacity of 1,650 kW. The Licensee is not proposing to change the operation of the Project.

2.1 Stage 1 Consultation Summary

Stage 1 Consultation Summary includes consultation beginning with pre-licensing questionnaires to obtain information to develop the PAD and ending with written comments and study requests from interested stakeholders. Formal comments and study requests were received from the following organizations/interested parties:

- American Whitewater
- Friends of the Gile
- Michigan Department of Natural Resources
- National Park Service
- River Alliance of Wisconsin
- Recreational Boaters
- Wisconsin Department of Natural Resources

Comments and study requests received, and the Applicant's responses are detailed in the *Summary of Study Comments and Responses* document that was filed with FERC on September 2, 2020 and is located in Section 3.2 below.

2.2 Stage 2 Consultation Summary

The following presents a summary of stakeholder comments, recommendations, and concerns and Applicant responses and positions relating to consultation following the written study requests and ending with the stakeholder comments on the DLA. The summary is arranged by subject matter with stakeholder comments, recommendations, and concerns followed by Applicant positions being presented on a stakeholder-by-stakeholder basis.

Any additional narratives, letters, and other information provided within this application further delineate the present positions of the parties.

2.2.1 Study Summary

Based on the study requests submitted during the first stage of consultation, the Licensee developed a study summary to identify study plans to be completed and the general study protocols.

In the study summary, the Licensee proposed to complete the following activities:

- Aesthetic Flow Documentation
- Aquatic and Terrestrial Invasive Species (ATIS) Study (including an aquatic plant study, development of bathymetric maps, and assessment of riverine and reservoir habitat)
- Boundary Change (provide additional information in DLA)
- Fishery Study
- Mussel Study
- Phase 1 Archaeological Survey and Shoreline Monitoring
- Recreation Use Study
- Recreation Flow (Whitewater) Study
- Threatened and Endangered Species (provide additional information in DLA)
- Water Quality Study
- Wildlife Habitat (provide additional information in DLA)

The Licensee filed the summary with the FERC on September 2, 2020 and provided copies of the study summary to AW, FOG, MDNR, MHRC, NPS, RAW, and the WDNR. Comments were received from WDNR regarding the ATIS and Mussel studies. Comments were received from AW and NPS on the Whitewater Recreation Flow Study. Comments received and the Licensee's responses are described in the sections below and are located in Section 3.2.

2.2.1.1 Aquatic and Terrestrial Invasive Species Study

On January 19, 2021, WDNR provided point intercept grids for the ATIS study at both Projects to be used to conduct the ATIS study.

2.2.1.2 Mussel Study Plan

Due to the WDNR's extensive experience in consulting on study plans for freshwater mussels during the relicensing process, the Licensee consulted with the WDNR in identifying sample locations. The Licensee provided a copy of the study scope and responded to several inquiries from WDNR staff. The WDNR provided their concurrence with the Mussel Study Plan on January 2, 2021.

2.2.1.3 Whitewater Recreation Flow Study

AW and NPS were invited by the Licensee to observe the Whitewater Recreation Flow Study. AW and NPS requested additional information regarding the study protocol. In response, the Licensee provided a copy of the proposed study plan.

2.2.2 Study Results

Results for each of the studies are presented in this application. The Licensee will respond to any stakeholder comments on the study results in the FLA.

2.2.3 Comments on DLA

Comments received on the DLA and the Applicant's responses will be included in this section in the FLA.

3. Documentation of Consultation

The Saxon Falls Project license was issued on December 22, 1989 for a term of 30 years with an effective date of January 1, 1990 and an expiration date of December 31, 2019. The Superior Falls Project license was issued on January 19, 1995 for a term of 30 years with an effective date of January 1, 1995 and an expiration date of December 31, 2024. On July 18, 2014, the Licensee filed a request for an extension of the license term for the Saxon Falls Project to align with the license expiration date of the Superior Falls Project. The FERC subsequently issued an Order on November 6, 2014, extending the license term of the Saxon Falls Project to expire in conjunction with the Superior Falls Project on December 31, 2024. On December 30, 2019, the Licensee filed Notices of Intent (NOI) to relicense the Projects, a PAD with information for both Projects, and a request to use the TLP. The FERC granted the Licensee's TLP request on February 13, 2020. Each stage of consultation is further discussed in the following sections.

3.1 Stage 1 Consultation

In accordance with the deadlines set by the FERC, the Licensee held the Joint Agency Meeting (JAM) on April 9, 2020. Due to COVID-19 health related concerns, the meeting was held via conference call, and the site visit was postponed to a later date. Notice of the JAM was published in the Daily Globe on March 17, 2020. The FERC and stakeholders were also notified of this meeting on March 10 and March 18, 2020. The JAM was attended by a total of fourteen individuals from resource agencies, non-governmental organizations, and interested members of the public. Comments and study requests were received after the JAM from the following entities: AW, FOG, MDNR, NPS, RAW, and WDNR. Several comments from whitewater boaters interested in boating the Montreal River were also received. The site visit was held on October 1, 2020. Notice of the site visit was published in the Daily Globe on September 16, 2020. The FERC and stakeholders were also notified of this meeting on September 4, 2020. A total of 5 individuals including non-governmental organizations and interested members of the public attended the site visit. No resource agencies participated.

The following presents copies of all correspondence between stakeholders and the Applicant, beginning with the submittal of the PAD Questionnaire by the Applicant to the Stakeholders and ending with the written study requests. The correspondence is presented in chronological order.

Saxon Falls and Superior Falls Questionnaires



**Superior Falls Hydroelectric Project - FERC Project No. 2587
Saxon Falls Hydroelectric Project - FERC Project No. 2610
Montreal River - Iron County, Wisconsin and Gogebic County Michigan
Licensing Preliminary Application Document Information Questionnaire**

Xcel Energy has retained Mead & Hunt, Inc. (Mead & Hunt) to assist with efforts to license the above-referenced Hydroelectric Projects (Projects) located on the Montreal River in Wisconsin and Michigan. Under Federal Energy Regulatory Commission (FERC) regulations, Xcel Energy is preparing a Preliminary Application Document (PAD) that provides the FERC and other entities with existing, relevant, and reasonably available information pertaining to the Projects to help identify issues and related information needs, develop study requests and study plans, and prepare documents analyzing impacts. This PAD Information Questionnaire will be used to help identify sources of existing, relevant, and reasonably available information that is not in Xcel Energy's possession.

1. Information about person completing this questionnaire:

Name: _____ Title: _____

Organization: _____

Address: _____

Phone: _____ Email: _____

2. Do you or your organization plan to participate in the 3 to 5 year-long licensing proceeding for the Superior Falls and Saxon Falls Hydroelectric Projects?

☐ Yes

☐ No

3. Do you or your organization know of existing, relevant, and reasonably available information that describes the existing environment or known potential impacts of the Projects?

☐ Yes *(Please complete 3a thru 3f)*

☐ No *(Proceed to 4)*

a. If yes, check box(es) to indicate the specific resource area(s) that the information relates to:

☐ Geology and soils

☐ Recreational and land use

☐ Water resources

☐ Aesthetic resources

☐ Fish and aquatic resources

☐ Cultural resources

☐ Wildlife and botanical resources

☐ Socio-economic resources

☐ Wetlands, riparian, and littoral habitat

☐ Tribal resources

☐ Rare, threatened, and endangered species

☐ Other resource information

Questions 3b – 3f are continued on the following pages



**Superior Falls Hydroelectric Project - FERC Project No. 2587
Saxon Falls Hydroelectric Project - FERC Project No. 2610
Montreal River - Iron County, Wisconsin and Gogebic County Michigan
Licensing Preliminary Application Document Information Questionnaire**

- b. Briefly describe the information or list available documents:
(Additional information, if any, may be provided on page 4)

- c. Where or how can Xcel Energy obtain this information?

- d. Please indicate whether there is a specific representative you wish to designate for potential follow-up contact by Xcel Energy or Xcel Energy's representative for the resource area(s) checked in 3a:
(Additional information, if any, may be provided on page 4)

Representative Contact Information

Name: _____ Title: _____

Address: _____

Phone: _____ Email: _____

Name: _____ Title: _____

Address: _____

Phone: _____ Email: _____

Questions 3e – 3f are continued on the following page



**Superior Falls Hydroelectric Project - FERC Project No. 2587
Saxon Falls Hydroelectric Project - FERC Project No. 2610
Montreal River - Iron County, Wisconsin and Gogebic County Michigan
Licensing Preliminary Application Document Information Questionnaire**

- e. Are you aware of any particular issues pertaining to the specific resource area(s) identified in 3a?
(Additional information, if any, may be provided on page 4)

☐ Yes (Please list specific issues below)

☐ No

Resource Area

Specific Issue

- f. Based on the issues identified in 3e, are you aware of any potential studies or information needs associated with the identified issues? (Additional information, if any, may be provided on page 4)

☐ Yes (Please list below)

☐ No

Potential Studies or Information Needs



**Superior Falls Hydroelectric Project - FERC Project No. 2587
Saxon Falls Hydroelectric Project - FERC Project No. 2610
Montreal River - Iron County, Wisconsin and Gogebic County Michigan
Licensing Preliminary Application Document Information Questionnaire**

4. Xcel Energy is investigating the use of the Traditional Licensing Process for these Hydroelectric Projects. Do you have any concerns with the use of the Traditional Licensing process?

☐ Yes *(Please describe concerns below)* ☐ No

Traditional Licensing Process Concerns

5. Xcel Energy is interested in any additional comments, questions, or information you have regarding the licensing of the Projects. If the additional comments, questions, or information you provide below pertain to a particular question, please indicate the applicable question (such as 3b, 3d, 3e, 3f).

Additional comments, questions, or information

Please return this completed questionnaire to Mead & Hunt using the enclosed self-addressed, stamped envelope **within 30 days of receipt** to allow for follow-up by Xcel or Xcel's representative.

Not responding within 30 days will indicate you are not aware of any existing, relevant, and reasonably available information that describes the existing environment or known potential impacts of the Projects.

Comments and/or questions may also be sent via email to: Shawn.Puzen@meadhunt.com

Saxon Falls Hydroelectric Project

FERC No. 2610: Montreal River, Iron County, WI and Gogebic County, MI

Licensee: Northern States Power Company - Wisconsin (d/b/a Xcel Energy)



Installed Capacity: 1.5 megawatts

Unit #1: 0.75 MW

Unit #2: 0.75 MW

License Expires: December 31, 2024

Notice of Intent to Relicense Due: December 31, 2019

Minimum Flow Requirement Natural River Channel:

5 cfs or inflow from the dam during ice-free season.

Reservoir Elevation Requirements:

Minimum Elevation of 997.0 feet msl Ice-Out to June 1

996.5 to 997.0 feet msl June 1 to Ice-Out

Approximate Reservoir Surface Acreage: 69 acres

Superior Falls Hydroelectric Project

FERC No. 2587: Montreal River, Iron County, WI and Gogebic County, MI

Licensee: Northern States Power Company - Wisconsin (d/b/a Xcel Energy)



Installed Capacity: 1.65 megawatts

Unit #1: 0.825 MW

Unit #2: 0.825 MW

License Expires: December 31, 2024

Notice of Intent to Relicense Due: December 31, 2019

Minimum Flow Requirements:

20 cfs from the dam 8:00 a.m. to 8:00 p.m. Memorial Day Weekend to October 15th

8 cfs from the dam at all other times Memorial Day Weekend to October 15th

Reservoir Elevation Requirements:

739.7 to 740.2 feet msl

Approximate Reservoir Surface Acreage: 16.9 acres

Saxon Falls Hydroelectric Project Licensing
FERC Project No. 2610

Indian Tribes

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FERC Project No. 2587

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Stroud, OK 74079

Ms. Wanda McFaggen, THPO

St. Croix Chippewa Indians of Wisconsin
Tribal Historic Preservation Office
24663 Angeline Avenue
Webster, WI 54893
THPO@StCroixTribalCenter.com

Mr. Chris McGeshick, Chairperson

Sokaogon Chippewa Community of Wisconsin
3501 Sand Lake Road
Crandon, WI 54520

Mr. Earl Meshigaud, Cultural Director

Hannahville Potawatomi Indian Community
M-14911 Hannahville B1 Road
Wilson, MI 49896

Ms. Cayla Olson, THPO

White Earth Band of the Minnesota Chippewa
Tribe
P.O. Box 418
White Earth, MN 56591

Mr. Clinton Parish, Chairman

Bay Mills Indian Community of Michigan
12140 W. Lakeshore Drive
Brimley, MI 49715-9319

**Mr. Cecil E. Pavlat Sr., Cultural Repatriation
Specialist**

Sault Ste. Marie Tribe of Chippewa Indians
523 Ashmun Street
Sault Ste. Marie, MI 49783

Mr. William Quackenbush, THPO

Ho-Chunk Nation
Executive Offices
P.O. Box 667
Black River Falls, WI 54615
Bill.Quackenbush@Ho-Chunk.com

Mr. Chris Swartz, President

Keweenaw Bay Indian Community
16430 Beartown Road
Baraga, MI 49908-9210

Mr. Lewis Taylor, Chairman

St. Croix Chippewa Indians of Wisconsin
24663 Angeline Ave.
Webster, WI 54893

Mr. Adam VanZile, THPO

Sokaogon Chippewa Community Mole Lake
Band
3051 Sand Lake Road
Crandon, WI 54520
Adam.VanZile@SCC-nsn.gov

Mr. Warren Wahweotten Jr., THPO

Prairie Band Potawatomi Nation
162Q Road
Mayetta, KS 66509

Ms. Natalie Weyaus, THPO

Mille Lacs Band of Ojibwe
43408 Oodena Drive
Onamia, MN 56359

Ms. Sherry White, THPO

Stockbridge Munsee Community of Wisconsin
Tribal Office
W13447 Camp 14 Road
Bowler, WI 54416

Ms. Corina Williams, THPO

Oneida Nation of Wisconsin
P.O. Box 365
Oneida, WI 54155-0365
CWilliam@OneidaNation.org

Ms. Melinda Young, THPO

Lac du Flambeau Band of Lake Superior
Chippewa Indians of Wisconsin
P.O. Box 67
Lac du Flambeau, WI 54538
LdFthpo@LdTribe.com

Federal

Senator Tammy Baldwin

U.S. Senator from Wisconsin
717 Hart Senate Office Building
Washington, DC 20510

Congressman Jack Bergman

2330 Rayburn HOB
Washington, DC 20515

Mr. Edward G. Buikema, Director

Federal Emergency Management Agency
Regional Office
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Chicago, IL 60605

Mr. Nick Chevance

Regional Environment Coordinator
U.S. Department of the Interior
National Park Service
Midwest Region
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Nicholas_Chevance@nps.gov

Director

Geological and Natural History Survey
University of Wisconsin Extension
3817 Mineral Point Road
Madison, WI 53705

Director

Great Lakes Fish & Wildlife Commission
Chief Blackbird Center, Maple Lane
P.O. Box 9
Odana, WI 54861

Director

Public Service Commission of Wisconsin
610 North Whitney Way
P.O. Box 7854
Madison, WI 53707-7854

**Director of Lands, Watershed, and Minerals
Management**

U.S. Department of Agriculture
Forest Service, National Forests
Eastern Region
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Director

U.S. Department of Commerce
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Gloucester, MA 01930

Director

U.S. Department of the Interior
Bureau of Land Management
Milwaukee District
626 East Wisconsin Avenue, Suite 200
Milwaukee, WI 53201-0631

Congressman Sean Duffy

2330 Rayburn HOB
Washington, DC 20515

Endangered Species Specialist

Endangered Species Specialist
US Fish & Wildlife Service
Twin Cities Field Office
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Bloomington, MN 55425

FERC Coordinator

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Corps of Engineers
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St. Paul, MN 55101-1638

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U.S. Department of the Interior
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Green Bay Field Office
2661 Scott Tower Drive
New Franken, WI 54229-9565

John M. Fowler

Executive Director
Advisory Council on Historic Preservation
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Washington, D.C. 20001

Mr. Jeff Gosse

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U.S. Department of the Interior
Fish & Wildlife Service
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Bloomington, MN 55437-1458
Jeff_Gosse@fws.gov

Senator Ron Johnson

U.S. Senator from Wisconsin
328 Hart Senate Office Building
Washington, DC 20510

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Mr. Lindy Nelson

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U.S. Senator from Michigan
717 Hart Senate Office Building
Washington, DC 20510

Mr. Samuel Rauch

National Marine Fisheries Service
Northeast Region
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Gloucester, MA 01930

Senator Debbie Stabenow

U.S. Senator from Michigan
717 Hart Senate Office Building
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Angie_Tornes@nps.gov

Ms. Jen Tyler

NEPA Implementation Section
U.S. Environmental Protection Agency
Region V
Mail Code: E-19J
77 West Jackson Boulevard, AR-18J
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Mr. Nick Utrup

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Fish & Wildlife Service
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Nick_Utrup@fws.gov

Mr. John Zygaj
Regional Engineer
Federal Energy Regulatory Commission
Chicago Regional Office
Federal Building
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State

Ms. Kathleen Angel

Wisconsin Coastal Management Program
Department of Administration
101 East Wilson Street; 9th Floor
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Senator Janet Bewley

State Senator – 25th District
Room 126 South
State Capitol
P.O. Box 7882
Madison, WI 53707-7882

Mr. Harry L. Brown

State Historic Preservation Office
State Historical Society of Wisconsin
816 State Street
Madison, WI 53706

Ms. Elle Gulotty

Michigan Department Natural Resources
Norway Office
520 West US-2
Norway, MI 49870
GulottyE@Michigan.gov

Ms. Cheryl Laatsch

FERC Coordinator
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Cheryl.Laatsch@wisconsin.gov

Representative Greg Markkanen

State Representative – 110th District
S-1489 House Office Building
P.O. Box 30014
Lansing, MI 48909

Senator Ed McBroom

State Senator – 38th District
P.O. Box 30036
Lansing, MI 48909-7536

Representative Beth Meyers

State Representative – 74th District
State Capitol – Room 7 North
P.O. Box 8953
Madison, WI 53708

Michigan State Historic Preservation Office

Cultural Resources Management and Planning
735 East Michigan Ave.
P.O. Box 30044
Lansing, MI 48909

Ms. Amira Oun

Michigan Department of Environmental Quality
P.O. Box 30458
Lansing, MI 48909-7958
OunA@Michigan.gov

Public Service Commission of Wisconsin

P.O. Box 7854
Madison, WI 53707

Ms. Pamela Stevenson

Michigan Attorney General Office
525 W. Ottawa St.
P.O. Box 30212
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**Wisconsin Cooperative Fishery Research
Unit**

College of Natural Resources
UW Stevens Point
Stevens Point, WI 54481-3897

Wisconsin Office of Attorney General

114 East, State Capitol
Madison, WI 53702-0001

Local

Ms. Kathryn Brauer

Town Clerk
Town of Saxon
P.O. Box 37
Saxon, WI 54559

Ms. Karen Gullan

City Clerk
City of Ironwood
213 S. Marquette St.
Ironwood, MI 49938

Mr. Gerry Pelissero

County Clerk
Gogebic County
200 N. Moore Street
Bessemer, MI 49911

Mr. Michael Saari

County Clerk
Iron County
300 Taconite Street
Suite 101
Hurley, WI 54534
clerk@ironcountymi.org

Ms. Mary Segalin

Town Clerk
Charter Township of Ironwood
10892 Lake Road
Ironwood, MI 49938

Ms. Stacy Wiercinski

Clerk/Treasurer
405 5th Avenue North
Hurley, WI 54534

Other

Mr. Scott Crotty

Senior Operations Manager

Xcel Energy

1414 W Hamilton Ave

Eau Claire, WI 54701-7252

Scott.a.crotty@Xcel.Energy.com

Mr. James Fossum

River Alliance of Wisconsin

JD Fossum Environmental Consulting

199 Janet Marie Ln.

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jfbio@yahoo.com

Mr. Matt Miller

Hydro License Compliance Consultant

Xcel Energy

1414 W Hamilton Ave

Eau Claire, WI 54701-7252

Matthew.J.Miller@XcelEnergy.com

Northwest Regional Planning Committee

1400 S. River St.

Spooner, WI 54801-8692

Mr. James Zyduck

Director of Hydro Plants

Xcel Energy

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James.Zyduck@XcelEnergy.com

Saxon Falls and Superior Falls
Questionnaire Responses



Superior Falls Hydroelectric Project - FERC Project No. 2587
Saxon Falls Hydroelectric Project - FERC Project No. 2610
Montreal River - Iron County, Wisconsin and Gogebic County Michigan
Licensing Preliminary Application Document Information Questionnaire

Xcel Energy has retained Mead & Hunt, Inc. (Mead & Hunt) to assist with efforts to license the above-referenced Hydroelectric Projects (Projects) located on the Montreal River in Wisconsin and Michigan. Under Federal Energy Regulatory Commission (FERC) regulations, Xcel Energy is preparing a Preliminary Application Document (PAD) that provides the FERC and other entities with existing, relevant, and reasonably available information pertaining to the Projects to help identify issues and related information needs, develop study requests and study plans, and prepare documents analyzing impacts. This PAD Information Questionnaire will be used to help identify sources of existing, relevant, and reasonably available information that is not in Xcel Energy's possession.

1. Information about person completing this questionnaire:

Name: Mike Saari Title: clerk
Organization: Iron County
Address: 300 Taconite St. Suite 101
Hayley WI 54534
Phone: 715 561- 3375 Email: clerk@ironcountymi.org

2. Do you or your organization plan to participate in the 3 to 5 year-long licensing proceeding for the Superior Falls and Saxon Falls Hydroelectric Projects?

☐ Yes ☒ No

3. Do you or your organization know of existing, relevant, and reasonably available information that describes the existing environment or known potential impacts of the Projects?

☐ Yes (Please complete 3a thru 3f) ☒ No (Proceed to 4)

a. If yes, check box(es) to indicate the specific resource area(s) that the information relates to:

- | | |
|---|---|
| <input type="checkbox"/> Geology and soils | <input type="checkbox"/> Recreational and land use |
| <input type="checkbox"/> Water resources | <input type="checkbox"/> Aesthetic resources |
| <input type="checkbox"/> Fish and aquatic resources | <input type="checkbox"/> Cultural resources |
| <input type="checkbox"/> Wildlife and botanical resources | <input type="checkbox"/> Socio-economic resources |
| <input type="checkbox"/> Wetlands, riparian, and littoral habitat | <input type="checkbox"/> Tribal resources |
| <input type="checkbox"/> Rare, threatened, and endangered species | <input type="checkbox"/> Other resource information |

Questions 3b – 3f are continued on the following pages



Superior Falls Hydroelectric Project - FERC Project No. 2587
Saxon Falls Hydroelectric Project - FERC Project No. 2610
Montreal River - Iron County, Wisconsin and Gogebic County Michigan
Licensing Preliminary Application Document Information Questionnaire

- b. Briefly describe the information or list available documents:
(Additional information, if any, may be provided on page 4)

- c. Where or how can Xcel Energy obtain this information?

- d. Please indicate whether there is a specific representative you wish to designate for potential follow-up contact by Xcel Energy or Xcel Energy's representative for the resource area(s) checked in 3a:
(Additional information, if any, may be provided on page 4)

Representative Contact Information

Name: _____ Title: _____

Address: _____

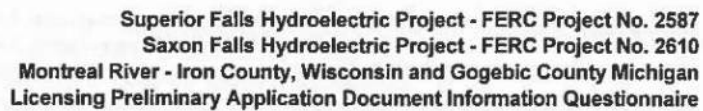
Phone: _____ Email: _____

Name: _____ Title: _____

Address: _____

Phone: _____ Email: _____

Questions 3e – 3f are continued on the following page



- ☐ Yes (Please list specific issues below) ☐ No

Specific Issue

This image shows a single sheet of white paper with horizontal blue or grey ruling lines. The lines are evenly spaced and run across the width of the page. There are approximately 20 lines visible. The paper appears to be a standard notebook page or a sheet of stationery.

- ☐
- Yes (Please list below)
- ☐
- No

Potential Studies or Information Needs

[illegible]



Superior Falls Hydroelectric Project - FERC Project No. 2587
Saxon Falls Hydroelectric Project - FERC Project No. 2610
Montreal River - Iron County, Wisconsin and Gogebic County Michigan
Licensing Preliminary Application Document Information Questionnaire

4. Xcel Energy is investigating the use of the Traditional Licensing Process for these Hydroelectric Projects. Do you have any concerns with the use of the Traditional Licensing process?

☐ Yes (Please describe concerns below) ☒ No

Traditional Licensing Process Concerns

5. Xcel Energy is interested in any additional comments, questions, or information you have regarding the licensing of the Projects. If the additional comments, questions, or information you provide below pertain to a particular question, please indicate the applicable question (such as 3b, 3d, 3e, 3f).

Additional comments, questions, or information

Please return this completed questionnaire to Mead & Hunt using the enclosed self-addressed, stamped envelope **within 30 days of receipt** to allow for follow-up by Xcel or Xcel's representative.

Not responding within 30 days will indicate you are not aware of any existing, relevant, and reasonably available information that describes the existing environment or known potential impacts of the Projects.

Comments and/or questions may also be sent via email to: Shawn.Puzen@meadhunt.com



LEECH LAKE BAND OF OJIBWE
Tribal Historic Preservation Office

Amy Burnette, Tribal Historic Preservation Officer
Sheila Gotchie, Office Manager

March 22, 2019

Mead & Hunt
Attn: Shawn Puzen
1702 Lawrence Drive
De Pere, WI 54115

RE: Proposed Saxon Falls Hydroelectric Project
Montreal River, Iron County, Wisconsin and Gogebic County, Michigan
FERC No. 2610
LL THPO No. 19-088-NCRI

Dear Mr. Puzen,

Thank you for the opportunity to comment on the above referenced project. It has been reviewed pursuant to the responsibilities given the Tribal Historic Preservation Officer (THPO) by the National Historic Preservation Act of 1966, as amended in 1992, and the Procedures of the Advisory Council on Historic Preservation (38CFR800).

I have reviewed the documentation. After careful consideration of our records, I have determined that the Leech Lake Band of Ojibwe does not have any known recorded sites of religious or cultural importance in this area.

Should any human remains or suspected human remains be encountered, all work shall cease and the following personnel should be notified immediately: County Sheriff's Office and the Office of the State Archaeologist. If any human remains or culturally affiliated objects are inadvertently discovered, this will prompt the process to which the Band will become informed.

Please note the above determination does not "exempt" future projects from Section 106 review. In the event of any other tribe notifying us of concerns for a specific project, we may reenter into the consultation process.

You may contact me at (218) 335-2940 if you have questions regarding our review of this project. Please refer to the LL-THPO Number as stated above in all correspondence with this project.

Respectfully submitted,

Amy Burnette

Tribal Historic Preservation Officer

Leech Lake Tribal Historic Preservation Office - Established in 1996
190 Sailstar Drive NE * Cass Lake, MN 56633
Phone (218) 335-2940 * Fax (218) 335-2974
amy.burnette@llojibwe.org



LEECH LAKE BAND OF OJIBWE
Tribal Historic Preservation Office

Amy Burnette, Tribal Historic Preservation Officer
Sheila Gotchie, Office Manager

March 22, 2019

Mead & Hunt
Attn: Shawn Puzen
1702 Lawrence Drive
De Pere, WI 54115

RE: Proposed Superior Falls Hydroelectric Project
Montreal River, Iron County, Wisconsin and Gogebic County, Michigan
FERC No. 2587
LL THPO No. 19-087-NCRI

Dear Mr. Puzen,

Thank you for the opportunity to comment on the above referenced project. It has been reviewed pursuant to the responsibilities given the Tribal Historic Preservation Officer (THPO) by the National Historic Preservation Act of 1966, as amended in 1992, and the Procedures of the Advisory Council on Historic Preservation (38CFR800).

I have reviewed the documentation. After careful consideration of our records, I have determined that the Leech Lake Band of Ojibwe does not have any known recorded sites of religious or cultural importance in this area.

Should any human remains or suspected human remains be encountered, all work shall cease and the following personnel should be notified immediately: County Sheriff's Office and the Office of the State Archaeologist. If any human remains or culturally affiliated objects are inadvertently discovered, this will prompt the process to which the Band will become informed.

Please note the above determination does not "exempt" future projects from Section 106 review. In the event of any other tribe notifying us of concerns for a specific project, we may reenter into the consultation process.

You may contact me at (218) 335-2940 if you have questions regarding our review of this project. Please refer to the LL-THPO Number as stated above in all correspondence with this project.

Respectfully submitted,

Amy Burnette

Tribal Historic Preservation Officer

Leech Lake Tribal Historic Preservation Office - Established in 1996
190 Sailstar Drive NE * Cass Lake, MN 56633
Phone (218) 335-2940 * Fax (218) 335-2974
amy.burnette@llojibwe.org



Superior Falls Hydroelectric Project - FERC Project No. 2587
Saxon Falls Hydroelectric Project - FERC Project No. 2610
Montreal River - Iron County, Wisconsin and Gogebic County Michigan
Licensing Preliminary Application Document Information Questionnaire

Xcel Energy has retained Mead & Hunt, Inc. (Mead & Hunt) to assist with efforts to license the above-referenced Hydroelectric Projects (Projects) located on the Montreal River in Wisconsin and Michigan. Under Federal Energy Regulatory Commission (FERC) regulations, Xcel Energy is preparing a Preliminary Application Document (PAD) that provides the FERC and other entities with existing, relevant, and reasonably available information pertaining to the Projects to help identify issues and related information needs, develop study requests and study plans, and prepare documents analyzing impacts. This PAD Information Questionnaire will be used to help identify sources of existing, relevant, and reasonably available information that is not in Xcel Energy's possession.

1. Information about person completing this questionnaire:

Name: Heroy Johnson Title: Deputy Supervisor
Organization: Cha
Address: Charter Township of Ironwood
N10892 Lake Road
Ironwood, MI 49938
Phone: 906-932 5000 Email: johnson.lwd.township.zoning@gmail.com

2. Do you or your organization plan to participate in the 3 to 5 year-long licensing proceeding for the Superior Falls and Saxon Falls Hydroelectric Projects?

☐ Yes Do not know at this time ☐ No

3. Do you or your organization know of existing, relevant, and reasonably available information that describes the existing environment or known potential impacts of the Projects?

☐ Yes (Please complete 3a thru 3f) ☒ No (Proceed to 4)

a. If yes, check box(es) to indicate the specific resource area(s) that the information relates to:

- | | |
|---|---|
| <input type="checkbox"/> Geology and soils | <input type="checkbox"/> Recreational and land use |
| <input type="checkbox"/> Water resources | <input type="checkbox"/> Aesthetic resources |
| <input type="checkbox"/> Fish and aquatic resources | <input type="checkbox"/> Cultural resources |
| <input type="checkbox"/> Wildlife and botanical resources | <input type="checkbox"/> Socio-economic resources |
| <input type="checkbox"/> Wetlands, riparian, and littoral habitat | <input type="checkbox"/> Tribal resources |
| <input type="checkbox"/> Rare, threatened, and endangered species | <input type="checkbox"/> Other resource information |

Questions 3b – 3f are continued on the following pages



Superior Falls Hydroelectric Project - FERC Project No. 2587
Saxon Falls Hydroelectric Project - FERC Project No. 2610
Montreal River - Iron County, Wisconsin and Gogebic County Michigan
Licensing Preliminary Application Document Information Questionnaire

- b. Briefly describe the information or list available documents:
(Additional information, if any, may be provided on page 4)

- c. Where or how can Xcel Energy obtain this information?

- d. Please indicate whether there is a specific representative you wish to designate for potential follow-up contact by Xcel Energy or Xcel Energy's representative for the resource area(s) checked in 3a:
(Additional information, if any, may be provided on page 4)

Representative Contact Information

Name: _____ Title: _____

Address: _____

Phone: _____ Email: _____

Name: _____ Title: _____

Address: _____

Phone: _____ Email: _____

Questions 3e – 3f are continued on the following page



Superior Falls Hydroelectric Project - FERC Project No. 2587
Saxon Falls Hydroelectric Project - FERC Project No. 2610
Montreal River - Iron County, Wisconsin and Gogebic County Michigan
Licensing Preliminary Application Document Information Questionnaire

- e. Are you aware of any particular issues pertaining to the specific resource area(s) identified in 3a?
(Additional information, if any, may be provided on page 4)

☐ Yes (Please list specific issues below)

☐ No

Resource Area

Specific Issue

- f. Based on the issues identified in 3e, are you aware of any potential studies or information needs associated with the identified issues? (Additional information, if any, may be provided on page 4)

☐ Yes (Please list below)

☐ No

Potential Studies or Information Needs



Superior Falls Hydroelectric Project - FERC Project No. 2587
Saxon Falls Hydroelectric Project - FERC Project No. 2610
Montreal River - Iron County, Wisconsin and Gogebic County Michigan
Licensing Preliminary Application Document Information Questionnaire

4. Xcel Energy is investigating the use of the Traditional Licensing Process for these Hydroelectric Projects. Do you have any concerns with the use of the Traditional Licensing process?

☐ Yes *(Please describe concerns below)* ☒ No

Traditional Licensing Process Concerns

5. Xcel Energy is interested in any additional comments, questions, or information you have regarding the licensing of the Projects. If the additional comments, questions, or information you provide below pertain to a particular question, please indicate the applicable question (such as 3b, 3d, 3e, 3f).

Additional comments, questions, or information

Please return this completed questionnaire to Mead & Hunt using the enclosed self-addressed, stamped envelope **within 30 days of receipt** to allow for follow-up by Xcel or Xcel's representative.

Not responding within 30 days will indicate you are not aware of any existing, relevant, and reasonably available information that describes the existing environment or known potential impacts of the Projects.

Comments and/or questions may also be sent via email to: Shawn.Puzen@meadhunt.com



Superior Falls Hydroelectric Project - FERC Project No. 2587
Saxon Falls Hydroelectric Project - FERC Project No. 2610
Montreal River - Iron County, Wisconsin and Gogebic County Michigan
Licensing Preliminary Application Document Information Questionnaire

Xcel Energy has retained Mead & Hunt, Inc. (Mead & Hunt) to assist with efforts to license the above-referenced Hydroelectric Projects (Projects) located on the Montreal River in Wisconsin and Michigan. Under Federal Energy Regulatory Commission (FERC) regulations, Xcel Energy is preparing a Preliminary Application Document (PAD) that provides the FERC and other entities with existing, relevant, and reasonably available information pertaining to the Projects to help identify issues and related information needs, develop study requests and study plans, and prepare documents analyzing impacts. This PAD Information Questionnaire will be used to help identify sources of existing, relevant, and reasonably available information that is not in Xcel Energy's possession.

1. Information about person completing this questionnaire:

Name: Elle Gulotty Title: Resource Analyst
Organization: Michigan Department of Natural Resources
Address: Norway Field Office
520 West US Hwy 2, Norway, MI 49870
Phone: 906-536-9247 Email: GulottyE@michigan.gov

2. Do you or your organization plan to participate in the 3 to 5 year-long licensing proceeding for the Superior Falls and Saxon Falls Hydroelectric Projects?

☒ Yes ☐ No

3. Do you or your organization know of existing, relevant, and reasonably available information that describes the existing environment or known potential impacts of the Projects?

☒ Yes (Please complete 3a thru 3f) ☐ No (Proceed to 4)

a. If yes, check box(es) to indicate the specific resource area(s) that the information relates to:

- | | |
|---|--|
| ¹ <input type="checkbox"/> Geology and soils | ⁷ <input checked="" type="checkbox"/> Recreational and land use |
| ² <input checked="" type="checkbox"/> Water resources | ⁸ <input checked="" type="checkbox"/> Aesthetic resources |
| ³ <input checked="" type="checkbox"/> Fish and aquatic resources | ⁹ <input type="checkbox"/> Cultural resources |
| ⁴ <input checked="" type="checkbox"/> Wildlife and botanical resources | ¹⁰ <input checked="" type="checkbox"/> Socio-economic resources |
| ⁵ <input checked="" type="checkbox"/> Wetlands, riparian, and littoral habitat | ¹¹ <input type="checkbox"/> Tribal resources |
| ⁶ <input checked="" type="checkbox"/> Rare, threatened, and endangered species | ¹² <input type="checkbox"/> Other resource information |

Questions 3b – 3f are continued on the following pages



Superior Falls Hydroelectric Project - FERC Project No. 2587
Saxon Falls Hydroelectric Project - FERC Project No. 2610
Montreal River - Iron County, Wisconsin and Gogebic County Michigan
Licensing Preliminary Application Document Information Questionnaire

b. Briefly describe the information or list available documents:

(Additional Information, if any, may be provided on page 4)

The project area is classified as a unique scenic resource highly sensitive to development. MDNR is interested in balancing recreational access and amenities while retaining the scenic and aesthetic quality of the area, which is derived in part from the relatively undisturbed (undeveloped) surroundings.

While additional information should be collected (for a number of the above areas), regarding recreation (7) multiple reports are currently available online from resource users documenting aesthetic and recreational qualities of the project vicinity. (7, 8, 10) Michigan Statewide Comprehensive Outdoor Recreation Plan should provide useful information regarding recreation priorities. (10, 7, 8) Gogebic County's 5 year plan (2018-2022) includes survey responses regarding recreational use (hiking, kayaking, fishing etc.)

(7,8) Many online forums describe positive aspects of the river for paddling and scenic viewing, however many lament aesthetic limitations perceived as being due to dam operations (e.g. <http://wisconsintrailguide.com/paddle/montreal-river.html>)

(7,8) From WI trailguide: "Unfortunately, the falls normally run at a trickle, only providing a full cascade during a dam release from the Saxon Falls Dam a short distance upstream." Similar report, but about difficulty of accessing amenities: <http://www.gowaterfalling.com/waterfalls/saxon.shtml>

Before it was discontinued around September 2017 (which should be remedied) the USGS gage associated with the project (04029990) provided information about how closely the project outflows matched the hydrograph for nearby streams (e.g. 04031000). For the period I reviewed (3/2016- 3/2017) it was a little funky, but not the worst I have seen.

c. Where or how can Xcel Energy obtain this information? *comments noted by subareas in 3 a.*

(2,7) Work with USGS to install gages.

(3,5,6) Collect aquatic organism data (including fish community inventory of pond and riverine areas), to include endangered, threatened and sensitive species.

(3) Evaluate fish entrainment and mortality as part of two phase study 1) reconnaissance to determine gross extent of facility entrainment and mortality and

2) if necessary a more intensive study to determine facility entrainment and mortality of fish in greater detail (study guidance available from MDNR)

7) Conduct inventory of recreational facilities, provide written descriptions, maps photos and diagrams of locations for MDNR evaluation

2) Document water quality. Provide data to allow for impact of proposed project operation on water quality to be determined

(4,5,6) Conduct a terrestrial and wetland habitat inventory

(4,5,6) Conduct inventory of wildlife in the riverine and pond areas, including threatened and endangered species

5 year plans and Michigan's SCORP can be accessed on-line. Additional reports from recreational users can also be found online, but directly engaging with stakeholders will be important to serving the public interest in this process.

