Upper Peninsula Power Company

AU TRAIN PROJECT

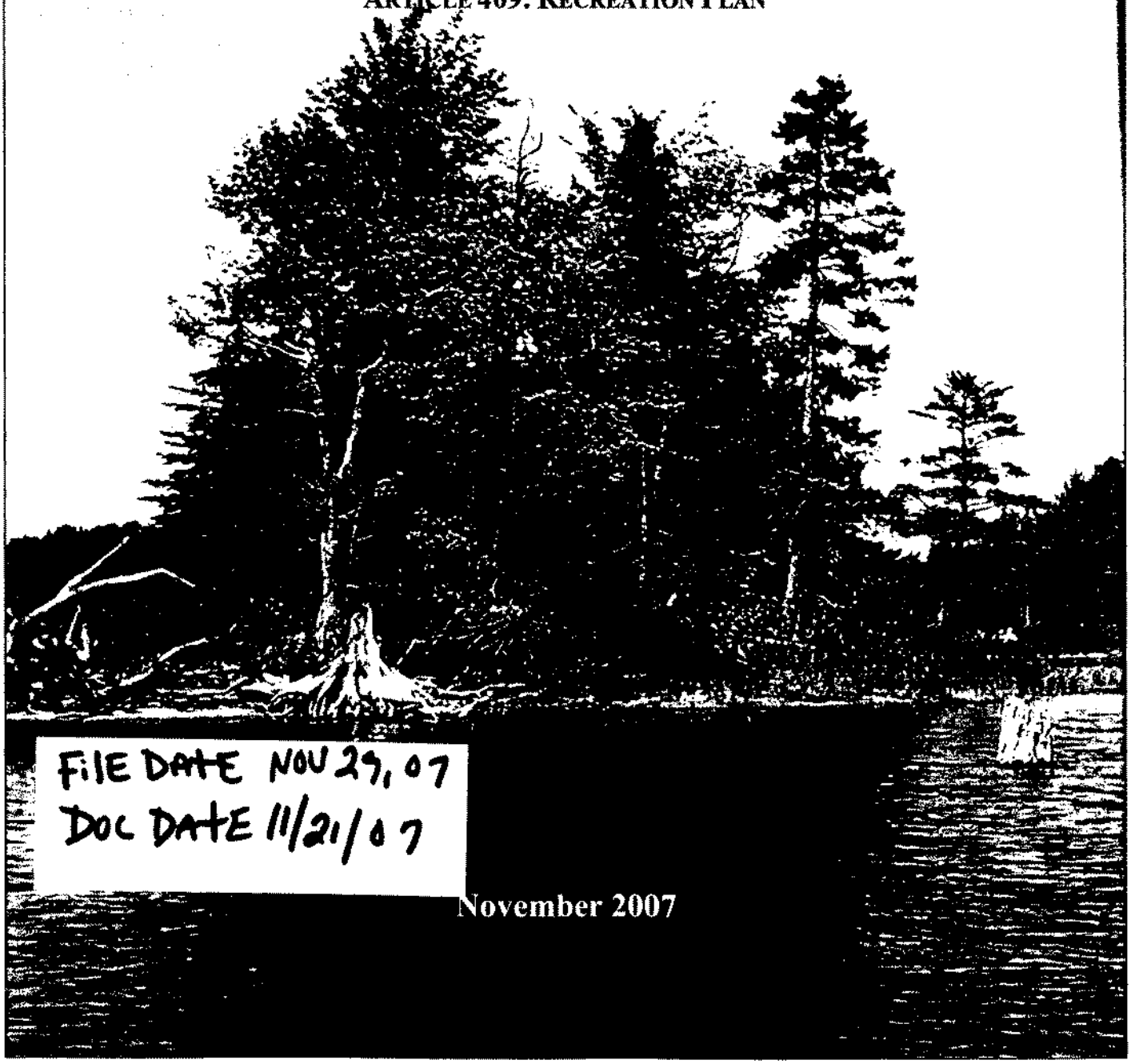
-FERC No. 10856-

SHORELINE MANAGEMENT PLAN

2 of 3

And

REQUEST FOR AMENDMENT OF ARTICLE 407: LAND MANAGEMENT PLAN, AND ARTICLE 409: RECREATION PLAN



November 2007

<>< <>< <>< <>< <>< <>< <>< <><
Jessica Mistak, Senior Fisheries Biologist
DNR Marquette Fisheries Station
484 Cherry Creek Rd
Marquette, MI 49855
906-249-1611 ext. 308
FAX 906-249-3190
><> ><> ><> ><> ><> ><> ><> ><>

>>> "Puzen, Shawn C" <SCPuzen@wpsr.com> 06/19/2006 3:52 PM >>>

Hello All-

Based upon the meeting on Tuesday, June 13, 2006, UPPCO has revised the SMP Goals and Objectives. The revisions were made according to the wording agreed upon in the meeting. UPPCO also added an Introduction statement to the beginning of the document to summarize the points UPPCO brought to your attention during the meeting about the reasons it is pursuing this effort and the proposed schedule.

Thank you for your participation in the meeting on Tuesday and please let me know if you have any questions....

Thanks,

<<SMP Goals and Objectives Revised.pdf>>

Shawn C. Puzen
Environmental Consultant
Wisconsin Public Service Corporation
(920) 433-1094
scpuzen@wpsr.com

Attachment 30
28 July 2006
COVER LETTER FOR MAILING OF ENVIRONMENTAL ASSESSMENTS TO EASTERN AND WESTERN FOCUS GROUPS ET AL.

July 28, 2006

Mr. Rusty Atherton
PO Box 33
Au Train MI 49806-0033

Dear Rusty:

Enclosed is e copy of the environmental assessments for AuTrain, Boney Falls, and Cataract. These ere being sent to all focus group members, altemates, and the resource egencies today.

Although the report will be evailable on UPPCO's Web slte, we're sending you an individuel copy to save you time end effort. Your copy and the copy on the Web site are complete and unabridged except for some informetion on endangered species that had to be redacted, because federal law doesn't ellow it to be disclosed to the public. The redacted information will be provided to the relevant government agencies for their use in the consultation process.

We look forward to seeing you at the Tuesday, August 8, open house being held at Tailwinds at K. I. Sawyer. Displays will be set up et 6:00 PM (Eastern) for review prior to the presentations, which will begin at 6:30. An open question-and-answer period will follow the presentations, and at 7:30 we'll edjoum end return to the displeys for one-on-one conversetions, individual questions, end a closer look at the visual materials. Any questions not addressed in the allotted Q&A time can be submitted on cards and will be addressed on UPPCO's Web site.

The presentations will cover the results of the environmental studies conducted on wildlife and aquatic habitat, loon nesting, recreational resources, end eesthetic resources. We won't be in a position to discuss the Shoreline Manegement Plan (SMP) at these sessions. The SMP will be the subject of e future public open house and will be formuleted from the study results, the agency consultetion process and public comment.

Sincerely,

Kent E Moyle

UPPCO General Manager

On July 28 2006, the preceding cover letter and associated attachments were sent to the following recipients:

Mr. Rusty Atherton
PO Box 33
Au Train MI 49806-0033

Mr. Doug Bovin
100 W. Munising Ave
Munising MI 49862

Mr. Todd Brock
N6518 Alger Heights Road
Munising MI 49862

Mr. Tom Curry
N2693 M-67
Limestone MI 49816

Mr. Bill Brisson
N2693 State Road M-67
Limestone MI 49816

Mr. Jim Dellies
PO Box 150
Gwinn MI 49841

Ms. Bonnie Hartzell
PO Box 98
Gwinn MI 49841

Mr. Tom Elegeert
5698 25th Road
Gladstone MI 49837

Mr. Archie Hendrick
N6139 Elmer Johnson Rd
Skandia, MI 49885

Mr. Jim Keebaugh
104 Provider
Gwinn MI 49841

Mr. Dave Koski
PO Box 143
Chatham MI 49816

Mr. Rod Larson
E5351 Park Street
AuTrain MI 49806

Mr. Joe Maki
609 N. 8th Street
Gladstone MI 49837

Mr. Greg Stevenson
PO Box 173
Perkins MI 49872

Mr. William Malmsten
22300 County Road CL
Ishpeming MI 49849

Mr. Joe McDonnell
3113 13th Lane
Berk River MI 49897

Mr. David Allen
318 E. Prospect
Marquette Mi 49855

Ms. Vickie Micheeu
Delta County Area Chamber of Commerce
230 East Ludington Street
Escanaba MI 49829

Mr. Greg Nominelli
Lake Superior Community Partnership
501 South Front Street
Marquette MI 49855

Ms. Lois Ellis
Lake Superior Community Partnership
501 South Front Street
Marquette MI 49855

Mr. Gerald Plourde
3892 East River 24.9 Lane
Cornell MI 49818

Mr. Doug Scheuneman. Sr.
423 East Varnum
Munising MI 49862

Mr. Arnold Sirtola
1456 W. Maple Ridge 37th Road
Rock MI 49880

Mrs. Carol Verbunker
PO Box 192
Munising MI 49862

Mrs. Kay LeVeque
PO Box 405
Munising MI 49862

Mr. Gerald Corkin
108 Woodland Drive
Negaunee MI 49866

July 28, 2006

Mr. Bill Besonen
6893 E One Mile Road
Trout Creek MI 49967

Deer Bill:

Enclosed is a copy of the environmental essessments for Bond Falls, Victoria, and Prickett Dam. These ere being sent to all focus group members, alternates and the resource agencies today.

Although the report will be available on UPPCO's Web site, we're sending you en individual copy to save you time and effort. Your copy and the copy on the Web site are complete and unabridged except for some information on endangered species that had to be redacted, because federal law doesn't allow it to be disclosed to the public. The redacted information will be provided to the relevant government egencies for their use in the consultation process.

We look forward to seeing you at the Monday, August 7, open house et the Ewen-Trout Creek School. Displeys will be set up at 6:00 PM (Eastern) for revlew prior to the presentations, which will begin at 6:30 in the cafetorium. An open question-and-answer period will follow the presentetions, and at 7:30 we'll adjourn end return to the displays for one-on-one conversations, individual questions, and e closer look et the visual meteriels. Any questions not addressed in the allotted Q&A time can be submitted on cards and will be addressed on UPPCO's Web site.

