

November 7, 2024

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

**Subject: Response to Trego Lake District Comments on Aquatic Vegetation Harvesting Feasibility Study
Trego Hydroelectric Project (FERC Project No. 2711-025)**

Dear Secretary Reese:

As part of the current licensing proceeding for the Trego Hydroelectric Project (FERC No. 2711), Northern States Power Company – Wisconsin (NSPW) conducted an Aquatic Vegetation Harvesting Feasibility Study (study). The study report was filed with the Federal Energy Regulatory Commission (FERC) on August 12, 2024¹ in response to FERC's May 14, 2024, request for additional information.² On October 10, 2024, the Trego Lake District (TLD) provided comments³ on the study report. NSPW hereby submits its responses to TLD's comments.

TLD Comment 1:

The study does not examine water depth and aquatic vegetation following the existing navigational channels and alleys as outlined in the FERC-required "Additional Study Request" on May 14, 2024. The study did not provide options but only one course of action. While TLD commented on Xcel's plan, the District was never contacted or communicated about our concerns—we were never "consulted." FERC's verbiage in the Desktop study discussed a collaborated effort with TLD, the National Park Service (NPS) and Wisconsin Department of Natural Resources (WDNR).

NSPW Response:

As requested by the FERC in their May 14, 2024, additional information request, the desktop study evaluated existing water depths and vegetation following the existing navigational channels and alleys. The evaluation was completed by mapping the location of all navigation lanes and alleys as identified in the original 1997 vegetation management plan, the lanes historically harvested by TLD, and the current navigation lanes identified via site visits in June and September 2024.⁴ As part of the study, each of these lanes/alleys were overlain on the vegetation maps, wild rice maps, and bathymetric maps for analysis.

NSPW consulted with the required parties during development of the desktop study plan. The TLD and NPS were the only agencies to provide comments. Many of the comments

¹ [Accession #20240812-5013](#)

² [Accession #20240514-3032](#)

³ [Accession #20241010-5056](#)

⁴ The June 2024 site visit was conducted with the assistance of TLD to understand if the desktop data was properly describing actual field conditions. The September 2024 site visit, also conducted with the assistance of TLD, occurred after the desktop study report was filed with the Commission. However, NSPW did not identify any new information from the September site visit that would require an amendment to the plan outlined in the August 2024 desktop study report.

recommended changes to the study that were outside of the study scope identified by FERC. All agency comments were included in the study report along with NSPW's corresponding

responses. The relicensing process has afforded all stakeholders the opportunity to provide comments and recommendations on the study report, as TLD did in their October 10, 2024 letter. While NSPW may have provided only one course of action based on the study results, that same course of action allows for modifications based on changing conditions in the reservoir over time and ensures there will continue to be public recreational access to the upper basin of Trego Lake.

TLD Comment 2:

Decreased water depths and the alteration of the main channel by sedimentation have removed and altered navigation lanes on the east side of the upper basin. The study reduces and hampers navigation in the identified area rather than ensure that boat lanes are established to enhance public access within the upper reservoir of Trego Lake, as spelled out in FERC Article 405 from January 6, 1997. The Desktop study also does not provide any alleys within the plans for cross traffic.

NSPW Response:

The desktop study mapped the location of the navigation lanes and alleys identified in the original 1997 vegetation management plan onto the vegetation maps, wild rice maps, and bathymetric maps for analysis. The results showed shallow water, thick vegetation, and/or wild rice in many of the originally identified navigation lanes and alleys, making their continued harvesting over the term of a new license unfeasible.

NSPW also reviewed the historic harvesting efforts conducted by TLD with respect to the current vegetation conditions. This information was then utilized by NSPW to propose a new vegetation harvesting plan moving forward. The plan allows for modifications over time to account for changing conditions in the reservoir and will continue to ensure public recreational access to the upper basin of Trego Lake, both in the area where the Namekagon River enters the reservoir and the mouth of Potato Creek. TLD may disagree with NSPW's conclusion that the alleys are not necessary to enhance navigation, however, both the existing navigation lanes and alleys were considered during our analysis.

TLD Comment 3:

Finally, based on the attached 1998 letter from Xcel to TLD, TLD accepted Xcel's unilateral decision to limit funding for weed harvesting and TLD reduced our area of harvesting for the next 25 years. The current relicensure process returned Article 405 to light. TLD acknowledges that FERC, in drafting the Article 405 language, identified 70 foot wide channels and 35-foot alleys to provide safe, adequate public access to the upper basin of Trego Lake. TLD corrected our actions, and in 2024 our harvesting plan was adjusted for the specifications of the 405. Our plans will not change in the future. We respectfully ask that Xcel coordinate with TLD, NPS, and WDNR on their desktop analysis to develop a collaborative plan for harvesting of Trego Lake.

NSPW Response:

The desktop study concluded that it is not feasible to continue harvesting the entire area as identified in the original 1997 vegetation management plan, nor is it necessary to maintain public access. NSPW utilized the information obtained in the desktop study to propose a new vegetation harvesting plan moving forward, a plan that allows for modifications over time based on changing conditions in the reservoir and will ensure that there will continue to be public

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recreational access to the upper basin of Trego Lake.

The wild rice beds and native aquatic vegetation within the upper reservoir provide high quality fish and wildlife habitat. NSPW has proposed a vegetation harvesting plan that maintains navigation channels for public recreation access, while simultaneously maintaining this high-quality aquatic habitat. This approach provides an appropriate balance between recreation, navigation, and aquatic habitat. As such, NSPW believes that the Commission has all the information necessary to complete its environmental analysis.

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

Sincerely,

Scott Crotty
Senior Hydro Operations Manager

CC: Charlie Peterson, Trego Lake District