2) Evaluate current (and proposed, if different) minimum flows in the bypassed reaches, for providing aesthetic, recreation, water quality, and habitat values

2) Consult records and provide project operations and hydrology information including daily fluctuation in tailwater, bypassed channels and reservoir for previous year, as well as normal, high and low water years

d. Please indicate whether there is a specific representative you wish to designate for potential follow-up contact by Xcel Energy or Xcel Energy's representative for the resource area(s) checked in 3a:

(Additional Information, if any, may be provided on page 4)

Representative Contact Information

Name: _____ Title: _____

Address: _____

Phone: _____ Email: _____

Name: _____ Title: _____

Address: _____

Phone: _____ Email: _____

Questions 3e – 3f are continued on the following page



Superior Falls Hydroelectric Project - FERC Project No. 2587
Saxon Falls Hydroelectric Project - FERC Project No. 2610
Montreal River - Iron County, Wisconsin and Gogebic County Michigan
Licensing Preliminary Application Document Information Questionnaire

- e. Are you aware of any particular issues pertaining to the specific resource area(s) identified in 3a?
(Additional information, if any, may be provided on page 4)

☒ Yes (Please list specific issues below)

☐ No

Resource Area

Specific Issue

Fish and aquatic resources
Water Resources, Fish and aquatic resources
Recreational and land use
Aesthetic resources and Recreational use
Recreational and land use

Run of River Operation (compliance and maintaining ROR in future operation)
Nexus of minimum flows to aquatic habitat/resources
Operational Verification- continuous gage stations for headwater elevation and downstream flows
Inventory of use, identify recreational needs
Gages (real-time), which may be in addition to those for compliance, to benefit recreational users (e.g. paddlers)
The aesthetic value of the project area is an attraction for resource users, and should be enhanced and protected as nature viewing, walking, and paddling increase in popularity
Assessment of use and improvements for recreationists, including those using personal watercraft
See also responses to other sections.

- f. Based on the issues identified in 3e, are you aware of any potential studies or information needs associated with the identified issues? (Additional information, if any, may be provided on page 4)

☒ Yes (Please list below)

☐ No

Potential Studies or Information Needs

see also 3.c. Comments noted with subareas added to options in 3.a.

(2,7) Work with USGS to install gages

(3,6) Collect aquatic organism data (including fish community inventory of pond and riverine areas), to include endangered, threatened and sensitive species.

(3) Evaluate fish entrainment and mortality as part of two phase study 1) reconnaissance to determine gross extent of facility entrainment and mortality and 2) if necessary a more intensive study to determine facility entrainment and mortality of fish in greater detail (study guidance available from MDNR)

(4,5,6) Conduct a terrestrial and wetland habitat inventory

(4,5,6) Conduct inventory of wildlife in the riverine and pond areas, including threatened and endangered species

7) Conduct inventory of recreational facilities, provide written descriptions, maps photos and diagrams of locations for MDNR evaluation.

7) Conduct assessment of current recreational use and regional trends to identify appropriate options and alternatives for recreational amenities.

2) Document water quality. Provide data to allow for impact of proposed project operation on water quality to be determined.

2) Evaluate current (and proposed, if different) minimum flows in the bypassed reaches, for providing aesthetic, recreation, water quality, and habitat values

2) Consult records and provide project hydrology information including daily fluctuation in tailwater, bypassed channels and reservoir for previous year, as well as normal, high and low water years

2) If changes in project operations are proposed, additional studies such as IFIM may be required.



Superior Falls Hydroelectric Project - FERC Project No. 2587
Saxon Falls Hydroelectric Project - FERC Project No. 2610
Montreal River - Iron County, Wisconsin and Gogebic County Michigan
Licensing Preliminary Application Document Information Questionnaire

4. Xcel Energy is investigating the use of the Traditional Licensing Process for these Hydroelectric Projects. Do you have any concerns with the use of the Traditional Licensing process?

☒ Yes (Please describe concerns below) ☐ No

Traditional Licensing Process Concerns

If the Traditional Licensing Process is pursued, MDNR would want reassurance that scoping meetings are appropriately timed, that the Licensee is committed to open communication and acting as a partner in fisheries and aquatic resource protection and mitigation. Providing structured timelines and check-ins that are sometimes more emphasized in the ILP would be beneficial, particularly ensuring that studies are done as early in the process as possible.

Filings relating to the License extension (ca. 2014) at Saxon Falls demonstrate an interest by NPS and American Whitewater, especially relating to recreational use at the projects. These and similar organizations should be invited to participate in this process if they have not been invited already.

5. Xcel Energy is interested in any additional comments, questions, or information you have regarding the licensing of the Projects. If the additional comments, questions, or information you provide below pertain to a particular question, please indicate the applicable question (such as 3b, 3d, 3e, 3f).

Additional comments, questions, or information

If anything is unclear, please reach out via email (GulottyE@michigan.gov) or phone (906-563-9247 x 109) thank you for the opportunity to comment.

Please return this completed questionnaire to Mead & Hunt using the enclosed self-addressed, stamped envelope within 30 days of receipt to allow for follow-up by Xcel or Xcel's representative.

Not responding within 30 days will indicate you are not aware of any existing, relevant, and reasonably available information that describes the existing environment or known potential impacts of the Projects.

Comments and/or questions may also be sent via email to: Shawn.Puzen@meadhunt.com



04/05/19

Superior Falls Hydroelectric Project - FERC Project No. 2587
Saxon Falls Hydroelectric Project - FERC Project No. 2610
Montreal River - Iron County, Wisconsin and Gogebic County Michigan
Licensing Preliminary Application Document Information Questionnaire

Xcel Energy has retained Mead & Hunt, Inc. (Mead & Hunt) to assist with efforts to license the above-referenced Hydroelectric Projects (Projects) located on the Montreal River in Wisconsin and Michigan. Under Federal Energy Regulatory Commission (FERC) regulations, Xcel Energy is preparing a Preliminary Application Document (PAD) that provides the FERC and other entities with existing, relevant, and reasonably available information pertaining to the Projects to help identify issues and related information needs, develop study requests and study plans, and prepare documents analyzing impacts. This PAD Information Questionnaire will be used to help identify sources of existing, relevant, and reasonably available information that is not in Xcel Energy's possession.

1. Information about person completing this questionnaire:

Name: James D. Fossum Title: Biologist - J. Fossum Env. Consulting
Organization: Hydro Consultant for the River Alliance of WI
Address: 199 Janet Marie Ln.
Winona, MN 55987
Phone: 507-429-9129 Email: jfbio@yahoo.com

2. Do you or your organization plan to participate in the 3 to 5 year-long licensing proceeding for the Superior Falls and Saxon Falls Hydroelectric Projects?

☒ Yes

☐ No

3. Do you or your organization know of existing, relevant, and reasonably available information that describes the existing environment or known potential impacts of the Projects?

☐ Yes (Please complete 3a thru 3f)

☒ No (Proceed to 4) - not specifically

a. If yes, check box(es) to indicate the specific resource area(s) that the information relates to:

☐ Geology and soils

☐ Recreational and land use

☐ Water resources

☐ Aesthetic resources

☐ Fish and aquatic resources

☐ Cultural resources

☐ Wildlife and botanical resources

☐ Socio-economic resources

☐ Wetlands, riparian, and littoral habitat

☐ Tribal resources

☐ Rare, threatened, and endangered species

☐ Other resource information

Questions 3b - 3f are continued on the following pages



Superior Falls Hydroelectric Project - FERC Project No. 2587
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Montreal River - Iron County, Wisconsin and Gogebic County Michigan
Licensing Preliminary Application Document Information Questionnaire

- b. Briefly describe the information or list available documents:

(Additional information, if any, may be provided on page 4)

As you know, Fishery & wildlife surveys done by the WI & MI DNR is always a good source of information. Also - the County Conservation Districts do studies & have environmental information.

- c. Where or how can Xcel Energy obtain this information?

at the WDNR & MDNR field offices near the project area - MDNR - probably Konrad office, WI WDNR - Peshtigo office - I think

- d. Please indicate whether there is a specific representative you wish to designate for potential follow-up contact by Xcel Energy or Xcel Energy's representative for the resource area(s) checked in 3a:

(Additional information, if any, may be provided on page 4)

Representative Contact Information

Name: Mr. Raj Shukla Title: Executive Director, River Alliance
Address: 1475 Butler St. Floor 2
MADISON, WI 53703
Phone: 608-257-2424 Email: _____

Name: _____ Title: _____

Address: _____

Phone: _____ Email: _____

Questions 3e - 3f are continued on the following page



Superior Falls Hydroelectric Project - FERC Project No. 2587
Saxon Falls Hydroelectric Project - FERC Project No. 2610
Montreal River - Iron County, Wisconsin and Gogebic County Michigan
Licensing Preliminary Application Document Information Questionnaire

e. Are you aware of any particular issues pertaining to the specific resource area(s) identified in 3a?
(Additional information, if any, may be provided on page 4)

☒ Yes (Please list specific issues below)

☐ No

Resource Area

Specific Issue

- ① Min-flow (5 cfs or inflow at Saxon Falls (SF)) Are the ^{existing} minimum flows adequate to protect fish & other? Min-flow requirements at Superior Falls (Sts) ^{aquatic life at these projects}
- ② Recreational flow releases - Are they feasible at these sites? ^{preserve project lands within the project boundary}
- ③ Preserve wetlands in the project boundary
- ④ How adequate are the recreational use facilities at these projects?
- ⑤ Identify what species of mussels are present & maintain hydra operations necessary to protect the mussel community

Based on the issues identified in 3e, are you aware of any potential studies or information needs associated with the identified issues? (Additional information, if any, may be provided on page 4)

☒ Yes (Please list below)

Potential Studies or Information Needs

- ① Potential instream flow studies
- ② recreational flow release study/aesthetic flow study
- ③ Update the fishery ^{at both Projects} information
- ④ Do mussel studies to update the mussel community
- ⑤ Do a federal & state - ^{at both Projects} V/E evaluation/study for aquatic & terrestrial species
- ⑥ Wetland delineation study
- ⑦ Recreational USE Survey
- ⑧ Evaluate turbine mortality, fish entrainment issue at both projects - potential for fish mortality by project operations
- ⑨ Prepare a Recreation Plan for both projects & USFAC recreational use facilities where necessary



Superior Falls Hydroelectric Project - FERC Project No. 2587
Saxon Falls Hydroelectric Project - FERC Project No. 2610
Montreal River - Iron County, Wisconsin and Gogebic County Michigan
Licensing Preliminary Application Document Information Questionnaire

4. Xcel Energy is investigating the use of the Traditional Licensing Process for these Hydroelectric Projects. Do you have any concerns with the use of the Traditional Licensing process?

☐ Yes (Please describe concerns below) ☒ No

Traditional Licensing Process Concerns

5. Xcel Energy is interested in any additional comments, questions, or information you have regarding the licensing of the Projects. If the additional comments, questions, or information you provide below pertain to a particular question, please indicate the applicable question (such as 3b, 3d, 3e, 3f).

Additional comments, questions, or information

Please send all relicensing information
to me - J.A. Fossom Environmental Consulting
To-CC-Rag is OK
Thank you
Jim F.

Please return this completed questionnaire to Mead & Hunt using the enclosed self-addressed, stamped envelope **within 30 days of receipt** to allow for follow-up by Xcel or Xcel's representative.

Not responding within 30 days will indicate you are not aware of any existing, relevant, and reasonably available information that describes the existing environment or known potential impacts of the Projects.

Comments and/or questions may also be sent via email to: Shawn.Puzen@meadhunt.com



Superior Falls Hydroelectric Project - FERC Project No. 2587
Saxon Falls Hydroelectric Project - FERC Project No. 2610
Montreal River - Iron County, Wisconsin and Gogebic County Michigan
Licensing Preliminary Application Document Information Questionnaire

Xcel Energy has retained Mead & Hunt, Inc. (Mead & Hunt) to assist with efforts to license the above-referenced Hydroelectric Projects (Projects) located on the Montreal River in Wisconsin and Michigan. Under Federal Energy Regulatory Commission (FERC) regulations, Xcel Energy is preparing a Preliminary Application Document (PAD) that provides the FERC and other entities with existing, relevant, and reasonably available information pertaining to the Projects to help identify issues and related information needs, develop study requests and study plans, and prepare documents analyzing impacts. This PAD Information Questionnaire will be used to help identify sources of existing, relevant, and reasonably available information that is not in Xcel Energy's possession.

1. Information about person completing this questionnaire:

Name: Sherry White Title: Tribal Historic Preservation Manager
Organization: Stockbridge-Munsee Tribe
Address: P.O. Box 70
Bowler WI 54416
Phone: (715) 793-3970 Email: sherry.white@mshican.nsn.gov

2. Do you or your organization plan to participate in the 3 to 5 year-long licensing proceeding for the Superior Falls and Saxon Falls Hydroelectric Projects?

☐ Yes

☒ No

3. Do you or your organization know of existing, relevant, and reasonably available information that describes the existing environment or known potential impacts of the Projects?

☐ Yes (Please complete 3a thru 3f)

☒ No (Proceed to 4)

a. If yes, check box(es) to indicate the specific resource area(s) that the information relates to:

☐ Geology and soils

☐ Recreational and land use

☐ Water resources

☐ Aesthetic resources

☐ Fish and aquatic resources

☐ Cultural resources

☐ Wildlife and botanical resources

☐ Socio-economic resources

☐ Wetlands, riparian, and littoral habitat

☐ Tribal resources

☐ Rare, threatened, and endangered species

☐ Other resource information

Questions 3b - 3f are continued on the following pages



Superior Falls Hydroelectric Project - FERC Project No. 2587
Saxon Falls Hydroelectric Project - FERC Project No. 2610
Montreal River - Iron County, Wisconsin and Gogebic County Michigan
Licensing Preliminary Application Document Information Questionnaire

- b. Briefly describe the information or list available documents:
(Additional information, if any, may be provided on page 4)

- c. Where or how can Xcel Energy obtain this information?

- d. Please indicate whether there is a specific representative you wish to designate for potential follow-up contact by Xcel Energy or Xcel Energy's representative for the resource area(s) checked in 3a:
(Additional information, if any, may be provided on page 4)

Representative Contact Information

Name: _____ Title: _____

Address: _____

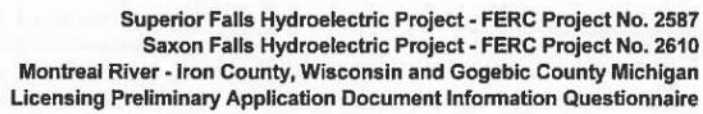
Phone: _____ Email: _____

Name: _____ Title: _____

Address: _____

Phone: _____ Email: _____

Questions 3e – 3f are continued on the following page



- ☒
- No

Specific Issue

[illegible]

- ☒
- No

Potential Studies or Information Needs

[illegible]



Superior Falls Hydroelectric Project - FERC Project No. 2587
Saxon Falls Hydroelectric Project - FERC Project No. 2610
Montreal River - Iron County, Wisconsin and Gogebic County Michigan
Licensing Preliminary Application Document Information Questionnaire

4. Xcel Energy is investigating the use of the Traditional Licensing Process for these Hydroelectric Projects. Do you have any concerns with the use of the Traditional Licensing process?

☐ Yes (Please describe concerns below)

☒ No

Traditional Licensing Process Concerns

5. Xcel Energy is interested in any additional comments, questions, or information you have regarding the licensing of the Projects. If the additional comments, questions, or information you provide below pertain to a particular question, please indicate the applicable question (such as 3b, 3d, 3e, 3f).

Additional comments, questions, or information

Please return this completed questionnaire to Mead & Hunt using the enclosed self-addressed, stamped envelope **within 30 days of receipt** to allow for follow-up by Xcel or Xcel's representative.

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Comments and/or questions may also be sent via email to: Shawn.Puzen@meadhunt.com



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

APR 22 2019

REPLY TO THE ATTENTION OF:

Shawn Puzen
Mead & Hunt, Inc.
1702 Lawrence Drive
De Pere, Wisconsin 54115

Re: Request for Information for Pre-Application Document for Federal Energy
Regulatory Commission (FERC) Hydroelectric Project No. 2587 on Superior Falls and
FERC Hydroelectric Project No. 2610 on Saxon Falls, Montreal River, Iron County,
Wisconsin, and Gogebic County, Michigan

Dear Mr. Puzen:

Mead & Hunt, Inc. is assisting Xcel Energy obtain licenses from FERC for the projects referenced above. Thank you for your March 28, 2018 letter requesting information to develop a Pre-Application Document (PAD) for submission to FERC as part of the relicensing process. We recommend accessing the following websites to obtain pertinent information on existing project environments and potential project impacts.

- NEPAassist is a free EPA web-based analytical tool that allows users to access geospatial environmental data for user-defined locations (<https://www.epa.gov/nepa/nepassist>).
- The Watershed Assessment, Tracking & Environmental Results System provides information about the quality of the nation's surface water (<https://www.epa.gov/waterdata/waters-watershed-assessment-tracking-environmental-results-system>).
- The U.S. Global Change Research Program's National Climate Assessment has information on potential impacts to infrastructure in the Upper Midwest caused by the increasing severity and frequency of major storm events. Future changes to the integrity of infrastructure could alter the environmental impacts of the proposed project over the life of the license. Information on adaptation is available at EPA's Climate Adaption Resource Center (See (<https://www.globalchange.gov/browse/reports> and <https://www.epa.gov/arc-x>).

EPA would appreciate the opportunity to provide scoping comments and review the environmental document prepared under the National Environmental Policy Act (NEPA). Please

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provide electronic copies of the scoping request and subsequent NEPA documents to Jen Tyler, the lead reviewer for this project, at tyler.jennifer@epa.gov. Ms. Tyler is available at 312-886-6394 if you would like to discuss our comments.

Sincerely,



Kenneth A. Westlake, Chief
NEPA Implementation Section
Office of Enforcement and Compliance Assurance



Superior Falls Hydroelectric Project - FERC Project No. 2587
Saxon Falls Hydroelectric Project - FERC Project No. 2610
Montreal River - Iron County, Wisconsin and Gogebic County Michigan
Licensing Preliminary Application Document Information Questionnaire

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1. Information about person completing this questionnaire:

Name: Greg Ryskey Title: Director
Organization: Gogebic County Forestry & Parks Commission
Address: 500 N. Moore Street
Bessemer, Michigan 49911
Phone: 906-663-4687 Email: gryskey@gogebiccountymi.gov

2. Do you or your organization plan to participate in the 3 to 5 year-long licensing proceeding for the Superior Falls and Saxon Falls Hydroelectric Projects?

☐ Yes ☒ No

3. Do you or your organization know of existing, relevant, and reasonably available information that describes the existing environment or known potential impacts of the Projects?

☐ Yes (Please complete 3a thru 3f) ☒ No (Proceed to 4)

a. If yes, check box(es) to indicate the specific resource area(s) that the information relates to:

- | | |
|---|---|
| <input type="checkbox"/> Geology and soils | <input type="checkbox"/> Recreational and land use |
| <input type="checkbox"/> Water resources | <input type="checkbox"/> Aesthetic resources |
| <input type="checkbox"/> Fish and aquatic resources | <input type="checkbox"/> Cultural resources |
| <input type="checkbox"/> Wildlife and botanical resources | <input type="checkbox"/> Socio-economic resources |
| <input type="checkbox"/> Wetlands, riparian, and littoral habitat | <input type="checkbox"/> Tribal resources |
| <input type="checkbox"/> Rare, threatened, and endangered species | <input type="checkbox"/> Other resource information |

Questions 3b - 3f are continued on the following pages



Superior Falls Hydroelectric Project - FERC Project No. 2587
Saxon Falls Hydroelectric Project - FERC Project No. 2610
Montreal River - Iron County, Wisconsin and Gogebic County Michigan
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- b. Briefly describe the information or list available documents:
(Additional information, if any, may be provided on page 4)

- c. Where or how can Xcel Energy obtain this information?

- d. Please indicate whether there is a specific representative you wish to designate for potential follow-up contact by Xcel Energy or Xcel Energy's representative for the resource area(s) checked in 3a:
(Additional information, if any, may be provided on page 4)

Representative Contact Information

Name: _____ Title: _____

Address: _____

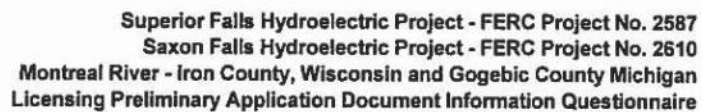
Phone: _____ Email: _____

Name: _____ Title: _____

Address: _____

Phone: _____ Email: _____

Questions 3e - 3f are continued on the following page



- ☐
- Yes (Please list specific issues below)
- ☐
- No

Specific Issue

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- ☐
- Yes (Please list below)
- ☐
- No

Potential Studies or Information Needs

[illegible]



Superior Falls Hydroelectric Project - FERC Project No. 2587
Saxon Falls Hydroelectric Project - FERC Project No. 2610
Montreal River - Iron County, Wisconsin and Gogebic County Michigan
Licensing Preliminary Application Document Information Questionnaire

4. Xcel Energy is investigating the use of the Traditional Licensing Process for these Hydroelectric Projects. Do you have any concerns with the use of the Traditional Licensing process?

☐ Yes (Please describe concerns below) ☒ No

Traditional Licensing Process Concerns

5. Xcel Energy is interested in any additional comments, questions, or information you have regarding the licensing of the Projects. If the additional comments, questions, or information you provide below pertain to a particular question, please indicate the applicable question (such as 3b, 3d, 3e, 3f).

Additional comments, questions, or information

Please return this completed questionnaire to Mead & Hunt using the enclosed self-addressed, stamped envelope **within 30 days of receipt** to allow for follow-up by Xcel or Xcel's representative.

Not responding within 30 days will indicate you are not aware of any existing, relevant, and reasonably available information that describes the existing environment or known potential impacts of the Projects.

Comments and/or questions may also be sent via email to: Shawn.Puzen@meadhunt.com



Superior Falls Hydroelectric Project - FERC Project No. 2587
Saxon Falls Hydroelectric Project - FERC Project No. 2610
Montreal River - Iron County, Wisconsin and Gogebic County Michigan
Licensing Preliminary Application Document Information Questionnaire

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1. Information about person completing this questionnaire:

Name: Angie Tarnes Title: Planner
Organization: National Park Svc
Address: 626 E. Wisconsin Ave
Milwaukee WI 53202
Phone: 414 297 3605 Email: angie_tarnes@nps.gov

2. Do you or your organization plan to participate in the 3 to 5 year-long licensing proceeding for the Superior Falls and Saxon Falls Hydroelectric Projects?

☒ Yes ☐ No

3. Do you or your organization know of existing, relevant, and reasonably available information that describes the existing environment or known potential impacts of the Projects?

☒ Yes (Please complete 3a thru 3f) ☐ No (Proceed to 4)

a. If yes, check box(es) to indicate the specific resource area(s) that the information relates to:

- | | |
|---|---|
| <input type="checkbox"/> Geology and soils | <input checked="" type="checkbox"/> Recreational and land use |
| <input type="checkbox"/> Water resources | <input type="checkbox"/> Aesthetic resources |
| <input type="checkbox"/> Fish and aquatic resources | <input type="checkbox"/> Cultural resources |
| <input type="checkbox"/> Wildlife and botanical resources | <input type="checkbox"/> Socio-economic resources |
| <input type="checkbox"/> Wetlands, riparian, and littoral habitat | <input type="checkbox"/> Tribal resources |
| <input type="checkbox"/> Rare, threatened, and endangered species | <input type="checkbox"/> Other resource information |

Questions 3b - 3f are continued on the following pages



Superior Falls Hydroelectric Project - FERC Project No. 2587
Saxon Falls Hydroelectric Project - FERC Project No. 2610
Montreal River - Iron County, Wisconsin and Gogebic County Michigan
Licensing Preliminary Application Document Information Questionnaire

- b. Briefly describe the information or list available documents:
(Additional information, if any, may be provided on page 4)

* Montreal River Canyon is a multi-state destination for white water boating, one of the most valued in the same area.

- c. Where or how can Xcel Energy obtain this information?

American Whitewater website

- d. Please indicate whether there is a specific representative you wish to designate for potential follow-up contact by Xcel Energy or Xcel Energy's representative for the resource area(s) checked in 3a:
(Additional information, if any, may be provided on page 4)

Representative Contact Information

Name: Self Title: _____

Address: _____

Phone: _____ Email: _____

Name: Tom O'Keefe Title: Pacific Northwest Director

Address: 3537 NE 87th St

Seattle WA 98115

Phone: o'keefe@americanwhitewater.org Email: americanwhitewater.org

Questions 3e - 3f are continued on the following page

425.417.9012



Superior Falls Hydroelectric Project - FERC Project No. 2587
Saxon Falls Hydroelectric Project - FERC Project No. 2610
Montreal River - Iron County, Wisconsin and Gogebic County Michigan
Licensing Preliminary Application Document Information Questionnaire

- e. Are you aware of any particular issues pertaining to the specific resource area(s) identified in 3a?
(Additional information, if any, may be provided on page 4)

☒ Yes (Please list specific issues below)

☐ No

Resource Area

Specific Issue

Recreation

barriers to access

need for recreational flow
release

access areas, signage,
trail enhancements

- f. Based on the issues identified in 3e, are you aware of any potential studies or information needs associated with the identified issues? (Additional information, if any, may be provided on page 4)

☒ Yes (Please list below)

☐ No

Potential Studies or Information Needs

① Recreation facilities condition
assessment

② Instream flow for recreation
evaluation



Superior Falls Hydroelectric Project - FERC Project No. 2587
Saxon Falls Hydroelectric Project - FERC Project No. 2610
Montreal River - Iron County, Wisconsin and Gogebic County Michigan
Licensing Preliminary Application Document Information Questionnaire

4. Xcel Energy is investigating the use of the Traditional Licensing Process for these Hydroelectric Projects. Do you have any concerns with the use of the Traditional Licensing process?

☒ Yes (Please describe concerns below) ☐ No

Traditional Licensing Process Concerns

Need good communication +
coordination, actions to
promote positive engagement
among all parties.

5. Xcel Energy is interested in any additional comments, questions, or information you have regarding the licensing of the Projects. If the additional comments, questions, or information you provide below pertain to a particular question, please indicate the applicable question (such as 3b, 3d, 3e, 3f).

Additional comments, questions, or information

- North Country National Scenic Trail
in vicinity of Superior Falls
- Superior Falls is a regional
tourist destination.
- May be Tribal interests.

Please return this completed questionnaire to Mead & Hunt using the enclosed self-addressed, stamped envelope **within 30 days of receipt** to allow for follow-up by Xcel or Xcel's representative.

Not responding within 30 days will indicate you are not aware of any existing, relevant, and reasonably available information that describes the existing environment or known potential impacts of the Projects.

Comments and/or questions may also be sent via email to: Shawn.Puzen@meadhunt.com

Cover Letter, NOI, PAD, & TLP Request



1414 West Hamilton Avenue
P.O. Box 8
Eau Claire, WI 54702-0008

December 30, 2019

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

Subject: Preliminary Application Document, Notice of Intent, Request to Use Traditional
Licensing Process, and Request for Designation as Non-Federal Representative
Saxon Falls Hydroelectric Project (FERC Project No. 2610)
Superior Falls Hydroelectric Project (FERC Project No. 2587)

Dear Secretary Bose:

In accordance with 18 CFR § 16.6 and Section 15 of the Federal Power Act, Northern States Power Company – Wisconsin, d/b/a Xcel Energy ("NSPW"), licensee of the Saxon Falls (FERC Project No. 2610) and Superior Falls (FERC Project No. 2587) Hydroelectric Projects (Projects), is hereby electronically filing with the Commission a Notice of Intent to File a License Application (NOI) and a Pre-Application Document (PAD) for the relicensing of said Projects. The current licenses for the Projects expire on December 31, 2024.

In accordance with the Commission's regulations, NSPW hereby declares its unequivocal intent to begin the relicensing process for both the Saxon Falls and Superior Falls Hydroelectric Projects by filing the enclosed Notices of Intent (NOI) to file applications for a subsequent license for the Saxon Falls Hydroelectric Project and a new license for the Superior Falls Hydroelectric Project. Along with the NOIs, a Pre-Application Document (PAD)¹ that includes information for both Projects is also enclosed.

In accordance with 18 CFR § 5.5(c), NSPW is providing a copy of the NOI and PAD in electronic format to the appropriate federal, state, and interstate resource agencies as well as Indian Tribes, local governments, and members of the public likely to be interested in the relicensing proceedings. A distribution list of all known potential stakeholders receiving copies of the NOI and PAD is attached. NSPW will also provide two paper courtesy copies of the NOI and PAD to Commission Staff in the Office of Energy Projects and the Office of General Counsel-Energy Projects as outlined in the Commission's filing guidelines.

Under 18 CFR § 5.3, NSPW requests approval from the Commission for use of the Traditional Licensing Process (TLP). The use of the TLP is not expected to negatively impact the timely issuance of the licenses and is expected to provide cost and time savings to NSPW and the relicensing participants. The majority of the stakeholders that have committed to participate in the relicensing process do not have concerns with the use of the TLP as evidenced by their responses to the questionnaires. The use of the TLP was supported by the Township of Ironwood, Michigan Department of Environment, Great Lakes, and Energy, the Friends of the Gile Flowage, Gogebic County Forestry and Parks, Iron County, River Alliance of Wisconsin,

¹ Since Northern States Power Company is NSPW for both the Saxon Falls and Superior Falls Hydroelectric Projects, one PAD including known information for both is being submitted.

and Stockbridge-Munsee Tribe. The Leech Lake Tribe and the EPA did not indicate support for, or opposition to, use of the TLP. The Michigan Department of Natural Resources supported use of the TLP on the condition that scoping meetings are appropriately timed and that NSPW is committed to open communication during the process. The Town of Kimball indicated it did not intend to participate in the relicensing and did not support the use of the TLP. Follow-up correspondence to determine why they were opposed to use of the TLP was not returned. The National Park Service was the only agency that expressly indicated opposition to the use of the TLP. They would prefer to use the Integrated Licensing Process as it allows for more collaboration.

NSPW is willing to meet the Michigan DNR's above-referenced conditions, and because there does not appear to be any complex resource issues that need to be addressed, minimal controversy is anticipated during the relicensing process. Furthermore, the amount of available information for the projects has resulted in a robust PAD and, as a result, the potential for significant disputes over studies is also expected to be low. Therefore, since the majority of the stakeholders who have committed to participate in the relicensing process support the use of the TLP, NSPW anticipates the Commission will be able to issue new licenses for the Projects in a timely fashion.

NSPW also believes the TLP is the most efficient process for the relicensing of the Projects because of the limited geographic scope of the project boundaries, the limited number of anticipated stakeholders, and the limited number of controversial issues brought forward in the questionnaire responses. Experience also indicates the TLP is less costly than the use of the Integrated Licensing Process (ILP). Under 18 CFR § 5.3 (d)(1), comments concerning NSPW's request to use the TLP must be filed with the Commission within 30 days of the filing date of the request and must include either the project number (FERC Project Nos. 2610 or 2587) or the name and address of the licensee as depicted in the PAD.

Pursuant to 18 CFR § 5.3 (d)(2), NSPW will file, no later than the date of this filing, a notice in a daily or weekly newspaper of general circulation in Iron County, Wisconsin and Gogebic County, Michigan. It will include the filing date of the request to the TLP, and the NOI and PAD, summarize the documents filed and the basis of the request to use the TLP, include the licensee's name, address and telephone number, and indicate that comments are due within 30 days of the filing date, include the project number and/or the licensee's name and address, and state that respondents must submit comments to the Secretary of the Commission in accordance with filing procedures outlined in the Commission's website at <http://FERC.gov>. The notice will also state that comments on the request to use the TLP should address, as appropriate, the likelihood of timely license issuance, complexity of resource issues, level of anticipated controversy, relative cost of the TLP compared to the integrated process, the amount of available information and potential for significant disputes over studies, and other factors believed to be pertinent.

To assist in open communication with the stakeholders, NSPW plans to use electronic correspondence as the primary source of communication. Hard copy correspondence will be utilized as the secondary means of communication where electronic correspondence is not feasible. Documents filed with the Commission and provided to the stakeholders will also be available on NSPW's website at <http://hydrorelicensing.com/> and FERC's eLibrary website.

A public scoping meeting and site visit will be held between 30 and 60 days of the Commission's decision on the use of the TLP. Written comments on the PAD must be filed with the Commission, and a copy sent to NSPW, within 60 days of the public scoping meeting.

Pursuant to 18 CFR § 5.5(e), NSPW also hereby formally requests to be designated as the Commission's non-federal representative in the relicensing of the Saxon Falls Hydroelectric

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Project (FERC Project No. 2610) and Superior Falls Hydroelectric Project (FERC Project No. 2587) for the purposes of consultation under Section 7 of the Endangered Species Act and the joint regulations under 50 CFR Part 402, the National Oceanic and Atmospheric Administration under Section 305(b) of the Magnuson-Stevens Fishery Conservation and Management Act and implementing regulations at 50 CFR § 600.920, and Section 106 of the National Historic Preservation Act and the implementing regulations under 36 CFR Part 800.

Thank you for your time and consideration in this matter. If you have any questions, please contact Matthew Miller at 715-737-1353 or matthew.j.miller@xcelenergy.com.

Respectfully Submitted,



James Zyduck
Director, Hydro Plants

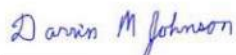
cc: Distribution List

H:\2019\206 Saxon Superior NOI and Request to Use TLP and non-fed rep with Miller edits 122319.docx

Certificate of Service

I hereby certify that I, on behalf of Northern States Power Company - Wisconsin (d/b/a Xcel Energy), have this day served by First Class Mail the foregoing documents in electronic format upon each person designated on the attached distribution list.

Dated this 30th day of December 2019.



Darrin M. Johnson
Mead & Hunt, Inc.

Saxon Falls Hydroelectric Project Licensing
FERC Project No. 2610

Superior Falls Hydroelectric Project Licensing
FERC Project No. 2587

Notice of Intent to Relicense
Request to Use the Traditional Licensing Process
Pre-Application Document
Distribution List

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Congressman Jack Bergman

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Ms. Tori Aschebrock
Clerk
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Northwest Regional Planning Committee

1400 S. River St.
Spooner, WI 54801-8692

Mr. Raj Shukla or Ms. Allison Werner

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Tshukla@wisconsinrivers.org

Mr. Thomas O'Keefe

American Whitewater
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Seattle, WA 98115-3639
OKeefe@AmericanWhitewater.org

**NOTICE OF INTENT
BEFORE THE FEDERAL ENERGY REGULATORY COMMISSION
TO FILE AN APPLICATION
FOR SUBSEQUENT LICENSE
SAXON FALLS HYDROELECTRIC PROJECT
FERC PROJECT NO. 2610
Northern States Power Company – Wisconsin (d/b/a Xcel Energy)**

In accordance with 18 C.F.R. Section 5.5, Northern States Power Company – Wisconsin, d/b/a Xcel Energy ("NSPW"), hereby declares its intent to file an application for a subsequent license for an existing minor hydroelectric development at the Saxon Falls Hydroelectric Project as described below.

Information Required Pursuant to 18 C.F.R. §§ 5.5 and 16.6(b)

1. Potential License Applicant's Name and Address

The licensee's name and address are:

Northern States Power Company – Wisconsin
Attn: James Zyduck
Director of Hydro Plants
1414 W Hamilton Ave
PO Box 8
Eau Claire, WI 54702
James.Zyduck@XcelEnergy.com

2. Project Number

The FERC project number is 2610.

3. License Expiration Date

The license expiration date is December 31, 2024.

4. Statement of Intent

Northern States Power Company - Wisconsin (d/b/a Xcel Energy), unequivocally intends to file an application for a subsequent license for the Saxon Falls Hydroelectric Project (FERC No. 2610) and has requested permission to use the Commission's Traditional Licensing Process.

5. Principal Project Works and Project Description

The principal project works consist of a 510 foot long, 40 foot high dam consisting of seven sections, a six foot inside diameter, 5/16 inch thick steel conduit that extends 1,607 feet from the dam to the surge tank, a 23.5 foot diameter by 59.5 foot high 3/8" thick surge tank, two 156 foot long by 56 inch diameter by ½ inch thick steel penstocks extending from the surge tank to the power house, 52 foot long by 30 foot wide by 16 foot high powerhouse, and a substation with a .25 mile long transmission line.

The dam consists of seven sections: 1) a right spillway abutment section with a concrete training wall and a concrete core wall that extends 20 feet into the earth fill to the right of the spillway, 2) a 126-foot

8-inch long Ambursen-type spillway section with a crest elevation of 997.0 feet National Geodetic Vertical Datum 1929 (NGVD), 3) a mass concrete ogee shaped gated spillway section with a 12-foot high by 26-foot wide steel tainter gate with a crest elevation of 984.0 feet NGVD, 4) a 12-foot wide non-overflow dam section with a crest elevation of 1004.1 feet NGVD, 5) a 20-foot wide concrete intake structure section with a concrete substructure and a masonry superstructure with a crest elevation of 1004.1 feet NGVD and 15 foot high by 20 foot wide trashracks, 6) a 57-foot wide non-overflow dam mass concrete section with a crest elevation of 1004.1 feet NGVD, and 7) a 260-foot long left earthen dam section with a crest elevation ranging from 1005.0 feet NGVD and 1007.6 feet NGVD.

The powerhouse contains two horizontal type units rated at 1,000 hp each.

The powerhouse also contains two General Electric 2300-volt, 600 rpm, 80% power factor AC generators with a nameplate capacity of 625 kW. The generators were rewound in 1957 and are now rated at 750 kW each.

6. Location of the Project

The location of the project is as follows:

States:	Wisconsin and Michigan
County:	Iron County, WI and Gogebic County, MI
Stream:	Montreal River 4.3 miles upstream of its confluence with Lake Superior
Nearby Communities:	City of Hurley, Wisconsin; City of Ironwood, Michigan; Towns of Carey, Pence, and Saxon, Wisconsin; Township of Ironwood, Michigan
Other:	Located in northeast Iron County, Wisconsin and northwest Gogebic County, Michigan; approximately 11 miles from the neighboring cities of Hurley, WI and Ironwood, Michigan; 25 miles east of the City of Ashland, Wisconsin; and approximately 132 miles northeast of the city of Eau Claire, WI.

7. Installed Plant Capacity

The plant has an installed capacity of 1.5 MW.