The presentations will cover the results of the environmental studies conducted on wildlife and aquetic habitat, loon nesting, recreational resources, end aesthetic resources. We won't be in a position to discuss the Shoreline Management Plan (SMP) et these sessions, because the SMP will be formulated from the study results, the egency consultation process, end public comment. That will be the subject of a future public open house.

Sincerely,

Kent E Moyle

UPPCO General Manager

On July 28, 2006, the preceding letter and associated attachments was sent to the following recipients:

Mr. Tom Church
PO Box 778
Watersmeet MI 49969

Mr. Robert Zelinski
E23423 Hwy. 2 West
Watersmeet MI 49969

Mrs. Fay Groitzsch
8281 US Hwy 45-S
Bruce Crossing MI 49912

Mr. Gale Eilola
Route 1 - Box 28A
Pelkie MI 49958

Mr. Roger Haapala
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Rockland MI 49960

Mr. Dawayne Holtz
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Bruce Crossing MI 49912

Ms. Victoria James
Smurfit-Stone Container
One Superior Way
Ontonagon MI 49953

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Ontonagon MI 49953

Mr. Dean Juntunen
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Mass City MI 49948

Mr. Dan Loosemore
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Ms. Pam Malnar
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Bruce Crossing MI 49912

Mr. Bill Marlor
Village of Baraga
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Baraga MI 49908

Mr. John Pelkola
P.O. Box 60
Trout Creek MI 49967

Mr. Jed Platske
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Bruce Crossing MI 49912

Mrs. Linda Rein
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Ontonagon MI 49953

Mr. James Rein
420 Pennsylvania Avenue
Ontonagon MI 49953

Mr. Fred Sliger
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Trout Creek MI 49967

Mr. Jeff Sturgell
100 Hemlock Street
Baraga MI 49908

Ms. Christa Walck
1010 East Fifth Avenue
Houghton MI 49931

Mrs. Nancy Warren
P O Box 102
Ewen MI 49925

Mr. Al Warren
P O Box 102
Ewen MI 49925

Ms. Sherry Zoars
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Watersmeet MI 49969

Mr. Ted Soldan
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Pelkie MI 49958

Mrs. Amy Isaacson
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Baraga MI 49908

Mr. Ed Fuhgenschuh
Route 12, Box 213
Pelkie MI 49958

Mr. Peter Heidemann
205 North Cedar
Ewen MI 49925

Mr. Evan MacDonald
801 North Lincoln Drive – Suite 201A
Hancock MI 49930

Mr. Eric Forsberg
Houghton County Controller
401 East Houghton Avenue
Houghton MI 49931

Mr. Jack Lehto
c/o Ottawa Sportsmen's Club
PO Box 475
Baraga MI 49908

Attachment 31

28 July 2006

PRESS RELEASE – AUGUST PUBLIC MEETINGS

UPPCO SCHEDULES OPEN HOUSES TO PRESENT RESULTS OF ENVIRONMENTAL STUDIES FOR HYDROELECTRIC PROJECT LANDS

HOUGHTON MI – Upper Peninsula Power Company (UPPCO), a subsidiary of WPS Resources Corporation (NYSE:WPS), will host open houses at two locations to provide information regarding the results of its environmental studies for hydroelectric project lands. The studies will form the basis for UPPCO's project lands Shoreline Management Plans, which will be developed following a public comment period on the environmental studies. The actual non-project uses of project land (public and private docks, walkways, paths, etc.) are not yet formulated and therefore will not be a topic for discussion at the Open House meetings.

The meetings will also focus on the methodology used in preparing the environmental studies as suggested by resource agencies such as the U.S. Fish & Wildlife Service, Michigan DNR, and others.

The first Open House, which will focus on the studies at Bond Falls, Victoria, and Prickett, will be held on Monday, August 7, from 6:00 PM to 8:00 PM (Eastern) in the cafetorium at the Ewen-Trout Creek School in Ewen MI. The second meeting on the AuTrain, Boney Falls, and Cataract studies will be held on Tuesday, August 8, from 6:00 PM to 8:00 PM (Eastern) at Tailwinds Bar & Grill at K. I. Sawyer.

Topics to be discussed

"We'll discuss the results of the environmental studies that were conducted on wildlife and aquatic habitat, loon habitat, recreational resources, and aesthetic resources," said Shawn Puzen, Environmental Consultant. "We know people are equally interested in the development plans and potential proposals for docks and other shoreline uses. However, we're not in a position to discuss those issues yet. Those plans won't be developed until all the comments on the environmental studies are in so they can be considered in the plans. We'll schedule more public meetings after the shoreline uses are proposed," he concluded.

At the August 7 and 8 meetings, and through August 28, UPPCO will accept written public comments concerning the results of the environmental studies. Each comment submitted will be addressed in UPPCO's future proposal to FERC.

Interested parties are encouraged to visit UPPCO's Web site at www.uppco.com (under the sold land link,) to review the scopes of the environmental studies, the results of the studies, and minutes of previous public meetings and focus group meetings.

Meeting Format

As previously mentioned, both open houses will begin at 6:00 PM (Eastern). The first half hour will allow attendees to review displays, maps, and other graphic information and become familiar with the scope of the studies. Presentations will begin at 6:30, followed by

an open question and answer period. At 7:30, the presentation period will adjourn to allow time to visit the tables for one-on-one discussions, individual questions, and a closer look at visual materials. Any questions not addressed in the allotted time can be submitted on cards and will be addressed on UPPCO's Web site

Public Comment on environmental studies

UPPCO will accept written comment at either of the two public meetings or by mail to:

UPPCO Environmental Studies
c/o Janet Wolfe
PO Box 130
Houghton MI 49931

Comments should address specific issues addressed by the environmental studies and be postmarked by August 28, 2006.

Attachment 32
28 July 2006
UPPCO TRANSMITTAL OF DRAFT RESOURCE REPORTS TO AGENCIES

Upper Peninsula Power Company
(a subsidiary of WPS Resources Corporation)
P.O. Box 19001
Green Bay, WI 54307-9001

July 28, 2006

(Recipient Address)

Dear (Recipient):

Draft Environmental Assessment Reports

Enclosed is a copy of the draft environmental assessment reports gathered by Upper Peninsula Power Company (UPPCO) as information for the development of a Shoreline Management Plan for the Bond Falls (Bond Falls and Victoria), Prickett, Cataract, Au Train, and Escanaba (Boney Falls) Hydroelectric Projects.

A copy of these reports is being provided for comment to all members of the relevant agency group. Copies of the reports will also be provided for comments to the members of the focus groups. The public will also be able to access the reports via the UPPCO website. The public and focus group versions of the reports will not provide the nesting locations of sensitive species (bald eagles, wood turtles, and loons).

Please provide your comments by the end of the day, August 28, 2006. If UPPCO does not receive comments by the end of the day, August 28, 2006, it will assume you do not have any comments.

Should you have any other questions or concerns, please do not hesitate to call me at (920) 433-1094 or contact me at spuzen@wpsr.com. Thank you for your time and consideration.

Sincerely,

Shawn C. Puzen
Environmental Consultant
Telephone: (920) 433-1094

syx

Enc.

cc: Mr. Bill Campbell, E PRO Consulting (no enc.)
Mr. Dave Dominie, E PRO Consulting (no enc.)
Mr. Doug Clark, Foley & Lardner (w / enc.)
Mr. John Estep, FERC (cover only)

This letter was sent to the following recipients:

Ms. Angela Tornes
National Park Service
626 East Wisconsin Avenue
Suite 100
Milwaukee, WI 53202

Ms. Pamela Stevenson
Assistant Attorney General
ENRA
P.O. Box 30755
Lansing, MI 48909

Mr. James Schramm
Ex O MRHC
P.O. Box 828
Pentwater, MI 49449

Mr. Norman Nass
USDA Forest Service - Ottawa National Forest
Region 9, Watersmeet Ranger District
E24036 Old US 2 East
Watersmeet, MI 49969

Ms. Jessiea Mistak
Michigan Department of Natural Resources
Marquette State Fish Hatchery and Station
488 Cherry Creek Road
Marquette, MI 49855

Mr. Gene Mensch
Keweenaw Bay Indian Community
Keweenaw Bay Tribal Center
107 Beartown Road
Baraga, MI 49908

Ms. Ann McCammon Soltis
Great lakes Indian Fish & Wildlife Commission
P.O. Box 9
Odanah, WI 54861

Ms. Darla Lenz
USDA Forest Service - Ottawa National Forest
Region 9, Ontonagon Ranger District
1209 Rockland Road
Ontonagon, MI 49953

Mr. Mike Lanasa
Ecosystems Team Leader
Hiawatha National Forest
2727 Lincoln Rd
Escanaba, MI 49829

Ms. Lesley Kordella
Federal Energy Regulatory Commission
888 First Street, NE
Washington, DC 20426

Ms. Cary Gustafson
Michigan Department of Environmental Quality
Crystal Falls Field Office
1420 US Hwy 2
Crystal Falls, MI 49920-9626

Mr. Kirk Piehler
USDA Forest Service
2727 North Lincoln Road
Escanaba, MI 49829

Mr. Chris Freiberger
Michigan Department of Natural Resources
Stevens T Mason Building
PO Box 30028
Lansing, MI 48909-7528

Mr. Mark Fedora
USDA Forest Service
Ottawa National Forest
E6248 US Highway 2
Ironwood, MI 49938

Ms. Christie Deloria-Sheffield
US Fish and Wildlife Service
1924 Industrial Parkway
Marquette, MI 49855

Mr. Bill Deephouse
MRHC
1210 E Fifth Avenue
Houghton, MI 49931

Attachment 33
8 August 2006
PUBLIC MEETING

Presentation of Environmental Studies – Tailwinds Restaurant, KI Sawyer, MI.

E-Pro Presentation
In February and March, resource agencies provided a list of recommended studies they'd like to see on these impounds. Three basic categories were developed: recreation, aesthetics and wildlife/aquatic habitat. Loon habitats were singled out as a separate study because of their sensitive nature. These categories were based on recommendations of agencies.