8. Names and Mailing Addresses

- *Every county in which any part of the project is located, and in which any Federal facility that is used or to be used by the project is located:*

County:	Iron
Contact name:	Michael Saari, County Clerk
Mailing Address:	300 Taconite Street, Hurley, WI 54534 clerk@ironcountywi.org

County:	Gogebic
Contact Name:	Gerry Pelissero, County Clerk
Mailing Address:	200 N. Moore Street Bessemer, MI 49911

- *Every city, town, or similar local political subdivision*

(A) *in which any part of the project is or is to be located and any Federal facility that is or is to be used by the project is located:*

Kathryn Brauer (Saxon Falls Project)
Town Clerk
Town of Saxon
P.O. Box 37
Saxon, WI 54559

LeRoy Johnson (Saxon Falls Project)
Deputy Supervisor
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Lori Genisot (Gile Flowage)
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Hurley, WI 54534

Susan Lesky (Gile Flowage)
Clerk/Treasurer
City of Montreal
54 Wisconsin Avenue
Montreal, WI 54550

(B) *that has a population of 5,000 or more people and is located within 15 miles of the existing proposed project dam:*

City of Ironwood
Karen Gullan
City Clerk
213 S. Marquette Street
Ironwood, Michigan 49938

- *Every irrigation district, drainage district, or similar special purpose political subdivision*

(A) *in which any part of the project is or is proposed to be located and any Federal facility that is or is proposed to be used by the project is located;*

Northwest Regional Planning Commission
1400 S. River St.
Spooner, WI 54801-8692

(B) *that owns, operates, maintains, or uses any project facility or any Federal facility that is or is proposed to be used by the project:*

None.

- *Every other political subdivision in the general area of the project or proposed project that there is reason to believe would likely be interested in, or affected by, the notification:*

None.

- *Indian tribes:*

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1720 Big Lake Road
Cloquet, MN 55720

Mr. Gary Bahr
Sac and Fox Nation of Missouri in Kansas and Nebraska
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Sac and Fox of the Mississippi in IA
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Mr. Marvin Defoe, THPO

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Mr. David Grignon, THPO

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Mr. Ryan Howell, THPO

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Lac du Flambeau, WI 54538
LdFthpo@LdfTribe.com

**NOTICE OF INTENT
BEFORE THE FEDERAL ENERGY REGULATORY COMMISSION
TO FILE AN APPLICATION
FOR NEW LICENSE
SUPERIOR FALLS HYDROELECTRIC PROJECT
FERC PROJECT NO. 2587
Northern States Power Company – Wisconsin (d/b/a Xcel Energy)**

In accordance with 18 C.F.R. Section 5.5, Northern States Power Company – Wisconsin, d/b/a Xcel Energy (“NSPW”), hereby declares its intent to file an application for a new license for an existing major hydroelectric development at the Superior Falls Hydroelectric Project as described below.

Information Required Pursuant to 18 C.F.R. §§ 5.5 and 16.6(b)

1. Potential License Applicant’s Name and Address

The licensee’s name and address are:

Northern States Power Company – Wisconsin
Attn: James Zyduck
Director of Hydro Plants
1414 W Hamilton Ave
PO Box 8
Eau Claire, WI 54702
James.Zyduck@XcelEnergy.com

2. Project Number

The FERC project number is 2587.

3. License Expiration Date

The license expiration date is December 31, 2024.

4. Statement of Intent

Northern States Power Company - Wisconsin (d/b/a Xcel Energy), unequivocally intends to file an application for a new license for the Superior Falls Hydroelectric Project (FERC No. 2587) and has requested permission to use the Commission’s Traditional Licensing Process.

5. Principal Project Works and Project Description

The principal project works consist of a 240 foot long and 29 foot high dam with five sections, a 1,697 foot long by 84-inch diameter conduit made of reinforced concrete pipe extending from the intake to the surge tank, a 28-foot diameter surge tank with a 13-foot high lower concrete section and a 28-foot high upper steel section, two 190-foot long by 54-inch diameter steel penstocks extending from the surge tank to the powerhouse, a 32-foot long by 62-foot wide powerhouse constructed with reinforced concrete, a substation, a 200 foot long 2.4 kV transmission line, and appurtenant facilities.

The dam consists of five sections: 1) a 70-foot long non-overflow/intake section with a 15-foot high by 23-foot wide intake structure with trashracks and a mechanically operated timber headgate, 2) a right tainter gate section with two 16-foot wide by 18-foot high steel tainter gates with a crest elevation of 722 feet National Geodetic Vertical Datum (NGVD) and a hydraulic hoist system, 3) a middle overflow section created by filling the Ambursen-style dam with mass concrete, extending the crest elevation of 740.2 feet, and installing two trash gates (a left sluice gate and a right vertical slide gate), 4) a left tainter gate section with an 18-foot wide by 15-foot high steel tainter gate with a crest elevation of 726.2 feet, and 5) a left overflow weir section with three 12-foot wide bays with a crest elevation of 740.2 feet.

The powerhouse contains two horizontal shaft, Francis type turbines with a rated capacity of 1250 hp at 127 feet of operating head at 600 rpm.

The powerhouse also contains two generator units with a capacity of 660 kW each. The generators were rewound in 1954 and 1957 and each now has the capacity to produce 825 kW at unity power factor.

6. Location of the Project

The location of the project is as follows:

States:	Wisconsin and Michigan
County:	Iron County, WI and Gogebic County, MI
Stream:	Montreal River (0.4 miles upstream of its confluence with Lake Superior)
Nearby Communities:	City of Hurley, Wisconsin; City of Ironwood, Michigan; Town of Saxon, Wisconsin; Township of Ironwood, Michigan
Other:	Located in northeast Iron County, Wisconsin and northwest Gogebic County, Michigan; approximately 14 miles from the neighboring cities of Hurley, WI and Ironwood, Michigan; 23 miles east of the City of Ashland, Wisconsin; and approximately 132 miles northeast of the city of Eau Claire, WI.

7. Installed Plant Capacity

The plant has an installed capacity of 1.65 MW.

8. Names and Mailing Addresses

- *Every county in which any part of the project is located, and in which any Federal facility that is used or to be used by the project is located:*

County:	Iron
Contact name:	Michael Saari, County Clerk
Mailing Address:	300 Taconite Street Hurley, WI 54534 clerk@ironcountywi.org

County:	Gogebic
Contact Name:	Gerry Pelissero, County Clerk
Mailing Address:	200 N. Moore Street Bessemer, MI 49911

- *Every city, town, or similar local political subdivision*

(A) *in which any part of the project is or is to be located and any Federal facility that is or is to be used by the project is located:*

Kathryn Brauer
Town Clerk
Town of Saxon
P.O. Box 37
Saxon, WI 54559

LeRoy Johnson
Deputy Supervisor
Charter Township of Ironwood
Ironwood, MI 49938
JohnsonIWDTownshipzoning@gmail.com

(B) *that has a population of 5,000 or more people and is located within 15 miles of the existing proposed project dam:*

City of Ironwood
Karen Gullan
City Clerk
213 S. Marquette Street
Ironwood, Michigan 49938

- *Every irrigation district, drainage district, or similar special purpose political subdivision*

(A) *in which any part of the project is or is proposed to be located and any Federal facility that is or is proposed to be used by the project is located:*

Northwest Regional Planning Commission
1400 S. River St.
Spooner, WI 54801-8692

(B) *that owns, operates, maintains, or uses any project facility or any Federal facility that is or is proposed to be used by the project:*

None.

- *Every other political subdivision in the general area of the project or proposed project that there is reason to believe would likely be interested in, or affected by, the notification:*

None.

- *Indian tribes:*

Mr. Marcus Ammesmaki, THPO
Fond du Lac Band of Lake Superior Chippewa
1720 Big Lake Road
Cloquet, MN 55720

Mr. Gary Bahr

Sac and Fox Nation of Missouri in Kansas and Nebraska
305 N. Main
Reserve, KS 66434

Mr. Brian Bisonette, THPO

Lac Courte Oreilles Band of Lake Superior Chippewa Indians of WI
13394 West Trepania Road
Hayward, WI 54843
Brian.Bisonette@lco-nsn.gov

Mr. Michael Blackwolf, THPO

Fort Belknap Indian Community
656 Agency Main Street
Harlem, MT 59526-9455

Mr. Jonathan Buffalo, NAGPRA Rep.

Sac and Fox of the Mississippi in IA
349 Meskwaki Road
Tama, IA 52339-9629

Ms. Amy Burnette, THPO

Leech Lake Band of Minnesota
Chippewa Tribe
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Mr. David Grignon, THPO

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W3426 Cty VV
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Miami Tribe of Oklahoma
PO Box 1326
Miami, OK 74355

Mr. Ryan Howell, THPO

Prairie Island Indian Community
5636 Sturgeon Lake Road
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Iowa Tribe of Oklahoma

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Ms. Melinda Young, THPO
Lac du Flambeau Band of Lake Superior Chippewa Indians of WI
P.O. Box 67
Lac du Flambeau, WI 54538
LdFthpo@LdfTribe.com

Joint Agency Meeting Correspondence



1414 West Hamilton Avenue
P.O. Box 8
Eau Claire, Wisconsin 54702-0008
Telephone (800) 895-4999

March 10, 2020

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

Subject: **Notification of Joint Meeting**
Saxon Falls Hydroelectric Project (FERC Project No. 2610)
Superior Falls Hydroelectric Project (FERC Project No. 2587)

Dear Secretary Bose:

In accordance with 18 CFR, Part 16, Section 16.8 (b)(3) and (b)(4), Xcel Energy hereby invites resource agencies, Indian tribes, and members of the public to attend a joint meeting to discuss the relicensing process for the Saxon Falls Hydroelectric Project, FERC Project No. 2610 and the Superior Falls Hydroelectric Project, FERC Project No. 2587. The meeting will allow for a review of information previously provided by Xcel Energy in its Preliminary Application Document (PAD), as well as to discuss information to be provided as a part of the relicensing process.

The Federal Energy Regulatory Commission (FERC) approved the licensee's request to use the Traditional Licensing Process for the Projects on February 13, 2020.

The meeting will take place on Thursday, April 9, 2020, at 10:00 a.m. at the Saxon Community Center at 2 Church Street, Saxon, Wisconsin.

Interested parties are also invited to a site visit of the Saxon Falls and Superior Falls Hydroelectric Projects following the meeting. Those interested in the site visit should plan on gathering after the meeting.

The agenda for the meeting is as follows:

1. **Xcel Energy**
 - Welcome
 - Introductions
 - Overview of meeting logistics and purpose
 - Overview of FERC licensing process
 - Description of the Saxon Falls and Superior Falls Hydroelectric Projects
 - Discussion of the Preliminary Application Document (PAD)

Ms. Kimberly D. Bose, Secretary
March 10, 2020
Page 2

2. Resource agency comments

3. Tribal comments

4. Public comments

- Members of the public are entitled to participate fully in the meeting and to express their views regarding resource issues that should be addressed in any application for a new license that may be filed by Xcel Energy.

5. Site Visits

According to 18 CFR, Part 16, Section 16.8 (b)(4), the meeting will be audio recorded. Interested resource agencies and Indian tribes may request a copy of the recording.

The PAD, which was provided to agencies, Indian tribes, and interested members of the public on December 30, 2019, is available for inspection at the following public libraries:

- Hurley Public Library – 405 5th Avenue North, Hurley, Wisconsin
- Ironwood Carnegie Library – 235 East Aurora Street, Ironwood, Michigan

As required by FERC regulation 18 CFR, Part 16, Section 16.8 (b)(5), written comments regarding the PAD shall be submitted to Xcel Energy no later than June 9, 2020 (60 days after the April 9 meeting). Any comments received from resource agencies, Indian tribes, and/or interested members of the public should:

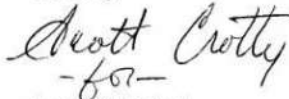
- Identify its determination of necessary studies to be performed or the information to be provided by the potential applicant.
- Identify the basis for its determination.
- Discuss its understanding of the resource issues and its goals and objectives for these resources.
- Explain why each study methodology recommended by it is more appropriate than any other available methodology alternatives, including those identified by the potential applicant.
- Document that the use of each study methodology recommended by it is a generally accepted practice.
- Explain how the studies and information requested will be useful to the agency, Indian tribe, or member of the public in furthering its resource goals and objectives that are affected by the proposed project.

Ms. Kimberly D. Bose, Secretary
March 10, 2020
Page 3

This notice of the joint meeting is being sent to those resource agencies, Indian tribes, and interested members of the public listed on the attached sheets.

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

Sincerely,

A handwritten signature in cursive script, appearing to read "James M. Zyduck", with a horizontal line underneath the signature.

James M. Zyduck
Director, Hydro Plants

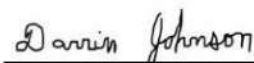
Enclosure: Certificate of Service
 Potential Licensing Participant List

cc: List of addresses (attached)
 Shawn Puzen – Mead & Hunt, Inc. (via e-mail)
 Project Files

Certificate of Service

I hereby certify that I, on behalf of Xcel Energy, have this day served (via first class mail) the foregoing documents upon each person designated on the attached Master Address Distribution List.

Dated this 10th day of March 2020.

A handwritten signature in black ink that reads "Darrin Johnson". The signature is written in a cursive style and is positioned above a horizontal line.

Darrin Johnson
MEAD & HUNT, Inc.

Saxon Falls and Superior Falls Hydroelectric Project Licensing
FERC Project No. 2610 and 2587

Indian Tribes

Mr. Marcus Ammesmaki, THPO

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1720 Big Lake Road
Cloquet, MN 55720

Mr. Gary Bahr

Sac and Fox Nation of Missouri in Kansas and
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LdFthpo@LdFTribe.com

Federal

Senator Tammy Baldwin

U.S. Senator from Wisconsin
717 Hart Senate Office Building
Washington, DC 20510

Congressman Jack Bergman

2330 Rayburn HOB
Washington, DC 20515

Mr. Edward G. Buikema, Director

Federal Emergency Management Agency
Regional Office
536 South Clark Street, 6th Floor
Chicago, IL 60605

Ms. Tokey Boswell

Regional Environment Coordinator
U.S. Department of the Interior
National Park Service Midwest Region
Midwest Region
601 Riverfront Drive
Omaha, NE 68128
Tokey_Boswell@nps.gov

Director

Geological and Natural History Survey
University of Wisconsin Extension
3817 Mineral Point Road
Madison, WI 53705

Director

Great Lakes Fish & Wildlife Commission
Chief Blackbird Center, Maple Lane
P.O. Box 9
Odana, WI 54861

Director

Public Service Commission of Wisconsin
610 North Whitney Way
P.O. Box 7854
Madison, WI 53707-7854

**Director of Lands, Watershed, and Minerals
Management**

U.S. Department of Agriculture
Forest Service, National Forests
Eastern Region
626 East Wisconsin Avenue, Suite 800
Milwaukee, WI 53202-4616

Director

U.S. Department of Commerce
National Oceanic and Atmospheric
Administration
One Blackburn Drive
Gloucester, MA 01930

Director

U.S. Department of the Interior
Bureau of Land Management
Milwaukee District
626 East Wisconsin Avenue, Suite 200
Milwaukee, WI 53201-0631

**Wisconsin 7th Congressional District
Representative**

2330 Rayburn HOB
Washington, DC 20515

Endangered Species Specialist

Endangered Species Specialist
US Fish & Wildlife Service
Twin Cities Field Office
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Bloomington, MN 55425

FERC Coordinator

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Corps of Engineers
St. Paul District
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St. Paul, MN 55101-1638

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Green Bay Field Office
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John M. Fowler

Executive Director
Advisory Council on Historic Preservation
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Office of Environmental Policy and Compliance
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U.S. Senator from Michigan
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Mr. Samuel Rauch

National Marine Fisheries Service
Northeast Region
55 Republic Drive
Gloucester, MA 01930

Senator Debbie Stabenow

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Ms. Jen Tyler

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Mr. Nick Utrup

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Mr. John Zyga

Regional Engineer

Federal Energy Regulatory Commission

Chicago Regional Office

Federal Building

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Chicago, IL 60604

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Senator Janet Bewley

State Senator – 25th District
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Mr. Tyler Howe

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816 State Street
Madison, WI 53706

Ms. Elle Gulotty

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Director of Hydro Plants

Xcel Energy

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James.Zyduck@XcelEnergy.com

Darrin Johnson

Subject: Saxon Falls and Superior Falls Joint Agency Meeting
Location: Skype Meeting

Start: Thu 4/9/2020 10:00 AM
End: Thu 4/9/2020 1:00 PM
Show Time As: Tentative

Recurrence: (none)

Meeting Status: Not yet responded

Organizer: Darrin Johnson
Required Attendees: Darrin Johnson; Shawn Puzen; Arianna Schmidt
Optional Attendees: Matt Miller; Elle Gulotty; Nick Utrup, USDOI-FWS; Laatsch, Cheryl - DNR; tyler.howe; Amira Oun; Crotty, Scott A; James Zyduck; Tornes, Angela

Good Afternoon,

In order to provide an option to participate in the Superior and Saxon Falls Joint Agency Meeting remotely, we have set up a conference call number for the meeting. The meeting will begin at 10 am Central time on Thursday April 9, 2020.

Please RSVP by April 1, 2020 if you plan to participate so we can forward meeting information including a detailed agenda and copy of the PowerPoint presentation prior to the meeting.

Feel free to contact me with any questions.

Darrin Johnson | FERC Licensing & Compliance

Mead & Hunt | 2440 Deming Way | Middleton, WI 53562

Direct: 608-443-0313 | Mobile: 715-697-3130

Darrin.Johnson@MeadHunt.com | meadhunt.com

Join Skype Meeting

Trouble Joining? [Try Skype Web App](#)

Join by phone

+1-855-632-3486,,3689150# (Global) English (United States)

+1-608-709-4420,,3689150# (Global) English (United States)

[Find a local number](#)

Conference ID: 3689150

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If you are running Windows 7 and do not have the Skype client installed, please verify you have version 4.0 or later of the Microsoft Silverlight browser plug-in installed prior to joining the meeting. If you are running Windows 8, Apple iOS or Android please download Skype for Business from the app store on your device prior to joining.

Darrin Johnson

From: Laatsch, Cheryl - DNR <Cheryl.Laatsch@wisconsin.gov>
Sent: Wednesday, March 18, 2020 10:00 AM
To: Darrin Johnson
Subject: Accepted: Saxon Falls and Superior Falls Joint Agency Meeting

Will you have the meeting via skype with presentation? I will be including some of our regional staff on the meeting invite.

Thanks, Cheryl

Darrin Johnson

From: Darrin Johnson
Sent: Wednesday, March 18, 2020 10:18 AM
To: Laatsch, Cheryl - DNR
Subject: RE: Saxon Falls and Superior Falls Joint Agency Meeting

Yes we will be using skype, but would like to send a copy of the powerpoint to participants as well as an insurance policy just in case Skype has issues.

Darrin Johnson | FERC Licensing & Compliance

Mead & Hunt | 2440 Deming Way | Middleton, WI 53562
Direct: 608-443-0313 | Mobile: 715-697-3130
Darrin.Johnson@MeadHunt.com | meadhunt.com

-----Original Appointment-----

From: Laatsch, Cheryl - DNR <Cheryl.Laatsch@wisconsin.gov>
Sent: Wednesday, March 18, 2020 10:00 AM
To: Darrin Johnson
Subject: Accepted: Saxon Falls and Superior Falls Joint Agency Meeting
When: Thursday, April 9, 2020 10:00 AM-1:00 PM (UTC-06:00) Central Time (US & Canada).
Where: Skype Meeting

Will you have the meeting via skype with presentation? I will be including some of our regional staff on the meeting invite.

Thanks, Cheryl

Darrin Johnson

From: Laatsch, Cheryl - DNR <Cheryl.Laatsch@wisconsin.gov>
Sent: Wednesday, March 18, 2020 10:23 AM
To: Darrin Johnson
Subject: RE: Saxon Falls and Superior Falls Joint Agency Meeting

Gotcha. I will be the rep.

We are committed to service excellence.

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

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



From: Darrin Johnson <Darrin.Johnson@meadhunt.com>
Sent: Wednesday, March 18, 2020 10:18 AM
To: Laatsch, Cheryl - DNR <Cheryl.Laatsch@wisconsin.gov>
Subject: RE: Saxon Falls and Superior Falls Joint Agency Meeting

Yes we will be using skype, but would like to send a copy of the powerpoint to participants as well as an insurance policy just in case Skype has issues.

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-----Original Appointment-----

From: Laatsch, Cheryl - DNR <Cheryl.Laatsch@wisconsin.gov>
Sent: Wednesday, March 18, 2020 10:00 AM
To: Darrin Johnson
Subject: Accepted: Saxon Falls and Superior Falls Joint Agency Meeting
When: Thursday, April 9, 2020 10:00 AM-1:00 PM (UTC-06:00) Central Time (US & Canada).
Where: Skype Meeting

Will you have the meeting via skype with presentation? I will be including some of our regional staff on the meeting invite.

Thanks, Cheryl

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Darrin Johnson

Subject: FW: Saxon Falls and Superior Falls Joint Agency Meeting
Location: Skype Meeting

Start: Thu 4/9/2020 10:00 AM
End: Thu 4/9/2020 1:00 PM
Show Time As: Tentative

Recurrence: (none)

Meeting Status: Not yet responded

Organizer: Darrin Johnson

Categories: Filed by Newforma

Hi Jim,

Below is the conference call information for the Saxon Falls and Superior Falls Joint Agency Meeting. I will also send you a copy of the presentation and detailed agenda once they are finalized so you will have a copy to follow along with.

Darrin Johnson | FERC Licensing & Compliance

Mead & Hunt | 2440 Deming Way | Middleton, WI 53562

Direct: 608-443-0313 | Mobile: 715-697-3130

Darrin.Johnson@MeadHunt.com | meadhunt.com

-----Original Appointment-----

From: Darrin Johnson

Sent: Tuesday, March 17, 2020 12:36 PM

To: Darrin Johnson; Shawn Puzen; Arianna Schmidt

Cc: Matt Miller; Elle Gulotty; Nick Utrup, USDO-I-FWS; Laatsch, Cheryl - DNR; tyler.howe; Amira Oun; Crotty, Scott A; James Zyduck; Tornes, Angela

Subject: Saxon Falls and Superior Falls Joint Agency Meeting

When: Thursday, April 9, 2020 10:00 AM-1:00 PM (UTC-06:00) Central Time (US & Canada).

Where: Skype Meeting

Good Afternoon,

In order to provide an option to participate in the Superior and Saxon Falls Joint Agency Meeting remotely, we have set up a conference call number for the meeting. The meeting will begin at 10 am Central time on Thursday April 9, 2020.

Please RSVP by April 1, 2020 if you plan to participate so we can forward meeting information including a detailed agenda and copy of the PowerPoint presentation prior to the meeting.

Feel free to contact me with any questions.

Darrin Johnson | FERC Licensing & Compliance

Mead & Hunt | 2440 Deming Way | Middleton, WI 53562

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1414 West Hamilton Avenue
P.O. Box 8
Eau Claire, Wisconsin 54702-0008
Telephone (800) 895-4999

March 18, 2020

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

Subject: **Notice of Joint Meeting – Supplemental Information**
Saxon Falls Hydroelectric Project (FERC Project No. 2610)
Superior Falls Hydroelectric Project (FERC Project No. 2587)

Dear Secretary Bose:

In accordance with 18 CFR, Part 16, Section 16.8 (b)(3) and (b)(4), Xcel Energy hereby invites resource agencies, Indian tribes, and members of the public to attend a joint meeting to discuss the relicensing process for the Saxon Falls Hydroelectric Project, FERC Project No. 2610 and the Superior Falls Hydroelectric Project, FERC Project No. 2587. The meeting will allow for a review of information previously provided by Xcel Energy in its Preliminary Application Document (PAD), as well as to discuss information to be provided as a part of the relicensing process.

The Federal Energy Regulatory Commission (FERC) approved the licensee's request to use the Traditional Licensing Process for the Projects on February 13, 2020.

The meeting will take place on Thursday, April 9, 2020, at 10:00 a.m. Due to current coronavirus health concerns, the Centers for Disease Control (CDC) recommends that social gatherings be limited to no more than 10 people and that discretionary travel be avoided. Therefore, in accordance with CDC guidelines, Xcel Energy has decided to change the meeting format from an in-person meeting to a conference call. A site visit to the Projects will be rescheduled at a later date later once the health and travel concerns have abated.

Please RSVP by April 1, 2020 if you plan to participate in the meeting via conference call. Xcel Energy will send out meeting information to those that RSVP to include a call-in number, meeting agenda, and PowerPoint presentation.

The agenda for the meeting is as follows:

1. **Xcel Energy**
 - Welcome
 - Introductions
 - Overview of meeting logistics and purpose
 - Overview of FERC licensing process

Ms. Kimberly D. Bose, Secretary
March 18, 2020
Page 2

- Description of the Saxon Falls and Superior Falls Hydroelectric Projects
- Discussion of the Preliminary Application Document (PAD)

2. Resource agency comments

3. Tribal comments

4. Public comments

- Members of the public are entitled to participate fully in the meeting and to express their views regarding resource issues that should be addressed in any application for a new license that may be filed by Xcel Energy.

According to 18 CFR, Part 16, Section 16.8 (b)(4), the meeting will be audio recorded. Interested resource agencies and Indian tribes may request a copy of the recording.

The PAD, which was provided to agencies, Indian tribes, and interested members of the public on December 30, 2019, is available for inspection at the following public libraries:

- Hurley Public Library – 405 5th Avenue North, Hurley, Wisconsin
- Ironwood Carnegie Library – 235 East Aurora Street, Ironwood, Michigan

As required by FERC regulation 18 CFR, Part 16, Section 16.8 (b)(5), written comments regarding the PAD shall be submitted to the Commission with a requested courtesy copy to Xcel Energy no later than June 9, 2020 (60 days after the April 9 meeting). Any comments received from resource agencies, Indian tribes, and/or interested members of the public should:

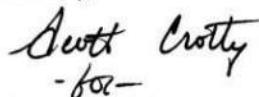
- Identify its determination of necessary studies to be performed or the information to be provided by the potential applicant.
- Identify the basis for its determination.
- Discuss its understanding of the resource issues and its goals and objectives for these resources.
- Explain why each study methodology recommended by it is more appropriate than any other available methodology alternatives, including those identified by the potential applicant.
- Document that the use of each study methodology recommended by it is a generally accepted practice.
- Explain how the studies and information requested will be useful to the agency, Indian tribe, or member of the public in furthering its resource goals and objectives that are affected by the proposed project.

Ms. Kimberly D. Bose, Secretary
March 18, 2020
Page 3

This notice of the joint meeting is being sent to those resource agencies, Indian tribes, and interested members of the public listed on the attached sheets.

Should you have any questions, or to RSVP for the meeting, please contact Matthew Miller at 715-737-1353 or matthew.j.miller@xcelenergy.com.

Sincerely,

A handwritten signature in black ink, appearing to read "Zyduck" followed by a flourish.

James M. Zyduck
Director, Hydro Plants

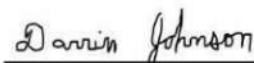
Enclosure: Certificate of Service
Potential Licensing Participant List

cc: List of addresses (attached)
Shawn Puzen – Mead & Hunt, Inc. (via e-mail)
Project Files

Certificate of Service

I hereby certify that I, on behalf of Xcel Energy, have this day served (via first class mail) the foregoing documents upon each person designated on the attached Master Address Distribution List.

Dated this 18th day of March 2020.

A handwritten signature in black ink that reads "Darrin Johnson". The signature is written in a cursive style and is positioned above a horizontal line.

Darrin Johnson
MEAD & HUNT, Inc.

Saxon Falls and Superior Falls Hydroelectric Project Licensing
FERC Project No. 2610 and 2587

Indian Tribes

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Mr. Gary Bahr

Sac and Fox Nation of Missouri in Kansas and
Nebraska
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Lac Courte Oreilles Band of Lake Superior
Chippewa Indians of Wisconsin
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Sac and Fox of the Mississippi in Iowa
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Mr. Earl Meshigaud, Cultural Director

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Specialist**

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Ms. Stacy Cutbank, THPO

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Ms. Melinda Young, THPO

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Congressman Jack Bergman

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Director

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Chief Blackbird Center, Maple Lane
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Director

Public Service Commission of Wisconsin
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Forest Service, National Forests
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Director

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Director

U.S. Department of the Interior
Bureau of Land Management
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Milwaukee, WI 53201-0631

**Wisconsin 7th Congressional District
Representative**

2330 Rayburn HOB
Washington, DC 20515

Endangered Species Specialist

Endangered Species Specialist
US Fish & Wildlife Service
Twin Cities Field Office
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Mr. Samuel Rauch

National Marine Fisheries Service
Northeast Region
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Gloucester, MA 01930

Senator Debbie Stabenow

U.S. Senator from Michigan
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Washington, DC 20510

Ms. Angie Tornes

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National Park Service
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Ms. Jen Tyler

NEPA Implementation Section
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Mr. Nick Utrup

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Regional Engineer

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Kathleen.Angel@Wisconsin.gov

Senator Janet Bewley

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Mr. Tyler Howe

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Senator Ed McBroom

State Senator – 38th District
P.O. Box 30036
Lansing, MI 48909-7536

Representative Beth Meyers

State Representative – 74th District
State Capitol – Room 7 North
P.O. Box 8953
Madison, WI 53708

Michigan State Historic Preservation Office

Cultural Resources Management and Planning
735 East Michigan Ave.
P.O. Box 30044
Lansing, MI 48909

Mr. Gary Hohlhepp

Michigan Department of Environment, Great
Lakes and Energy
525 West Allegan St.
P.O. Box 30458
Lansing, MI 48909-7958
kohlheppg@michigan.gov

Ms. Amira Oun

Michigan Department of Environment, Great
Lakes and Energy
525 West Allegan St.
P.O. Box 30458
Lansing, MI 48909-7958
OunA@Michigan.gov

Public Service Commission of Wisconsin

P.O. Box 7854
Madison, WI 53707

Ms. Pamela Stevenson

Michigan Attorney General Office
525 W. Ottawa St.
P.O. Box 30212
Lansing, MI 48909

State (continued)

Wisconsin Cooperative Fishery Research

Unit

College of Natural Resources

UW Stevens Point

Stevens Point, WI 54481-3897

Wisconsin Office of Attorney General

114 East, State Capitol

Madison, WI 53702-0001

Local

Mr. Ronald Ahonen
Chairman
Town of Kimball
5910W Rangeview Road
Hurley, WI 54599
715-561-2884
rwatwnc@centurylink.net

Ms. Tori Aschebrock
Clerk
Town of Carey
PO Box 146
Hurley, WI 54534

Ms. Kathryn Brauer
Town Clerk
Town of Saxon
P.O. Box 37
Saxon, WI 54559

Ms. Lori Genisot
Clerk
Town of Pence
PO Box 242
Montreal, WI 54550

Ms. Karen Gullan
City Clerk
City of Ironwood
213 S. Marquette St.
Ironwood, MI 49938

Mr. LeRoy Johnson
Deputy Supervisor
Charter Township of Ironwood
10892 Lake Road
Ironwood, MI 49938
JohnsonIWDTownshipzoning@gmail.com

Ms. Susan Lesky
Clerk/Treasurer
City of Montreal
54 Wisconsin Ave
Montreal WI 54550

Mr. Gerry Pelissero
County Clerk
Gogebic County
200 N. Moore Street
Bessemer, MI 49911

Ms. Heather Palmquist
Iron County Conservationist
607 3rd Ave. North
Hurley, WI 54534
lakes@ironcounty.org
715-561-2234

Mr. Eric Peterson
Iron County Forest Administrator
607 3rd Ave. North
Hurley, WI 54534
icfadmin@ironcountyforest.org

Mr. Michael Saari
County Clerk
Iron County
00 Taconite Street
Suite 101
Hurley, WI 54534
clerk@ironcountywv.org

Ms. Stacy Wiercinski
Clerk/Treasurer
405 5th Avenue North
Hurley, WI 54534

Other

Mr. Scott Crotty

Senior Operations Manager
Xcel Energy
1414 W Hamilton Ave
Eau Claire, WI 54701-7252
Scott.a.crotty@XcelEnergy.com

Mr. James Fossum

River Alliance of Wisconsin
JD Fossum Environmental Consulting
199 Janet Marie Ln.
Winona, MN 55987
jfbio@yahoo.com

Mr. Gary Hopp

Vice-President
Friends of the Gile Flowage
1437 S. Lake Ave.
Duluth, MN 55802
Gary@Hopp.us

Mr. Matt Miller

Hydro License Compliance Consultant
Xcel Energy
1414 W Hamilton Ave
Eau Claire, WI 54701-7252
Matthew.J.Miller@XcelEnergy.com

Northwest Regional Planning Committee

1400 S. River St.
Spooner, WI 54801-8692

Mr. Thomas O'Keefe

American Whitewater
3537 NE 87th St.
Seattle, WA 98115-3639
425-417-9012
OKeefe@AmericanWhitewater.org

Mr. Raj Shukla or Ms. Allison Werner

River Alliance of Wisconsin
147 S. Butler St., Suite 2
Madison, WI 53703
RShukla@wisconsinrivers.org

Mr. James Zyduck

Director of Hydro Plants
Xcel Energy
1414 W Hamilton Ave
Eau Claire, WI 54701-7252
James.Zyduck@XcelEnergy.com

Darrin Johnson

From: Miller, Matthew J <Matthew.J.Miller@xcelenergy.com>
Sent: Monday, March 23, 2020 5:18 PM
To: Shawn Puzen; Darrin Johnson
Subject: FW: RSVP for Saxon & Superior Falls Hydro Joint Meeting

From: Gary A. Hopp <gary@hopp.us>
Sent: Monday, March 23, 2020 8:30 AM
To: Miller, Matthew J <Matthew.J.Miller@xcelenergy.com>
Subject: RSVP for Saxon & Superior Falls Hydro Joint Meeting

**CAUTION EXTERNAL SENDER: Stop and consider before you click links or open attachments.
Report suspicious email using the 'Report Phishing/Spam' button in Outlook.**

Matt – please access this email as my RSVP for the upcoming Saxon & Superior Falls Hydro Joint meeting regarding the relicensing of these two projects.

Regards,

Gary Hopp
Vice President and Special Projects Coordinator
Friends of the Gile Flowage
www.friendsofthegile.org
218-590-3534

Darrin Johnson

Subject: FW: Saxon Falls and Superior Falls Joint Agency Meeting
Location: Skype Meeting

Start: Thu 4/9/2020 10:00 AM
End: Thu 4/9/2020 1:00 PM
Show Time As: Tentative

Recurrence: (none)

Meeting Status: Not yet responded

Organizer: Darrin Johnson

Categories: Filed by Newforma

Good Morning Gary,

Thank you for RSVPing for the Saxon and Superior Falls Joint Agency Meeting. Below is a link to the Skype meeting. If you do not have Skype, you can use the call-in information. I will send the detailed agenda and a copy of the presentation separately so you can follow along in the event you cannot access Skype. Let me know if you have any questions.

Darrin Johnson | FERC Licensing & Compliance

Mead & Hunt | 2440 Deming Way | Middleton, WI 53562
Direct: 608-443-0313 | Mobile: 715-697-3130
Darrin.Johnson@MeadHunt.com | meadhunt.com

-----Original Appointment-----

From: Darrin Johnson
Sent: Tuesday, March 17, 2020 12:36 PM
To: Darrin Johnson; Shawn Puzen; Arianna Schmidt
Cc: Matt Miller; Elle Gulotty; Nick Utrup, USDOJ-FWS; Laatsch, Cheryl - DNR; tyler.howe; Amira Oun; Crotty, Scott A; James Zyduck; Tornes, Angela; Jim Fossum (jfbio@yahoo.com); Clement, James P; Volbrecht, Randy A
Subject: Saxon Falls and Superior Falls Joint Agency Meeting
When: Thursday, April 9, 2020 10:00 AM-1:00 PM (UTC-06:00) Central Time (US & Canada).
Where: Skype Meeting

Good Afternoon,

In order to provide an option to participate in the Superior and Saxon Falls Joint Agency Meeting remotely, we have set up a conference call number for the meeting. The meeting will begin at 10 am Central time on Thursday April 9, 2020.

Please RSVP by April 1, 2020 if you plan to participate so we can forward meeting information including a detailed agenda and copy of the PowerPoint presentation prior to the meeting.

Feel free to contact me with any questions.

Darrin Johnson | FERC Licensing & Compliance

Mead & Hunt | 2440 Deming Way | Middleton, WI 53562

Direct: 608-443-0313 | Mobile: 715-697-3130

Darrin.Johnson@MeadHunt.com | meadhunt.com

[Join Skype Meeting](#)

Trouble Joining? [Try Skype Web App](#)

Join by phone

+1-855-632-3486,,3689150# (Global)

English (United States)

+1-608-709-4420,,3689150# (Global)

English (United States)

[Find a local number](#)

Conference ID: 3689150

[Forgot your dial-in PIN?](#) | [Help](#)



If you are running Windows 7 and do not have the Skype client installed, please verify you have version 4.0 or later of the Microsoft Silverlight browser plug-in installed prior to joining the meeting. If you are running Windows 8, Apple iOS or Android please download Skype for Business from the app store on your device prior to joining.

Darrin Johnson

From: Darrin Johnson
Sent: Friday, April 3, 2020 11:46 AM
To: Amira Oun (OunA@Michigan.gov); Elle Gulotty (gulotty@michigan.gov); Nick Utrup, USDOI-FWS; Laatsch, Cheryl - DNR; James Zyduck (james.zyduck@xcelenergy.com); Jim Fossum (jfbio@yahoo.com); gary@hopp.us; Volbrecht, Randy A; Clement, James P; Crotty, Scott A; 'Matthew.J.Miller@xcelenergy.com'; Shawn Puzen
Subject: Final Info on Saxon Falls and Superior Falls Joint Agency Meeting
Attachments: 20200320 FINAL Saxon Falls and Superior Falls JAM agenda.pdf; Saxon and Superior Falls JAM Presentation pdf.pdf

Good Morning,

I am just providing a final update on the Saxon Falls and Superior Falls Joint Agency meeting to be held next Thursday, April 9, 2020 at 10 am. Due to bandwidth concerns related to most people working from home, we will not be sharing the PowerPoint presentation via Skype during the meeting. Please follow along on the pdf version during the presentation. I have once again attached the detailed agenda with call in information and the presentation for your information.

Jest let me know if you have any questions.

Darrin Johnson | FERC Licensing & Compliance
Mead & Hunt | 2440 Deming Way | Middleton, WI 53562
Direct: 608-443-0313 | Mobile: 715-697-3130
Darrin.Johnson@MeadHunt.com | meadhunt.com

Darrin Johnson

From: Darrin Johnson
Sent: Friday, April 3, 2020 11:23 AM
To: Tornes, Angela; 'tyler.howe'
Cc: 'Matthew.J.Miller@xcelenergy.com'; Shawn Puzen
Subject: Saxon Falls and Superior Falls Joint Agency Meeting documents
Attachments: 20200320 FINAL Saxon Falls and Superior Falls JAM agenda.pdf; Saxon and Superior Falls JAM Presentation pdf.pdf

Good Morning,

Please find attached the detailed agenda with conference call information and a copy of the PowerPoint presentation for the Saxon Falls and Superior Falls Joint Agency meeting to be held on Thursday April 9. Due to bandwidth concerns with everyone working from home, we will not be sharing the presentation through Skype during the meeting. Please follow along on the attached pdf version of the presentation. Let me know if you have any questions.

Darrin Johnson | FERC Licensing & Compliance

Mead & Hunt | 2440 Deming Way | Middleton, WI 53562
Direct: 608-443-0313 | Mobile: 715-697-3130
Darrin.Johnson@MeadHunt.com | meadhunt.com

Darrin Johnson

From: Darrin Johnson
Sent: Wednesday, April 8, 2020 1:12 PM
To: 'Miller, Matthew J'; Shawn Puzen
Subject: RE: Saxon P-2610 Superior Falls P-2587 Joint Meeting

Categories: Filed by Newforma

Thanks Matt.

Darrin Johnson | FERC Licensing & Compliance

Mead & Hunt | 2440 Deming Way | Middleton, WI 53562
Direct: 608-443-0313 | Mobile: 715-697-3130
Darrin.Johnson@MeadHunt.com | meadhunt.com

From: Miller, Matthew J <Matthew.J.Miller@xcelenergy.com>
Sent: Wednesday, April 8, 2020 1:11 PM
To: Shawn Puzen <Shawn.Puzen@meadhunt.com>; Darrin Johnson <Darrin.Johnson@meadhunt.com>
Subject: FW: Saxon P-2610 Superior Falls P-2587 Joint Meeting

I forwarded Mr. O'keefe the meeting invite, PowerPoint, and meeting agenda.

From: Thomas O'Keefe <okeefe@americanwhitewater.org>
Sent: Wednesday, April 8, 2020 11:53 AM
To: Miller, Matthew J <Matthew.J.Miller@xcelenergy.com>
Subject: Saxon P-2610 Superior Falls P-2587 Joint Meeting

CAUTION EXTERNAL SENDER: Stop and consider before you click links or open attachments.
Report suspicious email using the 'Report Phishing/Spam' button in Outlook.

Matthew,

I have the letter for the in-person meeting to discuss relicensing and I know I received a subsequent letter modifying it to an online meeting. I can't find that letter or the details to log in. Could you send those?

Thanks,

Tom

Thomas O'Keefe, PhD
Pacific Northwest Stewardship Director
American Whitewater
3537 NE 87th St.
Seattle, WA 98115
425-417-9012
okeefe@americanwhitewater.org

Darrin Johnson

From: Michael LaRonge <Michael.LaRonge@fcpotawatomi-nsn.gov>
Sent: Wednesday, April 8, 2020 11:57 PM
To: Shawn Puzen; 'matthew.j.miller@xcelenergy.com'
Subject: Re: FERC Project No. 2610 (Saxon) and Project No. 2587 (Superior Falls) Hydroelectric Projects

Re: FERC Project No. 2610 (Saxon) and Project No. 2587 (Superior Falls) Hydroelectric Projects between Iron County, Wisconsin and Gogebic County, Michigan.

Dear Mr. Puzen,

Pursuant to consultation under Section 106 of the National Historic Preservation Act (1966 as amended) the Forest County Potawatomi Community (FCPC), a Federally Recognized Native American Tribe, reserves the right to comment on Federal undertakings, as defined under the act.

This response pertains to the projects mention above. The Tribal Historic Preservation Office (THPO) of the FCPC will be unable to attend the on-site meeting scheduled for April 9, 2020. However, The FCPC THPO requests information on archaeological surveys and the current cultural resource management plan for the two projects.

Your interest in protecting Wisconsin's cultural and historic properties is appreciated. If you have any questions or concerns, please contact me at the email or number listed below.

Respectfully,

Michael LaRonge
Tribal Historic Preservation Officer
Cultural Preservation Division
Forest County Potawatomi Community
8130 Mish ko Swen Drive
P.O. Box 340
Crandon, Wisconsin 54520
Phone: 715-478-7354
Email: Michael.LaRonge@FCPotawatomi-nsn.gov

@AmerWhitewater

Darrin Johnson

From: Cathy Techtmann <cathyt220@hotmail.com>
Sent: Wednesday, April 8, 2020 12:16 PM
To: Darrin Johnson
Cc: 'Matthew.J.Miller@xcelenergy.com'; James Zyduck (james.zyduck@xcelenergy.com); Shawn Puzen
Subject: Re: RSVP for Saxon Falls and Superior Falls Joint Agency Meeting

Hi Darrin:

Thank you for these materials and for updating the contact list to include both Gary Hopp and me.

I am looking forward to participating in tomorrow's call.

Best,

Cathy Techtmann, Pres.
Friends of the Gile Flowage

From: Darrin Johnson <Darrin.Johnson@meadhunt.com>
Sent: Friday, April 3, 2020 8:41 PM
To: Cathyt220@hotmail.com <Cathyt220@hotmail.com>
Cc: 'Matthew.J.Miller@xcelenergy.com' <Matthew.J.Miller@xcelenergy.com>; James Zyduck (james.zyduck@xcelenergy.com) <james.zyduck@xcelenergy.com>; Shawn Puzen <Shawn.Puzen@meadhunt.com>
Subject: RSVP for Saxon Falls and Superior Falls Joint Agency Meeting

Ms. Techtmann,

Thank you for providing an RSVP for the Saxon Falls and Superior Falls Joint Agency Meeting regarding relicensing. The meeting will be held on Thursday, April 9 at 10 a.m. Attached are copies of the detailed agenda and a pdf version of the PowerPoint presentation we will be going through during the meeting. The call in number for the conference call is located in the detailed agenda. Due to limited bandwidth with most people working from home due to COVID 19, we will not be able to share the presentation via Skype during the meeting. Please follow along on the attached pdf version during the meeting.

We have also updated the distribution list to ensure that both you and Gary Hopp are included as representatives from the Friends of the Gile Flowage for all future correspondence sent out regarding the relicensing process. If you have any questions regarding the meeting materials, please feel free to contact me.

Darrin Johnson | FERC Licensing & Compliance

Mead & Hunt | 2440 Deming Way | Middleton, WI 53562

Direct: 608-443-0313 | Mobile: 715-697-3130

Darrin.Johnson@MeadHunt.com | meadhunt.com

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Darrin Johnson

From: Thomas O'Keefe <okeefe@americanwhitewater.org>
Sent: Thursday, April 9, 2020 10:19 AM
To: Shawn Puzen
Cc: Miller, Matthew J
Subject: Saxon P-2610 Superior Falls P-2587 Joint Meeting

Shawn,

I suspect you have me on the list but just wanted to confirm.

I have also recruited a few local paddlers who are interested in tracking the project. I anticipate I will be working with them.

Megan Easterling <megansuedrew@gmail.com>
Travis Patterson <trvspatterson01@gmail.com>
Jake Ring <jake@ringoproductions.com>

Tom

Thomas O'Keefe, PhD
Pacific Northwest Stewardship Director
American Whitewater
3537 NE 87th St.
Seattle, WA 98115
425-417-9012
okeefe@americanwhitewater.org
@AmerWhitewater



1414 West Hamilton Avenue
PO Box 8
Eau Claire, WI 54702-0008

April 10, 2020

VIA Electronic Filing

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

**Subject: Proof of Publication for Notice of Joint Meeting
Saxon Falls Hydroelectric Project (FERC Project No. 2610)
Superior Falls Hydroelectric Project (FERC Project No. 2587)**

Dear Secretary Bose:

Xcel Energy published a notice in the Daily Globe, a daily newspaper of general circulation in Gogebic County, MI, announcing the April 9, 2020 Joint Meeting for the Saxon Falls (P-2610) and Superior Falls (P-2587) Hydroelectric Projects. The notice was published on March 17, 2020. Due to implications from the COVID-19 pandemic, we subsequently changed the meeting format from an in-person meeting to a conference call. Therefore, we had to publish a second notice informing the public of the change in the meeting format. The second notice was published on March 24, 2020. Copies of both affidavits are enclosed.

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

Sincerely,

James M Zyduck

Digitally signed by James M Zyduck
DN: cn=James M Zyduck, o=Renewable
Operations, ou=Xcel Energy Services,
email=james.zyduck@xcelenergy.com, c=US
Date: 2020.04.13 08:05:30 -0500

James M. Zyduck
Director, Hydro Plants

Enclosures: Affidavits of Publication

- c. Shawn Puzen - Mead & Hunt, Inc. (via e-mail)
Project Files

AFFIDAVIT OF INSERTION

Please Fill out Information Below:

(Note: Any line marked with an asterisk (*) must be filled in completely & accurately)

***Name of Publication: Daily Globe, Inc.**

***City, State: Ironwood, MI**

***Advertiser Name: XCEL ENEGRY**

Insertion Order #: #24488

***Date of Insertion: March 17, 2020**

Caption:

***Ad Size: 4x5"**

***Total # Inserted: ROP- FULL RUN**

**Please return completed & signed
affidavit to any of the following:**

E-mail: tearsheets@mansimedia.com

Fax: (717) 703-3022

Mail:

MANSI Media – Tearsheet Dept.
3899 N. Front St.
Harrisburg, PA 17110

My signature verifies that this ad was inserted as scheduled according to the above
specifications.

Jenna Kallas

Signature

March 26, 2020

Date

Jenna Kallas

Name (Please Print)

Please note, this form does **NOT need to be notarized, unless you are told otherwise by
a MANSI Media representative.*

AFFIDAVIT OF INSERTION

Please Fill out Information Below:

(Note: Any line marked with an asterisk (*) must be filled in completely & accurately)

***Name of Publication: Daily Globe, Inc.**

***City, State: Ironwood, MI**

***Advertiser Name: XCEL ENEGRY**

Insertion Order #: #24488

***Date of Insertion: March 24, 2020**

Caption:

***Ad Size: 4x5"**

***Total # Inserted: ROP- FULL RUN**

**Please return completed & signed
affidavit to any of the following:**

E-mail: tearsheets@mansimedia.com

Fax: (717) 703-3022

Mail:

MANSI Media – Tearsheet Dept.
3899 N. Front St.
Harrisburg, PA 17110

My signature verifies that this ad was inserted as scheduled according to the above
specifications.

Jenna Kallas _____

Signature

March 26, 2020 _____

Date

Jenna Kallas _____

Name (Please Print)

Please note, this form does **NOT need to be notarized, unless you are told otherwise by
a MANSI Media representative.*

Darrin Johnson

From: Gulotty, Elle (DNR) <GulottyE@michigan.gov>
Sent: Friday, April 24, 2020 11:45 AM
To: Darrin Johnson
Cc: 'Matthew.J.Miller@xcelenergy.com'; Shawn Puzen; Kruger, Kyle (DNR)
Subject: RE: Final Info on Saxon Falls and Superior Falls Joint Agency Meeting

Hi folks,

We are drafting a response based on the April 9 presentation and materials, and I want to make sure we do not miss the deadline, given all that's going on regionally and beyond.

What date were you expecting a response by?

Did I miss any correspondence in the last few weeks (corrected versions of documents, additional information requested by folks on the call)?

Thank you,
Elle

From: Darrin Johnson <Darrin.Johnson@meadhunt.com>
Sent: Friday, April 3, 2020 12:46 PM
To: Oun, Amira (EGLE) <OunA@michigan.gov>; Gulotty, Elle (DNR) <GulottyE@michigan.gov>; Nick Utrup, USDOJ-FWS <nich_utrump@fws.gov>; Laatsch, Cheryl - DNR <Cheryl.Laatsch@wisconsin.gov>; James Zyduck <james.zyduck@xcelenergy.com>; Jim Fossum (jfbio@yahoo.com) <jfbio@yahoo.com>; Gary@hopp.us; Volbrecht, Randy A <randy.a.volbrecht@xcelenergy.com>; Clement, James P <James.Clement@xcelenergy.com>; Crotty, Scott A <scott.a.crotty@xcelenergy.com>; 'Matthew.J.Miller@xcelenergy.com' <Matthew.J.Miller@xcelenergy.com>; Shawn Puzen <Shawn.Puzen@meadhunt.com>
Subject: Final Info on Saxon Falls and Superior Falls Joint Agency Meeting

Good Morning,

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Just let me know if you have any questions.

Darrin Johnson | FERC Licensing & Compliance
Mead & Hunt | 2440 Deming Way | Middleton, WI 53562
Direct: 608-443-0313 | Mobile: 715-697-3130
Darrin.Johnson@MeadHunt.com | meadhunt.com

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Darrin Johnson

From: Darrin Johnson
Sent: Monday, April 27, 2020 9:31 AM
To: Gulotty, Elle (DNR)
Cc: 'Matthew.J.Miller@xcelenergy.com'; Shawn Puzen; Kruger, Kyle (DNR)
Subject: RE: Final Info on Saxon Falls and Superior Falls Joint Agency Meeting

Elle,

The intake velocities for Superior Falls were originally located in the permit application from the last relicensing. We are having the engineering group re-calculate the intake velocities for both projects to make sure they are accurate. We should have those numbers by the end of the week. Once we get those back we will send all the requested information in one packet to the participants of the April 9 meeting. Comments and study requests are due on June 9, 2020, so that should still give everyone time to finalize comments prior to the deadline. Feel free to contact me if you have any questions.

Darrin Johnson | FERC Licensing & Compliance

Mead & Hunt | 2440 Deming Way | Middleton, WI 53562
Direct: 608-443-0313 | Mobile: 715-697-3130
Darrin.Johnson@MeadHunt.com | meadhunt.com

From: Gulotty, Elle (DNR) <GulottyE@michigan.gov>
Sent: Friday, April 24, 2020 11:45 AM
To: Darrin Johnson <Darrin.Johnson@meadhunt.com>
Cc: 'Matthew.J.Miller@xcelenergy.com' <Matthew.J.Miller@xcelenergy.com>; Shawn Puzen <Shawn.Puzen@meadhunt.com>; Kruger, Kyle (DNR) <KRUGERK@michigan.gov>
Subject: RE: Final Info on Saxon Falls and Superior Falls Joint Agency Meeting

Hi folks,

We are drafting a response based on the April 9 presentation and materials, and I want to make sure we do not miss the deadline, given all that's going on regionally and beyond.

What date were you expecting a response by?

Did I miss any correspondence in the last few weeks (corrected versions of documents, additional information requested by folks on the call)?

Thank you,
Elle

From: Darrin Johnson <Darrin.Johnson@meadhunt.com>
Sent: Friday, April 3, 2020 12:46 PM
To: Oun, Amira (EGLE) <OunA@michigan.gov>; Gulotty, Elle (DNR) <GulottyE@michigan.gov>; Nick Utrup, USDOT-FWS <nick_utrump@fws.gov>; Laatsch, Cheryl - DNR <Cheryl.Laatsch@wisconsin.gov>; James Zyduck <james.zyduck@xcelenergy.com> <james.zyduck@xcelenergy.com>; Jim Fossum <jfbio@yahoo.com> <jfbio@yahoo.com>; Gary@hopp.us; Volbrecht, Randy A <randy.a.volbrecht@xcelenergy.com>; Clement, James P <James.Clement@xcelenergy.com>; Crotty, Scott A <scott.a.crotty@xcelenergy.com>; 'Matthew.J.Miller@xcelenergy.com' <Matthew.J.Miller@xcelenergy.com>; Shawn Puzen

<Shawn.Puzen@meadhunt.com>

Subject: Final Info on Saxon Falls and Superior Falls Joint Agency Meeting

Good Morning,

I am just providing a final update on the Saxon Falls and Superior Falls Joint Agency meeting to be held next Thursday, April 9, 2020 at 10 am. Due to bandwidth concerns related to most people working from home, we will not be sharing the PowerPoint presentation via Skype during the meeting. Please follow along on the pdf version during the presentation. I have once again attached the detailed agenda with call in information and the presentation for your information.

Just let me know if you have any questions.

Darrin Johnson | FERC Licensing & Compliance

Mead & Hunt | 2440 Deming Way | Middleton, WI 53562

Direct: 608-443-0313 | Mobile: 715-697-3130

Darrin.Johnson@MeadHunt.com | meadhunt.com

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Darrin Johnson

From: Gulotty, Elle (DNR) <GulottyE@michigan.gov>
Sent: Monday, April 27, 2020 9:48 AM
To: Darrin Johnson
Subject: RE: Final Info on Saxon Falls and Superior Falls Joint Agency Meeting

Thank you Darrin, I look forward to reviewing that.

From: Darrin Johnson <Darrin.Johnson@meadhunt.com>
Sent: Monday, April 27, 2020 10:31 AM
To: Gulotty, Elle (DNR) <GulottyE@michigan.gov>
Cc: 'Matthew.J.Miller@xcelenergy.com' <Matthew.J.Miller@xcelenergy.com>; Shawn Puzen <Shawn.Puzen@meadhunt.com>; Kruger, Kyle (DNR) <KRUGERK@michigan.gov>
Subject: RE: Final Info on Saxon Falls and Superior Falls Joint Agency Meeting

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Elle,

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Darrin Johnson | FERC Licensing & Compliance

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From: Gulotty, Elle (DNR) <GulottyE@michigan.gov>
Sent: Friday, April 24, 2020 11:45 AM
To: Darrin Johnson <Darrin.Johnson@meadhunt.com>
Cc: 'Matthew.J.Miller@xcelenergy.com' <Matthew.J.Miller@xcelenergy.com>; Shawn Puzen <Shawn.Puzen@meadhunt.com>; Kruger, Kyle (DNR) <KRUGERK@michigan.gov>
Subject: RE: Final Info on Saxon Falls and Superior Falls Joint Agency Meeting

Hi folks,

We are drafting a response based on the April 9 presentation and materials, and I want to make sure we do not miss the deadline, given all that's going on regionally and beyond.

What date were you expecting a response by?

Did I miss any correspondence in the last few weeks (corrected versions of documents, additional information requested by folks on the call)?

Thank you,
Elle

From: Darrin Johnson <Darrin.Johnson@meadhunt.com>
Sent: Friday, April 3, 2020 12:46 PM
To: Oun, Amira (EGLE) <OunA@michigan.gov>; Gulotty, Elle (DNR) <GulottyE@michigan.gov>; Nick Utrup, USDO-I-FWS <nick_utrup@fws.gov>; Laatsch, Cheryl - DNR <Cheryl.Laatsch@wisconsin.gov>; James Zyduck <james.zyduck@xcelenergy.com> <james.zyduck@xcelenergy.com>; Jim Fossum <jfbio@yahoo.com> <jfbio@yahoo.com>; Gary@hopp.us; Volbrecht, Randy A <randy.a.volbrecht@xcelenergy.com>; Clement, James P <James.Clement@xcelenergy.com>; Crotty, Scott A <scott.a.crotty@xcelenergy.com>; 'Matthew.J.Miller@xcelenergy.com' <Matthew.J.Miller@xcelenergy.com>; Shawn Puzen <Shawn.Puzen@meadhunt.com>
Subject: Final Info on Saxon Falls and Superior Falls Joint Agency Meeting

Good Morning,

I am just providing a final update on the Saxon Falls and Superior Falls Joint Agency meeting to be held next Thursday, April 9, 2020 at 10 am. Due to bandwidth concerns related to most people working from home, we will not be sharing the PowerPoint presentation via Skype during the meeting. Please follow along on the pdf version during the presentation. I have once again attached the detailed agenda with call in information and the presentation for your information.

Just let me know if you have any questions.

Darrin Johnson | FERC Licensing & Compliance
Mead & Hunt | 2440 Deming Way | Middleton, WI 53562
Direct: 608-443-0313 | Mobile: 715-697-3130
Darrin.Johnson@MeadHunt.com | meadhunt.com

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Darrin Johnson

From: Darrin Johnson
Sent: Monday, May 4, 2020 9:59 AM
To: Tom O Keefe (okeffe@americanwhitewater.org); gary@hopp.us; Cathyt220@hotmail.com; hurley@hurleywi.com; Jake Ring; Megan Easterling; Elle Gulotty (gulotty@michigan.gov); kruger@michigan.gov; Amira Oun (OunA@Michigan.gov); Jim Fossum (jfbio@yahoo.com); Tornes, Angela; Laatsch, Cheryl - DNR; connie.antonuk@wisconsin.gov
Cc: Shawn Puzen; Jen Schuetz; James Zyduck (james.zyduck@xcelenergy.com); Volbrecht, Randy A; Crotty, Scott A; 'Matthew.J.Miller@xcelenergy.com'
Subject: Information Citations Requested at Superior Falls and Saxon Falls Joint Agency Meeting
Attachments: 20200504 Final Information Citations requested at Saxon Falls and Superior Falls JAM.pdf

Categories: Filed by Newforma

During the Saxon Falls and Superior Falls Joint Agency Meeting, there was a request for a few information citations. Please find attached the requested information citations and the calculations used to determine intake velocities. If you have any questions, feel free to contact me.

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Recreation Users Group

- National Park Service (NPS), Friends of the Gile Flowage (FOG), and Michigan Department of Natural Resources (MDNR) indicated that they were interested in forming a recreation user's group with the Licensee to resolve any recreation study issues.
- After further consideration, NSPW does not believe that a separate work group is necessary to address recreation study concerns and does not intend to establish a separate work group. NSPW plans to continue to work with interested parties to address comments and study requests regarding recreation resources during the relicensing process.

Mussel Information

- MDNR questioned the source of mussel information and requested a citation. Mussel information for the Montreal River was located within the WDNR website. There is no note of recent surveys being conducted.
 - Citation: *WDNR, Mussel Observations by County. 2020.*
<http://wiatri.net/inventory/mussels/About/musselWaters.cfm>.

Invasive Species Information

- MDNR questioned where invasive species information came from and requested the citation.
 - All three projects were identified in WDNR Lakes and AIS Mapping Tool. Of the three projects, only Gile Flowage was identified as having verified NR 40 listed species.
 - Citation: *Wisconsin Department of Natural Resources. 2019. WDNR Lakes and AIS Mapping Tool.* https://dnrmaps.wi.gov/H5/?viewer=Lakes_AIS_Viewer.
 - Additional Saxon Falls aquatic invasive sampling information is available on the "conditions" tab of the Saxon Falls Flowage WDNR Water Detail webpage.
 - Citation: <https://dnr.wi.gov/water/waterDetail.aspx?wbic=2941100>
 - Additional Gile Flowage aquatic invasive sampling information is available on the "conditions" tab of the Gile Flowage WDNR Water Detail webpage.
 - Citation: <https://dnr.wi.gov/water/waterDetail.aspx?wbic=2942300>
 - Superior Falls is surveyed annually by NSPW for purple loosestrife (PL) and Eurasian water milfoil (EWM). Neither have been identified since surveying began in 1998.
 - Additional Superior Falls invasive species monitoring information is available from WDNR water monitoring station # 10022264 at:
 - Citation: <https://dnrx.wisconsin.gov/swims/viewStationResults.do?action=sampleResultsPrevious&show=&id=20738115¶mcode=&sampleResultsStart=0>

Intake Velocities

- MDNR requested information on where intake velocity information came from.

Saxon Falls

- No intake velocities were identified in the PAD or last license application.

- The Mead and Hunt engineering group recalculated the maximum intake velocity at 0.71ft/sec (calcs attached).¹

Superior Falls

- Intake velocities identified in the PAD were listed in the License Application as 0.6 ft/sec at max capacity and 0.5 ft/sec under normal conditions. Both these values are below the sustained and darting swim speeds of most fish.
 - Citation: *Northern States Power Company. 1991. Application for a License for a Minor Water Power Project, Superior Falls Hydroelectric Project, FERC Project No. 2587. December 17, 1991.*
- FERC Environmental Assessment determined that entrainment mortality was not likely to be biologically significant.
 - Citation: *Federal Energy Regulatory Commission. 1995. Final Environmental Assessment, Superior Falls Hydroelectric Project (FERC Project No 2587)- Wisconsin/Michigan. January 19, 1995.*
- Mead and Hunt engineering group recalculated maximum intake velocities at 0.83 ft/sec (calcs attached).²

¹ Calculations assume 0.25" thickness of bars.

² Calculations assume 0.25" thickness of bars.

**Saxon Falls
Velocity Through Trashrack**

Hydraulic Capacity Estimate: Maximum

Calc by: JAM

Date: 4/24/2020

Checked by: NLH

Date: 4/27/2020

Parameters:

Max Headwater EL =	997.0 ft	Top of trashrack is below, so fully submerged
Powerhouse Max Hydraulic Capacity, Q =	170 cfs	
Trashrack Height, H =	20.0 ft	Measured along incline of trashrack
Trashrack Width, W =	15.0 ft	
Bar Width, BW =	0.25 in	
Clear Space, CS =	1.0 in	

Computing Trashrack and Bar Geometry

Total Trashrack Area = $H \times W$

Total Trashrack Area, A_{Trash} = 300 sq. ft

Bar Width + Clear Space, BC = 1.25 in

Total # Bars = $\left(\frac{W}{BC}\right) - 1$

Total # Bars = 143

Bar Surface Area = $BW \times H$

Bar Surface Area, BA = 0.42 sq. ft

Total Bar Surface Area = Total # Bars \times BA

Total Bar Surface Area, BA_{Total} = 59.58 sq. ft

Computing Velocity

Effective Flow Area = $A_{Trash} - BA_{Total}$

Effective Flow Area, A = 240.42 sq. ft

$$V = \frac{Q}{A}$$

Velocity, V = 0.71 ft/s

\\corp.meadhunt.com\share\folder\entp\2400100\150358.01\TECH\H&H\Saxon Falls\Saxon Falls Trash Rack Spreadsheet

Mead & Hunt

**Superior Falls
Velocity Through Trashrack**

Hydraulic Capacity Estimate: Maximum

Calc by: JAM

Date: 4/24/2020

Checked by: NLH

Date: 4/27/2020

Parameters:

Max Headwater EL =	740.2 ft	Top of trashrack is below, so fully submerged
Powerhouse Max Hydraulic Capacity, Q =	220 cfs	
Trashrack Height, H =	22.0 ft	Measured along incline of trashrack
Trashrack Width, W =	15.0 ft	
Bar Width, BW =	0.25 in	
Clear Space, CS =	1.0 in	

Computing Trashrack and Bar Geometry

$$\text{Total Trashrack Area} = H \cdot W$$

$$\text{Total Trashrack Area, } A_{\text{Trash}} = 330 \text{ sq. ft}$$

$$\text{Bar Width + Clear Space, } BC = 1.25 \text{ in}$$

$$\text{Total \# Bars} = \left(\frac{W}{BC} \right) - 1$$

$$\text{Total \# Bars} = 143$$

$$\text{Bar Surface Area} = BW \cdot H$$

$$\text{Bar Surface Area, } BA = 0.46 \text{ sq. ft}$$

$$\text{Total Bar Surface Area} = \text{Total \# Bars} \cdot BA$$

$$\text{Total Bar Surface Area, } BA_{\text{Total}} = 65.54 \text{ sq. ft}$$

Computing Velocity

$$\text{Effective Flow Area} = A_{\text{Trash}} - BA_{\text{Total}}$$

$$\text{Effective Flow Area, } A = 264.46 \text{ sq. ft}$$

$$V = \frac{Q}{A}$$

$$\text{Velocity, } V = 0.83 \text{ ft/s}$$

Darrin Johnson

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Sent: Monday, May 11, 2020 9:54 AM
To: Darrin Johnson
Subject: RE: Information Citations Requested at Superior Falls and Saxon Falls Joint Agency Meeting

Darrin,

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Federal Energy Regulatory Commission. 1995. Final Environmental Assessment, Superior Falls Hydroelectric Project (FERC Project No 2587)-Wisconsin/Michigan. January 19, 1995.

Thank you,
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From: Darrin Johnson <Darrin.Johnson@meadhunt.com>
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To: Tom O Keefe (okeffe@americanwhitewater.org) <okeffe@americanwhitewater.org>; gary@hopp.us; Cathyt220@hotmail.com; hurley@hurleywi.com; Jake Ring <jake@ringoproductions.com>; Megan Easterling <meganseasterling@gmail.com>; Gulotty, Elle (DNR) <GulottyE@michigan.gov>; Kruger, Kyle (DNR) <KRUGERK@michigan.gov>; Oun, Amira (EGLE) <OunA@michigan.gov>; Jim Fossum (jfbio@yahoo.com) <jfbio@yahoo.com>; Tornes, Angela <angie_tornes@nps.gov>; Laatsch, Cheryl - DNR <Cheryl.Laatsch@wisconsin.gov>; connie.antonuk@wisconsin.gov
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Is the version incorporated in the license in the PAD the only version in your possession?

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Darrin Johnson

From: Darrin Johnson
Sent: Tuesday, May 12, 2020 11:17 AM
To: Gulotty, Elle (DNR)
Cc: Shawn Puzen; 'Matthew.J.Miller@xcelenergy.com'; Crotty, Scott A
Subject: RE: Information Citations Requested at Superior Falls and Saxon Falls Joint Agency Meeting
Attachments: 19950119-3041 Order Issuing New License and Final EA.pdf

Attached is a copy of the Final EA we used when completing the PAD. It is attached to the order issuing the license. We downloaded an electronic version from the FERC Elibrary. The Final EA begins on page 44 of the pdf document.

DARRIN JOHNSON

FERC COMPLIANCE AND LICENSING, WATER
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DARRIN JOHNSON

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From: Gulotty, Elle (DNR) <GulottyE@michigan.gov>

Sent: Monday, May 11, 2020 9:54 AM

To: Darrin Johnson <Darrin.Johnson@meadhunt.com>

Subject: RE: Information Citations Requested at Superior Falls and Saxon Falls Joint Agency Meeting

Darrin,

Please send a digital copy of:

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Thank you,

Elle

From: Darrin Johnson <Darrin.Johnson@meadhunt.com>

Sent: Monday, May 4, 2020 10:59 AM

To: Tom O Keefe (okeffe@americanwhitewater.org) <okeffe@americanwhitewater.org>; gary@hopp.us; Cathy220@hotmail.com; hurley@hurleywi.com; Jake Ring <jake@ringoproductions.com>; Megan Easterling <meganseasterling@gmail.com>; Gulotty, Elle (DNR) <GulottyE@michigan.gov>; Kruger, Kyle (DNR) <KRUGERK@michigan.gov>; Oun, Amira (EGLE) <OunA@michigan.gov>; Jim Fossum (jfbio@yahoo.com) <jfbio@yahoo.com>; Tornes, Angela <angie_tornes@nps.gov>; Laatsch, Cheryl - DNR <Cheryl.Laatsch@wisconsin.gov>; connie.antonuk@wisconsin.gov

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120 YEARS AND STILL SHAPING THE FUTURE

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To: Gulotty, Elle (DNR)
Cc: Shawn Puzen; 'Matthew.J.Miller@xcelenergy.com'; Crotty, Scott A
Subject: RE: Information Citations Requested at Superior Falls and Saxon Falls Joint Agency Meeting

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Cc: Shawn Puzen <Shawn.Puzen@meadhunt.com>; Jen Schuetz <jen.schuetz@meadhunt.com>; James Zyduck <james.zyduck@xcelenergy.com> <james.zyduck@xcelenergy.com>; Volbrecht, Randy A <randy.a.volbrecht@xcelenergy.com>; Crotty, Scott A <scott.a.crotty@xcelenergy.com>; 'Matthew.J.Miller@xcelenergy.com' <Matthew.J.Miller@xcelenergy.com>
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Sent: Tuesday, May 12, 2020 2:23 PM
To: Darrin Johnson
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Subject: RE: Information Citations Requested at Superior Falls and Saxon Falls Joint Agency Meeting

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Please be aware I intended this to be a quick/minor clarification and MDNR's formal comments, concerns etc. will be provided separately.

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Michigan Hydro Relicensing Coalition

1620 High Street
Traverse City, MI 49684

Telephone (231) 775-4321

May 20, 2020

James Zyduck
Director, Hydro Plants
Northern States Power Company - Wisconsin (dba Xcel Energy)
1414 West Hamilton Avenue
P.O. Box 8
Eau Claire, WI 54702

Re: Michigan Hydro Relicensing Coalition request to be added to the distribution list for re-licensing of the Saxon Falls and Superior Falls hydroelectric projects.

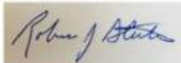
Dear Mr. Zyduck:

Recently, the Michigan Hydro Relicensing Coalition (MHRC) was provided a copy of the Notice of Intent (NOI) and Pre-application Document (PAD) for the re-licensing of the Saxon Falls and Superior Falls hydro-electric projects, owned and operated by Northern States Power - Wisconsin (NSPW). These two projects are licensed by the Federal Energy Regulatory Commission (FERC; P-2610 and P-2587, respectively). The MHRC has an interest in these proceedings as the two projects are located on the Montreal River, an interstate river between Michigan and Wisconsin.

The MHRC is a coalition of four statewide, nonprofit conservation groups with an interest in the protection and enhancement of aquatic resources: Michigan United Conservation Clubs, Michigan Council of Trout Unlimited, Great Lakes Council of Flyfishers International, and Anglers of the Au Sable. All members are 501(c)(3) non-profit organizations. The MHRC mission is to ensure that conservation, environmental and recreational concerns are adequately addressed by the FERC and given the fullest possible consideration throughout the re-licensing process. Formed in 1991, the MHRC has participated in the majority of hydro re-licensing in Michigan over the past 25+ years.

Given our interest in re-licensing of Michigan hydro projects, the MHRC considers itself to be a stakeholder and is requesting to be added to the distribution list for all proceedings related to the re-licensing of the Saxon Falls and Superior Falls hydro projects. Thank you very much for your consideration of this request and please contact me if you have any questions.

Sincerely,



Robert J. Stuber, Executive Director
Michigan Hydro Relicensing Coalition

Cc: Matthew J. Miller (NSPW; matthew.j.miller@xcelenergy.com)
Shawn Puzen (Mead and Hunt; shawn.puzen@meadhunt.com)

Darrin Johnson

From: Miller, Matthew J <Matthew.J.Miller@xcelenergy.com>
Sent: Thursday, May 21, 2020 8:29 AM
To: Bob Stuber; Zyduck, James M
Cc: Shawn Puzen; Crotty, Scott A
Subject: RE: Michigan Hydro Relicensing Coalition Request
Attachments: 2020-05-20 MHRC Stakeholder Request-NSPW.pdf

Thanks Bob. We will add you to our stakeholder list.

Matthew Miller
Xcel Energy | Responsible By Nature
Hydro License Compliance Consultant
1414 W. Hamilton Ave., P.O. Box 8, Eau Claire, WI 54702
P: 715.737-1353 F: 715.737.1077
E: matthew.j.miller@xcelenergy.com

XCELENERGY.COM

From: Bob Stuber <stuberbob@gmail.com>
Sent: Wednesday, May 20, 2020 10:45 AM
To: Miller, Matthew J <Matthew.J.Miller@xcelenergy.com>; Zyduck, James M <james.zyduck@xcelenergy.com>
Cc: Shawn Puzen <Shawn.Puzen@meadhunt.com>
Subject: Michigan Hydro Relicensing Coalition Request

EXTERNAL - STOP & THINK before opening links and attachments.

Please see attached request for the Michigan Hydro Relicensing Coalition to be added to the distribution list for the re-licensing of the Saxon Falls and Superior Falls hydro-electric projects (P-2610, P-2587). Thank you very much for your cooperation in this matter.

Bob Stuber, Executive Director
Michigan Hydro Relicensing Coalition

Stakeholder Comments on PAD
And Study Requests

20200601-5015 FERC PDF (Unofficial) 5/31/2020 12:47:12 AM

Blake Cazier, Duluth, MN.
Montreal River - I believe I whitewater kayaked the section from Dam to
Lake Superior in late 80's

Parking and access should be considered and resources provided

Rec flows should also be more accessible

thank you

20200601-5089 FERC PDF (Unofficial) 6/1/2020 11:17:25 AM

Brian Gulbransen, Okemos, MI.

Dear all,

I am writing in regards to the relicensing of the Montreal River Hydropower Projects in northern Michigan/Wisconsin. I am a Professor of Neuroscience at Michigan State University and an avid whitewater kayaker. I have kayaked the Montreal river canyon between Saxon Falls and Lake Superior several times over the past few years and am a strong supporter of increasing the whitewater paddling opportunities on this fantastic river.

The Montreal river canyon is truly unique with beautiful rapids, towering conglomerate walls, and abundant wildlife. I can never believe this amazing place is in the midwest! I have paddled this section several times with my son, who was in middle school at the time and this is one of his favorite sections of whitewater anywhere. I would certainly make the trip north to paddle this section more often if flows were more consistent and if assessing flow rate was more straightforward than calling a hotline and listening to the recording. This recording is not always updated regularly and we have made the long drive up to paddle this section only to find that the level dropped significantly overnight. If flows were more consistent and reporting was online, I think this river would gain much more interest from the whitewater community. I already think this is one of the top whitewater rivers in the midwest and preserving whitewater recreation opportunities should be a priority. As FERC considers study needs for relicensing of the Saxon Falls Hydroelectric Project I am requesting a study of instream flow needs for whitewater recreation, an evaluation of public access needs, and options for providing improved access to real-time flow information. I believe these needs are justified given the unique quality of the whitewater opportunities in this area that are typically not found in the midwest. Thank you in advance for considering my request and I hope this information is useful in your decision making process. Please don't hesitate to contact me if I can provide any other information that you might find helpful.

Best,

Brian Gulbransen, PhD

20200601-5111 FERC PDF (Unofficial) 6/1/2020 12:08:42 PM

Christopher O'Brien, Pulaski, WI.

My name is Christopher O'Brien and I am a whitewater kayaker and instructor from Pulaski, WI. I am writing as FERC considers study needs for relicensing of the Saxon Falls and Superior Falls Hydroelectric Project I am requesting a study of instream flow needs for whitewater recreation, an evaluation of public access needs, and options for providing improved access to real-time flow information. I have been wanting to get up to this beautiful part of the Upper Peninsula of Michigan to kayak and enjoy the Montreal River. I would love to see more paddlers like myself who have not had the opportunity to kayak this river to have more chances to experience it. If given more opportunities to have water levels that make kayaking the Montreal easier at different times of the year. The access to the river for the public is concerning for me as there has been a set of stairs to get to Saxon Falls that could be updated as well as the parking situation at the Superior Falls takeout only has room for 2 vehicles. Please consider recreation opportunities for whitewater kayakers and canoeists in the future. There are people from all over the Midwest that will come to the area to paddle this river if given the opportunities. Thank you for your time!