Recreation – The first objective was to find out the quantity and types of existing recreation at the impoundments. First, existing information was reviewed, primarily through existing licenses and the documents that went into the developments of the licenses.

Site visits by boat were then conducted, going around the perimeter of a lake; where there appeared to be areas of recreation, the environmental consultants got out and investigated those sites. Using a standard survey form, about 5 pages long, they recorded characteristics of the sites such as amenities, measurements and erosion. The site's location was also recorded on a global positioning system (GPS). The sites were also characterized as being formal or informal - formal meaning the site was actively being managed and there were amenities provided such as toilets, picnic tables, fire pits, etc.
Informal sites are not actively managed but are frequently visited by people and have paths or trails worn leading to the site. All sites, formal and informal, were put on a map.
There is a representative photo and a narrative that describes what each site is like in the reports.

On all sites, there are formal recreation sites. UPPCO has campsites at Boney Falls and Au Train. Bond Falls has extensive recreation, as does Cataract. Also, there are several informal sites at each impoundment. All are depicted on the map and explained in detail in the report.

For the studies, the environmentalists also determined a boating carrying capacity for each site. This exercise was done to determine the appropriate number of watercraft acceptable on each impoundment. If an impoundment was to be used for water skis, jet skis, etc., that's going have different results than one that would if people used watercraft like canoes and kayaks. They tried to determine the usable surface area of the impoundment, taking the size of impoundment and subtracting out a 100-200 foot buffer as safety zone around lake. They then got a usable lake surface area, divided by a boating density factor that was determined by types of boats used. Places where larger boats would be used would have larger usable surface types.

Aesthetics – The agencies wanted to understand what areas are considered to have high aesthetic value, why and who values these areas. People have a clear visual preference with regards to landscape. Water and dramatic relief, or a combination of the two, make an area aesthetically pleasing. The study utilized research that exists and did a quantitative assessment of what the aesthetic values are of each impoundment.
Impoundments were divided into subunits, about a 1/2-mile to 1 mile large. This was the criteria for the analysis:

Relief/typography – This refers to change in visible relief, dramatic relief (which is a change w/in a 1/2 mile) and ridgeline layering (how many different ridgelines can you see?).

Physical Features - This includes islands, coves, rocks, ledges and beaches. The more there are of those in a site, the higher the ranking. There is also the component of mystery as in wanting to keep going to see what's around the bend.

Vegetation Diversity Is it coniferous, deciduous, a combination of the two, super story trees, trees leaning out on water these are all important aesthetic values. Wetlands are another thing people like to look at as well as seasonal color.

Special Features - This refers to a place where you can view wildlife eagles, deer, moose, raptors, etc. this adds to the landscape.

Cultural or Historical Features – An example of this is an old cabin in the woods with history that draw people in.

Natural Character All of the impoundments have this. This basically means the land is rather undeveloped. There can be some development there if it is well done. But if there is residential, recreational or industrial development that is poorly done, those are detractors. People don't like to see that and those were given negative points.

The sites were divided into subunits these are the ratings for the impoundments on the eastern end. (He didn't give ratings for the ones on the western) The point system used can be found in the reports.

Au Train – A sizable site, it was divided into seven subunits. A couple of subunits rated high and the rest were medium none were rated low. This site is a reasonably attractive one. One reason Au Train has more points is because it got points for relief, while the others have significantly less relief. Also Au Train has more vegetation diversity.

Cataract Also divided into seven subunits, most of them rated medium with a few lows.

Boney Falls – All the subunits on this impoundment rated low. One primary reason for this was although it has nice natural character, it is very flat with a uniform shoreline. This doesn't mean it isn't visually attractive, it is just a ranking.

Gary's Presentation

For this study, a team of environmental consultants was formed, including King & McGregor, a Michigan-based consulting firm.

The goal was to produce a natural resource base map; a template to use later on to potentially determine and avoid impacts to these resources. Prior to the study, they consulted resource agencies to develop a protocol and discuss which resources were of interest to them and generally determine the extent of the level of the mapping effort.

In May, helicopter surveys for eagle nests, great blue heron and osprey were conducted. A preliminary base map with information on these species was produced. They then went out to these areas to investigate. Also, in June, boat surveys were done to observe the terrestrial areas in the impoundments. Large and small habitat components important to certain species were mapped, as well as sensitive habitats, like wetlands and submerged aquatic vegetation beds.

The results in the impoundments were very consistent with what was found in others. Areas of submerged aquatic vegetation, emergent aquatic vegetation, shrub wetlands were typically located in areas of low energy, such as bays, not exposed to winds. They mapped coarser areas.

coarse woody debris, deadwood, etc. and found in the coarser areas with bigh energy, tbere were more wave wakes and wind energy, and in lower energy areas more wetlands.

According to the study, there is Loon activity at Au Train, but it is unknown if tbere was any nesting activity. The Loon activity was sporadic, there was some foraging but tbey weren't acting as if tbey were defending territory. There were also babitat for Sandhill Cranes at Au Train; the environment consultants observed foraging habitat, staging and roosting babitats as well. At all impoundments, there was a variety of waterfowl. At Cataract, there were more water fowl, dipping ducks and diving ducks because there is more underwater vegetation there.

Terrestrial Habitat Woodland raptor calls were done using an MP3 player. At Au Train, they got two responses from Red-Sbouldered Hawks. There is likely a nest in the area, hut tbey were not able to determine if it is within project lands. They also did calls for barn owls, but only heard one in the distance. Tbey also heard one Osprey at Cataract but saw no nests. Tbey also looked for old growth, but didn't find any of that – they found some old trees, but none that exhibited old growth eco-system cbaracteristics.

In general, tbe habitats are typical to tbe upper Midwest. Again, the maps that were produced are templates that are going to be used to potentially determine how to avoid and minimize negative impacts. It was necessary to find out what's tbere so it can be protected.

Questions

Q: When you were doing your studies with the wetlands and waters and stuff does the typography of the shorelines in your studies have any impact on what you would suggest for docks or anything of that nature because of erosion and compaction?

E-Pro's job was not to evaluate or assess any type of development. This was simply a starting point witb which tbose decisions can be later made. Areas of erosion around the various impoundments were noted and depicted on the maps.

Q: How much time did you spend surveying the land versus time you spent modeling? And are there any other plans for spending more time in other seasons when certain wildlife might be more present?

Between all the field crews, E-Pro spent approximately 26 field days out there between May and June. E-Pro felt it captured a good base map and a good template to move forward.

Q: Why didn't E-Pro contact more local people, users of the impoundments like fishermen, hunters, campers, and paddlers? I would like to see you talk to a lot more local users of these lands and ask them why they value it and have that in your study.

E-Pro did contact and got tbeir input on, that included tbe Ottawa national forest, fisheries and biologists at MDNR, UP Fisheries supervisor at MDNR, Ecosystem team leader at Hiawatba National Forest, the campground managers at bond falls who also are familiar with the others and us forests service station manager. Admittedly, E-Pro did not talk to everybody who was out on tbe impoundment on a regular basis.

Q. Have you had developed any parameters or come to any conclusions to deal with water level fluctuations on the reservoir, specifically referring the Au Train impoundment which I am interested in?
Only minimally. E-Pro did look at licenses and what are the water level regimes that are dictated in the licenses. Where there was significant variation E-Pro did note what the potential impacts of that might be within the realm of the studies conducted.

Q: Who put the economic information on taxes on the back tables? Is it open for discussion at this meeting?
UPPCO put the information on the back tables as an update to information previously requested by interested parties. The discussion at this meeting is aimed at the environmental studies. The economic data will be discussed at a future meeting.

Q: Did the study take into consideration species, game and non-game, that are present in these impoundments in the fall-time? Migratory species?
Yes. E-Pro at the items of interest the agencies requested including suitable foraging habitat for diving and dipping ducks as well as staging habitat for sand hill cranes and several other species.

Q: Could you tell us a little bit about the loon population as their so affected by the public interaction and how you see that effecting their nesting and their feeding habits on those waterways in that area? In all those areas?
E-Pro can't release or talk about any specific loons since they are a sensitive species and it is irresponsible to put that information in these reports. That information is available from the resource agencies. In terms of the nesting, it determined if there was nesting habitat at the impoundments, particularly one of the impoundments focused on was Au Train.

Q: What are your plans or conclusions for the goose refuge at the south end of the Au Train reservoir? Did you study this and study what possible future plans you might have?
E-Pro documented nuisance species and one of the species that we considered nuisance species in constitution with the agencies was Canada goose. E-Pro documented the occurrence of geese relative numbers but that was the extent of our study.

Comments
"If this meeting isn't to talk about development, please don't put information about development on the back tables unless you're going to open it up to everyone to talk about."

"Since this has been brought up and it was in the back, the handout about these tax assessments and how they'll go up, I'm going to have a question on that. Reading from page 1 of 1: the following is an assessment of taxes collected 2005 dollars of non project land Boney Falls land sold and to be sold by UPPCO the estimates assume the lots are sold and the homes constructed and the lots are going to take several years without water access and docking rights, the estimates will drop 50-75 percent. Well, I guess the first question in my mind is if the price UPPCO gets from Naterra's drops 50-75 percent if they don't get the docking rights."

"I wanted to follow up on an observation about the redactions within the document. I've been very involved in making comments on all kinds of documents including government documents

and this type of treatment of the subject manner that was done. first we protested not revealing site specific location, hut there's a lot of information that is contained within those statements and there should he plenty of that that is appropriate for the public to know. Otherwise you know we're restrained from having all the information we need to be ahle to comment fully to you folks ahout our coneerns on these impoundments and how their used. So that's an ohservation, I think you can treat it hetter and at least divulge some of the information. I certainly respect your need to keep confidential location and things hut at the same time when you put that there and redact all that stuff out, we know the animal is present so some of the, like you wrote, is certainly digestihle by the public."