-Christopher O'Brien

20200601-5025 FERC PDF (Unofficial) 5/31/2020 8:40:16 AM

Hi, my name is Kraig Lund and I live in Lakeville, MN. I've been paddling whitewater for over 18 years, and I first stumbled across the Montreal river/canyon area in 2013. Since first paddling the Montreal Canyon section, I realized it is a very special place. The canyon is beautiful and is chock full of high quality rapids suitable for intermediate level paddlers. This is a rare combination in this area of the country where the majority of whitewater rivers lean towards either the beginner or expert levels.

Since discovering this gem, I've tried to make at least one visit to the river each year. However, catching the river with enough water to paddle has always been an extremely difficult endeavor. Lack of access to real-time data, unpredictable springtime melts, and unscheduled flow changes at the dams coupled with a 4-5 hour drive from the Twin Cities makes visiting the area a gamble when trying to decide where to paddle on a whitewater weekend.

During this relicensing process, I would implore the licensing body to consider recreational aspects such as whitewater paddling. Scheduled releases could be an economic boon to the area as whitewater paddlers from all over the Midwest would flock to this high quality river, particularly if such releases were scheduled in the summer and fall months when finding paddle-able flows in the region can be difficult. Restaurants, lodging, gas stations and other businesses could benefit from such releases. There are many examples around the country and the Midwest to support this assertion – look no further than the Wausau Whitewater Park.

I am asking FERC to consider the following aspects during the relicensing process:

1. Conduct a study to gain a better understanding of instream flow needs for recreation on the Montreal Canyon and West Branch Montreal.
2. Scheduled recreational releases with medium instream flow rate. In a perfect world, several weekends in the summer and fall.
3. Improved access to real-time flow data in the Canyon (below Saxon falls) and on the West Fork of the Montreal, to help with gauging natural springtime and rain-dependent flows
4. Improved put-in and take-out access.

Please consider these recreational aspects during the relicensing process. Public lands and waters should be accessible to everyone and I would love to see this gem of a river managed for everyone, including recreationalists.

Thank you,

Kraig Lund

20200601-5125 FERC PDF (Unofficial) 6/1/2020 12:47:17 PM

Thomas Hagerty, Shafer, MN.

Please understand the importance of allowing access and improvement of access to the few remaining whitewater runs in the region. I believe power generation and the whitewater community can work together to achieve a long lasting solution.

20200602-5020 FERC PDF (Unofficial) 6/2/2020 11:08:09 AM

Neal Schroeter, Ironwood, MI.
Neal Schroeter
615 N Lowell
Ironwood, MI 49938

6/2/2020

Concerning Relicensing of Dams on the Montreal River.

I've lived in Ironwood, MI for 34 years & have paddled the Montreal Canyon probably 300-400 times! I've paddled the West Branch probably 20-30 times. So, I'm probably more familiar with the whitewater runs than anyone in history!

The Montreal Canyon is one of the best whitewater runs in the Midwest! It has nice friendly continuous class II-III playable rapids in a very scenic canyon. Probably ideal levels are somewhere between 700-1500 cfs. Higher levels can also be exciting to run. Mostly, however, the river will run after snow melt or 2 or more inches of rain.

The West Branch is more of a class II-VI run. It has been much harder to find at the right levels for paddling. When the Gile Flowage is full, then there is sufficient release, but then, often too much for a safe run! It has always been very unpredictable. Ideal levels for this are somewhere between 400-1000 cfs.

It will be a great service to the public to hold a few releases per year on the West Branch. About 15 years ago, I worked with the power company. I had garnered a lot of letters of support from the paddling community throughout the mid-west expressing interest. I'm sure interest is still the same. It would be a great tourism boost & reflect kindly on the power company!

As these dams are relicensed, I hope we can work together on organizing some recreational releases!

Thank-you!
Neal Schroeter
Owner - Whitecap Kayak
906-364-1467

20200603-5003 FERC PDF (Unofficial) 6/3/2020 6:58:44 AM

Ryan Whipple, Reed City, MI.

Hello, my name is Ryan whipple. Im a dedicated paddler with a love of whitewater and gorgeous scenery , the Montreal river canyon has both and is uniquely beautiful for the midwest . I believe scheduled whitewater releases would be very greatly appreciated and utilized by many paddlers . also a realtime stream flow gauge would be very helpful for people like myself who live a distance away but would gladly make the trip if there was accurate information on river levels.

as FERC considers study needs for relicensing of the Saxon falls and superior falls Hydroelectric project I am requesting a study of in stream flow needs for whitewater recreation, realtime streamflow information, and possible public access improvements .

Thank You ,
Ryan Whipple

20200604-5001 FERC PDF (Unofficial) 6/3/2020 10:05:16 PM

Greg Weiss, Cornucopia, WI.
Hello,

I have been a kayaker and canoeist since 1990 and have paddled the Montreal River canyon and West branch for almost as long. When there is enough water in the river to paddle, it is where we chose to go over any other. It is one of the most diverse, pristine, unusual, and fun rivers that I have ever experienced. This spring I have paddled it 15 times. It never gets old.

As FERC considers study needs for re-licensing of the Saxon Falls and Superior Falls Hydroelectric Project I am requesting a study of in-stream flow needs for whitewater recreation, an evaluation of public access needs, and options for providing improved access to real-time flow information.

Though I understand that the limited water storage ability may preclude regular releases during the drier parts of the summer, a few per season planned ahead of time would be a boon for local businesses.

Thank you for your consideration,

Greg Weiss

20200608-5113 FERC PDF (Unofficial) 6/8/2020 12:31:13 PM



Friends of the Gile Flowage, Inc.
PO Box 227
Montreal, WI 54550

June 8, 2020

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

Electronic Filing

Re: Friends of the Gile Flowage Lake Association Comments on the Pre-application Document and Study Request for the Saxon Falls (P-2610) and Superior Falls (P-2587) Hydroelectric Projects

Dear Secretary Bose:

The Friends of the Gile Flowage, Inc. (FOG), a 501c3 Wisconsin qualified lake association, respectfully submits the following comments on the Pre-application Document (PAD) for the Saxon Falls (P-2610) and Superior Falls (P-2587) Hydroelectric Projects. This includes the Gile Flowage Dam that is currently unlicensed and the 3138 acre Gile Flowage it creates. The Gile Flowage augments water for downstream electrical generation.

The Gile Flowage is one of the last "wild" Laurentian shield lakes in northern Wisconsin with over 20 undeveloped islands and shoreline reminiscent of the Boundary Waters. It is a destination for local residents and transient visitors for lake kayaking, fishing, and boating; as well as an economic driver for Iron County, Wisconsin. The Gile Flowage's outflow supports recreational along the Montreal River "corridor" including whitewater kayaking, fish and wildlife habitats, and aesthetics at its waterfalls and rapids.

As a project stakeholder, FOG is the only organization representing the Gile Flowage. FOG has a 15 year history of Gile Flowage stewardship through its watershed research, lake plans, aquatic invasive species and boater education, island clean-ups, water quality sampling, and fish and wildlife habitat improvement projects. Many of these projects have been done in partnership with Xcel Energy/Northern States Power Company (NPS) which has been a good steward of the Gile Flowage. Our research and resources are available at www.friendsofthegile.org.

In addition to the PAD findings, we feel additional studies are needed given the importance of this relicensing. FOG is submitting three study requests: 1) a study on the impacts of Gile Flowage water level management on shoreline and island erosion and subsequent impacts on habitats, invasive species, recreation, 2) a comprehensive recreation study looking at needs and opportunities for the Montreal River corridor in addition to sections within project boundaries, and 3) a comprehensive aesthetics study on Montreal River corridor in addition to sections within project boundaries. For the latter two studies, if possible we encourage a holistic approach to consider not only sections within the project boundaries, but their connectivity and dependence on adjacent sections of the Montreal River in total for meeting our area's recreational needs and opportunities.

20200608-5113 FERC PDF (Unofficial) 6/8/2020 12:31:13 PM

FOG Study Request #1: Impact of Gile Flowage Water Level Management

Based on the Wisconsin Public Service Commission's 1937 order authorizing construction of the Gile Flowage Dam, the maximum pool depth was set at an elevation of 1490'. A minimum outflow from the Gile Dam is 10cfs based on an agreement with the City of Montreal. According to the PAD, there is a "gentleman's agreement" allowing for maximum drawdowns of 15 feet to the elevation of 1475', although in the past NSP has minimized its drawdowns.

The PAD states that NSP is "proposing to continue operating the Gile Flowage in the same manner that it is currently operated." On page 139, the PAD states that "no changes in management will affect these resources", but we are not sure what this means since there are no management criteria or policies presented.

We acknowledge that the Gile Flowage exists to provide supplemental water for power generation and that drawdowns are a necessary management tool. While NPS management has been one of a good steward, we are concerned that not addressing potential impacts of water level management of the Gile Flowage avoids careful consideration of its impacts on shoreline and island erosion that is already occurring. Water level management impacts shoreline and nearshore fish and wildlife habitat, as well as water quality. Water levels influence habitat conditions for invasive species such as curly leaf pond weed, Eurasian water milfoil, and Purple Loosestrife which have already invaded lakes south of the Gile Flowage.

Currently the Gile Flowage's riparian shoreline is owned and managed by Xcel Energy/NSP. This may be one reason why water level management is not addressed in greater detail because impacts would only affect company property. However, this ownership picture is changing with Xcel pursuing potential sale of its riparian properties to adjacent private land owners. If privatization occurs and water level management is not addressed, erosion will be impacting private property and the rights of individual riparian owners.

We feel it would be prudent now to study and address Gile Flowage water level management impacts.

FOG Study Request #2: Recreation Use and Opportunities Study of the Montreal River Corridor

The Montreal River offers a variety of interdependent water-based recreational activities, requiring consideration as a holistic system. Upstream, the 3138 acre Gile Flowage is prized for unspoiled lake kayaking, island camping, boating, and rugged aesthetic beauty; as well as fishing, shoreline hiking, bird watching, and other uses. These uses depend on management of Flowage water levels. In turn, outflows from the Gile Flowage help support unique whitewater kayaking opportunities downstream on the Montreal River; as well as aesthetics at its many scenic waterfalls. Downstream water-based recreation uses depend, in part, to the management of the Flowage's outflow and drawdowns, which also affect the Flowage.

We agree with stakeholders representing whitewater kayaking interests that a recreation use study is needed. We strongly support a Recreational Use and Opportunities Study that evaluates the Montreal River as a system recognizing the connectivity of upstream and downstream flows and needs, present and future public outdoor recreation demands, and maintaining and enhancing a quality environmental setting. We would also encourage this study include opportunities for increased public access, handicap accessibility, and environmental protection including stopping the spread of invasive species.

20200608-5113 FERC PDF (Unofficial) 6/8/2020 12:31:13 PM

FOG Study Request #3: Aesthetic Study of the Montreal River System

The West Branch of the Montreal River, the Gile Flowage it creates, and its downstream pairing with East Branch of the Montreal River includes some of the Midwest's most unique scenic and historic resources. These resources not only provide aesthetic beauty and unique habitats, they are an economic driver for tourism for Iron County. Iron County is a limited resource area which ranked 64th out of Wisconsin's 72 counties in per capita income in the 2010 Census.

There are numerous waterfalls on the Montreal River which Iron County is now using as an asset to promote healthy lifestyle recreation and tourism. These include one of Wisconsin's highest at Superior Falls, as well as Saxon Falls, Kimball Falls, Interstate Falls, and Peterson Falls. There is no mention in the PAD about aesthetic flows in regards to these important resources. The 300' deep Montreal River Canyon is currently only accessible by river or via private property. It is a unique Midwest landform whose inaccessibility presents safety issues for river users, but opportunities for future public access and should be addressed.

On page 139, the PAD states NSP's intention to maintain the Gile Flowage's shoreline in natural condition and releases of continuous minimum flow to the West Branch to maintain aesthetics; and that "no proposed operational, reservoir level, minimum flow, or land use changes would cause adverse aesthetic impacts." While we fully support continuation of NSP's stewardship, we feel there is a need to study of the impact of aesthetics on the environmental and economic contributions of the Gile Flowage, especially given that Xcel/NSP's ownership of its undeveloped riparian shoreline may be privatized. The PAD makes only passing mention of the over 20 undeveloped islands within the Gile Flowage. These islands are a critical component of the Flowage's aesthetic value and offer unique recreational opportunities and habitats. Xcel/NSP's current policy does not allow camping on these islands, although this is a common practice creating issues with public sanitation and litter that also must be addressed.

We feel that the Montreal River corridor, including areas connecting those included in the project boundaries be inventoried, including formal and informal trails, formal and informal access, camping, and scenic viewing. The inventory should identify current use, current conditions, opportunities for public access, education and interpretation, and any impacts that the project might have on them. Aesthetic/culture areas include:

Montreal River Waterfalls

- Superior Falls
- Saxon Falls
- Kimball Falls
- Interstate Falls
- Peterson Falls
- Spring Camp Falls (just south of the project boundary, but is noteworthy within the Montreal River system)

Gile Flowage

- Islands
- Scenic rock bluffs

Montreal River Historic Sites and Trails

- Mouth of the Montreal River: site of a historic Ojibwe Indian village site

20200608-5113 FERC PDF (Unofficial) 6/8/2020 12:31:13 PM

- Flambeau Trail: Historic Native American, fur trade route following the Montreal River from the Mouth of the Montreal River across the Gile Flowage
- North Country Trail

The project area is also within the Ceded Territory of the Lake Superior Ojibwe. We recommend that the Tribal Historic Preservation Officers of the Bad River Band and Red Cliff Band of the Lake Superior Chippewa Indians be consulted as to tribal historic and cultural resources that may be within the project area that we are not aware of.

PAD Corrections


Finally, we suggest a few corrections to the PAD including:

- Page 55, second paragraph: the West Branch of the Montreal River originates from Island Lake in **Knight** Township.
- Page 96, last sentence: According to a 4/29/2011 letter from County Register of Deeds Bob Traczyk, the Town of Pence Landing is owned by **Iron County**.

Thank you for the opportunity to provide comments on the PAD for the Saxon and Superior Falls Projects and Gile Flowage; and for considering our request three study requests. We look forward to working with the Xcel Energy/NSP, stakeholders, and FERC on this license application.

Please contact me if you have any questions regarding these comments at 715.561.2185 or cathyt220@hotmail.com.

Sincerely,



Cathy Techtman, President
Friends of the Gile Flowage, Inc.
PO Box 227
Montreal, WI 54550
cathyt220@hotmail.com
Phone: 715.561.2185

20200608-5001 FERC PDF (Unofficial) 6/5/2020 8:09:56 PM

Karen E Frank, D.D.S., Waterford, MI.
To Whom It May Concern,

Hello my name is Karen Frank. I am a whitewater kayaker who lives in Southeast Michigan. I have traveled numerous times to the Upper Peninsula to enjoy kayaking the Montreal Canyon below Saxon Falls. It is worth the long drive due to its unique beauty and quality whitewater rapids. I have paddled it at flows as low as 720 cfs and as high as 1200 cfs. It is an important recreational opportunity due to its beauty and suitability for a wide range of kayakers (from low intermediates to experts).

As FERC considers study needs for re-licensing of the Saxon Falls and Superior Falls Hydroelectric Project I am requesting a study of instream flow needs for whitewater recreation, an evaluation of public access needs, and options for providing improved access to real-time flow information.

Thank you for your time and consideration.

Sincerely,

Karen E. Frank

20200608-5000 FERC PDF (Unofficial) 6/5/2020 8:07:35 PM

Paul E. Lange, Waterford, MI.

Hello my name is Paul Lange and I have kayaked the Montreal for the first time last spring. I would look forward to an opportunity to paddle that stretch of river on a regular basis if flows could be regulated. As FERC considers study needs for relicensing of the Saxon Falls and Superior Falls Hydroelectric Project I am requesting a study of instream flow needs for whitewater recreation, an evaluation of public access needs, and options for providing improved access to real-time flow information.

Thank you so much,
Dr. Paul Lange

20200608-5158 FERC PDF (Unofficial) 6/8/2020 3:24:55 PM

Todd Leigh, Marquette, MI.

I've been a whitewater kayaker since 1992, and I first kayaked on the Montreal River back in 1996, and paddled both the main canyon and the West Branch at that time. At the time, I was amazed at the unique character of the canyon, which has beautiful conglomerate rock cliffs on both sides of the river, making for a very interesting run. Back then, it was a long way from my home in Chicago to the river, and I didn't return for many years.

Then in 2017, I moved to Marquette MI for retirement, and since then I've paddled the Montreal Canyon every year, often with friends who come up to the UP from down-state to paddle the UP with me. It remains a beautiful and unique river, and one of the great things about it is that, while there are many whitewater rivers in the UP, there are very few that hit the sweet spot of class III difficulty that the Montreal canyon has, with accessible flow information so you can tell when it is running. So I do plan to continue running the Montreal Canyon regularly in the future.

I would also like to be able to paddle the West Branch more regularly... at this time it is hard to do so as there is no real way to know in advance when there will be releases on that section of the river.

As FERC considers study needs for relicensing the Saxon Falls and Superior Falls Projects, some things that would improve the recreational aspects of the canyon for me are:

- a study of instream flow needs for whitewater recreation
- an evaluation of public access needs, as it would be nice to have better access at both the put-in and the take-out
- and options for providing improved access to real-time flow information, as it would be nice to be able to get flow info via a web-app instead of having to call on the phone.

Thank you for considering these issues in the relicensing process.

20200609-5075 FERC PDF (Unofficial) 6/9/2020 10:57:01 AM

UNITED STATES OF AMERICA
FEDERAL ENERGY REGULATORY COMMISSION

Northern States Power Company)	Docket No. 2587
Eau Claire, Wisconsin)	Superior Falls Project
)	
)	Docket No. 2610
)	Saxon Falls Project

COMMENTS OF AMERICAN WHITEWATER ON THE PRE-APPLICATION DOCUMENT AND STUDY
REQUEST

I. INTRODUCTION

American Whitewater hereby files comments pursuant to 18 CFR §16.8(b)(5) on the Pre-Application Document filed by Northern States Power Company for a new license for the Superior Falls Project, FERC Project No. 2587 and Saxon Falls Project, FERC Project No. 2610 (hereafter Projects),¹ located on the Montreal River in Iron County and Gogebic County, Wisconsin. In addition, we request a study of Integrated Analysis of Recreational Flows and River Access. American Whitewater has a documented interest in recreational opportunities on this river dating back more than 30 years and these opportunities are directly impacted by project operations and have a project nexus. In addition to recreation, we have a strong interest in resource protection including fishery resources and riparian habitat. Our individual members who live in the region, and value the river for the recreational opportunities and its natural resources, have also filed several comments on this docket.

II. STATEMENT OF INTEREST

American Whitewater is a national non-profit 501(c)(3) river conservation organization founded in 1954 with approximately 50,000 supporters, 6,000 dues-paying members, and 100 local-based affiliate clubs, representing whitewater enthusiasts across the nation. American Whitewater's mission is to protect and restore America's whitewater rivers and to enhance opportunities to enjoy them safely. The organization is the primary advocate for the preservation and protection of whitewater rivers throughout the United States, and connects the interests of human-powered recreational river users with ecological and science-based data

¹ Notice of Intent / Pre-Application Document of Northern States Power Company - Wisconsin for the Superior Falls Project, et al. under P-2587. FERC eLibrary Submittal 20191230-5284, <https://elibrary.ferc.gov/idmws/search/intermediate.asp?link_file=yes&doclist=14825475>.

20200609-5075 FERC PDF (Unofficial) 6/9/2020 10:57:01 AM

to achieve the goals within its mission. Our vision is that our nation's remaining wild and free-flowing rivers stay that way, our developed rivers are restored to function and flourish, that the public has access to rivers for recreation, and that river enthusiasts are active and effective river advocates. A significant percentage of American Whitewater members live in Wisconsin, Minnesota, and Michigan and make use of the recreational opportunities available on the Montreal River and its two major branches.

American Whitewater has extensive experience in hydropower relicensing. We were a founding member and currently Chair the Hydropower Reform Coalition. We work with our coalition partners, state and federal agencies, tribes, and licensees to represent the public interest in hydropower relicensing. We have actively participated in more than 100 relicensing proceedings nationally, more than any other non-governmental organization. In the Midwest we were active stakeholders in several relicensing efforts including the following: Black River, Hatfield Dam (FERC P-10805); Chippewa River, Jim Falls (FERC P-2491); Fox River, Badger-Rapide Croche (FERC P-2677); Menominee River, Little Quinnesec (FERC P-2536); Otonagon River, Bond Falls (FERC P-1864); Paint River, Lower Paint (P-2072); Peshtigo River, Johnson Falls (FERC P-2522); Pine River, Pine (FERC P-2486); Red River, Gresham (P-2484); St. Louis River, Cloquet (P-2363); Wisconsin River, Grandfather Falls (P-1966); and Wisconsin River, Rhinelander (P-2161).

As part of the Superior Falls and Saxon Falls relicensing on the Montreal River, American Whitewater has a direct interest in river and riparian conservation and resource protection, appropriate public access to the river that protects resource values, and instream flows for the benefit of fishery resources, river and riparian condition, and recreation.

Many articles and guidebook descriptions speak to the exceptional quality of the whitewater in the section of river between the powerhouse for the Saxon Falls Project and the reservoir for the Superior Falls Project. In a 1981 article published in the *American Whitewater Journal*, Matt Kuckuck described the Montreal Canyon (beginning at the Saxon Falls Powerhouse) as "by far the most commonly paddled" of the sections of the Montreal River with "continuous easy rapids in a deep, very powerful, conglomerate gorge."² In *Whitewater; Quietwater: A Guide to the Wild Rivers of Wisconsin, Upper Michigan, and Northeast Minnesota*, Bob Palzer describes the Montreal Canyon as "a fantastically beautiful gorge with high, sheer cliffs on both sides of the river."³ In his book *Northwoods Whitewater*, Jim Rada begins his description with the

² At page 17. Kuckuck, M. 1981. Matt Kuckuck's Best of the South Shore Part II. *American Whitewater Journal*.

³ At page 91, Palzer, B. and J. Palzer. 1998. *Whitewater; Quietwater: A Guide to the Wild Rivers of Wisconsin, Upper Michigan, and Northeast Minnesota*. Menasha Ridge Press.

20200609-5075 FERC PDF (Unofficial) 6/9/2020 10:57:01 AM

words, “this run is one of the most prized in all the Northwoods.”⁴ He goes on to describe the impacts of the Project on whitewater recreation. In *Paddling Northern Wisconsin*, Mike Svob, begins his description stating that “everything about the Montreal is spectacular... no other stretch of river in the state is likely to generate such wonderment and delight as this 3.2 miler.”⁵ The Montreal River and its major tributary, the West Branch, have regional and national significance and have been the site of national and international competitions, including the Pan American Cup races in 1984 and National Wildwater Championships in 1992.

When this Project was last relicensed in 1989, the Environmental Assessment specifically noted that the Project “offers opportunities for canoeing and kayaking” and further stated that “recreational facilities provided by the applicant include... [a] steep stairway that provide[s] access to the tailwater area and downstream whitewater opportunities in the Montreal Canyon.”⁶ The whitewater resources of this reach are well recognized by the whitewater boating community, known to the licensee, and have been previously recognized by the Commission.

During the summer of 1997, American Whitewater initiated correspondence and spoke with Mark Foyt of Northern States Power to discuss our interest in improved access at the Saxon Falls Powerhouse and improved information on project operations and flows, which is essential for paddlers to understand when water is in the river. While Mr. Foyt made a commitment to improve accessibility to information on Project operations, he indicated that more substantial improvements to whitewater recreation could be addressed when the current license expires in 2019. In 2006, we discussed our plan to conduct a survey of instream flow needs for recreation on the West Branch Montreal River with Robert Olson of Northern States Power to quantitatively evaluate optimal flows using a structural norm approach. At the time, Mr. Olson made no commitment to modify operations in response to our study, noting that the Project was not up for relicensing until 2019 and these issues could be addressed at that time.

In 2014, Northern States Power applied for extension of license term for the Saxon Falls Hydroelectric Project;⁷ American Whitewater intervened in the proceeding and while we supported efforts to coordinate the license terms for the Saxon Falls Project (FERC Project

⁴ At page 90, Rada, J. 2003. *Northwoods Whitewater*. Sangfroid Press.

⁵ At Page 72, Svob, M. 1998. *Paddling Northern Wisconsin: 82 Great Trips by Canoe and Kayak*. Wisconsin Tales and Trails, Inc.

⁶ At Section F(1)(i) of the Environmental Assessment included in the License Order *Northern States Power Company* 49 FERC 62,269 (1989).

⁷ Notice of application accepted for filing, soliciting comments, motions to intervene, and protests re Northern States Power Company under P-2610. (FERC eLibrary Issuance 20140804-3019).

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No. 2610) and the Superior Falls Project (FERC Project No. 2587), we expressed concern with the fact that this would further delay an effort to address project impacts on recreation. We requested interim mitigation measures to include additional information on project operations and hydrology to see what possibilities may exist for improving the recreational opportunities at the Projects, improved access at the Saxon Falls Powerhouse, and improved access to real-time flow information for project inflows (i.e. release from Gile Flowage that impacts whitewater recreation on the West Branch Montreal) and flows below the project in the Montreal Canyon. Our request for interim mitigation measures for license extension was denied and the license term was extended.⁸ Although this action further delayed an evaluation of project impacts on whitewater recreation and various mitigation measures that could be implemented to address these impacts, the Commission ultimately concluded that our issues “would be more appropriately examined in the context of the relicensing proceeding.”⁹

For the reasons described above, American Whitewater has a direct interest in this proceeding and our participation will enable a more complete record to be developed, and will lead to better informed decision making. All future correspondence to American Whitewater should use the contact information provided below.

Thomas O’Keefe
Pacific Northwest Stewardship Director
American Whitewater
3537 NE 87th St.
Seattle, WA 98115
Email: okeefe@americanwhitewater.org
Phone: 425-417-9012

III. COMMENTS

Pursuant to 18 CFR §16.8(b)(5), American Whitewater provides these comments on the Preliminary Application Document organized by sections in the document.¹⁰

Section 4.1.5

⁸ *Northern States Power Company* 149 FERC ¶ 62,090 (2014).

⁹ *Northern States Power Company* 150 FERC ¶ 61,028 (2015).

¹⁰ Notice of Intent / Pre-Application Document of Northern States Power Company - Wisconsin for the Superior Falls Project, et al. under P-2587. FERC eLibrary Submittal 20191230-5284, <https://elibrary.ferc.gov/idmws/search/intermediate.asp?link_file=yes&doclist=14825475>

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We appreciate the reference to whitewater rafting, canoeing, kayaking among the recreational activities associated with the project. Given the direct impacts of project operations on whitewater recreation and American Whitewater's long history of engagement on this project, this single mention of the activity in the Preliminary Application Document is insufficient.

Section 4.3.3.2

We understand that the non-licensed Gile Flowage is operated in order to supplement flows on the West Fork of the Montreal River and Northern States Power Company does not propose any changes to current operations. As part of the relicensing process, we have an interest in better understanding the nexus of Gile Flowage releases to project operations including the timing, magnitude, duration, and frequency. We also have an interest in understanding if operation of the Gile Flowage as a non-licensed storage reservoir is appropriate. If Gile Flowage is supporting project operations, it should be included as part of the Projects and operated in a manner that is best adapted to a comprehensive plan for improving or developing a waterway or waterways for all beneficial public uses including recreation.¹¹ This could include releases from the reservoir for recreation and/or improved forecast information and notification of times when releases or reservoir draw downs that provide opportunities for whitewater boating are expected to occur.

Section 4.8.1.3 Saxon Falls Tailwater Access

The Preliminary Application Document describes this as an "informal recreation site" that "serves as a put-in below the powerhouse for canoers and kayakers wishing to access the Montreal River Canyon." American Whitewater has an interest in understanding the options and costs of improving this access. We appreciate the availability of the flow phone "where boaters can check discharge from the Gile Flowage and the Saxon Falls Dam," but we have received report that this recording is not always updated in a timely manner. It is now standard practice to provide these data in realtime through a website utilizing an API that allows for integration of flow data with boating websites and various apps.

Section 4.8.1.4 Montreal River Canyon

We appreciate the recognition of the Montreal River Canyon as a resource with "unique wild and scenic qualities."

Section 4.8.2 Gile Flowage Existing Recreational Facilities and Opportunities

We agree that there are "many opportunities for... water sports within the vicinity of the Gile Flowage Reservoir," but the description fails to mention whitewater boating that occurs

¹¹ 16 U.S. Code § 803(a)

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downstream of the dam that is directly impacted by regulation of water levels and flow releases from the dam. Whitewater recreation and the impacts of Gile Flowage operations need to be described in more detail in advance of developing a license application.

Section 4.8.3.2 Superior Falls Canoe Take-out

As described, the Superior Falls Canoe Take-out is utilized by boaters who paddle the Montreal Canyon and provides parking for up to two vehicles. American Whitewater requests that the adequacy of this facility be evaluated in consideration of license terms that could be put in place for the next 30-50 years.

Section 4.8.4.1 Recreational Needs Identified in Management Plans, State of Wisconsin

We agree that “recreation amenities provided in the vicinity of the Saxon Falls Project, Gile Flowage, and Superior Falls Project help fulfill [the goals]” outlined in the 2019 to 2023 Statewide Comprehensive Outdoor Recreation Plan (SCORP) for water and shore access for fishing and boating. However, the existing facilities need to be evaluated for their adequacy over the term of a future license. We believe some improvements and upgrades are needed to meet the state’s goals.

Section 5.1.7.1 Recreation and Land Use: Saxon Falls Project

We support consideration of real time flow gages that will provide information to the recreating public and provide immediate access to flow information for resource agencies. We agree with the need to inventory and assess recreational facilities and evaluate recreational flow releases. While the licensee proposes to formalize the existing Saxon Falls overlook, “no new recreation facilities or improvements are being proposed.”¹² As stated above, we believe the Saxon Falls Tailwater Access needs to be considered for improvements.

Section 5.1.7.2 Recreation and Land Use: Gile Flowage

We support consideration of real time flow gages that will provide information to the recreating public and provide immediate access to flow information for resource agencies. We agree with the need to inventory and assess recreational facilities and evaluate recreational flow releases.

IV. CONCLUSION

It is the Commission’s policy with respect to recreational development at licensed

¹² At Page 138, Notice of Intent / Pre-Application Document of Northern States Power Company - Wisconsin for the Superior Falls Project, et al. under P-2587. FERC eLibrary Submittal 20191230-5284, <https://elibrary.ferc.gov/idmws/search/intermediate.asp?link_file=yes&doclist=14825475>.

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projects to “seek, within its authority, the ultimate development of [recreational] resources, consistent with the needs of the area to the extent that such development is not inconsistent with the primary purpose of the project.”¹³ We believe a significant opportunity exists to address whitewater recreation at the Projects.

Please do not hesitate to contact me if you have any additional questions.
Respectfully submitted on June 9, 2020.

Thomas O’Keefe, PhD
American Whitewater

Enclosure:
Study Request: Integrated Analysis of Recreational Flows and River Access

¹³ 18 CFR § 2.7

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UNITED STATES OF AMERICA
FEDERAL ENERGY REGULATORY COMMISSION

Northern States Power Company)	Docket No. 2587
Eau Claire, Wisconsin)	Superior Falls Project
)	
)	Docket No. 2610
)	Saxon Falls Project

CERTIFICATE OF SERVICE

Pursuant to Rule 2010 of the Commission's Rules of Practice and Procedure, I hereby certify that I have this day caused the foregoing **American Whitewater's Comments on the Pre-Application Document and Study Request for the Superior Falls Project (P-2587) and Saxon Falls Project (P-2610)** to be served upon each person designated on the official service list compiled by the Secretary in this proceeding.

Dated this 9th day of June, 2020.



Carla Miner
3691 S 3200 W
West Valley City, UT 84119-3553
carla@americanwhitewater.org

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**Traditional Licensing Process Study Request:
Integrated Analysis of Recreational Flows and River Access**

American Whitewater submits the following study request for Integrated Analysis of Recreational Flows and River Access pursuant to [18 CFR §16.8\(b\)\(5\)](#).

18 CFR §16.8(b)(5) Unless otherwise extended by the Director of Office of Energy Projects pursuant to paragraph (b)(6) of this section, not later than 60 days after the joint meeting held under paragraph (b)(3) of this section each interested resource agency, and Indian tribe, and member of the public must provide a potential applicant with written comments:

18 CFR §16.8(b)(5)(i) Identifying its determination of necessary studies to be performed or information to be provided by the potential applicant;

American Whitewater requests a controlled whitewater flow study on the Montreal River and its major tributary the West Branch Montreal. For these two reaches, the level of public interest and information already on the record renders a Desktop Analysis inadequate to quantify flow dependent recreational opportunities. An intensive study or Level 3 is necessary to inform future license conditions and we request a controlled flow study consistent with methodology established by Whittaker et al. 2005.¹⁴

- Montreal West Branch

The study area encompasses the West Branch Montreal River from Gile Flowage to Highway 2 as identified in American Whitewater's National Whitewater Inventory.¹⁵

American Whitewater completed a survey-based flow study (i.e. a study where users self report flows and respond to an online survey) in 2007 determining that 400-1000 cfs was the optimal range. While we concluded that a significant population of river users would prefer higher flow releases, we did not evaluate flows greater than 1000 cfs. We determined that while some individuals have run the river at these higher flows, these opportunities are limited and unlikely to be provided for during a controlled release. Based on the results of our study we proposed an optimum release schedule for a weekend of two releases that would begin with a release of 600 cfs on Saturday morning at 10 am and until 4 pm, and a second release day of 800-1,000 cfs on Sunday, which would begin at 10 am and end at 4 pm. If the release schedule had to be limited to one day we concluded a flow of 600-800 cfs should be released between 10 am and 4

¹⁴ Whittaker, D., B. Shelby, J. Gangemi. 2005. Flows and Recreation: A Guide to Studies for River Professionals. Confluence Research and Consulting.

¹⁵ <https://www.americanwhitewater.org/content/River/detail/id/2301/>

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pm on a Saturday. A limitation of this study was the fact that users self-reported their runs and in some cases estimating flows and scoring flows that they may not have actually experienced. The study provides a useful starting point but results need to be confirmed to be used as the basis for protection, mitigation, and enhancement measures for recreation in a new license.

- Montreal Canyon

The study area encompasses the Montreal River, commencing at Saxon Falls Tailwater Access and extending downstream to the Superior Falls take-out adjacent to the Wisconsin Highway 122 bridge as identified in American Whitewater's National Whitewater Inventory.¹⁶ Whitewater; Quietwater has a recommended range of 250-5000 cfs.¹⁷ The guidebook Paddling Northern Wisconsin recommends a minimum flow of 250-300 cfs.¹⁸ The guidebook Northwoods Whitwater lists 400 cfs as the minimum flow, 1000 cfs as OK, and 5000 cfs as awesome.¹⁹

Information gathered from guidebooks for the Montreal Canyon, information from the internet flow survey for the West Branch Montreal, and structured interviews with potential participants in a controlled flow study can be used to choose the flows to evaluate in a controlled flow study. Project operations are known to affect whitewater boating on these river segments, and there is a strong recreational demand for using this reach. The objective of this study would be to improve the precision of estimate flow ranges for whitewater boating using a variety of flows. A quantitative optimal flow range is needed to help refine and inform the development of protection, mitigation, and enhancement measures. A better quantitative evaluation of flow could also help save costs due to generation loss in the future by preventing a higher flow than needed from being released during post-licensing implementation.

The controlled flow study will include an evaluation of at least three different flows. Information from guidebooks, the results of the West Branch Montreal study, and structured interviews with boaters that have used this reach will be used to determine the flows to be evaluated. A survey will be distributed after each of the flows as well as a close-out survey. A focus group discussion will be facilitated after boaters have run each of the flows as well. The

¹⁶ <https://www.americanwhitewater.org/content/River/detail/id/2301/>

¹⁷ At Page 90; Palzer, B. 1998. Whitewater; Quietwater: A Guide to the Wild Rivers of Wisconsin, Upper Michigan, and Northeast Minnesota, Eighth Edition. Menasha Ridge Press.

¹⁸ At Page 72, Svob, M. 1998. Paddling Northern Wisconsin: 82 Great Trips by Canoe and Kayak. Wisconsin Tales and Trails, Inc.

¹⁹ At page 90, Rada, J. 2003. Northwoods Whitewater. Sangfroid Press.

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controlled flow study could be conducted at a time of year when sufficient flows are available and weather conditions permit.

In addition to instream flow needs for recreation, we also request that public access to the river be evaluated and flows for aesthetic enjoyment of both Saxon Falls and Superior Falls be quantified and evaluated.

18 CFR §16.8(b)(5)(ii) Identifying the basis for its determination;

A clear project nexus exists between project operations and recreational opportunities on the Montreal River and the West Branch Montreal River. The two hydropower Projects regulate allocation, timing, levels and distribution of water flows on the two reaches of the Montreal River of interest for whitewater recreation. This regulation influences the spatial and temporal availability of water for a variety of uses including power generation, fisheries, maintenance or riparian connectivity, and recreation.

18 CFR §16.8(b)(5)(iii) Discussing its understanding of the resource issues and its goals objectives for these resources;

Whitewater boating is a flow-dependent activity that occurs on the Montreal River and its two major branches. The river is of considerable interest to the regional whitewater boating community. The primary objective of this study is to quantitatively define the range of flows for whitewater recreation, and to determine the quality and type of experience that different flows provide. The data are necessary to balance recreation needs with needs for fishery resources, ecological and geomorphic processes, and power generation. Specifically there is a need to design the study to provide evaluative information. Existing information regarding flow-based recreational opportunities is descriptive, which is insufficient to adequately evaluate the needs of river-based recreational opportunities in developing a new license for the project. The study outcome should be quantitative data for minimum and optimum flows for each activity and experience.

An integrated analysis that includes a controlled flow study is required to quantitatively describe flow-dependent recreational opportunities in the Project area. Quantitative information will help establish the role the Project plays in addressing instream flow needs and recreational management goals of the National Park Service and American Whitewater.

18 CFR §16.8(b)(5)(iv) Explaining why each study methodology recommended by it is more appropriate than any other available methodology alternatives, including those identified by the potential applicant pursuant to paragraph (b)(2)(vi) of this section;

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License applicants using the Traditional Licensing Process are directed to provide license participants with "detailed descriptions of any proposed studies and the proposed methodologies to be employed."²⁰ In our review of the Pre-Application Document and subsequent filings on the docket, we found no evidence of proposed studies to determine instream flow needs for recreation.