Attachment 34
27 August 2006
PUBLIC COMMENTS FROM LINDA S. REIN

Bond Falls Landowners
420 Pennsylvania Avenue
Ontonagon, MI 49953
(906) 884-2903

August 27,2006

UPPCO Environmental Studies
c/o Janet Wolf
PO Box 130 Houghton, MI 49931

Dear Ms. Wolf:

Re: P-1864, P-2402

The Bond Falls Landowners have many concerns regarding the recent assessments done on the six U.P. Flowages affected by the UPPCO/WPS/Naterra Land Sales.

We have studied the assessments for Victoria, Prickett and Bond Flowages done by E-Pro Engineering & Environmental Consulting and have the following comments and concerns:

We question the real purpose of the study as it appears to be nothing more than an attempt to justify the proposed campground reorganization plans, the proposed residential development and plans for private shoreline structures like PRIVATE DOCKS for the express use of the new lot owners.

When we all purchased our properties, we realized that we were NOT purchasing "lakefront" or "shoreline" properties, and hence we have had no "exclusive rights of use" to the shoreline, as the FERC License dictates that it is to be managed for the benefit of the public. Anything happening on the project lands is supposed to "protect and enhance the scenic, recreational, and environmental values of the project", and be for the benefit of the public.

Given that the study was conducted during such a short period of time, during only a several week period in the late spring/ early summer, we believe it is inadequate and does not represent an accurate picture of these flowages. At this early time in the season, many species of flora and fauna were not emergent at that time. These studies certainly cannot qualify in any sense of the Imagination as a comprehensive EIS of any kind. Such a short "snap-shot" cannot possibly be complete as it does not take into account any yearly or seasonal variations and we believe many wildlife species were over looked, missed altogether, miscounted, and ignored .

The invasive species known as Rusty Crayfish was not even noted in summary for Bond Falls Flowage. As Bond Falls Landowners we have documented the presence of Rusty Crayfish with the resource agencies, and we have noted their presence at Bond for at least the last 20 years. This destructive species is very prominent and we question how E-Pro could overlook or discount something so obvious and important.

This make us question what else has been overlooked, omitted, miscounted, discounted or ignored.

We question the methodology used in the study, and whether it can be actually considered "valid" as actual "scientific data" vs. what appears to be no more than "subjective observations" from a quick boat ride and walk around to try and document how PUBLIC USE has been so detrimental and caused so much "erosion" on the flowage. Interesting that the E-Pro assessment credits very little to the fluctuating water levels caused by the inherent way that UPPCO/WPS manages this hydro project.

We believe more weight should have been given to the historical fact that UPPCO/WPS fluctuates the water levels greatly and we question why the E-Pro surveys for the most part overlook and minimize this fact.

A visual observation of certain sites and then a subjective assumption such as the probable causes of erosion is not very scientific and tells you nothing about how many people actually use each site. Interestingly enough none of the notes in the survey eluded to deer or other wildlife and the pathways they make to the water which can also cause "compaction" and "erosion" or "sedimentation" of the sites.

A more scientific assessment would have included a look at the campground log records of the actual usage. It is our observation that most campers are conscientious and cause very little impact.

Lets see some, "real", "authentic" data, not your qualitative analysis which amount to nothing more than subjective personal opinions on the part of the E-Pro surveyors. With the methodology used, there was a great chance things could be missed and/or omitted with the claim that "We weren't looking for that." We demand to see quantitative scientific data!

When we questioned the methodology used regarding "Aesthetic Values" with UPPCO and E-Pro at the PUBLIC MEETINGS, we were told that neither of you had ANY plans to actually survey or poll or question any of the "ACTUAL USERS" of these flowages, to see which attributes they value!

If you REALLY wanted to know who uses and values these flowages and why, you could have very easily researched your data and surveyed campers, visitors to the State Park and the Falls, and even visitors who used the day-use area especially on busy weekends and holidays like this past July 4, when the flowage was at peak use with hundreds and hundreds of users present for you to poll. Why did you not do this?

It appears that no data was used from campground logs regarding campground usage by site. This would have given a more accurate idea of who uses these campsites, which sites are the most popular and why, and which ones subsequently get the most use and have the most " aesthetic value" to the public.

We believe your data is flawed, incomplete and unscientific.

We believe the assessments for these flowages should include the environmental impacts of the proposed residential developments and proposed plans for "non-project use of project lands" which does not appear to be compliant with the FERC License. We urge FERC to force UPPCO to follow the section 5.4 handbook process and initiate a new and comprehensive environmental impact study that accounts for seasonal variations in the flora and fauna, recreational uses, aesthetic values and the impact of the proposed non-project use of project lands.

Thank you for the opportunity to comment.

Sincerely,

Linda S. Rein
Representing over 36 Bond Falls Area Landowners

Copy to:
Filed electronically to the Federal Energy Regulatory Commission

Attachment 35
27 August 2006
PUBLIC COMMENTS FROM NANCY WARREN

Upper Peninsula Public Access Coalition
P O Box 102
Ewen, MI 49925
www.uppac.com

906 988-2892
August 27, 2006

UPPCO Environmental Studies
c/o Janet Wolfe
PO Box 130
Houghton, MI 49931

Dear Ms Wolfe:

Re: P-1864, P-2402

The Upper Peninsula Public Access Coalition is a volunteer organization that was formed January 2006, in response to the proposed sale of 7300 acres of UPPCO lands surrounding six Upper Peninsula flowages to Naterra Land, a development company. Our primary concern is the impact of UPPCO's proposed non project uses of the project lands. To date, we have gathered over 1500 signatures requesting that the Federal Energy Regulatory Commission order the preparation of a new and comprehensive environmental impact study.

We have read the environmental assessments for the Bond, Victoria and Prickett impoundments that were conducted by E-PRO Engineering & Environmental Consulting and have several concerns:

- From the obvious omissions and clerical errors, it seems clear the reports were completed in haste. For example, the Middle Branch of the Ontonagon River, a premier trout stream and part of the Federally designated Wild and Scenic River System was referred to as "Interior Creek".

- A waterfall, popular for its recreational and aesthetic values, was missed entirely by the E-PRO team. When questioned about the failure to document the presence of spotted knapweed, honeysuckle and rusty crayfish, non native invasive species known to exist at Bond Flowage, the E-PRO representative stated it was because these species are too common.

According to the UPPCO document dated 4 18 06 "Scope of Services", the Agencies requested that UPPCO map and identify "aesthetic resources (areas to be considered to have high value)" and describe "why these areas have high aesthetic value and who values the aesthetic resources". This was a stated objective of the study. Yet, E-PRO never spoke to one actual user; fisherman, hunter, camper, paddler, bird watcher, picnicker, tourist, to ascertain first hand: "Who values these resources and why?"

The assessments, completed in just a matter of days, captured only a snapshot overview of some of the natural features and resources of the project lands and waters of the impoundments.

UPPCO recently sent letters to Interior Township residents speculating about increased tax revenues to the township and county if their proposed non-project uses of project lands are approved. This data was also distributed at the public meetings giving the impression these increased revenues would be net gains, without allowing public questions or discussion of increased cost of services. We believe this is inappropriate and an attempt to mislead the public.

UPPCO is attempting to solicit local support for private docks, piers and trails on the project lands, without addressing the negative impacts of these uses on the project lands. Not only aesthetics but fishing, waterfowl hunting, hiking, birdwatching, animal tracking, camping and other forms of recreation will be impacted by non-project uses of project lands. None of this was addressed by these studies.

We believe the assessments for these impoundments should include the environmental impacts of the proposed action and alternatives. We urge FERC to force UPPCO to follow the section 5.4 handbook process and initiate a new and comprehensive environmental impact study – one that incorporates seasonal habits of birds and wildlife, recreational uses, aesthetic values and the impacts of the proposed non-project use of the project lands.

Thank you for the opportunity to comment.

Sincerely,

Nancy Warren
Upper Peninsula Public Access Coalition

Copy to:
Filed electronically with FERC

Attachment 36
28 August 2006
COMBINED AGENCY COMMENTS ON DRAFT REPORTS

Michigan Hydro
Relicensing Coalition

August 28, 2006

Shawn Puzen
Upper Peninsula Power Company
P.O. Box 19001
Green Bay, WI 54307-9002

RE: Resource agency comments on draft environmental baseline assessments for non-project use of project lands (FERC Project Numbers 1864, 10854, 2506, 2402, and 10856)

Dear Mr. Puzen:

Please find enclosed combined comments from the Michigan Department of Natural Resources, U.S. Forest Service (Hiawatha and Ottawa National Forests), National Park Service, U.S. Fish and Wildlife Service, Michigan Hydro Relicensing Coalition and Keweenaw Bay Indian Community (Resource Agencies) on the environmental baseline assessments conducted by E-PRO Engineering and Environmental Consulting. These studies were conducted to map and assess important natural resource features on several Federal Energy Regulatory Commission (FERC) hydroelectric basins (FERC Project Nos. 1864, 10854, 2506, 1402, and 10856).

These comments are provided by the Resource Agencies in consultation with Upper Peninsula Power Company (UPPCO) as part of the FERC Shoreline Management Planning process. The overarching goal of the agencies in this process is to assure that any non-project use of project lands does not compromise the integrity of the licenses in place.

We have reviewed the draft studies for recreation, wildlife, loon and aesthetic resources and have enclosed our comments on the studies for each basin. The Resource Agencies are not involved in every project, therefore, we are providing Table 1 (attached) to clarify which agencies are involved at each basin.

General Comments

We recommend that UPPCO not identify these studies as "Environmental Assessments." Environmental Assessment (EA) has a specific meaning under the National Environmental Policy Act (NEPA). These assessments do not meet the requirements of an EA as defined under NEPA. In general, an EA includes brief discussions of the following: the need for the proposal, an analysis of alternatives, environmental impacts of the alternatives, and a listing of agencies and persons consulted. FERC will likely be completing an EA as part of reviewing and approving a Shoreline Management Plan (SMP). In order to reduce confusion regarding the purpose of the studies by E-PRO, we suggest that the studies be referred to as "Environmental Baseline Assessments."

The study results do provide an overview of some of the resources of each flowage and surrounding project land. This information has improved our understanding of the location and extent of important environmental features at each basin. The information, however, is limited in scope as it was gathered during a brief period during May and June 2006. The reliability of the data collected is also questionable since standard protocols, as suggested by the resource agencies, were not utilized for some resources (raptors, substrate mapping, etc.) Other resources, such as old growth, hemlock, and oak stands were not identified and therefore the studies are not useful in identifying these important habitat features. These caveats will need to be considered as the SMP is developed.