18 CFR §16.8(b)(5)(v) Documenting that the use of each study methodology recommended by it is a generally accepted practice; and

The methodology we propose is generally accepted practice in federal hydropower licensing proceedings where project operations impact river-based recreation. Our proposal follows the integrated approach of Whittaker et al. (2005).²¹ Their approach outlines three "levels" of studies: (1) Level 1 - desktop analysis, (2) Level 2- limited reconnaissance, and (3) Level 3- intensive studies (i.e. controlled flow study). The existence of flow-based recreational opportunities is well documented for this reach making desktop analysis and field reconnaissance unnecessary. For that reason, the applicant should complete Level 3 analysis.

Methods for flow studies to evaluate recreational flow needs at federally-licensed hydropower projects have been peer reviewed.²² The methodology has been employed in approximately 100 proceedings (e.g. Sultan River, Henry M. Jackson, P-2157)²³ including several reaches with existing commercial use.

18 CFR §16.8(b)(5)(vi) Explaining how the studies and information requested will be useful to the agency, Indian tribe, or member of the public in furthering its resource goals and objectives. The public has considerable interest in the opportunities for whitewater recreation on the Montreal River. With a history of boating dating back decades, and regional recognition that the river represents a significant potential whitewater resource, a need exists to quantitatively define river-based recreational opportunities. Whitewater boating as a sport has grown substantially in the State of Wisconsin and nationally in the time since the current license was issued, and this trend is predicted to continue. The results of the study will be useful to the public that has an interest in protection, mitigation, and enhancement of recreational opportunities directly impacts by project operations.

²⁰ 18 CFR §16.8(b)(2)(vi)

²¹ Whittaker, D., B. Shelby, J. Gangemi. 2005. Flows and Recreation: A Guide to Studies for River Professionals. Confluence Research and Consulting.

²² Whittaker, D & B. Shelby. 2002. Evaluating instream flows for recreation: Applying the structural norm approach to biophysical conditions. Leisure Sciences Vol 24(3-4): 363-374.

²³ Henry M. Jackson Hydroelectric Project, FERC Project No. 2157; Filing of Revised Study Plans, FERC eLibrary Accession Number 20060912-5117

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Jacob Ring, Ironwood, MI.
Hello,

I am writing as a whitewater paddler, local businessperson and Ironwood resident, and community activist. Let me start by saying the whitewater in these sections of river is amazing and something that has the right stuff to attract paddlers from far and wide. Ironwood, Michigan is a growing community with a lot of positive change happening right now. As we move forward as a community, having a diverse offering of activities for our residents and visitors is important for quality of life. We do not have nearly the same amount of river user-ship that one would expect on the Montreal River. This is mostly due to the unpredictable nature of rain-dependent summer flows. Recreational releases in summer would allow the regional paddler with a job or family to make plans ahead of time to visit Ironwood. Most folks just cannot drop what they are doing when it rains, however most can plan a weekend to visit if given enough time to plan. Recreational releases will bring paddlers from Wausau, Duluth, the Twin Cities, Milwaukee, Chicago and beyond. When these individuals come to town they will need food, gas, a beer perhaps. Although whitewater may not be the largest sport in the world. It doesn't take much to have a positive effect on these local communities.

In addition to the great economic potential for Ironwood and Hurley(at a time where it is sorely needed!), the timing of potential recreational releases pairs well with a current project I am working on with Ironwood Parks and Recreation. We are currently developing a water trail through the city of Ironwood, a section suited for the novice paddler. As this project moves forward, it supports the diversity of paddlers that may visit the region. Although whitewater is not for everyone, the water trail, whitewater releases, and lake paddling offer something for everyone. This has only become the case in 2020, meaning the current time for recreational releases is now. Kayaking is one of the fastest growing outdoor activities in 2020, and to have an opportunity to be a community that can offer something for everyone has great economic potential.

Recreational releases are as much for the local communities as they are for the paddlers. In this situation, both groups stand to benefit. The beautiful part? It is an absolutely negligible amount of water compared to the storage volume and is generally a win-win for all involved. I hope to see the flow and paddler studies carried out to show this.

Thank you for considering the communities around your dams when you re-license them. I hope everyone who reads this understands that Ironwood and Hurley stand to lose positive economic growth if there are no recreational releases. In a time where the Upper Peninsula is one of the poorest parts of the country, these sort of niche activities that can only happen in our area are the types of creative ways we need to help ourselves as the people who live here. Do not forget the people who live here.

Jake Ring

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Former Water Resources Management Specialist
Ironwood Parks and Recreation Board
Downtown Ironwood Development Authority Board
Gogebic Range Health Foundation Development Committee
Business Owner Ringo Productions
Business Manager Cold Iron Brewing



GRETCHEN WHITMER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF NATURAL RESOURCES
LANSING



DANIEL EICHINGER
DIRECTOR

June 9, 2020

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

Electronic Filing

**RE: COMMENTS ON PRE-APPLICATION DOCUMENT AND STUDY REQUESTS FOR
THE SAXON FALLS (FERC NO. 2610) AND SUPERIOR FALLS (FERC NO. 2587)
HYDROELECTRIC PROJECTS**

Dear Secretary Bose,

The Michigan Department of Natural Resources (MDNR) has reviewed the Pre-Application Document (PAD), for the Saxon Falls (P-2610) and Superior Falls (P-2587) hydroelectric projects. MDNR is the primary state resource agency charged with the management and protection of Michigan's aquatic public trust resources. We respectfully request study of the current status of the aquatic resources, and anticipated effects of the proposed license provisions on natural resources and recreation. The new license for these projects will influence the Montreal River for 40 years. The MDNR cannot make informed decisions regarding the license without up-to-date information on the natural and public trust resources of the Montreal River system. The Licensee proposes both changing and continuing elements of the existing license, however, the context in which all elements of the existing license occur has changed since the prior license was issued. We focus on updating information through studies, and seek further consideration and consultation in areas where we anticipate the most significant management implications of issuing a new license will occur, including: resource studies to address the proposed change in project boundary, inclusion of the role of Gile Flowage operations, continuation of similar Saxon and Superior Falls operations and mitigation of potential drawdowns, protecting sensitive species and their habitats, addressing aquatic invasive species, and land management, and studies to support appropriate recreational access and user experience.

In addition, MDNR requests clarification of characterizations in the PAD and joint meeting and offers the following comments on the PAD.

Comments on the PAD:

The Licensee has characterized its relicensing request as status quo or non-controversial. We find some of the Licensee's proposals are controversial and are concerned about: accounting for Gile Flowage; adequacy of proposed revised project boundaries and associated project elevations; and balancing public trust interests in light of shifts in resources and recreational needs over the decades since the previous license was issued.

1. Gile Flowage: The Gile Flowage was not fully considered in the original license, and its role must be understood, and therefore studied comprehensively. We agree that Gile Flowage operations are relevant to the ecological health of that flowage, as well as the

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www.michigan.gov/dnr • (517) 284-MDNR(6367)

system overall. We have very limited data on the effects of project operations on fisheries within the flowage, as well as water quality and other downstream effects. While time and other activities will almost certainly be shown to have imparted gradual changes to resources considered during the original license, including Gile Flowage as part of any new license is necessary and categorically requires reevaluation of many resource areas.

2. **Project Boundaries:** We request additional information and justification for the elevations the Licensee has presented, which it has used as a basis for significant changes to the project boundary, including removing lands from the project boundary. The Licensee has characterized the elevation changes as correcting an oversight by FERC. The boundary change appears to shift areas included in the project license such that reservoirs may be emphasized over tailwaters, with implications for recreation and resource protection. If allowed, we expect this to have significant effect, and whether it originated as an oversight or not, we want to ensure the license balances the public trust interests in the project.
3. **Balancing interest in public trust resources:** MDNR is concerned it will be difficult to fully evaluate the project with insufficient biological/ecological/use data. To date, the Licensee has provided primarily desktop reviews of information available from other sources which are not project-specific, updated, nor adequate to understand the implications of either continued project operations nor proposed changes moving forward. MDNR seeks to ensure desirable and feasible conditions for environmental resource protection, mitigation, and enhancement are achieved. To accomplish this more thorough, project-specific and recent information will be required. We anticipate conditions on the ground are not the same as when the prior license was issued, and yet most of our information dates to that time period or earlier. We request studies that will help elucidate where and to what effect conditions on the ground have departed from prior condition and provide the basis for mitigation and enhancements to benefit natural resources and the public.

Study Requests:

The Licensee has proposed no studies, and has not proposed any additional protection, mitigation, or enhancement measures for Saxon Falls, Superior Falls or Gile Flowage. The Licensee states existing information does not identify significant concerns or adverse effects of the projects. MDNR finds that determination problematic due to the lack of updated information. Limited information is provided, particularly recent information on the projects and associated resources. While the Licensee proposes to retain many aspects of the existing license, the context in which these activities occur has likely changed. MDNR does not have necessary information to fully evaluate the license provisions proposed, and whether they are adequately protective of natural resources. MDNR manages fisheries and aquatic resources affected by project operations and is responsible for ensure the public trust interests in the projects are maintained. Recognizing that much of the waters are jointly managed with Wisconsin DNR, we believe consultation on specific methodology is warranted, however we provide some general references to assist in evaluating the scope of MDNR's requests.

Resource Studies:

- **Project Boundary Change:** The Licensee should conduct a Habitat Evaluation Procedure to provide a comparative analysis of habitats provided in the reservoir vs.

- tailwater and adjacent lands, including changes associated with the proposed revised project boundary.
- One benefit FERC identifies in many licensed projects is protection of riparian lands. We want to know whether the same kind, quality, and amount of fish and wildlife habitat is provided by the proposed areas to be included in the project boundary. We regard license conditions which prescribe no-harvest buffers as extremely valuable for both aesthetics and riparian habitat protection. While minimum buffer zones are not a panacea, they can reduce soil erosion, increase recruitment of large woody debris, provide shade and promote healthy shoreline communities.
 - Given how uncommon the high-gradient tailwater habitats are compared to reservoirs, we expect that protecting these habitats from inappropriate and non-project developments will be especially important. The Licensee should demonstrate why site-specific conditions make the project an exception.
- **Gile Flowage Operations:** The Licensee should conduct an environmental assessment of potential operations regimes at Gile. The PAD indicates no operation changes are proposed, but the effects of operations including Gile Flowage have not been fully evaluated, including:
- Identification of potential mitigation for drawdown if the allowed bandwidth remains as substantial as presently permitted. While the Licensee has not implemented the full drawdown extent allowed in the "gentleman's agreement," effects of both the implemented and allowed drawdown extents must be understood if substantial drawdowns remain an element of the project license. Drawdowns are generally recognized as harmful to aquatic life and pose a significant disturbance and source of degradation which must be justified.
 - Gile Flowage effects on downstream water quality including parameters usually incorporated in 401 Water Quality Cert.
- **Project Operations and Potential Drawdowns:** The Licensee should conduct a study of potential impacts of project operations, including operating band and drawdowns of various types across the facilities. The Licensee has proposed continuing an operating band of 0.5 feet at Saxon Falls during the ice-free season, a minimum elevation at Superior Falls, and summer and winter drawdowns at Gile Flowage to supplement flows. As described in more detail elsewhere, the impact of continuing these operating conditions on aquatic resources should be clarified using updated survey data, and more fully accounting for the role of Gile Flowage. Drawdown impacts should include potential effects of drawdowns for maintenance, repair, or inspection, and drawdowns under emergency or extenuating conditions at Saxon and Superior Falls or Gile Flowage. The licensee should outline the extent to which it anticipates planned drawdowns will be necessary and assist in developing plans for mitigating negative impacts. Currently, Article 403 of each license does not require stranded organism survey and relocation efforts for Saxon or Superior Falls. Knowledge of what occupies the bottomlands, and what dewatering would look like are critical for mitigating the negative effects of potential future drawdowns at all sites.
- Aquatic Resources Study request: Document aquatic resources present in the reservoir and tailwaters, following standardized fisheries methods, e.g.:
 - Stream Fishery Resources reference:

- Wills, Todd C., T. G. Zorn, and A. J. Nuhfer. 2006. Stream Status and Trends Program sampling protocols. Chapter 26 in Schneider, James C. (ed.) 2000. Manual of fisheries survey methods II: with periodic updates. Michigan Department of Natural Resources, Fisheries Special Report 25, Ann Arbor
- Available from
http://www.michigandnr.com/PUBLICATIONS/PDFS/ifr/Manual/SMII_Chapter26.pdf
 - Impoundment Fishery Resources reference:
Schneider, James C. (ed.) 2000. Manual of fisheries survey methods II: with periodic updates. Michigan Department of Natural Resources, Fisheries Special Report 25, Ann Arbor.
 - Available from
http://www.michigan.gov/documents/dnr/SMII_Assembled_Doc_2017_final_552610_7.pdf
- Depict the likely progression and impacts of operating bandwidths on habitat and aquatic organisms using bathymetry, substrate and other habitat variables so that alternatives can be developed and analyzed.
 - Based on these studies the Licensee should document how proposed operations and alternatives minimize negative impacts, including drawdowns.
 - MDNR routinely requests measures to avoid and minimize negative effects of drawdowns. Where and to the extent drawdowns must occur (e.g. within coffer dams, etc.) we propose protective drawdown and refill rates, timing, monitoring, and require stranded organism survey and relocation efforts.
 - Drawdowns are among the most significant acute causes of mortality to freshwater mussels in Michigan's regulated aquatic systems.
 - Where sensitive resources are potentially going to be affected, the use of coffer dams or modified drawdown rate/timing/duration/extent may be warranted.
 - Hydrographic/Bathymetric maps need to be created/updated in order to be of use for understanding drawdown impacts and mitigation:
 - The PAD Section 4.3.6.1 indicates a literature search did not yield a bathymetric map for Saxon Falls, and 4.3.6.2 indicates Northern States Power does not have a bathymetric map for Gile Flowage. The map provided in the Appendix 4.3.6.3-1 for Superior Falls flowage dates to ca. 1991 and is not of adequate resolution (photo, or contour interval) to be of much use. Updated bathymetry should be collected for the three sites.
 - Freshwater mussel, macroinvertebrate and substrate surveys are necessary. Limited freshwater mussel data are available, and while freshwater mussels are often the focus of our discussion of drawdowns, they are not the only group of interest. Other natural resources can and may warrant further protection efforts, including spawning and nursery areas, and areas subject to instability and aggradation during drawdowns.
 - In Planned and Emergency scenarios, prior identification of nearby potentially stable habitats which could serve as relocation areas is highly beneficial. In addition, prior survey efforts provide the Licensee an opportunity to proactively protect sensitive resources during the planning phases of any maintenance or repair drawdown that may be required.

- **Sensitive species and their habitats:** The Licensee has provided only desktop reviews of data from existing sources, which are useful but also incomplete and often out of date. Recent, local data are necessary.
 - o The Licensee does not propose additional freshwater mussel surveys. The PAD indicates that the only freshwater mussel data available are from WDNR. Those records are from 1975 and represent two species. We believe recent, comprehensive data (i.e. both qualitative and quantitative surveys) for each project should be collected within and outside of the reservoirs. MDNR can provide additional comments and guidance on proposed survey methods to understand the community structure, density and diversity of mussels. We believe quantitative survey efforts will be necessary to capture community diversity, as well as reproductive status. Reference for sampling methodology: Strayer and Smith 2003.¹
 - o We request that the Licensee conduct assessments on the biological resources and communities the project and its vicinity via on-the-ground surveys in addition to desktop analysis they have already presented. The PAD frequently states that no data was available, we would like to make sure that the Licensee provides data needed for consultation on project-related impacts.
- **Aquatic invasive species:** Due to their ability to degrade habitats, and the role of developments in promoting disturbance, Licensees have often been asked to assist in monitoring and controlling invasive species. However, licenses have often been overly-narrow in focus, resulting in inefficiency and facilitating the spread of non-targeted invasive species. We propose Early Detection/Rapid Response, along with education and pathway reduction.
 - o Early detection/rapid response. Baseline study to identify native and invasive plant and animal distribution in the project boundary, project waters, and adjacent riparian areas. We would support utilizing the point intercept method commonly used in Wisconsin for aquatic monitoring, and other systematic methods for baseline inventory or ongoing monitoring in consultation with resource agencies. For a general overview of the EDRR structure, Safeguarding America's lands and waters from invasive species, 2016². In order to determine whether a concerning/potentially emerging species is established or a candidate for aggressive management, the Licensee must first develop updated information on the existing community.
 - o Education and pathway reduction: resources to assist visitors in disposing of potential AIS, durable education materials, Licensee-funded or implemented monitoring efforts for watch-list and other likely emerging invasives, and commitment to control, either in-house or potentially alternative sources such as funding to local cooperative invasive species management groups or

¹ Strayer, D.L., and D.R. Smith. 2003 A guide to sampling freshwater mussel populations. American Fisheries Society Monograph No. 8. American Fisheries Society, Bethesda, Maryland

² The U.S. Department of the Interior. 2016. Safeguarding America's lands and waters from invasive species: A national framework for early detection and rapid response, Washington D.C., 55p. Available from: <https://www.doi.gov/sites/doi.gov/files/National%20EDRR%20Framework.pdf>

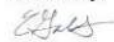
- conservation districts e.g. Northwoods CWMA in Wisconsin, and Western Upper Peninsula Invasives Coalition (WePIC) in Michigan.
- The Licensee has provided only desktop reviews of data from existing sources, which are useful but also incomplete and often out of date. Recent, local data are necessary.
- **Land Management:** The Licensee's proposed land management strategy is unclear. The Licensee should present its proposed land management strategy, including the extent of no-harvest and riparian buffers, as well as timber and land use practices to be allowed or limited. The PAD indicates that the current riparian areas are largely undeveloped, but the Licensee has not described how this would change under the proposed project boundary.

Recreation Study:

- **Recreational access and experience:** The proposed changes in project boundary shift the character of the lands incorporated into the project from riverine/tailwater (including regionally uncommon high-gradient stretches of interest to paddlers) to predominantly reservoir. The benefits to the public arising from the inclusion of these primarily reservoir-occupied lands are different from those stemming from tailwater land. One of the primary recreational uses of the Montreal River is kayaking and canoeing. The Licensee should study, and document these differences, and if differences are documented the Licensee should retain and enhance recreational amenities especially in the project tailwaters and riverine areas. Independent of this change, the PAD indicates that recreational access is sufficient based on Form 80 Surveys. The amenities for Saxon and Superior Falls are minimal, and the condition of existing facilities in relation to recreational needs is not well-supported. The PAD outlines intention to enhance the Saxon Falls Scenic Overlook but doesn't thoroughly explain how and why this area is a priority over other project recreational amenities, including amenities that might be added. In the Form 80 survey provided for Saxon, 50% of use was at an informal site. If additional improvements or new recreation facilities were provided, it is reasonable to expect that more people would utilize them, and that public enjoyment would increase. Further study of aesthetic considerations and recreational benefits is warranted, and options and alternatives should be weighed in consultation with the resource agencies.

Thank you for the opportunity to comment and request studies. If you have any questions or feel additional clarification would help, please feel free to contact me at GulottyE@michigan.gov, or via work cell at 906-282-8300 while the Norway Field Office is closed.

Sincerely,



Elle Gulotty
Resource Analyst
Habitat Management Unit
FISHERIES DIVISION

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Michigan Hydro Relicensing Coalition

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Telephone (231) 775-4321

June 9, 2020

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

Electronic Filing

Re: Michigan Hydro Relicensing Coalition Comments on the Pre-application Document and
Study Requests for the Saxon Falls (P-2610) and Superior Falls (P-2587) Hydroelectric Projects

Dear Secretary Bose:

The Michigan Hydro Relicensing Coalition (MHRC) is a coalition of four statewide, nonprofit conservation groups with an interest in the protection and enhancement of aquatic resources: Michigan United Conservation Clubs, Michigan Council of Trout Unlimited, Great Lakes Council of Flyfishers International, and Anglers of the Au Sable. All members are 501(c)(3) non-profit organizations. The MHRC mission is to ensure that conservation, environmental and recreational concerns are adequately addressed by the Federal Energy Regulatory Commission (FERC) and given the fullest possible consideration throughout the re-licensing process. The MHRC has participated in the majority of hydro re-licensing in Michigan over the past 25 years.

Given our interest in re-licensing of Michigan hydro projects, The MHRC has reviewed the Notice of Intent (NOI) and Pre-application Document (PAD) for the re-licensing of the Saxon Falls and Superior Falls hydro-electric projects on the Montreal River, owned and operated by Northern States Power - Wisconsin (NSPW). These two projects are licensed by FERC (P-2610 and P-2587, respectively). The MHRC respectfully submits the following comments on the PAD.

The licensee concludes in the PAD that very few re-licensing studies are needed and that no mitigation and enhancement measures are proposed. The licensee's stated rationale is that no changes are planned to operations, reservoir levels or minimum flows that would cause adverse impacts to the resources associated with the projects (e.g., water quality, aquatic, terrestrial wildlife, wetlands, etc.), thus no need for studies. The licensee also states that there is no need for mitigation or enhancement as the licensee will continue to comply with the existing license articles and the fact that these projects have been in existence for a century. The MHRC strongly disagrees with these conclusions.

The MHRC supports the re-licensing studies requests proposed by the Resource Agencies (National Park Service, U.S. Fish and Wildlife Service, Michigan Department of Natural Resources, Michigan Department of Environment, Great Lakes and Energy, and the Wisconsin Department of Natural Resources) and NGOs (River Alliance of Wisconsin, Friends of the Gile

Michigan Hydro Relicensing Coalition

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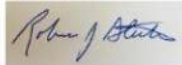
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Flowage). The MHRC feels these organizations have provided good rationale for these proposed studies in terms of stated goals and objectives, public interest considerations, need for additional information, and establishing the nexus between project operations and effects on the resource to be studied (and how the study results would inform the development of license requirements).

The MHRC also feels there is a need for the licensee to develop mitigation and enhancement to offset impacts associated with the continued operation of these projects. As stated above, MHRC disagrees with the licensee's presumption that the status quo is acceptable because the projects have been in place for a century, therefore no mitigation is necessary. On the contrary, unavoidable environmental impacts will occur through the continued operation of these hydropower projects and they need to be addressed. These impacts include habitat fragmentation of the river ecosystem, blockage of free movement of aquatic organisms, increasing downstream water temperatures, obstruction of the transport of sediment and woody debris, and alterations of river flows. There are also effects on public recreation opportunities that need to be addressed.

Thank you very much for your consideration of these comments. The MHRC looks forward to participating in the re-licensing process for the Saxon Falls and Superior Falls hydro projects to ensure that conservation, environmental and recreational concerns are adequately addressed and given the fullest possible consideration. Please contact me if you have any questions.

Sincerely,



Robert J. Stuber, Executive Director
Michigan Hydro Relicensing Coalition

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June 9, 2020

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

Electronic Filing

**Re: National Park Service Comments on the Pre-application Document and Study Request
for the Saxon Falls (P-2610) and Superior Falls (P-2587) Hydroelectric Projects**

Dear Secretary Bose:

The National Park Service (NPS) respectfully submits the following comments on the Pre-application Document (PAD) for the Saxon Falls (P-2610) and Superior Falls (P-2587) Hydroelectric Projects. The NPS is also submitting three study requests: 1) a comprehensive recreation study request, 2) a recreation flow study request, and 3) an aesthetics flow study request

The NPS has authority to consult with the Federal Energy Regulatory Commission (FERC) and applicants concerning a project's effects on outdoor recreation resources under the Federal Power Act (18 CFR 4.38(a), 5.41(f)(4)-(6), and 16.8(a)); the Outdoor Recreation Act (Pub Law 88-29), and the NPS Organic Act (39 Stat. 535). It is the policy of the NPS to represent the national interest regarding recreation and to assure that hydroelectric projects subject to relicensing incorporate the full potential for meeting present and future public outdoor recreation demands while maintaining and enhancing a quality environmental setting for those projects. Investigating opportunities to improve the recreation experience is consistent with NPS policy and FERC guidelines to identify potential future recreation needs.

A. NPS COMMENTS ON THE PAD

The NPS recognizes that the PAD covers the Saxon Falls and Superior Falls Hydroelectric Projects and the Gile Flowage Facility, currently unlicensed. When referring to Saxon Falls and Superior Falls, the term "Projects" is used; when discussing Gile Flowage concerns, the term "facility" is used.

1. Proposed Project Boundary Reductions

The Applicant proposes changing the boundary of the Saxon Falls Project in Section 3.2.2 (p. 14) and changing the boundary of the Superior Falls Project in Sections 3.4.2 (p. 27). Such proposals involve reducing the acreage within the project boundaries to “only include areas required for Project operation.” The NPS is concerned that the resultant boundary reductions could limit the ability to enhance recreation opportunities in the project areas by reducing the area where crucial recreation support facilities may be needed.¹

FERC issued Order 313 (30 FR 16197) to ensure that the ultimate development of recreation resources at all projects is consistent with the area's recreational needs. Under FERC Order 313, licensees are required to:

1. Acquire lands to assume optimum development of the recreational resources afforded by the project
2. Develop suitable public recreational facilities with adequate public access, considering the needs of physically handicapped persons in the design of facilities and access
3. Coordinate efforts with other agencies in the development of recreation areas and facilities
4. Provide for planning, operation, and maintenance of these facilities
5. Inform the public of opportunities for recreation at licensed projects

The NPS is concerned that reducing the project boundaries would limit the ability of the project to meet recreational needs. In addition, the project boundary is not limited to only those lands necessary or appropriate for the maintenance and operation of the project. The FERC definition of the project boundary includes “other project purposes.” These other project purposes include protecting or enhancing resources (e.g., fish and wildlife) or non-power related uses (e.g., recreation and aesthetics), as defined under 18 CFR 4.41(h)(2):

The boundary must enclose only those lands necessary for operation and maintenance of the project **and for other project purposes, such as recreation**, shoreline control, or protection of environmental resources. Existing residential, commercial, or other structures may be included within the boundary only to the extent that underlying lands are needed for project purposes (e.g., for flowage, public recreation, shoreline control, or protection of environmental resources) (*emphasis added*).

Based on the definition of project boundary, plus the mandate for hydropower projects to meet recreational needs, the Applicant should not reduce the current project boundaries (and, if necessary, consider the potential need to expand them) until it is determined that they are not necessary for other project purposes, including meeting the area's recreational needs.

¹ Such recreation needs cannot be determined until a comprehensive recreation study is conducted, as the one requested by the NPS in this letter.

2. Limited information the North Country National Scenic Trail

The North Country National Scenic Trail is briefly discussed in Section 4.8.3.1 of the PAD (p. 101). This trail was designated a National Scenic Trail by the Congress on March 5, 1980 and is administered by the NPS in accordance with the National Trails System Act. A section of the North Country National Scenic Trail transects the Superior Falls Project Area upstream of Superior Falls Dam along Wisconsin Highway 122/Michigan Highway 505. The applicant should provide additional details about the trail, such as the length of trail within both the existing and proposed Project boundaries.

3. Recreation Concerns

a. General Lack of Recreation Data

The Federal Power Act requires licensees to equally consider non-power resources including recreation. The Applicant is not currently planning recreation studies for the Projects or Gile Flowage; the NPS recommends that the Applicants conduct such studies. A recreation study is needed to inform the license decision and for the development of a recreation resource management plan (RRMP) and, if needed, a Shoreline Management Plan as required by FERC (18 CFR 4.51(f)(5)). The study is required because existing information about the current and projected recreation resources, use characteristics, and needs is insufficient. As previously stated, FERC requires studies relative to recreation resources including the development of an RRMP and to do so in consultation with the NPS.

Existing information in the PAD is not adequate to develop a comprehensive RRMP nor would it serve to inform FERC's equal consideration of the power and non-power values of the Montreal River and West Fork of the Montreal River in its licensing decision or help identify measures needed to protect, mitigate and enhance recreational resources. The PAD does not include a description of the uniqueness of the Gile Flowage as a bi-state asset of natural, recreational, and economic (ecotourism) resource significance.

b. Insufficient Discussion of Important Boating Opportunities Directly Affected by Project Operation

In Section 4.8.1.4 on page 93 of the PAD, the Applicant identifies Saxon Falls Tailwater Access as an informal recreation site serving as a put-in below the powerhouse for canoers and kayakers to access the Montreal River Canyon. That section also mentions that a phone number is available to the public where boaters can check discharge from the Gile Flowage and Saxon Falls dam. In Section 4.8.1.4, there is a brief description of the Montreal River Canyon and that access is available via the Montreal River at a kayak put-in location near the Saxon Falls powerhouse and a take-out location approximately 3 miles downstream at the Superior Falls take-out adjacent to the Wisconsin Highway 122 bridge. The Superior Falls take-out is also identified in Section 4.8.3.2 on page 101 of the PAD.

The above discussion of whitewater boating opportunities in Montreal Canyon is insufficient. The 3.1-mile section of river from below Saxon Falls to Hwy. 122 offers highly sought-after

whitewater boating opportunities that are rare in the region. American Whitewater describes the Montreal Canyon run as an “[e]xtremely scenic play run. It’s hard to believe you are in the Midwest when you are in the canyon.”² The Wisconsin Trail Guide describes boating in this section of river as follows:

*Many consider this as one of the premier, advanced whitewater runs in the Upper Midwest. The canyon run features long continuous stretches of wavy class II to III rapids and ledges with numerous holes and excellent play spots. At high water levels, a few of the drops and long pitches rate class IV forming large haystacks and wave trains.*³

Two other sections of river that offer boating opportunities that are directly affected by project operations that are not mentioned in the PAD. One is the 14.4-mile section from Highway 2 to Saxon Falls Dam,⁴ which includes a 1-mile section of West Fork Montreal River. With less intense rapids (rated Class I-II by American Whitewater), this section of river offers more relaxed opportunities for novice boaters, as well as a longer trip.

The second section of river directly affected by project operation not mentioned in the PAD is the 6.3-mile section of the West Fork Montreal River from Gile Falls below Gile Flowage to Highway 2. American Whitewater claims that this section of river contains one of the longest Class IV rapids in the state, and further describes boating opportunities in the river as follows:

*The West Branch of the Montreal is a low-volume river located on the south shore of Lake Superior in northern Wisconsin, USA. On the stretch of the West Branch between Gile Falls and Highway 2 a popular class IV- whitewater run exists. Although this stretch hosted the National Wildwater Championships in 1992 and the Pan Am races in the early 1980’s, paddlers can generally only find adequate flows for whitewater runs during a week or two in early spring when the reservoir upstream spills.*⁵

In order to understand boating opportunities and needs in the project vicinity, the Applicant needs to provide detailed information on the three above-mentioned sections of river affected by project operations. The NPS is requesting a boating flow study which includes each of these three sections in order to obtain this needed information.

1. Below Saxon Falls to Hwy. 122 (3.1 miles), known to boaters as “Montreal River Canyon”
2. Highway 2 to Saxon Falls Dam (14.4 miles)
3. Gile Falls to Highway 2 (6.3 miles), known to boaters as “The West Branch”

² <https://www.americanwhitewater.org/content/River/detail/id/2301/>

³ <http://wisconsintrailguide.com/paddle/montreal-river.html>

⁴ This is an shorter alternative to the 17.9-mile Nylund Road to Saxon Falls Dam, both of which are described by [American Whitewater](#). The Nylund Road to Saxon Falls Dam includes 3.5-miles of the Montreal River that are not directly affected by project operations.

⁵ <https://www.americanwhitewater.org/content/Article/view/articleid/29874/display/full/>

4. Aesthetic Flow Concerns

Water flowing over natural falls and spillways is a highly valued river-related resource. The experience of viewing adequate aesthetic flows over a vertical drop is almost as greatly valued, if not more so, than being on the river itself. The aesthetic qualities of flowing water have several elements; water volume is among the most important. The enchantment of viewing falling water depends on the sight, sound, and feel of the moving volume of water. The FERC's laws recognize the aesthetic value of flowing water and provide provisions to protect and enhance these flows, considered a "non-power value" which receive "equal consideration" with power values.

The Applicants propose no studies for aesthetic flows in the project areas, each of which contains one of the ten highest waterfalls in Wisconsin: Saxon Falls and Superior Falls. The NPS commends the Applicant for their intention to create a formal Saxon Falls Scenic Overlook on the Wisconsin side of the Montreal River to provide a safe location to observe the Saxon Falls waterfall; we look forward to developing a concept design for this facility. In addition to a formal viewing area, detailed information is needed to understand the aesthetic qualities of various flows over the falls. The current minimal flows released into the bypass reach of the Montreal River immediately below the Saxon Falls Dam and over the falls is 5 cfs or inflow (whichever is less) during ice-free season (i.e. ice-out to October 31). The PAD states that part of the reason for the release is to protect aesthetic resources, but no mention is made regarding how the determination was made that 5 cfs was sufficient for aesthetic purposes. Information is needed to determine public preferences for aesthetic flows over Saxon Falls. For example, a quick Internet search indicated that higher flows were more aesthetically pleasing:

- *When the water is high it is especially impressive.*⁶
- *One of the largest falls on the Michigan/Wisconsin border, Saxon Falls is deeply impressive during high flowage times.*⁷
- *The first [waterfall], Saxon Falls, is located just above the put-in and has a total drop of 90 feet. Unfortunately, the falls normally run at a trickle, only providing a full cascade during a dam release from the Saxon Falls Dam a short distance upstream*⁸

Similarly, details of public preferences for aesthetic flows over Superior Falls waterfall is also lacking in the PAD. Superior Falls waterfall is located in the bypass reach of the Montreal River between the dam and powerhouse. Under current operating conditions, a minimum flow of 8 cfs is released into the bypass reach from the Saturday before Memorial Day to October 15 of each year. A minimum flow of 20 cfs into the bypass reach is required between 8 am and 8 pm on weekends and holidays during the same timeframe. The stated purpose of these flows is to "maintain aesthetics." However, like with the Saxon Falls Project's "aesthetic flows," no detail is provided on how public preferences for these aesthetic flows were determined.

⁶ <https://gowaterfalling.com/waterfalls/saxon.shtml>

⁷ <https://www.theoutbound.com/wisconsin/hiking/hike-to-saxon-falls>

⁸ <http://wisconsintrailguide.com/paddle/montreal-river.html>

B. NPS STUDY REQUEST #1: COMPREHENSIVE RECREATION STUDY

The NPS recommends the following study request which addresses each of the seven study criteria as required under 18 CFR §5.9.

1. Criteria 1: Study Description and Objectives (§5.9(b)(1)):

The comprehensive recreation study that the NPS proposes involves a detailed condition assessment and inventory of project and facility related recreation facilities to evaluate whether recreation needs are being met within the proposed project boundaries. These steps are followed by a demand analysis which contributes to the overall recreation study: comparing demand to the inventory and condition assessment allows further evaluation of existing and projected recreation needs within the project and facility areas. This recreation study will comprise the following elements:

- 1) Project and Facility Recreational Facility Inventory and Condition Assessment
- 2) Project and Facility Recreational Facilities Accessibility Assessment
- 3) Project and Facility Recreation Demand Analysis

The information from the recreation inventory and condition assessment, accessibility assessment, and demand analysis is necessary to determine potential future improvements to or expansion of recreation facilities within the proposed project boundaries. The objective of this recreation study is to determine the condition of existing recreational facilities, their capacity to address current and future user demand, and to provide the basis for making recommendations for improving/enhancing recreation opportunities.

2. Criteria 2: Resource Management Goals (§5.9(b)(2)):

The NPS has authority to consult with the FERC and applicants concerning a proposed project's effects on outdoor recreation resources under the Federal Power Act (18 CFR §§ 4.38(a), 5.41(f)(4)-(6), and 16.8(a)); the Outdoor Recreation Act (PL 88-29) and the NPS Organic Act (16 USC et seq.). The WSR Act (section 11(b)) also directs the NPS to assist, advise, and cooperate with governments, landowners, or individuals to plan, protect, and manage river and river-related resources. It is the policy of the NPS to represent the national interest regarding recreation and to assure that hydroelectric projects subject to licensing recognize the full potential for meeting present and future public outdoor recreation demands while maintaining and enhancing a quality environmental setting for those projects. It is in the public interest to analyze impacts and trade-offs, provide mitigation to these impacts and evaluate opportunities for recreation in the future. The FERC guidelines and the Federal Power Act also provide direction to give equal consideration to other non-hydropower resources including recreation. As federal agencies operating in the public interest, both NPS and FERC are charged with making resource management decisions based on sound information about public needs and interests, including interests in recreation resources.

3. Criteria 3: Resource Agency Status of Requestor and Relevant Public Interest (§5.9(b)(3))

The NPS is a resource agency. It is in the public's interest to fully document recreation opportunities and potential for improvements in this important window of relicensing. Existing and potential future recreation must be evaluated during the FERC licensing process (18 C.F.R. 4.51).

4. Criteria 4: Existing Information and Need for Additional Information (§5.9(b)(4))

The PADs provide a brief overview of recreation opportunities in the project vicinities, including those found within the current Saxon and Superior Falls project boundaries and Gile Flowage facility boundary. No detail is provided on the condition of such facilities, statistics on visitor use and user preferences, and recreation demand. Additional information is also needed on project area hydrology, recreation boating use of the Montreal River and three sections of the West Fork Montreal River which run through the two project boundaries and Gile Flowage and river segments outside of project boundaries but affected by project operations; project and facility operations effects on those opportunities; and how recreationists access reaches of the rivers in the project or facility area, including portage sites. The PAD also lacks a description of potential improvements that could help enhance recreation experiences. In addition, while the PAD identifies in Section 4.8.5 (p. 108) that Americans with Disabilities Act (ADA) needs are accommodated in several locations in the vicinity of the Saxon Falls Project, Gile Flowage, and Superior Falls Project, it does not identify any ADA-compliant facility within the project and facility areas. Opportunities for the disabled to access Project facilities need to be identified to provide accessibility or other upgrades to meet current and future user needs.

5. Criteria 5: Nexus to Project (§5.9(b)(5))

A clear nexus exists between project and facility operations and recreational opportunities on the Montreal River, West Fork Montreal River, Saxon and Superior Falls reservoirs, Gile Flowage, and associated shoreline. Saxon and Superior Falls dams limit flows in the Montreal River and alter recreation opportunities downstream of the dams. Similarly, flows out of Gile Flowage dam are regulated for Project purposes and alter recreation opportunities downstream of the dam on both West Fork Montreal and the Mainstem Montreal rivers. In addition, the changes of 15' in Gile Flowage surface elevation create and restrict other recreation opportunities on and surrounding Gile Flowage.