We appreciate the opportunity to provide these comments. If you have any questions about this matter, please contact any of the signatories below at the phone numbers provided.

Sincerely,

Jessica Mistak

Jessica Mistak
Senior Fisheries Biologist
Michigan Department of Natural Resources
(906) 249-1611 ext. 308

Norman E. Nass

Norman Nass
District Ranger
U.S. Forest Service; Ottawa National Forest
(906) 358-4551 ext 14

Mike Lanasa

Mike Lanasa
Ecosystems Team Leader
U.S. Forest Service: Hiawatha National Forest
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Christie M. Deloria

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William L. Deephouse

William Deephouse
Michigan Hydro Relicensing Coalition
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Gene Mensch

Gene Mensch
Fish and Wildlife Biologist
Keweenaw Bay Indian Community, Natural Resources Department
(906) 524-5757 ext 12

Angela M. Tornes

Angela M. Tornes
Regional hydropower coordinator
National Park Service

Enclosures

Cc: John Estep

Combined Agency Comments

On

Environmental Baseline Studies

for

Bond Falls, Victoria, Prickett, Cataract, Boney Falls, and AuTrain basins.

Unless otherwise noted the comments below apply to all hasins. "Agencies" are Michigan Department of Natural Resources, U.S. Fish & Wildlife Service, U.S. Forest Service (Ottawa and Hiawatha National Forests), Michigan Hydro Relicensing Coalition, National Park Service, and Keweenaw Bay Indian Community.

Study Overview

Impoundments

- For many of these inpoundments the reservoir target elevation or minimum elevations varies. Because of this we propose the minimum pond elevation that could he experienced during the boating season he utilized to conservatively estimate surface area and shoreline.

Basin Name	Recommended Elevation
Bond Falls	1469.9 NGVD (minimum elevation during hoating season)
Victoria	905 feet Mean Sea Level
Cataract	1,173.5 Mean Sea Level
Boney Falls	906.17 USGS Datum
Au Train	772 ft local datum

Recreation Resources

Introduction

- Michigan Hydro Relicensing Coalition/River Alliance of Wisconsin (MHRC/RAW) and National Park Service should he included in the list of agencies and NGO's

Existing Recreation Facilities

- At the basins many informal recreation sites were identified; most hasins had a much higher numher of informal recreation sites compared to formal recreation sites. Please clarify whether UPPCO plans to keep the informal sites open for puhlic use or if these sites will be closed.

- The Recreation Plan does not discuss any nearby formal or informal trails. These features should be included and mapped.

- (Au Train, Boney Falls, Prickett) The Recreation Plan does not discuss any bank fishing sites. These features should be included and mapped.

- For all of the sites a relative measure of compaction was provided. How was compaction measured or observed?

- There are many other forms of recreation on these flowages that do not involve direct use of recreation sites identified and inventoried. Fishing, waterfowl hunting, hiking, birdwatching, canoeing kayaking, and other forms of recreation occur on and around these flowages. These activities could be impacted by non-project use of project lands. The impact of non-project use of project land on these recreational activities must be analyzed.

- (Bond Falls) Site R-1 is described as a formal boat launching, picnicking, camping, and bank fishing site. There is one nearby campsite (No. 11), but no picnicking or bank fishing facilities are available here. Additionally, two formal boat launching sites are noted. The second site (R-18) is listed on page 2-19 as an informal site. Please clarify whether these sites are formal or informal.

- (Bond Falls) The 15 informal recreation facilities on Map 2-1 and description are confusing. For 9 of these sites (R-1, 5, 9, 10, 11, 12, 13, 15, and 19) you specifically note "no erosion" at the site. However, under 2.2.3 Areas Not Conducive to Recreational Development, you state that "field crews observed eroded banks in 15 different areas around the lake." Do these 15 areas include the recreation sites? Please map these sites so that the location of the recreation sites and erosion sites are shown together.

- (Bond Falls) Descriptions of the informal sites note that the site "appears to be associated", "may be associated", or "is associated" with a formal campsite. How was the relationship between campsite and informal areas determined? In our observations, many of the informal sites are closely associated with formal campsites.

- (Prickett) The Michigan Recreational Boating Information System directory (available from Michigan.gov dnr website) lists Prickett Dam Backwaters site as having a parking area for 15 car trailer units. Please correct this information for site R-2 on page 2-3 and make the necessary calculation corrections in section 2.3.3 Lake Use Rate on page 2-8.

- A description of average recreational use of the campgrounds, as well as purpose of campground visit, should be included.

- Include a description of how the existing recreational use may be affected by proposed non-project use of project land

Additional Recreation Observations

- It should be noted that Michigan Department of Natural Resources staff have observed increased use of the basins during waterfowl hunting season (September through November) and during deer hunting season (October through December). This increased use is not captured in the short time frame of visits in May and June.

- Please note the days of the week and duration of visits to the impoundments. Boating observations may have missed users who were out in the early morning or evening. Also weekend days may have more usage and may not have been captured during the study.

- A description on how proposed non-project uses of project land will impact recreation, including hunting, should be included.

- A thorough description of recreational use by anglers, hunters, and trappers should be included.

- Passive recreational use, such as mushroom and berry picking or bird watching, should be described.

Areas not Conducive to Recreation Development.

- The use of the phrase "natural wave action" is misleading, since the effects of wave action on these flowages is magnified by the artificial manipulation of water levels, which does not allow vegetation to become established in shoreline areas, thus making many areas more prone to erosion from wave action than they would normally be on a natural lake.

- A discussion of site conditions not conducive to the development of dock structures and marinas including shallow water areas that limit ingress and egress to the shore, wetlands, and other sensitive areas should be included. In addition, a map of shoreline site conditions not conducive to the development of dock structures or marinas should be included. According to Wagner (1991)[1], shallow areas of lakes (e.g., less than 5 feet) are most likely to exhibit negative impacts associated with boating. These impacts include sediment re-suspension, reduced water quality, and reduced habitat for aquatic and terrestrial species.

- (Prickett, Victoria) Please provide a detailed topographic map to help visualize the steep bank areas around the reservoir.

- (Bond Falls) For the various sites described, the causes for any erosion observed are stated (human use, natural wave action, etc). This is somewhat speculative, and it would be more appropriate to refer to the Bond Falls Erosion Control Plan (and subsequent contractor report) for information on probable causes of erosion at each site.

[1] Wagner, K. J. 1991. Assessing impacts of motorized watercraft on lakes: Issues and perceptions. Pages 77-93 *in* Proceedings of a National Conference on Enhancing the States' Lake Management Programs. Northeastern Illinois Planning Commission

Boating Carrying Capacity

- An important step in determining acceptable boating densities and desired types of water-based recreational use is lacking: developing a "desired condition" for the reservoirs. The desired condition details the setting and type of recreation experiences desired. There are accepted methods for developing the desired condition, such as Water Recreation Opportunity Spectrum (WROS). WROS helps determine the niche of a particular water body in the region. Without determining the desired condition, calculating possible numbers of boats on a water body lacks meaning and context. Any number (or range of numbers) that is arrived at, and any specific watercraft type, may or may not fit with the desired condition. The Forest Service can provide more information on the use of WROS for developing a desired condition for particular basins.

- User perceptions of acceptable boating density in similar settings are missing from the discussion (this is part of WROS process described above).

- A discussion on the type of watercraft commonly used on the impoundment needs to be included.

- The density estimates do not take into account potential for increased public use of the basin and associated facilities over the term of the FERC license.

- The "Recreational Resources" map does not include constraints to recreational development (e.g., docks and marinas) such as shallow water areas, areas of aquatic vegetation, and wetlands.

Usable Lake Surface Area

- Please clarify the elevation of "full pond". We suggest the minimum pond elevation during the open water boating season be utilized to provide a conservative estimate. See comment under "Study Overview: Impoundments" above.

- (Au Train) The southern portion, or approximately 1/5, of the basin is considered a wildlife refuge and is closed for over 2 months of the year. This needs to be taken into account when calculating the useable lake surface area.

Boating Density

- Since this section is based largely upon Boating Carrying Capacity as determined by the previous section, and since there are serious questions about the methodology used to estimate Boating Carrying Capacity (see comments above), the range of boat numbers arrived at, and the type of watercraft, has no meaning or context. Again, a "desired condition", detailing the setting and types of desired recreational experiences, needs to be determined before making calculations of acceptable boating densities and types of watercraft.

- User perceptions of acceptable boating density at the flowages, or in similar settings are missing from the discussion. No interviews were conducted with boaters on this flowage to help determine acceptable boating densities.

- Information on the type of watercraft actually used on the impoundments should have been provided, rather than speculating as to what types of boats/motors represent the "most likely" users.

- The studies referenced (in table 2-1 for Bond Falls) may not be relevant to the discussion, depending on user perceptions in those areas and their history. Using an average of the figures obtained from these studies, is probably overly simplistic and not appropriate for determining appropriate boater densities for this flowage.

- Please include a note in the study that the Resource Agencies and UPPCO, while team evaluating impacts to project resources, will need to agree in the Shoreline Management Plan upon an acceptable boating density standard.

- Please note that fishing boats (and boats used for waterfowl hunting) often have motors greater than 25 HP.

- (Prickett) The analysis should take into account the presence of stumps and floating snags in this flowage, which are abundant and which are one of the major "defining characteristics" of this flowage (p. 5-7). These stumps and snags are one of the main features that attract fishermen to the flowage, and fishing is the dominant recreational use at this time (p. 5-10).

Conclusions

- (Prickett) The presence of stumps and floating snags, and the ways these features shape the current recreational use of Prickett Flowage, needs to be included in the analysis. This would logically be part of the WROS assessment discussed above.