Continued recreation is an important benefit of most hydroelectric projects, and FPA regulations require consideration for protection and enhancement of recreational opportunities. FERC's policies include ensuring that the ultimate development of recreation resources at licensed projects is consistent with area recreation needs and with the primary project purpose. To plan for future needs for recreation within the proposed project boundaries, data on existing recreation facilities and their respective conditions is necessary to make informed decisions about the development needs required through the term of the new project FERC license. Information is needed on shoreline aesthetics and other impacts of erosion at Gile Flowage resulting from pond level fluctuations.

6. Criteria 6: Study Methodology (§5.9(b)(6))

An inventory of recreation opportunities and facilities, and determining recreation demand using field observations, user surveys, and focus groups is consistent with generally accepted practices employed during hydroelectric relicensing proceedings. Evaluating outdoor recreation facilities per the Architectural Barriers Act Accessibility Guidelines⁹ is a common technique to establish the level of accessibility at outdoor recreation areas and recreation facilities. Studies inventorying and assessing shoreline erosion impacts are commonly done associated with relicensing and are readily available.

c. Study Area

The area of focus for the recreation facilities condition assessment and demand analysis consists of existing project recreation areas within the existing boundaries surrounding the Saxon and Superior Falls Projects, as well as within the Gile Flowage facility boundaries. The area of study for shoreline erosion aesthetic impacts is the entire Gile Flowage shoreline.

d. Study Sites

All existing developed and dispersed recreation sites within the Saxon Falls and Superior Falls project boundaries and Gile Flowage facility boundaries should be inventoried, including formal and informal trails, formal and informal access and camping sites on shore and islands, and scenic viewing locations. The inventory should identify current use, current conditions, and any impacts that the project might have on these. We recommend consulting NPS and other stakeholders in developing the survey instruments and protocol. Particular attention should be given to these facilities within the project/facility boundaries:

Saxon Falls Recreation Sites

- Saxon Falls Boat Landing
- Saxon Falls Scenic Overlook
- Saxon Falls Tailwater Access

Superior Falls Recreation Sites

- The North Country National Scenic Trail
- Superior Falls Canoe Take-out
- Superior Falls Scenic Overlook
- Superior Falls Tailwater Fishing Area

Gile Flowage Recreation Sites

- Sucker Hole Landing
- Town of Pence Landing

⁹ <https://www.access-board.gov/guidelines-and-standards/buildings-and-sites/about-the-aba-standards/aba-standards/chapter-10-recreation-facilities>

- County C Landing
- Gile Park Landing

e. Study Methods

This recreation study has three components: (a) existing facility inventory and condition assessment, (b) recreational facilities accessibility assessment, and (c) a recreation demand analysis.

Existing Facility Inventory, Condition Assessment

The existing facility inventory and condition assessment portion of this recreation study consists of two steps: (1) site facility inventory and (2) field reconnaissance/condition assessment. The facility inventory and condition assessment will inform the demand analysis and will also evaluate the condition of each of the facilities at the listed recreation sites. The inventory also includes condition of shoreline erosion at Gile Flowage and its impacts on aesthetics.

Step 1 –Site Inventory.

This recreation study will inventory the number and type of components that are provided at the recreation sites listed above. The existing facility inventory should include identification and location of parking spaces, picnic units, boat landings/ramps, bathrooms, camp sites, and other facility components. Trails, including scenic overlook and river access trails, will be inventoried for signage, types of improvements, general widths, substrate (e.g., gravel, rock, grass, ramp, etc.), slope, presence and condition of stairs and rails, erosion impacts at access sites, and general trail conditions. Informally created user trails and sites (i.e., sites along shorelines and islands that are frequented by recreation users but not identified as FERC designated Project facilities) will also be identified and assessed. In addition, shoreline erosion and its impacts on aesthetics at Gile Flowage will be identified.

Step 2 – Field Reconnaissance/Condition Assessment.

The field reconnaissance should include a physical condition inspection of existing Project recreation facilities and trails, as identified under Step 1. The reconnaissance should also identify observable use patterns and field verify if recreation amenities are constructed and in a condition that serves user needs. User created sites should be identified for observable use and wear patterns.

The following steps should be taken to complete the facilities inventory:

1. Complete reconnaissance level field research: conduct fieldwork to create a detailed inventory on the conditions of existing recreation facilities and other user created sites within the study area for the recreation study with observable wear patterns.
2. Assemble the results and create maps of data collected in the field.

The condition assessment will be qualitative based on a range of repair/replacement/maintenance needs to acceptable appearance and function to evaluate the condition of recreation

facilities. Photos should be taken of facilities, signs, trailheads, etc., and cataloged based on feature type or location. Other user created sites with observable wear patterns within the project areas should be cataloged for further evaluation within the recreation study.

Existing Facility Accessibility Assessment

Project-related recreation facilities should be assessed for applicable accessibility/ADA requirements. The facility inventory assessment and facility accessibility assessment field work should be completed concurrently.

Recreation Use Demand Component

The Recreation Use Demand Component of this Recreation Study consists of 6 steps: (1) observational survey; (2) visitor use questionnaire; (3) review of research publications and existing information; (4) assessment of regional uniqueness and significance of the project areas' primary recreation opportunities; (5) interviews with user/friend's groups and recreation providers; and (6) a regional demand assessment. The steps are described in more detail below.

Step 1 – Observational Survey.

Observed recreation use occurring in the project areas based on observational surveys should be used to estimate existing use. Multiple observational surveys should be conducted year-round, with an emphasis on the summer and on holidays. Timing and sampling frequencies should be based on estimated use levels and the survey should be conducted on different types of days (weekday, weekend, holiday, or opening of fishing season). The observation data that should be recorded includes vehicle counts, angler counts, boat counts, trail/portage user counts, and day use/picnic area usage.¹⁰

Step 2 – Visitor Use Questionnaire.

A concise questionnaire focusing on visitor use and experience should be fielded at the identified recreation sites when people are present. The survey should be conducted during various days during the survey period including weekdays and weekend as well as holidays. A review of past visitor data should be assessed to determine appropriateness of target survey dates with considerations for current season use patterns and any potential unexpected conditions taken into account. The questionnaire should be crafted to collect information from recreationists about recreation, activity participation, accessibility needs, areas visited, group size, user conflicts, perceived crowding, visitor profile, visual impressions, and satisfaction with or desire for recreational opportunities and facilities in the project areas. The questionnaire should provide an opportunity for visitors to express any potential concerns over the current condition of and future possibilities for recreation and recreation facilities in the project areas.¹¹ The draft questionnaire should be shared with NPS and other interested stakeholders for comment.

¹⁰ **Covid pandemic provision #1:** Collecting observation data should be deferred to 2021.

¹¹ **Covid pandemic provision #2:** Visitor use survey would need to be address use perceptions from years past, not from 2020 due to visitation limitations.

Step 3 – Review of Research Publications and Existing Information.

Recent relevant Wisconsin and Michigan-based user preference surveys and other outdoor recreation surveys about recreation demand in the project areas should be gathered and reviewed. These include the most recent state and county recreation management plans identified in the PAD including the Wisconsin and Michigan Statewide Comprehensive Outdoor Recreation Plans (SCORPs). The Applicants should also search for more current surveys that analyze the project and facility areas' outdoor recreation participation rates and growth needs in northern Wisconsin and Michigan to help address how the project recreation facilities are helping to meet demands of the greater area. Demand and user preference studies at various scales, covering Wisconsin and Michigan, but especially those addressing northern sections of the states, should be reviewed for their applicability to the project areas. Recreation activity and participation trends information should be examined from the existing demand studies and reports.

Step 4 – Assessment of Regional Uniqueness and Significance of the Project Areas' Primary Recreation Opportunities.

Regional uniqueness and significance of the project areas' primary recreation opportunities should be evaluated. Site-specific factors that contribute to the uniqueness of the project areas can inform the demand analysis and needs assessment. Where available, information should be gathered for sites including types of designation including water/canoe trail designation, types of recreation opportunities available, visitation statistics (including information on visitors' origin), and general popularity for regional outdoor recreation areas.

Step 5 – Interviews with User Groups and Recreation Providers.

Interviews should be conducted with a variety of identified regional and local recreation providers, user groups, and outdoor recreation tourism organizations associated with recreation in the project areas and in the project vicinity. Examples include Friends of Gile Flowage, American Whitewater members, Friends of the North Country National Scenic Trail, and the Chambers of Commerce in Hurley, Wisconsin, and Ironwood, Michigan. These entities should be interviewed to gather additional information on current use, user preferences and needs (including instream flows for recreation in the bypass reach), perceived regional uniqueness and significance of recreation opportunities within the project areas, existing data, and observations in the project areas for both existing and potential future users.

Step 6 – Regional Demand Assessment.

The recreation demand analysis should compare demand with the existing supply of recreation opportunities and use patterns. A gap analysis should be performed by comparing relative demand to supply, with consideration for trends and variations in user groups based on research and forecasts of population growth. By comparing this information to a detailed inventory of existing recreation opportunities and using information gathered in the observational surveys, visitor use questionnaires, structured interviews, and focus groups, it will be possible to determine whether there is a need for modifications to existing facilities and/or for the development of additional facilities and recreation amenities.

f. Analysis

The information gathered by the recreation study will assess the suitability of facilities in terms of meeting the changing needs of recreation users in the project areas. The analysis will include developing existing and projected visitor-use estimates, along with existing and projected demand (including unmet demand) for recreational opportunities. The facility and shoreline erosion inventory assessment data collected should be analyzed to identify short- and long-term improvement needs over the term of the new license. The recreation demand analysis should provide relevant information about user preferences and needs as related to recreation facilities provided by the Project. The draft report should be shared with NPS and other interested stakeholders for comment.

7. Criteria 7: Level of Effort and Cost (§5.9(b)(7))

The cost would be contingent on the billing rate arrangement with the Applicants' consultants (rate is not known).

C. NPS STUDY REQUEST #2: RECREATIONAL FLOWS STUDY

The following study request addresses each of the seven study criteria as required under 18 CFR §5.9.

1. Criteria 1: Study Description and Objectives (§5.9(b)(1)):

This purpose of this study is to evaluate the impacts of the Projects on existing and potential boating opportunities in the Montreal River and West Fork Montreal River:

1. Below Saxon Falls to Hwy. 122 (3.1 miles Montreal River), known to whitewater boaters as "Montreal River Canyon"
2. Highway 2 to Saxon Falls Dam (14.4 miles: 1-mile West Fork Montreal River and 13.4 miles Montreal river)
3. Gile Falls to Highway 2 (6.3 miles West Fork Montreal River), known to whitewater boaters as "The West Branch"

All three uniquely different sections of river are affected by flows controlled by Gile Flowage and Saxon Falls Project. The objective of the study is to determine which flows are preferred by boaters passing through each of the three river sections as well as which flows are acceptable and unacceptable.

The components of the study should include: (1) hydrologic analysis and description of the project and facility as they impact the rivers in the project and facility vicinity; (2) recreation user and stakeholder focus group; (3) the potential for a controlled flow study to determine minimum and optimal flows for boating, if warranted by findings of hydraulic analysis; and (4) report on recreation opportunity and potential improvements.

2. Criteria 2: Resource Management Goals (§5.9(b)(2)):

The NPS has authority to consult with the FERC and applicants concerning a proposed project's effects on outdoor recreation resources under the Federal Power Act (18 CFR §§ 4.38(a), 5.41(f)(4)-(6), and 16.8(a)); the Outdoor Recreation Act (PL 88-29) and the NPS Organic Act (16 USC et seq.). The WSR Act (section 11(b)) also directs the NPS to assist, advise, and cooperate with governments, landowners, or individuals to plan, protect, and manage river and river-related resources. It is thus the policy of the NPS to represent the national interest regarding recreation and to assure that hydroelectric projects subject to licensing recognize the full potential for meeting present and future public outdoor recreation demands, while maintaining and enhancing a quality environmental setting for those projects. FERC guidelines and the Federal Power Act also provide direction to give equal consideration to other non-hydropower resources.

3. Criteria 3: Resource Agency Status of Requestor and Relevant Public Interest (§5.9(b)(3))

The NPS is a resource agency. It is in the public's interest to fully document recreation opportunities and potential for improvements in this important window of relicensing. Recreational boating on the Montreal and West Fork Montreal rivers is impacted by project operations and as part of the licensing effort recreation needs must be considered as per FERC guidance to evaluate existing and potential future recreation needs (18 C.F.R. 4.51).

4. Criteria 4: Existing Information and Need for Additional Information (§5.9(b)(4))

The PAD provides only cursory information on boating use and opportunities on the bypass reach on the Saxon Project through Montreal Canyon. The PAD does not mention the other two river sections affected by project operations (Highway 2 to Saxon Falls Dam and Gile Falls to Highway 2). Limited information of all three rivers is available on the Internet such as American Whitewater's website and Wisconsin Trail Guide website; more information is needed on project area hydrology, boating opportunities, project operations effects on those opportunities, and how recreationists access the three river sections. The PAD also lacks a description of potential improvements that could enhance boating experience.

American Whitewater conducted the *West Branch Montreal River Internet Flow Study*¹² in 2007 that provides some information on flows preferred by boaters in the Gile Falls to Highway 2 section. The following excerpt summarizes some of the findings of the study:

Whitewater paddlers who responded to the internet survey were enthusiastic about the possibility of scheduled releases. Many expressed difficulty in predicting runnable flows for the West Branch and some respondents had never done the run due to the extremely short season when adequate flows spilled from the dam. Respondents articulated a need for whitewater opportunities in the warm weather summer months in the upper Midwest and many were willing to travel long distances for scheduled releases on the weekend. Results from the impact

¹² [Stanford, E. and T. O'Keefe \(2007\)](#)

acceptability curve suggest that instream flow releases of 600-1,000 cfs would be acceptable to a majority of river users. A Saturday release was favored by 56% of respondents and the average preferred time and duration for instream releases were 10am and 6 hours respectively. (p. 2)

While the reliability of the study is limited due to the methods used (e.g., internet studies are by nature a biased and hard to control medium for conducting research, and over one-third of those surveyed had not completed the stretch of river), it does provide important insights on acceptable instream flow levels on the West Fork Montreal River that can inform the necessary more robust whitewater boating flow study.

5. Criteria 5: Nexus to Project (§5.9(b)(5))

A clear nexus exists between project operations and recreational opportunities on the Montreal and River West Fork Montreal River. The 3.1-mile section of the Montreal River below Saxon Falls to Highway 122 is located in the bypass reach of the Saxon Project and is directly affected by flow releases of the Saxon Falls Project. The 14.4-mile Highway 2 to Saxon Falls Dam section that includes both the West Fork Montreal River and mainstream Montreal River and the 6.3-mile section of the West Fork Montreal River from Gile Falls to Highway 2 are directly affected by flow releases out of Gile Flowage Dam. While the Gile Flowage is not currently licensed by FERC, it is operated for project purposes.¹³ The PAD states the purpose of the Gile Flowage as follows:

The Gile Flowage was created to augment river flows during summer and winter low-flow periods at the downstream Saxon Falls and Superior Falls Projects. Both Projects are heavily dependent upon flow augmentation from the Gile Flowage during these low-flow periods.

This section of river is greatly valued by whitewater enthusiasts but is greatly limited to few days of use due to low flows coming out of Gile Flowage Dam for project purposes. There is thus a clear nexus between project operations and recreation boating opportunities below Gile Flowage Dam on the West Fork Montreal River. These effects extend down to and beyond the confluence with the Montreal River to Saxon Falls Reservoir.

6. Criteria 6: Study Methodology (§5.9(b)(6))

The recommended study methods are those presented in *Flows and Recreation: A Guide to Studies for River Professionals* (Whittaker, Shelby and Gangemi 2005). The methods described in the guide are consistent with generally accepted practices in the scientific community. This is a phased approach where the results of a “Level 1” assessment are used to determine whether a “Level 2” assessment is warranted, while the results of a Level 2 assessment are used to determining whether a “Level 3” assessment is warranted.

¹³ FERC has recently initiated a review of the Gile Flowage to determine whether it is subject to the Commission’s mandatory licensing jurisdiction under section 23 of the Federal Power Act (FPA). This is based on the stipulation that storage reservoirs that are not directly connected to other project works must be licensed if they are necessary or appropriate in the maintenance and operation of a complete unit of hydropower improvement or development (85 FR 7542 [Feb. 10, 2020]).

A **Level 1 Assessment** includes:

1. **Literature Review:** Review and summarize existing documents with information about recreation opportunities or the river's physical characteristics that make it attractive for recreation.
2. **Hydrology Assessment:** Summarize hydrology for the reach and the hydrologic relationship between river gauges and the river flows of this reach. Describe how the project operations work and affect the hourly, daily, and monthly flows and potential recreation opportunities. This summary of information may also include interviews with people knowledgeable about the river system and the gauges on the river.
3. **Interviews, Recreation Focus Group, and Stakeholder Meeting:** Interviews should be conducted with key resource experts and recreation users to gain additional information about recreational opportunities and the project's hydrology. A stakeholder and focus group meeting should be conducted with recreation users with the purpose to further identify the recreation flows, access to the project, and potential needs. The meeting should include a presentation on the results of the hydrology analysis and existing information on recreation access and boatable flows. It should also serve to gather input from recreation users on use, optimum boatable flows access, and other potential needs for improvements to enhance the experience.

The focus groups should include recreational boaters, NGOs, and agency recreation staff. They should include questions about 1) how people use the river, with the goal to describe the character of recreation opportunities and identify flow-dependent attributes; 2) the effects of flows on those attributes and whether participants can identify specific flows that affect the quality of opportunities; and 3) how to prioritize opportunities and identify recreation users' need for improved access and flow information. Interviews with agency staff will include questions about facility and use information, as well as relevant hydrology information.

4. **Report:** The results of the two study components should be summarized in a report that describes the hydrology optimum recreation boating flows, and project effects on recreation flows; recreation access to the project; and potential improvements and information needs to consider as part of the licensing process. The report should be released in draft form to interested stakeholders with an opportunity to provide comment.

The report should also include documentation of the recreational needs and explicit analysis for whether studies should progress to Level 2. The decision rests on the answers to these basic questions:

- a) Are there flow-dependent recreation opportunities available in the subject stream reaches?
- b) Are flow-dependent opportunities affected by project operations?
- c) Are flow-dependent recreation opportunities "important" relative to other resources or foregone generation?
- d) Does Level 1 information precisely define flow ranges?

If the answers to these questions are outstanding, a **Level 2 Assessment** will be necessary. This involves:

1. **Site Visits:** A site visit with experienced boaters will provide stakeholders with an enhanced understanding of project operations and an opportunity for dialogue on what, if any, changes may be desirable. Participants should scout each river reach to examine the quality and characteristics of boating opportunities, estimate potential flow ranges, identify obvious hazards, and determine whether an on the water flow study is necessary to evaluate recreation boating opportunities.
 - A site visit should be planned for the spring or early summer. This will offer a greater probability of observing higher than base flow levels. It also provides sufficient time to develop preliminary hydrology information about higher flows, become familiar with the resource via interviews and existing literature, and set up logistics with local recreational boaters who may help guide the site visit. The site visit should include evaluations of the three reaches for all recreation opportunities.
2. **Report:** The Level 2 report should include an assessment of the study participant's evaluations of the potential quality and characteristics of the boating opportunities, including difficulty, type of run, and the type of craft suitable for the run. The report should also describe potential flow ranges, obvious hazards, and recommendations for implementing an on the water flow study, if necessary.

The Level 2 report should include explicit decisions about whether additional study is necessary. The Applicants and their consultants would outline the issues in the report, but review by agencies and stakeholders (via working groups) can make those decisions more collaborative or identify disputes. The decision of whether to launch a more intensive Level 3 study is the critical study output, dependent on answers to the same questions discussed for the adequacy of Level 1 efforts.

If warranted, a **Level 3 Assessment** should involve an on the water-controlled flow study where boaters can determine acceptable and optimal instream flow conditions. The Level 3 report should describe the recreation boating attributes of the range of flows studied (including difficulty, unique features, and portage requirements), the acceptable and optimal flows for each reach, and the frequency of availability of the identified flows under current and any proposed project operation. The report should also incorporate results from the other studies that may be relevant to identifying competing uses or resource needs, including aquatic ecosystem ramping rates to mimic natural storm events, and consideration of balancing Gile Flowage elevation changes with instream recreation releases.

The report should also inform the development of license conditions for whitewater boating that could include opportunities to optimize natural flow targets, enhance recreation usage at the project, and enhance flow availability consistency. The report should propose composition of a Whitewater Recreation Committee that could monitor performance on an annual basis. This committee could include the Licensee, NPS, American Whitewater, and regional paddling clubs

and meet on an annual basis prior to the recreation season to evaluate the prior year's event performance in providing recreational flows and opportunities to make modifications as appropriate.

7. Criteria 7: Level of Effort and Cost (§5.9(b)(7))

The cost would be contingent on the billing rate arrangement with the Applicants' consultant (rate is not known) and the number of study levels that are determined necessary as the study progresses but would be consistent with the cost of equivalent studies. The NPS believes that the information needed can be collected with a Level 1 Assessment, so costs would be kept at a minimal. However, the determination whether a Level 2 Assessment, followed by a Level 3 Assessment are needed can only be determined by completing a Level 1 Assessment.

D. NPS STUDY REQUEST #2: AESTHETIC FLOWS STUDY

1. Criteria 1: Study Description and Objectives (§5.9(b)(1)):

This aesthetic flow study would describe and evaluate the impacts of project operations on aesthetic flows over Saxon Falls and Superior Falls waterfalls. The objective of the study is to evaluate aesthetics of a range of flows using representative panels or samples to produce empirical flow evaluation curves and assess the acceptability of flow regimes or mitigation options.

2. Criteria 2: Resource Management Goals (§5.9(b)(2)):

The NPS has authority to consult with the FERC and applicants concerning a proposed project's effects on outdoor recreation resources under the Federal Power Act (18 CFR 4.38(a), 5.41(±)(4)-(6), and 16.8(a)); the Outdoor Recreation Act (Pub Law 88-29) and the National Park Service Organic Act (39 Stat. 535). It is the policy of the NPS to represent the national interest regarding recreation, and to assure that hydroelectric projects subject to re-licensing recognize the full potential for meeting present and future public outdoor recreation demands, while maintaining and enhancing a quality environmental setting for those projects. Identifying the minimum and optimum aesthetic flows is consistent with NPS policy and FERC guidelines to identify project impacts and enhancements to recreation and aesthetics.

3. Criteria 3: Resource Agency Status of Requestor and Relevant Public Interest (§5.9(b)(3))

The NPS is a resource agency. It is in the public's interest to fully document aesthetic resources and potential for improvements in this important window of relicensing.

4. Criteria 4: Existing Information and Need for Additional Information (§5.9(b)(4))

The PADs do not describe the nature of aesthetics flows over the spillways. While Article 402 of the current Saxon Falls Project license and Article 404 of the current Superior Falls Project license requires minimum flows to protect (Saxon Falls) or enhance (Superior Falls) aesthetic resources, no details are provided on how the aesthetics of various flow levels were evaluated to

determine public preferences. Article 413 of the current Superior Falls license requires the implementation of a Visual Resources Protection Plan to avoid or minimize disturbances to the quality of the existing visual resources of the project area.¹⁴ This plan was accepted by FERC on January 21, 1998 and identifies that the “purpose of the minimum flow provision is to assure that sufficient water passes over the Superior Falls waterfall to maintain the aesthetic qualities of this attractive natural feature,” but there is no mention to how aesthetic qualities were determined. A detailed aesthetic flow study is needed to determine how the public ascertains the “aesthetic qualities” for both Superior Falls and Saxon Falls waterfalls.

5. Criteria 5: Nexus to Project (§5.9(b)(5))

This is a direct project flow-related impact on a resource identified by FERC as needing to be studied. The flows over Saxon and Superior Falls waterfalls are affected by project operations. Different flow levels alter the aesthetics of the flows over the waterfalls, creating a direct nexus between the projects and aesthetic flows. It is unclear how present operations determined aesthetic preference.

6. Criteria 6: Study Methodology (§5.9(b)(6))

a. Study Sites

The aesthetics study would focus on the Saxon Falls waterfall located within the Saxon Falls Project boundaries and the Superior Falls waterfall located within the Superior Falls Project boundaries.

b. Study Methods

While it is likely that an aesthetic flow study was conducted for the current Superior Falls license in the late 1980's/early 1990's, the available study tools at that time are outdated. The aesthetic flow study proposed in this study request follows recently compiled methods outlined in *Flows and Aesthetics: A Guideline to Concepts and Methods* (Whittaker and Shelby 2017). These guidelines call for a progressive approach with phased efforts of increasing resolution. Accordingly, any assessment should start with information about a river's aesthetic features, their likely dependence on flows, and potential effects from water development projects. More intensive or detailed studies should then be prescribed in situations that merit them.

The following framework suggests three levels of resolution, with distinct study options associated with each level.

- Level 1: “Desk-top” options. This is the initial information collection and integration phase. It usually focuses on office-based methods using existing information, or limited interviews with people familiar with flows and aesthetics on the reach.

¹⁴ Note: in Table 3.6.3.1-1 on page 36 of the PAD, Article 413 incorrectly reads, “Requires Licensee to file a plan to avoid or minimize the quality of the existing visual resources of the project area...”

- Level 2: Limited reconnaissance options. This increases the degree of resolution through limited reconnaissance-based studies, more intensive analysis of existing information, or more extensive interviews.
- Level 3: Intensive studies. This substantially increases the degree of resolution through more intensive studies, which may include multiple flow reconnaissance, flow comparison surveys, or controlled flow studies.

The *Flows and Aesthetics* (2017) guidelines describe seven methods that can be used to evaluate the aesthetics of flows in rivers or spillways/waterfalls. Out of that group of seven methods, the NPS suggests that the Applicants use “panels and survey-based evaluations” found on page 28 of *Flows and Aesthetics* (2017) to assess aesthetic flows over Saxon and Superior Falls waterfalls.

Panel and Survey-based Evaluation

The panel and survey-based evaluation involve the evaluations of aesthetic resources by stakeholders, user groups, or the general public. This can take the form of smaller panels representing specific stakeholders, or larger surveys of target groups. This goal is to collect quantitative evaluations from representative panels or samples, allowing empirical analysis of characteristics such as acceptability of or agreement about managed flow regimes.

Objective

Evaluate aesthetics of various flows using representative panels or samples to produce empirical flow evaluation curves and assess the acceptability of flow regimes or mitigation options.

Typical approach:

- Choose key observation points (KOPs) to represent important landscape perspectives.
- Assemble panels to represent stakeholders, user groups, or the general public.
- View a range of flows from KOPs on-site, or through representative photographic media.
- Develop numeric ratings of specific elements or the overall view.
- Develop graphs or tables that illustrate the change in evaluations through the flow range (e.g., flow evaluation curves), and support for management options.
- Develop qualitative descriptions of changes and explanation through the range.

Product:

A report summarizing methods and findings. Methods should discuss panel/sample development, evaluation criteria and rating items, KOP and flow range choices, and prompts for qualitative discussions. Findings should include graphs/tables of flow ratings, and text explaining ratings.

7. Criteria 7: Level of Effort and Cost (§5.9(b)(7))

The level of effort would be a phased approach with a desktop analysis. The decision to progress into future phases should be made in consultation with stakeholders.

E. CONCLUSION

We appreciate the opportunity to provide comments on the PAD for the Saxon and Superior Falls Projects and Gile Flowage and request three studies for the Projects and Gile Flowage. We look forward to working with the licensee, stakeholders, and FERC on this license application. Should you have any questions regarding these comments, please contact me at 414.297.3605 or angie_tornes@nps.gov.

Sincerely,



Angela M. Tornes, NPS Interior Regions 3,4,5 Coordinator
Hydropower Assistance Program

Cc:

Matt Miller, Xcel Energy/Northern States Power Company

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Nick Utrup, US Fish and Wildlife Service

Cheryl Laatch, Wisconsin DNR, WI

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Bob Stuber, Michigan Hydro Relicensing Coalition, Traverse City, MI

Cathy Techtmann, Friends of the Gile Flowage

Allison Werner, River Alliance of Wisconsin

James Fossum, JDFossum Environmental Consulting, Winona, MN

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June 8, 2020

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

Re: Preliminary Information Document (PAD) and recommended studies for relicensing the Saxon Falls (SAF) Hydroelectric (hydro) Project (FERC No. 2610), Superior Falls (SUF) Hydro Project (FERC No. 2587), and the associated Gile Storage Reservoir, Montreal River, Iron County, Wisconsin and Gogebic County, Michigan

Dear Secretary Bose:

The River Alliance of Wisconsin (RAW) has reviewed the PADs, dated 12/30/19, for the referenced hydro projects. On 4/9/20, Xcel Energy (XE) and their consultants, Mead and Hunt (M&H), held the initial *Joint Meeting* for relicensing the referenced hydro projects. Due to *Corona Virus* concerns, XE and M&H held the meeting by conference call. XE stated that the required site visit would be scheduled later this summer. The RAW intends to participate in relicensing these projects and we recommend that you seriously consider the environmental studies we recommend as described below. We believe they need to be conducted by the XE or their Consultants to provide FERC staff the necessary information to prepare the draft *Application for License and Environmental Assessment* (EA) Although it's not optimum to recommend studies before the agency/stakeholder site inspection, we are making them to comply with the 60-day FERC deadline for stakeholder response (6/9/20).

GENERAL COMMENTS

To satisfy obligations under sections 4(e) and 10(a) of the *Federal Power Act*, as amended, and *Electric Consumers Protection Act*, among legislation, the FERC must give equal consideration to developmental and environmental interests when issuing a new license. Further, when making licensing decisions, the FERC is required to develop measures for the protection of environmental resources and enhancement of recreational facilities to ensure that relicensing is accomplished in the best interest of the general public as well as the Applicant. The FERC licensing process for hydro projects is a public process. The RAW participates in hydro relicensing proceedings as a Non-Governmental Organization. The RAW is a not for profit

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organization consisting of many stakeholder groups and concerned citizens statewide. Further, through the relicensing process the RAW advocates for river restoration, protection, and enhancement of fish and wildlife species and the habitats upon which they depend, and enhancement of recreational resources at the project within and contiguous to the project boundary. The RAW has a long history of being active in relicensing projects in Wisconsin and the Upper Peninsula of Michigan.

Hydro project information and current operations

XE's information in the PAD describing the hydro projects states the following operational requirements.

Saxon Falls:

- A minimum flow of five cfs or inflow must be released from the dam during the ice-free season.
- A minimum reservoir elevation of 997.0 feet mean sea level (msl) must be maintained ice-out to June 1.
- The reservoir elevation must be maintained within 996.5 to 997 feet msl. June 1 to ice-in.

Superior Falls:

- A minimum flow of 20 cfs must be released from the dam 8:00 a.m. to 8:00 p.m. Memorial Day weekend to October 15.
- A minimum flow of eight cfs must be released from the dam all other times including Memorial Day weekend to October 15.
- The reservoir elevation operational limits must be 739.5 to 740.0 feet msl.

RAW concerns with hydro project operations

1. No minimum flow is released in the bypass channels during the winter which would limit the ability of the aquatic community to be sustained in the channel year-round.
2. Minimum flows released to the bypass channels on a daily basis renders the habitat unstable for sustaining an aquatic community due to fluctuating discharge.

RECOMMENDED STUDIES

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1. Biological survey of the bypass channels. We recommend that a biological survey be conducted in both project bypass channels to document aquatic life living there.

I. Describe goals and objectives of each study proposal and information to be obtained.

The goal of the study is to identify what aquatic species of macroinvertebrates, mussels, fish and other aquatic life are currently living in the bypass channels.

II. Explain the relevant resource management goal of the agencies or Native American tribes with jurisdiction over the resource to be studied.

We defer to the resource agencies and/or Native American tribes to comment on that criteria.

III. If the requestor is not a resource agency, explain any relevant public interest considerations.

A review of the SAFs and SUFs project operations and the natural hydro graph of the Montreal River in the vicinity of the project show that flow discharge into the bypass channels are subjected to a wide flow variance seasonally and daily. These conditions create very unstable living conditions for aquatic life including fish, macroinvertebrates (e.g. caddisfly, stonefly) and mollusks. In addition, no minimum flow is currently required in the license for release into bypass channels during the winter. The aquatic organisms currently inhabiting the rocky bypass channel habitat is not well documented in the PAD. Therefore, a biological survey is needed in both project bypass channels to document aquatic life living there. We understand that the flow in the Montreal River is naturally “flashy” seasonally. However, we are certain to recommend that any minimum flow associated with the new license provide a more stable habitat to sustain aquatic life. The opportunity to enhance the aquatic community in the bypass channels could be achieved with a more stable minimum discharge year-round.

IV. Describe existing information concerning the subject of the study proposal and the need for additional information.

Very little information was presented in the PAD; therefore a biological survey is needed to characterize the current aquatic community in the bypass channels.

V. Explain any nexus between project operations and effects on the resource to be studied and how the study results would inform the development of license requirements.

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The nexus is that when the projects were built much of the natural flow in the Montreal River was diverted through conduits to the power houses leaving dewatered bypass channels. After that occurred the aquatic community was forced to adjust to a new flow regimen that was not naturally occurring.

VI. Explain *how any study methodology is consistent with generally accepted practice in the scientific community*;

The study methodology used for the biological survey should be one that is *standard sampling protocol* used by the Wisconsin DNR and Michigan DNR. The agencies likely have guidelines available for use by the utilities in developing the plan of study. The Wisconsin DNR *Fish Indices of Biological Integrity* and their *Macroinvertebrate Indices of Biological Integrity* methodologies may help in planning the study. Please consult resource agency staff.

VII. *Describe consideration of level of effort and costs, and why any proposed alternative studies would not be sufficient to meet the stated information need*;

We believe that XE and their Consultants are in a much better position with their well-established contacts with consulting firms to scope out the costs and level of effort for relicensing studies; therefore, we will not comment on this criterion.

2. Instream Flow study. Once the aquatic community is characterized in the bypass channels, a strategy/s can be developed to protect and improve the aquatic community over the new license period. Accordingly, we recommend XE conduct a habitat-based instream flow study in both bypass channels. The flow study should incorporate habitat suitability indices for selected target species. It may be more practical to conduct this study in Year 2.

I. *Describe goals and objectives of each study proposal and information to be obtained*;

The goal of the study is to determine what minimum flow will protect and enhance the aquatic community in the bypass channels during each month of the year.

II. *Explain the relevant resource management goal of the agencies or Native American tribes with jurisdiction over the resource to be studied*

We defer to the resource agencies and/or Native American tribes to comment on that criteria.

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III. If the requestor is not a resource agency, explain any relevant public interest considerations;

Sustaining a healthy aquatic community in the river and bypass channels is heavily dependent on maintaining relatively stable stream flows

IV. Describe existing information concerning the subject of the study proposal and the need for additional information;

There are flow records from operations of the projects and there is a record of hydrology described in the PAD. However, no flow/habitat-based study was described in the PAD. This information is needed to develop a minimum flow to protect the aquatic community.

V. Explain any nexus between project operations and effects on the resource to be studied and how the study results would inform the development of license requirements

The nexus is that portions of the original river channel were converted to bypass channels when the hydro projects were built. After that occurred the aquatic community was forced to change and adjust to a new flow regimen (i.e. with much less water) that was not naturally occurring.

VI. Explain how any study methodology is consistent with generally accepted practice in the scientific community;

The study methodology used should be one that is accepted as credible and valid by the Wisconsin DNR, Michigan DNR and U.S. Fish and Wildlife Service (FWS). The FWS *Instream Flow Incremental Methodology*, as updated, has historically been a credible method to use for instream flow studies. However, there are other flow/habitat-based methodologies also used to for such studies. Please consult with the resource agencies.

VII. Describe consideration of level of effort and costs, and why any proposed alternative studies would not be sufficient to meet the stated information needs.

Please reference our statement in Criteria VII. stated above.

Given the beauty of the Montreal River flowing through a wild terrain, some stakeholders have expressed an interest that an *aesthetic flow* be released from the projects. This concern could be evaluated as part of a habitat-based instream flow study.

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3. Mussel survey. In consultation with the Wisconsin DNR, Michigan DNR and FWS, conduct a mussel study in the bypass channels, project flowages and in the riverine sections upstream and downstream of the SAF and SUP projects.

I. Describe goals and objectives of each study proposal and information to be obtained;

The goal of the study is to determine mussel species density and diversity, including characterizing mussel habitat in the river and flowages and bypass channels of the SAF and SUP projects.

II. Explain the relevant resource management goal of the agencies or Native American tribes with jurisdiction over the resource to be studied;

We defer to the resource agencies and/or Native American tribes to comment on that criteria.

III. If the requestor is not a resource agency, explain any relevant public interest considerations;

In accordance with the *Public Trust Doctrine*, the mussel community is an aquatic resource that is owned by the public and to be protected by all water resource users, including licensees operating hydro projects. In general, mussels in Wisconsin and Michigan Rivers are in peril. Mussels are an important component of a river system and are sensitive to changes in flow discharge in the tailwater of a dam and to water level fluctuations in a reservoir. Mussels are not very mobile and can be easily adversely affected by hydro operations in terms of species diversity and relative abundance within the zone of fluctuating flow and fluctuating water levels. There is also good reason for a mussel study to document the presence of any state or federal threatened or endangered species that may occur in the project area. Without this knowledge, it is not possible to develop protection strategies for the mussels.

IV. Describe existing information concerning the subject of the study proposal and the need for additional information;

Very little information about mussel species and distribution in the area of the projects was stated on the PAD, apparently because there is not much data available. To accurately describe the mussel community currently inhabiting the project area and to enable the licensee to prepare an accurate environmental report (Exhibit E) for the license application, we

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recommend that a mussel survey be conducted in the project impoundments, main river, and in the bypass channels.

V. Explain any nexus between project operations and effects on the resource to be studied and how the study results would inform the development of license requirements

The nexus is that the mussels live in habitat directly affected by the day to day operation of the hydro projects. Since mussels exhibit slow mobility, they are sensitive to changes in flow changes and water levels. The hydro projects have profoundly affected the natural flow of the Montreal River, especially in the bypass channels.

VI. Explain how any study methodology is consistent with generally accepted practice in the scientific community;

The study methodology used should be one that is accepted as credible and valid by the Wisconsin DNR, Michigan DNR and FWS mussel experts. The Wisconsin DNR has available “Guidelines for sampling freshwater mussels in wadable streams” which can help XE develop a plan of study. Michigan DNR likely has similar guidelines.

VII. Describe consideration of level of effort and costs, and why any proposed alternative studies would not be sufficient to meet the stated information needs.

Please reference our statement in Criteria VII. Stated above.

4. Aquatic and terrestrial invasive species study (ATIS). Conduct an ATIS study in the SAF and SUP flowages and in the riverine sections of the projects.