Wildlife and Aquatic Habitat

Study Objectives

- The main objectives of the Wildlife and Aquatic Habitat study should be clarified to reflect the objectives listed in the Scope of Services: 1) gather all readily obtainable, existing information on wildlife and aquatic habitat/species associated with the subject impoundments and project lands, 2) conduct field work to verify the presence and condition of existing data, 3) map and document (on a broad-scale) new occurrences of habitat and species of interest observed during the field work effort, and 4) use these data to develop natural resource constraint maps/databases for each impoundment.

- In addition to possible nesting platforms, potential nesting sites should also be included in the list of study objectives.

- Gray wolf and gray wolf habitat should be included in the list of study items.

Nearshore Aquatic Habitat

- Fisheries assessments were either lacking or were incorrect. Information on the current status of the fish community should be included.

- The presence and distribution of littoral fisheries habitat such as gravel lenses, woody structure, and aquatic vegetation is described in general terms within the assessments. The assessments indicate that habitat conditions were documented using GIS-based field maps and GPS, however the data displayed within the assessments was not site specific. Further detail of specific habitat types with GPS mapping aspects will be necessary if any habitat alteration proposals are entertained. The data displayed within the assessments lacks specificity that would allow for determining the impact any proposals seeking shoreline alterations, dock construction, or woody habitat manipulation.

- (Bond Falls) Please provide a map showing the location for the photo in Figure 3-1.

- (AuTrain) Please clarify intent of the third sentence in the first paragraph under 3.2.1.

Bald Eagle, Great Blue Heron, and Osprey Nesting

- Include information on the typical altitude above ground level at which the helicopter was flown, as well as the separation between transects.

- (Bond Falls) The information obtained (re. existence of suitable bald eagle nest trees on the large peninsula along the eastern shore) is new information and needs to be considered in reference to the new campground unit planned for that peninsula.

- (Bond Falls) A discussion of whether any natural suitable osprey trees currently exist in or around the flowage is missing.

- (Prickett) It is unclear what criteria were used to evaluate nesting habitat potential for great blue heron. The large wetland complex at the south end of the flowage would appear to provide good habitat in general for herons (and herons were observed there), yet the statement is made (p. 3-5) that there is a "lack of suitable natural nesting habitat for great blue heron." Herons are colonial nesters and will utilize a wide range of tree species and tree sizes for their nests (Atlas of Breeding Birds of Michigan, 1991), so it is unclear why there is a lack of nesting habitat.

- (Victoria) It is concluded that "no suitable natural nesting habitat was observed" for ospreys, please define suitable osprey nesting habitat.

Waterfowl and Sandhill Crane

- According to the Michigan Audubon Society [2], cranes are not dependent on using traditional bogs with sphagnum and leatherleaf for nesting and often use smaller wetlands

[2] http://www.michiganaudubon.org/bakersanctuary_crane.html

with a greater variety of vegetative cover types. Therefore it is not correct to conclude that there is no crane nesting habitat on project lands around the flowage.

- Although evidence of waterfowl and sandhill crane nesting was limited during the assessments, the large number of goslings, ducklings, and juvenile sandhill cranes indicate that nearby nesting locations are present.

- These surveys were conducted at the wrong time of year to accurately reflect migratory wildlife usage.

- (Prickett) The very brief period of observation for wildlife on this flowage (2 days in June) must be considered when reviewing the data obtained. For example, we have observed several different species of waterfowl on Prickett flowage over the years (including mallards, black ducks, wood ducks, etc.), yet the brief visit revealed only one waterfowl species: common merganser. We would consider the information provided in this report anecdotal.

- (AuTrain) Please clarify the intent of the last sentence of the last paragraph under 3.2.3.

Wetlands and Significant Upland Habitats

- Documentation of the prominent plant species in each wetland cover type and documentation of the hydrological condition of the wetlands including extent of inundation and general water depths is missing.

- (Bond Falls) On 3-7 it states that sandbar willow along the shoreline is typically flooded, providing excellent habitat for wildlife. This may be true in May, but by July, this habitat is gone, as water levels are generally much lower and far below this vegetation.

- (Bond Falls) On p. 3-9 it states that ..."no other unique or significant upland habitat was observed at Bond Falls". This is somewhat misleading, since surveys were not conducted for some upland habitat types recommended by the agencies (stands with old growth characteristics or stands with hemlock/white pine component).

- (Prickett) The sizeable cedar/yellow birch/hemlock wetland and the stand of mature hemlock is an important forest component that was noted in the study. Were these areas identified from a boat or examined on shore?

- (Victoria) There is no discussion of Significant Upland Habitats. Were any project lands surveyed for significant upland habitats?

Wood Turtles

- (Bond Falls) There appears to be an error in this section; Interior Creek does not empty into Bond Flowage, but rather into the M. Branch of the Ontonagon River, some distance south of the flowage. The location for the wood turtle observation should presumably be where the M. Branch flows into the impoundment.

- (Bond Falls) We are familiar with the area around where the M. Branch flows into the impoundment, and the area with the most potential for wood turtle nesting is on the steeper sandy banks along the east side of this narrow bay, not the west side, as labeled in the figure. The angle of slope, sparsity of vegetation, and greater exposure to the sun on the east side of this bay would likely be preferred by wood turtles for nesting.

- (Victoria) Please clarify whether the south or southeast facing slopes that were identified as possible wood turtle nesting habitat were checked on-the-ground for evidence of use by nesting wood turtles or just observed from a distance.

Woodland Raptor Nesting

- It is not clear what distance interval was used to sample for woodland raptors, and how much of this survey was conducted while on land, versus from a boat. Also, please provide time of day the woodland raptor surveys were conducted.

- The search protocol to detect woodland raptors and their nests is insufficient and poorly timed to accurately determine their presence (raptor surveys should occur between April 15 and 30). Additional raptor surveys should be conducted, as well as surveys of raptor nests in absence of foliage, to accurately determine raptor presence.

Wild Rice Surveys and Possible Restoration

- Although grazing by Canada geese can impact wild rice beds, U.S. Forest Service (USFS) has restored wild rice beds on other water bodies within the Ottawa National Forest where geese are relatively abundant. The USFS has not had to employ geese exclusion methods in those areas. Therefore, we suggest replacing the word "likely" with "possible."

Presence of Nuisance Species

- The conclusion that orange hawkweed is widely distributed yet relatively uncommon is confusing and needs clarification.

- Reed canary grass is typically considered a non-native invasive species in this area. Why is it not considered a nuisance species in this study?

- It is not clear whether any sampling was done to detect aquatic invasive plant species such as Eurasian watermilfoil and curly-leaf pondweed. These and other invasive plant species could easily be missed if the only surveys performed were observational, rather than using a weed-rake or similar device to sample vegetation.

- It is incorrect to routinely classify Canada geese as nuisance species. Although they are capable of becoming a nuisance in urban/suburban settings, they are not considered a nuisance at these projects.

- (Bond Falls) Spotted knapweed occurs in many locations on project lands around Bond Flowage, including the campground areas, boat landings, etc. Non-native honeysuckle

also occurs on project lands in the area. Yet, there is no mention of either of these nuisance species in the report.

- (Bond Falls) Rusty crayfish, an invasive animal species, are known to be very abundant within Bond Flowage, yet there is no mention of them in the report. Was any sampling for rusty crayfish, spiny water-flea or other invasive animals conducted?

Shoreline Erosion and Steep Slopes

- A discussion of the general length of the erosion sites as well as the potential causes is missing.

- It should he mentioned that some erosion does occur naturally and this type of erosion is of less concern than erosion caused by project operations or use.

- A description of the scale used to define erosion as major, minor, or moderate should be included.

- Include a description of where eroded material is being deposited.

- (Bond Falls) On 3-12 it states that "most of the active erosion did not appear to be a result of wave action or ice floes". This statement is rather speculative, with no connection to data gathered during this study. It also contradicts some earlier statements (Sec. 2.2.1) that wave action appeared to be a contributing factor in erosion observed at recreation sites.

Gray Wolf Consultation

- We agree that wolves can be found throughout the Upper Peninsula. We would expect that wolves periodically use the areas around the basin for foraging and pup rearing. Because of this we believe that wolves should he considered in developing the SMP. As previously discussed, the review and approval of the SMP by FERC will require section 7 consultation with the U.S. Fish and Wildlife Service.

- (AuTrain, Boney Falls) A discussion of the gray wolf is missing.

Other Comments

- A discussion of rare, threatened, and endangered species is missing.

- It should he noted that the agencies had suggested that more detailed information should be obtained on vegetation within the project lands (specifically stands with old growth characteristics, stands with mesic conifers, stands with red oak), hut this information was not obtained during the study.

- It should be noted that recommended agency protocol for collection of aquatic habitat data, and conducting raptor surveys, was not utilized. This unfortunately makes the data obtained of lesser quality for assessing impacts from non-project use of lands and waters on these resources.

- Please make a note under the list of "Other Wildlife Species Observations" that this is not an all inclusive list. Many wildlife and fish species commonly observed on project lands or waters (e.g., Nashville warbler, Northern oriole, blackburnian warbler, song sparrow, veery, rose-breasted grosbeak) are missing.

- (Prickett) The "Other Wildlife Species Observation" list appears to be in the wrong section (currently in the Gray Wolf Consultation section).

- Please provide, in addition to the detailed maps, a habitat constraints map showing an overview of the entire basin.

- On the "Species Observations and Habitat Components," please color-code the species observations so that it is easier to identify important areas for different suites of organisms. For instance bald eagle observations in one color, waterfowl observations in another color, etc.

- (AuTrain) Trumpeter swans are expanding their range and have been documented by MDNR biologists at the AuTrain Basin. MDNR staff believe that trumpeter swan nesting potential at the basin has increased and will be realized within the next few years.

Qualitative Assessment of Potential Impacts of Stump Removal (Prickett Basin)

- This section attempts to assess environmental impacts of implementing a proposal to remove stumps at Prickett. We suggest the environmental effects analysis provided in this document is not sufficient for NEPA. The analysis would need to be more comprehensive looking at all proposed non-project uses of project lands and the direct, indirect, and cumulative impacts of these actions on all affected resources.

- The month of July would be considered part of the fish spawning or bird nesting brood rearing seasons for several fish or bird species that utilize the snags and submerged wood. August and early September would be considered staging and migration period for many bird species.

Lake Sturgeon

- Two possible ways that downstream sturgeon could be impacted by movement of sediment are discussed. A conclusion is reached that little or no effect to sturgeon would result if high water flows move sediment downstream of spawning beds. A more thorough analysis is necessary to determine the potential impacts of stump removal on downstream sturgeon. Please provide documentation or data to verify the conclusion.

- Several other fish species likely spawn in the Sturgeon River downstream of the Prickett basin. An analysis of impacts of downstream sediment movement resulting from stump removal should address these species as well.

Bird Nesting Habitat

- The conclusion reached in this section...."Removal of the trees outside the nesting and rearing season likely would not result in direct impacts to individuals of these three species," is misleading. Snags were heavily used by these species for nesting and other activities and contributed significantly to their local production. Please clarify how removal of flooded snags outside of the nesting and rearing season will not result in impacts to kingbirds, tree swallows, and common grackles.

Impoundment Fisheries

- On page 3-15 it states "...it is also possible that the flooded snags provide an excessive amount of cover and spawning habitat. This could result in an overabundance of fish, leading to stunted game fish populations. Removal of some flooded snags could help to alleviate stunting problems." The statement that the fishes of Prickett Impoundment are stunted is inaccurate and the assumption that removing woody structure would alleviate stunting is also inaccurate. Michigan DNR fisheries survey data from 1954 - 1999 has clearly documented a quality sport fishery within the Prickett Impoundment. Only one survey effort in 1962 found bluegills that were considered stunted. Fisheries surveys since that period have documented a healthy fishery composition with many predators (northern pike, walleye, and largemouth bass) and forage species (bluegill, yellow perch, black crappie, white sucker, and golden shiners). Data from a May 1999 survey documented a mean growth index for walleye to be +2.4 inches above State average. . The report's speculation that removal of flooded snags could alleviate stunting is unsubstantiated by fact. A literature review has failed to find scientific studies that support removal of woody debris to enhance fish populations. We recommend this paragraph be removed from the final report.

- In addition to providing cover for bait fish, flooded snags provide a substrate for aquatic invertebrates. Invertebrates are a major ecosystem component and source of food for fish and other animals. Because of the large amount of flooded wood in Prickett basing, the contribution of this wood to the total available habitat for invertebrates is significant. The potential effect of removing this wood on the aquatic ecosystem is not adequately analyzed in this document.

- Please define "dri-ki."

- We suggest re-wording the concluding statement to: "Removal of flooded snags would eliminate a significant source of fish habitat from the impoundment."

Common Loons (Victoria, Bond, Au Train, Prickett)

- We agree that "human disturbance is well known to affect loon nesting and productivity" (p. 4.2), which is why the agencies included "shoreline areas with minimal road access" within our definition of potential loon nesting habitat. Despite this, there was no attempt made during this study to map and describe shoreline areas with limited road access.

which would have provided additional valuable information with which to assess loon habitat suitability.

- The short time frame of the surveys (1/2 day in some instances) is inadequate to evaluate loon use of the flowages.

- (AuTrain) In general we would like to point out the high amount of loon activity on the basin. We recommend that UPPCO pursue an amendment to the AuTrain FERC license for the protection and enhancement of the common loon population.

Methodology

- In addition to possible nesting platforms, potential nesting sites should also be included in the list of study objectives.

- According to the Scope of Services, aerial reconnaissance was to occur in May. Please explain how only conducting a boat survey in mid-June may have impacted the results.

- Explain how conducting loon surveys in mid-June could have impacted the results. The optimal time for loon survey is the last two weeks of May and early June.

Presence of Loons

- (Bond Falls) The mouth of Interior Creek (p. 4-4) should be the mouth of the M. Branch Ontonagon River.

- (Bond Falls) It is possible that other adult loons observed during the study had attempted to nest before the surveyors were there, and failed for one or more (unknown) reasons. Also, the FERC license includes conditions which should enhance potential for loon nesting over time; this would need to be considered in any environmental assessment that analyzes the potential impact of non-project use of project lands and waters on loons. This is supported by the statement on 4-5: "If (loons) are resident, and are using specific territories, then protection of those areas may encourage their success".

Limiting Factors

- A discussion of water levels maintained by UPPCO during the time of loon nesting would be beneficial in determining potential success.

- (Bond Falls) The statement "...it was determined that there are no limiting factors which affect loons' use of the impoundment for nesting" is not supportable, considering the very limited scope and duration of the study. A wide variety of factors such as reservoir water level fluctuation, human disturbance, forage quality and quantity, e'c., could have easily come into play as factors limiting loons' use of the impoundment, but these would have not been detected on a visit to the flowage of one day.

- (Victoria, Bond Falls, Au Train, Prickett,) The assumption that loons cannot be assumed to breed or will do so in the future because only 50% of the highly suitable breeding lakes are currently being used in the northern two-thirds of the State is flawed for two reasons.

1) The assumption could just as easily be made that loons can be assumed to nest at these flowages now or in the future; and 2) The use of the reference is misleading since the term "northern two-thirds of the State" refers to the northern Lower Peninsula and not the Upper Peninsula. The actual point of the reference is that too few loons exist in the NLP to utilize all available habitats. We suggest that this entire discussion be removed from the documents.

- (Prickett, Victoria) A Secchi Disk measurement of 1.85 m (6.07 ft) is noted as not being optimal for loons and approaches the point at which foraging is hindered. Please provide literature supporting this statement. USFS experience on the Ottawa National Forest is that water clarity in this region is rarely a limiting factor for loon foraging, if the lake has an adequate forage base.

- (Victoria) It is speculative to conclude that water level changes in the flowage are "somewhat moot" in their effects on loons. A thorough, comprehensive study would be needed to support such a conclusion.

Conclusions

- Conclusions reached after short duration field observations, such as turbidity being a limiting factor for loon foraging, water level fluctuations not impacting loon nesting, or even the presence or absence of breeding pairs during the entire breeding season, are speculative. Concluding statements in the study should identify the relative uncertainty of the data and that more thorough investigations are necessary to fully understand loon use or possible use of a basin.

- Include information on prior loon nesting from the Michigan Natural Features Inventory and the Michigan Loon Preservation Association.

- (Bond Falls, AuTrain) We agree with the conclusions of the assessment to continue observations and study of the common loons at Bond Falls and AuTrain basins. These studies will allow for protection of preferred habitat, identification of any limiting factors, and form the basis for recommending any enhancement measures necessary to insure future nesting success.

Aesthetic Resources

- Although the surveyors did talk with some land managers in the area regarding which attributes are considered to be visually special, it does not appear that any such interviews were conducted with typical users of these flowages and adjacent project lands (boaters, fishermen, hikers, birdwatchers, picnickers, hunters, etc.). This would be valuable information to include (see below). These interviews should include questions related to the current status of the project as well as the proposed development.

Methodology

- Under the first bullet in Task 1, please describe what "other relevant places" were reviewed for information on scenic lake assessments.

Criteria

- The scoring criteria for Relative Relief are not meaningful for this area, owing to the relatively low relief of the lakes being studied. We recommend changing the scale to more appropriately reflect the areas being assessed. Also, this factor should be given less weight in the scoring table.

- In general, the scoring system used to develop total aesthetic quality scores for the different sub-units is flawed. By breaking most criteria down into various sub-components, and rating each of them separately, much more weight is given to some sub-components than they warrant, especially with regard to lakes in this region of the country. For example, physical features are broken down into six sub-components, each of which is rated with a score of from 0-15. Relief, Vegetation Diversity, and Special Features are also each broken down into three sub-components, and each given a score. By contrast, Degree of Naturalism, which was the lake characteristic most valued by every manager interviewed (p. 5-4), is weighted the same as any of the 15 sub-components above, giving it very little importance overall. Therefore, the total aesthetic quality scores for each sub-unit in Table 5-2 are very misleading, since they give much more emphasis to physical features, relief and other qualities than they do to Degree of Naturalism. We believe that the scoring system should be revamped to give the appropriate weighting to lake attributes that are the most or least important in this region (for example: Degree of Naturalism may be most important, and Relief may be least important). Interviews with actual users of the flowages (in addition to the managers already interviewed) should be done first to help gather information upon which to base this revised weighting of the criteria.

- The scoring criteria for Natural Character does not include 0, although this number was used in Table 5-2.

- Please explain how the individual resource management professionals were selected to provide input on valued qualities when considering inland lakes.

- (Prickett) An attribute that may deserve greater weighting at Prickett are the flooded snags (which are a sub-component within the Special Features category). This would be supported by a statement on p. 5-7 that "flooded snags and submerged stumps ...are one of the defining characteristics" of Prickett impoundment.

Overall Visual Character and Setting

- Please clarify where Lake Gogebic, Mountain Lake, and Lake of the Clouds are located.

- Please clarify what is meant by "draw-down regimen."

- (AuTrain) The last sentence of the second paragrapb (under 5.2) sbould be correcled to read "is managed by the Michigan Department of Natural Resources as a wildlife refuge."

Types and Numbers of Users

- This section is missing information on the types and numbers of public users at the basins; rather, it only includes the types of recreational use available. According to the Scope of Services, the assessment should include information on wbo uses the project and why they value it.

- (Bond Falls) Please include a citation for tbe following portion of tbe last sentence wbich refers to the waterfall(s): "most who come to see tbem don't stay for other activities."

- (Boney Falls) Clarify the meaning of "the otber side" under 4.3.1.

User Expectations

- Tbis section should include actual expectations of individuals who use the project, rather than expectations of general recreationists. We suggest that this information tben be used to identify the objectives to be attained for the aesthetic resources of the project lands surrounding each flowage.

- (Prickett) Please correct tbe information to indicate tbat 15 car/trailer units are provided at the public access site.

Highest Value Areas

- Include the highest possible score in the discussion.

- Map 5-1 is very hard to understand. We recommend removing tbe colors as they appear to be a reference to individual scores in each sub-unit. These scores are presented in table 5-2.