I. Describe goals and objectives of each study proposal and information to be obtained;

Infestation of project waters with ATIS can substantially degrade the quality of the aquatic habitat for native vegetation and the quality of experience to the recreating public. It is critical to identify what ATIS species are present so they can be removed or controlled before they become infested.

II. Explain the relevant resource management goal of the agencies or Native American tribes with jurisdiction over the resource to be studies.

We defer to the resource agencies and/or Native American tribes to comment on that criteria.

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III. If the requestor is not a resource agency, explain any relevant public interest considerations;

Aquatic invasive species (AIS) such as purple loosestrife, Eurasian watermilfoil, and curly-leaf pondweed are invasive wetland plants which out-compete many other valuable wetland plants and can dominate the species composition of a wetland or aquatic macrophyte bed in a few years. Terrestrial invasive plants have the same pattern and can out-compete native vegetation as well. There is little food value for wildlife from purple loosestrife; accordingly, infestation of valuable wetlands by this plant is extremely undesirable and harmful. Eurasian watermilfoil, curly-leaf pondweed, and other AIS can rapidly cause aquatic weed problems and alter fish communities by providing too much refugia leading to overpopulation and/or growth stunting problems in reservoirs and flowages. The objective of a study is to update current information on what ATIS occur in project waters and within the project boundary.

IV. Describe existing information concerning the subject of the study proposal and the need for additional information;

It is necessary to document the current environmental setting of the project to update the ATIS information so the licensee, resource agencies and other stakeholders can develop strategies for control/management before infestation become unmanageable.

V. Explain any nexus between project operations and effects on the resource to be studied and how the study results would inform the development of license requirements

The nexus is that the ATIS present are living in the aquatic and riparian environment created when the hydro projects were built.

VI. Explain how any study methodology is consistent with generally accepted practice in the scientific community;

The study methodology used should be one that is accepted as credible and valid by the Wisconsin DNR and Michigan DNR. The agencies likely have study guidelines available for use by the utilities in developing the plan of study. Please consult resource agency staff.

VII. Describe consideration of level of effort and costs, and why any proposed alternative studies would not be sufficient to meet the stated information needs.

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Please reference our statement under Criteria VII above.

5. Fishery Studies. Conduct fishery surveys in the flowages and riverine sections of the SAF and SUP projects.

I. Describe goals and objectives of each study proposal and information to be obtained;

Fishery data described in the PAD is derived from Wisconsin DNR fish surveys last conducted from 1979 – 1987. To accurately describe the fish community currently inhabiting the project area and to enable the licensee to prepare an accurate environmental report (Exhibit E) for the license application, we recommend that fish community information be updated to include data on species composition and frequency of abundance.

II. Explain the relevant resource management goal of the agencies or Native American tribes with jurisdiction over the resource to be studied;

We defer to the resource agencies and/or Native American tribes to comment on that criteria.

III. If the requestor is not a resource agency, explain any relevant public interest considerations;

The angling public depends on the Wisconsin DNR and Michigan DNR to manage game and nongame fish that are popularly fished in project waters. The DNR needs up to date information to formulate effective game and nongame fish management strategies.

IV. Describe existing information concerning the subject of the study proposal and the need for additional information;

Existing information concerning past fishery surveys would be available in Wisconsin DNR and Michigan DNR published and unpublished reports and electronic data bases. Again, the DNR needs up to date information to formulate effective game and nongame fish management strategies.

V. Explain any nexus between project operations and effects on the resource to be studied and how the study results would inform the development of license requirements

The nexus is that the aquatic environment created when the hydro projects were built

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changed free-flowing riverine habitat in the Montreal River. Now fishery habitat also includes more lake-like habitat with the creation of impoundments (flowages) behind the dams.

VI. Explain how any study methodology is consistent with generally accepted practice in the scientific community;

The study methodology used should be in accordance with *standard sampling protocol* (fyke netting, seining, electrofishing techniques) used by the Wisconsin DNR and Michigan DNR. The agencies likely have guidelines available for use by the Utilities in developing the plan of study. The Wisconsin DNR *Fish Indices of Biological Integrity* may help in planning. Please consult resource agency staff.

VII. Describe consideration of level of effort and costs, and why any proposed alternative studies would not be sufficient to meet the stated information needs.

Please reference our statement in Criteria VII. Stated above.

6. Recreation Study. Evaluate the existing condition of recreational facilities and document needed upgrades. Evaluate the condition of existing recreational facilities. Update the existing recreational brochure (if there is one) or prepare a new one to serve as a guide for the public. Prepare a draft *Recreation Plan* for the project to be reviewed by the resource agencies and other stakeholders.

I. Describe goals and objectives of each study proposal and information to be obtained;

The goal of this study is for the licensee to develop a *Recreational Plan* for the projects. The information generated by the recreational use study will be useful to the understanding of the resource agencies, Native American tribes, and general public in terms of what recreational facilities are present, where they are, what condition they are in, what types of recreation they accommodate and document the need for any new rec. sites that should be developed. The *Recreation Plan* will be an informative document to all parties that participate in relicensing. Further it will provide a plan for the Licensee to implement during the period of the new license.

The draft plan should be available for review by all concerned Stakeholders.

II. Explain the relevant resource management goal of the agencies or Native American tribes with jurisdiction over the resource to be studied;

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We defer to the resource agencies and/or Native American tribes to comment on that criteria.

III. If the requestor is not a resource agency, explain any relevant public interest considerations;

The reservoirs and riverine sections of rivers impounded by hydro projects have long ago become major sources of recreation for the public. The FERC's permission via a license for a Utility to use of a river to generate hydropower mandates that recreational facilities (among many other environmental considerations) be installed within the project boundary and kept in good condition for public use. People are entitled through the *Public Trust Doctrine* to use the reservoirs and riverine sections impounded by dams for recreational use. This includes fishing, boating, hiking picnicking, camping, and other non-consumptive wildlife-oriented use. When a project undergoes relicensing, that is a logical time for XE to do a recreational use study and develop a *Recreational Plan*.

IV. Describe existing information concerning the subject of the study proposal and the need for additional information;

It is necessary to for the XE to do a recreational use study in order to prepare a Recreational Plan for the projects. Please consult the resources agencies, city, and county offices and the local lake group for information on public use of the project area. Although there is some information on recreation facilities and use in the PAD, we believe it is inadequate for the license application.

V. Explain any nexus between project operations and effects on the resource to be studied and how the study results would inform the development of license requirements;

The flowages impounded by the hydro projects and associated shoreline created opportunities for public use including boating, fishing, picnicking, and wildlife-oriented recreation. Typically, FERC licensed project waters are used heavily by the public.

VI. Explain how any study methodology is consistent with generally accepted practice in the scientific community;

The study methodology used should be one that is accepted as credible and valid by the Wisconsin DNR, Michigan DNR and National Park Service. Please consult resource agency staff.

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VII. Describe consideration of level of effort and costs, and why any proposed alternative studies would not be sufficient to meet the stated information needs.

Please reference our statement in Criteria VII. Stated above.

We recommend that a recreation study and *Recreational Report* also be done for the Gile Flowage. See justification for the study discussed above.

The Gile Flowage, west fork of the Montreal River

Operation of the Gile Flowage Storage Reservoir

- A minimum flow release of 10 cfs is required to be released from the reservoir into the West Branch of the Montreal River.
- The minimum reservoir elevation allowed is 1,475 feet msl and the maximum elevation allowed is 1,490 feet msl.
- The reservoir size is 3,317 acres at full pool at elevation 1,490 ft. msl.
- A 15-foot drawdown is allowed to augment river flow to the SAF and SUP hydro projects located downstream on the Montreal River.

Environmental concerns that are often associated with drawdowns include:

- shoreline erosion problems, especially at recreational use sites
- a dewatered shoreline which can adversely affect growth of aquatic plants and can create unstable habitat for mussels, turtles and other aquatic life by fluctuating water levels
- winter kill of fish if the impoundment is drawn down several feet in winter as the dissolved oxygen levels in the water column can become too low (i.e., less than 5 mg/l)

Relative to the Gile Flowage, we believe these concerns should be evaluated by XE during relicensing to determine the extent, if any, they are occurring at this storage reservoir. In addition, we know drawdown of the Gile Flowage augments flow to the SAF and SUP projects downstream. We request that XE send information to the stakeholders on the monetary value that drawdown contributes to monthly and yearly hydro generation at SAF and SUP. This information should be included in FERC's EA.

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We will defer to the resource agencies and the *Friends of the Gile Flowage* on what relicensing studies they deem appropriate for the Gile Flowage.

Please send for our review your **draft** study plans.

We look forward to our participation in relicensing these projects to help accomplish environmental protection and improvement at the projects. If you have questions on our comments, please contact me at (608) 257-2424 (ext. 115). Also, please feel free to call our Hydro Consultant, James Fossum at (507) 429-9129.

Sincerely,



Raj Shukla
Executive Director

Cc: Matt Miller, Xcel Energy, Eau Claire, WI
Shawn Puzen, Mead and Hunt, Inc., Madison, WI
Nick Utrup, US Fish and Wildlife Service, Bloomington, MN
Angela Tornos, National Park Service, Milwaukee, WI
Cheryl Laatch, Wisconsin DNR, WI
Elle Gulotty, Michigan DNR, Norway, MI
Amira Oun Michigan Depart. of Environment, Great Lakes and Energy, Lansing, MI
Bob Stuber, Michigan Hydro Relicensing Coalition, Traverse City, MI
Cathy Techtmann, Friends of the Gile Flowage
James Fossum, *JDFossum Environmental Consulting*, Winona, MN

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Sam Schank, Galesville, WI.

I am a whitewater paddler here in the Midwest, and I just want to put in my two sense in light of the re-licensing of these two dams'. Both stretches of river below both of the dams provide excellent whitewater and scenic paddling opportunities. I have had the pleasure of running both stretches in the spring, which is the only time of year I can confidently make the 5 hour drive to these rivers and know that they will be runnable. As a whitewater paddler, I am typically not very excited about dams clogging up rivers and making a lake out of gods beautifully created whitewater rivers, but dams do offer one great opportunity to whitewater paddlers, and that is controlled flows. Like I said earlier, I live 5 hours away from these rivers, so I am not going to make the drive unless I know that they are going to have water. I would like to ask that as you re-license these dams, you consider the possibility of controlled releases on both stretches of river. This is a very common thing in the southeastern USA, and we do have some controlled releases on the Thompson Dam/Reservoir in Carleton MN, the Black River Dam in Hatfeild WI, and the Wausau Whitewater Park in Wausau WI. Even if the release only happens 2-4 times a year, if the releases are planned on weekends when the other dams are not releasing, I promise you, there will be a lot of paddlers at the release. Releases on these stretches of river could promote tourism to the area, and even possibilities of whitewater competitions being heled on these stretches.

Thanks and God Bless,
Sam & Chelsea Schank

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State of Wisconsin
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June 9, 2020

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

Shawn Puzen
FERC Licensing and Compliance Manager
Mead & Hunt, Inc.
1720 Lawrence Drive
De Pere, Wisconsin 54115

Matthew J. Miller
Hydro License Compliance Consultant
Norther States Power Company
1414 W. Hamilton Ave, PO Box 8
Eau Claire, Wisconsin 54702

RE: Wisconsin Department of Natural Resources Comments on Preliminary Application Document for the Saxon Falls Hydroelectric Project P-2610 and Superior Falls Hydroelectric Project P-2587.

Dear Ms. Bose, Mr. Puzen, and Mr. Miller:

The Wisconsin Department of Natural Resources (Department, WDNR) appreciates the opportunity to participate in the process to relicense the Saxon Falls and Superior Falls hydroelectric dams, as proposed in the Preliminary Application Document (PAD). These dams are licensed by FERC under Projects P-2610 and P-2587.

The Saxon Falls Project is located in the Town of Saxon, Iron County, Wisconsin and Ironwood Township, Gogebic County, Michigan. The Superior Falls Project is located in the Town of Saxon, Iron County, Wisconsin and Ironwood Township, Gogebic County, Michigan. The Gile Flowage (UL20) is an unlicensed headwater storage reservoir that provides seasonally uniform streamflow for hydroelectric generation at the downstream Saxon Falls and Superior Falls Projects. The Gile Flowage is located within the towns of Pence and Carey, Iron County, Wisconsin.

The Department has limited information regarding natural resource information associated with the hydroelectric dams and their impoundments. Studies associated with Saxon Falls and Superior Falls relicensing have different purposes, from a short term, long term, and cumulative impact. The Department has carefully considered our responsibilities under the Clean Water Act and Navigable Waters Public Trust Doctrine for the proposed relicensing of Saxon Falls and Superior Falls, and the potential inclusion of Gile Flowage.

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We are recommending the following studies be completed. Each study is presented as appropriate for the various alternatives that could be evaluated as part of the comprehensive review and assessment of the project area. Our requests for information and studies focus on the continued operation of the Saxon Falls dam and Superior Falls dam, as well as our information and study requests relating to the inclusion of Gile Flowage.

As Xcel Energy Services Inc. begins to evaluate the array of study requests, and determine their study proposal and next steps, the Department will continue to provide guidance and recommendations.

Please be aware that Scientific Collectors Permits may be required to complete various surveys. Please work with the Department to obtain appropriate permits and approvals prior to the collection of data.

To save time and costs, the Department recommends that studies be combined and that the licensee meet with the stakeholders who have requested studies to explore their options and still achieve desired data collection. We also recommend exploring the use of citizen monitoring groups and organizations.

The licensee should continue to work with the Department to collect resource information and develop study plans and protocols. If new information becomes available through the relicensing process, we reserve the rights to require additional studies to gather appropriate information.

Please direct all inquiries to the Project Managers:

Connie Antonuk, Field Integration Leader, (715) 365-8946, Connie.Antonuk@wisconsin.gov
Cheryl Laatsch, FERC Coordinator, (920) 387-7869, Cheryl.Laatsch@wisconsin.gov

If you have any questions or comments regarding our recommendations, please contact me at 920-387-7869, or Cheryl.laatsch@wisconsin.gov. We look forward to working with you.

Regards,



Cheryl Laatsch
Statewide FERC Coordinator
Wisconsin Department of Natural Resources

Study Request

Relicense of Saxon Falls P-2610

ASSESSMENT OF CURRENT DAM OPERATIONS AT SAXON FALLS

- **Goals and Objectives:** Determine if the project is meeting the requirements of minimum flows and run-of-river operations; including documenting how downstream river flows are managed appropriately to limit water level fluctuations.
- **Relevant DNR Management Goals:** Assess the current operations to ensure that the operations are operating at run-of-river flows.
- **Existing Information:** A minimum flow of 5 cfs or inflow, whichever is less, is released into the bypass reach of the Montreal River immediately below the Saxon Falls Dam during the ice-free season. USGS Gage No. 04029990 is located at the Saxon Falls project, and daily discharge values are provided by the Licensee to the USGS.
- **Operation nexus to resource and how informs license:** Ensure Saxon Falls is meeting the intent of run-of-river, and not causing divergence in flows that harm the downstream aquatic ecosystem.
- **Methodology:** Desktop review of existing inflow and outflow data, including an evaluation report of run-of-river and operations requirements.
- **Level of Effort and Cost:** Staff time is expected to be 20-40 hours at \$125 per hour equaling \$2,500-\$5,000 for data analysis and report.

ASSESSMENT OF MINIMUM FLOW AND RESOURCE IMPACTS AT THE BYPASS CHANNELS AT SAXON FALLS

- **Goals and Objectives:** Determine if the project minimum flow of 5 cfs is providing sufficient flows for the aquatic environment and evaluate additional flows for comparison.
- **Relevant DNR Management Goals:** Evaluate the current minimum flow and ensure that the minimum flow does not have an adverse impact on the aquatic resources within the Saxon Falls project boundary.
- **Existing Information:** A minimum flow of 5 cfs or inflow, whichever is less, is released into the bypass reach of the Montreal River immediately below the Saxon Falls Dam during the ice-free season. USGS Gage No. 04029990 is located at the Saxon Falls project, and daily discharge values are provided by the Licensee to the USGS.
- **Operation nexus to resource and how informs license:** Ensure Saxon Falls is meeting the intent of run-of-river, and not causing divergence in flows that harm the downstream aquatic ecosystem.
- **Methodology:** In-stream flow study, which includes a description of current habitat conditions within the bypass channel under current operation and flows to determine if the current minimum flows are impacting available habitat, fish, and macroinvertebrate communities. Assess various minimum flow regimes to determine what is appropriate to not have an adverse impact on the resource.

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- **Level of Effort and Cost:** Staff time is expected to be 20-40 hours of field work at \$125 per hour, plus costs for equipment.

ASSESSMENT OF STREAM FLOWS, CHANNEL DIMENSIONS, AND LINEAR GRADIENT AT SAXON FALLS

- **Goals & Objective:** Determine the impact the proposed project has on the existing stream flows, channel dimensions and linear gradient of Saxon Falls and the Montreal River.
- **Relevant DNR Management Goals:** The proposed study would investigate the impacts the project would have on the existing stream flows, channel dimensions, and linear gradient of the river. The impacts that the project may cause on the existing stream flows, channel dimensions and linear gradient may alter resources and recreational and developmental management plans for the future.
- **Existing Information:** Data is limited relating to flow, channel dimensions, and linear gradient impacts within the project boundary.
- **Operation nexus to resource and how informs license:** The relicensing of Saxon Falls has the potential to have short term and long-term impacts on the aquatic community of the Montreal River downstream of the impoundment. These impacts include, but are not limited to, dewatering and limiting available aquatic habitat in the downstream river channel depending on stream discharge and dam operation. These impacts can vary by season as well as daily. Proper management of the resource will help ensure that adequate flows are available to aquatic life at the proper time and thermal regime.
- **Methodology:** Conduct a study to determine stream morphology downstream of the project at various flows, including width, depth, wetted perimeter and substrate composition. The study should identify any wetlands that are flooded. This should include available aquatic habitat under current operation through flood flow conditions. Quantitative Habitat Assessment Methodology should be used to document habitat conditions. Refer to existing management efforts (recreational, resource, habitat) to investigate the impacts the proposed project would have.
- **Level of Effort and Costs:** Staff time is expected to be about 20-40 hours of fieldwork at \$125 per hour plus cost of equipment.

ASSESSMENT OF WATER QUALITY AT SAXON FALLS

- **Goals & Objectives:** Assess and monitor the following water quality parameters:

Total Phosphorus	Color	Ammonia
Chlorophyll-a	Total Nitrogen	Chloride
Dissolved Oxygen (DO)	Sulfate, Total Mercury	Bacteria
Temperature	Iron, Manganese, and/or Sulfide	Cyanobacteria
Conductivity	Dissolved Phosphorus	Total Suspended Solids
pH	Nitrate (plus nitrite)	Sediment Accumulation
Secchi Depth		

- **Relevant DNR Management Goals:**

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Total Phosphorus: One of the primary causes of eutrophication and most widespread pollutant in waterbodies statewide and nationally. Impoundments are unlikely to raise the concentration of phosphorus in the downstream river but play a role in the transformation, such as the ratio of dissolved phosphorus to total phosphorus. Bottom-draw facilities, especially if the impoundment is deep and stratifies, may have the potential to influence the magnitude and timing of phosphorus inputs to the downstream river. Dam operation might influence internal phosphorus loading to the impoundment by affecting the mixing regime as water levels change.

Chlorophyll-a: A measurement of the amount of algae in a waterbody, one of the primary manifestations of eutrophication. As impoundments increase surface area, slow and warm water are likely to produce more chlorophyll-a, per unit phosphorus/nitrogen, than the upstream or downstream river. Impoundments may produce chlorophyll-a in the lake environment that is then passed to the downstream river. Dam operations may have limited ability to control chlorophyll-a, but location of discharge will play a role in the potential to release downstream. Dam operations can reduce chlorophyll-a by reducing water residence times and by artificially mixing the phytoplankton into deep waters below the euphotic zone (resulting in less primary production than expected given nutrient levels). Other tools to reduce nutrient and algal concentrations include flow by-passes, pre-impoundments, scour valves that discharge nutrient-rich hypolimnetic water, and modifications to the operating regime. Drawdown can increase internal nutrient loading by instigating a mixing event.

Dissolved Oxygen: Dissolved oxygen is critical for the health and survival of aquatic organisms. Deep impoundments may stratify and become oxygen depleted in deep water. Impoundments may then cause a decrease in dissolved oxygen in the downstream river, especially if there is bottom withdrawal of a eutrophic impoundment, or an impoundment that stratifies. Additionally, eutrophic impoundments may transform nutrients into organic matter (mainly algae) that then flows into the river, decomposes and reduces oxygen. Dam operations can influence downstream dissolved oxygen by changing/mixing withdrawal location (top versus bottom draw) or aerating discharge before it reenters the downstream riverine environment (among others). Additionally, passing anaerobic waters through turbines or similar precision machinery may also cause damage to the facility's equipment.

Temperature: Temperature regime of a waterbody structures community composition of fish, invertebrates, plants, etc. Temperature also effects rates of chemical reactions, ecosystem productivity and the ability for gasses to dissolve in water. Impoundments can increase water temperatures by slowing water velocity and increasing surface area to absorb solar radiation. Additionally, deep impoundments may cause deep water temperatures to decrease if there is stratification. Dam operations can influence downstream temperature by changing/mixing withdrawal location, top versus bottom draw (among others).

Conductivity: High concentrations of dissolved ions, measured as conductivity, can impair the osmoregulation of organisms with gills and other semipermeable membranes. Sources of elevated conductivity are likely from nonpoint and certain point source discharges. However, conductivity is important for classifying the impoundment and stream and is therefore needed as background information.

pH: pH can control the biologic availability, solubility and speciation of chemicals in water. Although wild rice does well in slightly acidic waters (pH 5.9 – 6.2), even moderately acidic water may irritate the gills of aquatic fish and insects or reduce the hatching success of fish eggs. Eutrophication increases swings in pH during the algal growth and die-off phases. Highly eutrophic impoundments may release high or low pH to the river downstream. In addition, fluctuating water levels can acidify the

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impoundment by exposing the waterbody bed to air and then flushing sulfate into the water when lake levels rise again or when it rains. Dam operation probably has very little opportunity to mitigate dramatic pH swings at short time-scales, but operations that cause sufficient changes in water levels may affect pH at a seasonal or interannual time scale.

Secchi Depth: Secchi depth measures water clarity and is a general indicator of waterbody health. The impoundment could affect Secchi depth through its effects on eutrophication and suspended sediments. Dam operations can influence internal nutrient loading and chlorophyll-a, and thus, water clarity.

Color: Color refers to how much colored organic matter is in the water, staining it brown. Water color is important for understanding the ecology of the waterbody. Highly stained waters reduce water clarity, and in turn, can affect algal and plant growth and even fish growth. The impoundment is unlikely to affect color, but color will be important for understanding the ecology of the impoundment.

Total Nitrogen: An oversupply of nitrogen is one of the primary causes of eutrophication. A lack of nitrogen limits wild rice development. Impoundments are unlikely to raise the concentration of nitrogen in the downstream river. Although some planktonic algae can fix atmospheric nitrogen, this amount is likely overwhelmed by the amount of nitrogen coming in from the watershed via tributary streams. Impoundments do play a role in the transformation, such as the ratio of dissolved inorganic nitrogen to organic nitrogen.

Sulfate, Total Mercury: Dam operations can influence the sulfur and ultimately the mercury cycle. In short, long-term drawdowns can eventually lead to increased sulfate runoff when it rains. This acidifies the water and can then enhance methyl mercury concentrations in water and methyl mercury in fish. Sulfate can also be converted to toxic sulfide which affects the mitochondria of plants. When sulfate is high, sulfides are also usually high and therefore toxic to wild rice and other plants. This process has been demonstrated in formation of new reservoirs and in the regulation of existing reservoirs. Impoundments can cause this process to happen. Water levels will need to be managed to prevent increased methyl mercury and high sulfate levels.

Iron, Manganese, and/or Sulfide in Reservoir: These are reducing substances that can have high concentrations in the hypolimnion of reservoirs under anoxic conditions. They use oxygen through their own chemical transformations and can decrease sulfide but can further increase oxygen demand. In addition, iron binds phosphorus under oxic conditions, but releases phosphorus under anoxic conditions. Therefore, reservoirs with high iron could be prone to internal phosphorus loading if they go anoxic in the hypolimnion. Dam operations can impact stratification and mixing, and thus, the concentration of these substances and internal nutrient loading.

Dissolved Phosphorus: An oversupply of phosphorus is one of the primary causes of eutrophication and most widespread pollutant in waterbodies, statewide and nationally. Low phosphorus levels limit wild rice seedling success and development. Impoundments are unlikely to raise the concentration of phosphorus in the downstream river, but play a role in the transformation, such as the ratio of dissolved phosphorus to total phosphorus. Bottom-draw facilities, especially if the impoundment is deep and stratifies, may have the potential to influence the magnitude and timing of phosphorus inputs to the downstream river. For instance, if there is stratification, a bottom-draw facility may discharge highly bioavailable dissolved phosphorus from the hypolimnion to the downstream river contributing to eutrophication issues. Dam operation might influence internal phosphorus loading to the impoundment by affecting the mixing regime as water levels change.

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Nitrate (plus nitrite): One of the bioavailable forms of nitrogen, a primary cause of eutrophication. Impoundments are unlikely to raise the concentration of nitrate in the downstream river. Although some planktonic algae can fix atmospheric nitrogen, this amount is likely overwhelmed by the amount of nitrate coming in from the watershed via tributary streams.

Ammonia: One of the bioavailable forms of nitrogen, a primary cause of eutrophication. Impoundments are unlikely to raise the concentration of ammonia in the downstream river. Although bottom-draw facilities, especially if the impoundment is deep and stratifies, may influence the magnitude and timing of ammonia inputs to the downstream river. Dam operations are unlikely to influence ammonia concentration unless there is a bottom draw of a stratified, anoxic impoundment

Chloride: Chloride, at elevated levels is toxic to fish, invertebrates and amphibians. At lower levels, it can negatively affect diversity, productivity, and increase the density of water. Chloride is increasing statewide and nationally in waterbodies that have even small percentages of their watershed in urbanized land use. The impoundment is unlikely to transform or change chloride levels from the incoming tributaries (assuming long-term stable water levels). The major exception being if the shore is heavily developed and there are major applications of road salt or point sources with high chlorides.

Bacteria: Bacterial indicators, such as E. coli, are used to detect the presence of fecal contamination in waterbodies to protect recreational uses. Impoundments are unlikely to increase E. coli in downstream rivers, unless there is heavy recreation (campgrounds, beaches, non-sewered sanitation) on the impoundment.

Cyanobacteria: Harmful algal blooms are of concern for human health, recreation, and fish and aquatic life. High concentrations of chlorophyll-a are often correlated with high concentrations of cyanobacteria and cyanotoxins, but not in all cases. These indicators need to be measured independently for evaluation. As impoundments increase surface area, slow and warm water are likely to produce more chlorophyll-a per unit phosphorus/nitrogen, than the upstream or downstream river. Recent studies of dams across wide geographic areas show that cyanobacterial blooms are more prevalent when dams are drawn down. Temperatures increases, along with water residence times and nutrient concentrations, may support cyanobacteria. Dam operations can influence the likelihood of cyanobacterial blooms.

Total Suspended Solids (TSS): High concentrations of TSS can inhibit visibility for predators, damage gill structure of fishes, and lead to high rates of sedimentation in streams and alter benthic habitat. Impoundments are likely to lower TSS concentrations in the downstream river. In extreme cases where sediment build-up behind a dam structure is high, there may be some chance of increased concentrations of TSS. Dam operation is unlikely to influence TSS unless there is a catastrophic event, draw down or using ash cinders as a sealant.

Sediment Accumulation Behind Dam: Dams trap sediments upstream. Ecological concerns include increasing turbidity upstream and smothering spawning beds in the reservoir and upstream. Sediment build up can also threaten the longevity of the dam itself.

- Existing Information: Limited information is available on water quality data within the Project Boundary. Water clarity from satellite imagery has been performed annually 2010-2016. DO, temperature, water color, and water clarity monitoring were last performed in 2010. Fecal coliform bacteria from untreated waste from upstream cities appeared to be corrected at the time of the 1989 license issuance. There is some water quality information including nutrients and metals data in the Montreal River near and upstream of Hurley, but none near the project boundary.

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- Operation nexus to resource and how informs license: The operation of the dam affects the water quality of the impoundment and downstream resources. The overall goal of the request is to further understand the current water quality conditions of the reservoir and river resources which will help inform management decisions in the future.
- Methodology: Data should be collected or analyzed using the DNR WISCALM Guidance and surface water grab sampling protocol. For the analytes without state standards, they should be analyzed by mean and median values and reported in a table by date and time annually. Temperature should be evaluated to determine if there are impacts to cold/cool water fish communities. Temperature thermistors should be deployed at a site upstream of the reservoir in a riverine area, in the bypass channel, and in the fully mixed zone downstream of the powerhouse. Water samples should be collected from 3 sites; at the deep hole within the impoundment, in the bypass channel and in the fully mixed zone downstream of the powerhouse. Dissolved oxygen should be monitored to determine if there are any DO sags downstream of the impoundment in the bypass channel, fully mixed zone downstream of the powerhouse, and in the deep hole of the impoundment. Assess or map sedimentation buildup behind the dam.
- Level of Effort and Costs: Six field days plus with two people \$125 per hour plus costs for equipment. Estimated 40 hours for report writing and chemical analysis.

ASSESSMENT OF WILDLIFE AND WILDLIFE HABITAT AT SAXON FALLS

- Goals & Objectives: Document wildlife presence and diversity, habitat types, and general wildlife and vegetation abundance within the project area. The goal of this study is to evaluate the distribution and composition of vegetation, wildlife, and wildlife habitats, including wetlands, and the effects operations of those actions have on wildlife inhabiting those habitats.
- Relevant DNR Management Goals: The Department has responsibility to manage wildlife, including listed species. This information will be beneficial to understanding the current environment and potential needs for resource management associated with Saxon Falls.
- Existing Information: Information is limited. To our knowledge, the PAD does not include any field assessment or survey of wildlife habitat or use.
- Operation nexus to resource and how informs license: The relicensing of Saxon Falls has the potential to have short term and long-term impacts on habitat and wildlife use of affected habitats. Proper management of the resource will help to minimize any adverse impacts associated with the removal, restoration, and relicensing activities.
- Methodology: Using a qualified biologist or ecologist knowledgeable in local vegetation, identify, classify, and delineate on a map major vegetation cover types within project area. Existing aerial photography, on the ground surveys, or a combination of the two to identify and map the cover types may be used. The biologist/ecologist will record all wildlife present.

Ground-truth any remote-sensing mapping efforts, record all wildlife observed (directly or indirectly) and document any terrestrial invasive species detected during survey efforts. Describe each cover type by species composition, successional stage, and aerial extent (acreage) within the survey area, including invasive species. As an example, the methodology expressed in the following reference could be used:
https://www.fs.fed.us/research/publications/gtr/gtr_wo89/gtr_wo89.pdf

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- Level of Effort and Costs: 80 hours of desktop review, field work, and data summary at an estimated \$125 per hour, plus equipment costs.

ASSESSMENT OF RIVERINE AND RESERVOIR HABITAT AT SAXON FALLS

- Goals & Objectives: Define, measure, and assess the stream habitat conditions upstream and downstream of the hydropower facilities. Define, measure, and assess the reservoir habitat, including upstream and downstream of the reservoir.
- Relevant DNR Management Goals: Obtaining recent habitat assessment information is critical for future management actions and establishing baseline data. Water level fluctuations due to drawdowns may affect aquatic habitat.
- Existing Information: Limited information on riverine habitat in the project area. A 1991 survey of the Saxon Falls Project reservoir indicated the shoreline banks varied from regular and steep to irregular and low banked; the shorelines are heavily vegetated with second growth forest up to the water's edge, which is heavily vegetated with aquatic plants.
- Operation nexus to resource and how informs license: Having updated instream and reservoir habitat assessment information is critical for evaluating the effects of the project on the stream ecosystem. It will provide baseline data to current conditions. The data can be used to help guide river management associated with Saxon Falls.
- Methodology: The riverine habitat should be evaluated with the WDNR Quantitative Habitat Assessment methodology in the wadable stretches of Montreal River at various flows or estimates. We acknowledge that access may be limited due to rocks, and water velocity/whitewater. For the reservoir, WDNR shoreland habitat protocol should be used.
- Level of Effort and Costs: 80 hours of field work and 40 hours of data analysis and reporting at \$125 per hour, plus equipment costs.

ASSESSMENT OF FISHERIES AT SAXON FALLS

- Goals & Objectives: Define the diversity and abundance of the fish community within the Saxon Falls project.
- Relevant DNR Management Goal: Understand the existing environment. The department manages public water for recreational use, such as fishing, protection and management of species, and overall health of the fishery of the state.
- Existing Information: There is no current fish survey data collected within the past 10 years. The PAD states that the most recent fish collections were performed in 1979 and 1987. According to the WDNR Fish Stocking Database, the WDNR has been routinely stocking the Montreal River from 1972 through 2018. The mouth of the Montreal River to the Saxon Falls Flowage is classified as a warm water stream, and the river upstream of the Saxon Falls Project is classified as a cold water stream. The portion of the Montreal River flowing through the Saxon Falls and Superior Falls Projects is categorized as warm water sport fish community for fish and other aquatic life uses and for general recreation, public health and welfare, and fish consumption uses.

The Saxon Falls Project contains a 15-foot-high by 20-foot-wide main trashrack with 1-inch clear spacing. A search of available literature did not identify any entrainment or mortality information regarding the Project.

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- **Operation nexus to resource and how informs license:** Having current fish survey information will help department staff make informed management decisions regarding the fishery.
- **Methodology:** Seasonal catch per unit effort (CPUE) surveys in the spring, summer, and fall to quantify fish population relative abundance and summary report to document the species available to recreational fishers and general fish community composition.
- **Level of Effort and Costs:** One night shoreline electrofishing pass per season (early May, late July, mid-October when water temperatures are between 55-70°F) along entire shoreline (pass speed \leq 2 mph). Three nights trap/fyke net during spring (when water temperatures are \sim 40°F) at a single station approximately 500-1,000 feet upstream from powerhouse discharge. 120 hours of fieldwork and 40 hours of data reporting at \$125 per hour, plus equipment costs.

MACROINVERTEBRATE SURVEY AT SAXON FALLS

- **Goals & Objectives:** Assess the water quality using macroinvertebrate bio-indicators below and above the impoundments and within the riverine system.
- **Relevant DNR Management Goals:** The department is charged with managing the water quality of the waters of the state and meeting designated criteria under the Clean Water Act.
- **Existing Information:** Limited information exists on the macroinvertebrate community immediately downstream and upstream of the impoundments and within the riverine system.
- **Operation nexus to resource and how informs license:** Macroinvertebrates are likely impacted by segmentation of the river, and impoundments can impact communities due to changing thermal and/or flow regimes. These bio-indicators are used to assess the health of the resource.
- **Methodology:** Wisconsin DNR Guidelines for Collecting Macroinvertebrate Samples from Wadable Streams (2017) and Large River Macroinvertebrate Sampling (2015). Data should be analyzed using the current WDNR WISCALM Guidance. Macroinvertebrates should be collected upstream of the reservoir in the riverine reach, in the bypass channel and downstream of the powerhouse in the fully mixed zone.
- **Level of Effort and Costs:** One day of field work with an estimated 20 hours of field and data analysis at \$125 per hour equals \$2,500. Lab analysis at state certified lab estimated to cost \$1,000. Mobilization, travel, and equipment is estimated at \$2,000.

AQUATIC AND TERRESTRIAL INVASIVE SPECIES SURVEY AT SAXON FALLS

- **Goals & Objectives:** Evaluate the presence/absence of invasive species listed in NR40, including habitat preferences, within the project area.
- **Relevant DNR Management Goal:** Minimize the transport and establishment of existing invasive species and establish management practices to reduce new invasive species. Compliance with NR40.
- **Existing Information:** Limited information is available. Banded Mystery Snail (not verified) was observed in 2011, in addition to Narrowleaf Cattail (not verified) and Reed Canary Grass.
- **Operation nexus to resource and how informs license:** The project may influence invasive species that have the potential to directly or indirectly cause economic or environmental harm or harm to human health, including

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harm to native species, biodiversity, natural scenic beauty and natural ecosystem structure, function or sustainability; harm to the long-term genetic integrity of native species; harm to recreational, commercial, industrial and other uses of natural resources in the state; and harm to the safety or wellbeing of humans, including vulnerable or sensitive individuals. – per NR40.

- **Methodology:** Use WDNR Early Detection Early Response Protocols. Additional methodology may be needed for terrestrial species, and other methodologies such as point-intercept may be appropriate if combining this study with other studies.
- **Level of Effort and Costs:** 40 hours of field work and reporting at \$125 per hour equals \$5,000. Mobilization, equipment, and supplies are estimated at \$10,000.

AQUATIC PLANT SURVEY AT SAXON FALLS

- **Goals & Objectives:** The goal of the aquatic plant study is to provide baseline data on the condition of the aquatic plant community in the Saxon Falls Project.
- **Relevant DNR Management Goals:** The proposed aquatic plant study will provide baseline aquatic plant information to determine if management practices would be needed to enhance the existing aquatic plant community, and overall health of Saxon Falls as a bio indicator. Water levels can influence aquatic vegetation.
- **Existing Information:** In-water plant community data is limited within the project community. A 1991 survey of the Saxon Falls Project reservoir indicated the shoreline banks varied from regular and steep to irregular and low banked. The shorelines are heavily vegetated with second growth forest up to the water's edge, which is heavily vegetated with aquatic plants. A survey of the shoreline in 2003 indicated the shoreline was essentially stable and well-vegetated with only slight erosion due to animal activity, particularly beaver, and high-water events at the upper end of the flowage.
- **Operation nexus to resource and how informs license:** The study results will provide baseline aquatic plant data. The data informs the Department of the effects on the surface water resource and would be used to formulate management options. Plant density and diversity of aquatic and native species are important for establishing various management plans and protecting the resource.
- **Methodology:** The information collected from this study includes an assessment of the density and diversity of macrophytes, which includes frequencies of occurrence of different plant species, as well as estimates of species richness, abundance, and maximum depth of plant colonization. The aquatic invasive species study should be conducted according to WDNR's Recommended Baseline Monitoring of Aquatic Plants in Wisconsin.
- **Level of Effort and Costs:** 40 hours of fieldwork and 40 hours of reporting at \$125 per hour, plus equipment costs.

MUSSEL STUDY AT SAXON FALLS

- **Goals & Objectives:** The goal of the study is to determine freshwater mussel density and diversity, including characterizing mussel habitat within the Saxon Falls project area. The study would provide information on freshwater mussel species present, their diversity, density, and a better understanding of baseline conditions and associated management needs for Saxon Falls relicensing.