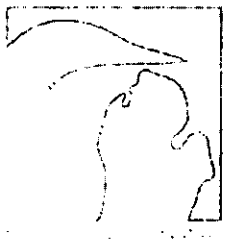
Public Viewpoints

- Since a primary use of these impoundments is by boaters and fisbermen, and since ... "all parts of the lake are visually sensitive to people who are boating, informally camping, or using sboreland areas" (p. 5-18), tbis section on public viewpoints provides little value to the aesthetics assessment.

Table 1. List of organizations and their involvement with Upper Peninsula Power Company owned Bond Falls, Victoria, Prickett, AuTrain, Boney Falls, and Cataract basins. These basins are regulated under Federal Energy Regulatory Commission licenses.

Organization Name	Basin Name					
	Bond Falls	Victoria	Prickett	AuTrain	Boney Falls	Cataract
Michigan Department of Natural Resources	X	X	X	X	X	X
U.S. Fish & Wildlife Service	X	X	X	X	X	X
U.S. Forest Service – Hiawatha National Forest				X		
U.S. Forest Service – Ottawa National Forest	X	X	X			
National Park Service	X	X	X	X	X	X
Michigan Hydro Relicensing Coalition	X	X	X			
Keweenaw Bay Indian Community	X	X	X			

Attachment 37
28 August 2006
PUBLIC COMMENTS FROM JOSEPH KAPLAN, DIRECTOR
COMMON COAST RESEARCH & CONSERVATION



Common Coast Research & Conservation

P. O. Box 202 • Hancock, MI 49930 • Phone: 906-487-9060

28 August, 2006

Shawn Puzen
UPPCO
P.O. Box 19001
Green Bay, WI 54307-9002

Dear Mr. Puzen:

We appreciate the opportunity to provide comments on the draft Assessment of the Recreation, Wildlife, Loon, Aesthetic, Resources for Victoria (FERC Project # 1864), Bond (FERC Project # 1864), An Train (FERC Project #10856), and Prickett (FERC Project # 2402) Impoundments. Our organization, Common Coast Research and Conservation, is a non-profit company dedicated to the study and protection of common loons throughout Michigan's Upper Peninsula. Our biologists work closely with public agencies, corporations, and the private sector in an effort to increase understanding of this State-threatened species. Our experience with loons spans over fifteen years, and includes the monitoring of color-marked individuals at three principal sites in Michigan's Upper Peninsula: Seney National Wildlife Refuge, Ottawa National Forest, and Isle Royale National Park. We offer our expertise to you as UPPCO evaluates and implements measures to enhance loon usage of its Upper Peninsula reservoirs.

We are pleased that your consultants found suitable nesting habitat on all of the surveyed reservoirs, and observed loons (including a breeding pair on Bond Falls) on all impoundments save for Prickett. In general, we agree with the list of loon nesting requirements provided in the draft assessment, but recommend that you add mercury exposure as a potential limiting factor. Elevated levels of this highly-toxic heavy metal have been documented in loons from the region, and have been shown to be significantly influenced by the type of fluctuating water levels common to managed impoundments.

One prominent aspect of the assessment with which we do not agree is the emphasis placed upon turbidity as a limiting factor for loon usage on the reservoirs where territorial loons were not documented (Victoria and Prickett). We feel that the references provided in the report do not support the conclusions of the consultant in this regard, and should therefore be reconsidered. In the report turbidity is referenced under "Water Quality" in the following manner:

> "Loons are visual hunters; therefore, clear water is crucial for efficient foraging. A Michigan study (Gostomski and Evers 1998) documented that time spent for foraging adults in turhid water was significantly greater than in clear water. Barr (1996) documented that secchi disk readings of 1.5m or less alter loon foraging behavior. A study of total suspended solids in Seney National Wildlife Refuge, Michigan, documented a preference by breeding loon pairs for lakes that have less than 28 Nepbelometric Turbidity Units (NTU), while lakes over that level were not used for nesting purposes (Evers 2004)."

The Evers 2004 paper cited ahove employed unpuhlished data from a study of water quality parameters at Seney National Wildlife Refuge (E.J. Collier 2003). The turhidity "threshold" provided as a limit to loon nesting in this study was based upon a sample of only three unoccupied refuge pools ("lakes") during a single hreeding season (1995). It should also he noted that these three pools provided the highest turhidity values recorded on the refuge during an ensuing eight-year sampling period. Owing to tbis extremely limited sample size, and to the subsequently lower turhidity values which have not allowed for further assessment, we do not helieve that the cited reference lends valid support to the report's argument concerning possihle complications from excess turbidity.

Citing another Michigan study (Gostomski and Evers 1998), the excerpted paragraph states that "time spent for foraging adults in turbid water was *significantly* [emaphsis added] greater than in clear water". We do not agree with this interpretation. Gostomski and Evers tbemselves state in their paper that time-hudget comparisons hetween Isle Royale (clear water) and Seney (turhid water) loons "could only he speculative" hecause of differences in sample sizes which precluded statistical comparisons. Furthermore, the authors provide no actual data on water quality (Seney pools are described as "generally stained due to the imputs of tannins"), and merely speculate that the possihle differences in foraging rates between the sites may originate from visihle differences in water clarity and prey base.

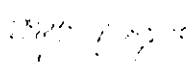
The final reference witbin the report pertaining to turhidity Barr (1986) does provide data in support of a visibility-related parameter operating as a potential limiting factor for loon occupancy: Lakes with Secchi disc water clarity of less than 1.5 meters had lower occupancy levels (31-35%) than tbeir more transparent counterparts (78-93%). While Victoria's clarity (0.9 m) falls hclow this tbreshold, Prickett's value (1.85m) does not; the report's contention that the latter is approaching "the point at which foraging is hindered" therefore seems both inaccurate (Barr's limit refers to occupancy, not foraging capacity) and unjustifiahly alarmist. Additionally, in the same paper Barr found an association hetween fluctuating high water levels and increased turhidity. In view of tbis finding we disagree with tbe conclusion in the assessment report that "given the degree of turhidity ohserved on Victoria, and the resultant extreme likelihood that loons will not nest here, water level regimes and their potential effects on nesting loons are somewhat moot."

In light of these revelations, we suggest that UPPCO's consultants establish a far more robust and defensible assemblage of peer-reviewed studies before including turbidity as a possible mitigating factor for loon occupancy on reservoirs such as Victoria and Prickett. We would also suggest including a discussion of how turbidity levels might be expected to change in response to the updated water management regulations contained within the new license agreement.

Beyond the report's treatment of water clarity, we also were given pause by this repeated quotation in support of the likelihood that there may not be enough loons to occupy reservoirs in Michigan: "The Michigan DNR states that only 50 percent of 'highly suitable' breeding lakes (for common loons) are currently being used in the northern 2/3 of the State of Michigan (Michigan DNR, 2006)". As this reference derives from a state website that provides only *general* information on loons – with no attached data on specific regional populations, nor any definition of what constitutes a "highly suitable" breeding lake – it seems inappropriate to the standards of a technical report. The Michigan DNR's own Loon Recovery Plan (1992) highlighted the dramatic disparity in occupancy rates between different regions of northern Michigan, and identified the western Upper Peninsula (where three of the four surveyed reservoirs reside) as an area of comparatively high loon densities. Our own extensive survey work throughout the Ottawa National Forest suggests that occupancy rates on lakes and reservoirs with viable nesting habitat runs far higher than 50%; we would recommend that UPPCO consultants access the Ottawa National Forest's loon occupancy database in GIS format – which was developed in partnership with Common Coast Research & Conservation – to determine more accurately occupancy rates in the areas surrounding the Bonds Falls, Victoria and Prickett impoundments.

We hope that you find these initial comments useful.

Sincerely,



Joseph Kaplan
Director
Common Coast Research & Conservation

Cc:
FERC
USFWS
USFS
MDNR

References:

Evers, D.C. 2004. Status Assessment and Conservation Plan for the Common Loon (*Gavia immer*) in North America. U.S. Fish and Wildlife Service, Hadley, MA.

Collier, E.J. 2003. Seney National Wildlife Refuge Water Quality Report - May 2003. Unpublished report, Seney National Wildlife Refuge, Seney, MI.

Gostomski, T.J. and D.C. Evers. 1998. Time-activity budget for Common Loons, *Gavia immer*, nesting on Lake Superior. Canadian Field-Naturalist 112:191-197.

Michigan DNR. 2006. http://www.michigan.gov/dnr/0,1607,7-153-10370_12145_12202-32587--,00.html Accessed June 20, 2006.

MI Loon Recovery Committee. 1992. A plan for recovery of the common loon in Michigan. Unpubl. report submitted to the Michigan Department of Natural Resources. Michigan Loon Recovery Committee, Lansing, MI.

Attachment 38
28 August 2006
PUBLIC COMMENTS FROM D. BORCHERDING

-----Original Message-----
From: fishingal@cbarter.net [mailto:fishingal@cbarter.net]
Sent: Monday, August 28, 2006 1:11 AM
To: Wolfe, Janet
Subject: Bond Flowage Land Sale

Dear Ms. Wolfe,

The environmental assessments regarding the Bond & Victoria Flowage sales leave much to be desired. This is far too important & valuable a habitat & natural resource to fail to do a complete & comprehensive impact study. The argument that there are no development plans at this time doesn't seem too valid, considering that Naterra Land Co. has unveiled plans to do just that, 424 lots at Bond Falls, with 35 individual piers & 40 multi-slip piers. I live on one of the Madison lakes, & I get a very sick feeling when I imagine that happening to a pristine, unspoiled flowage like the Bond. There should be NO piers, NO lights, & very little impact on this area. The people who purchase property on these bodies of water should understand what is at stake, & should be the type of people who will be happy to beach their small boats as the campers do. These waters are not suitable for large, noisy, polluting watercraft, & that should not be permitted nor expected. This area can be developed, yes, but it MUST be done responsibly & correctly with as little disturbance & human impact as possible. Thank you for your attention. D. Boreberding McFarland, WI.

Attachment 39
28 August 2006
PUBLIC COMMENTS FROM SCOTT HICKMAN

-----Original Message-----
From: scott hickman [mailto:suboscine@hotmail.com]
Sent: Monday, August 28, 2006 11:01 AM
To: Puzen, Shawn C
Cc: christie deloria@fws.gov; travisb@michigan.gov
Subject: CCBasin

Hi all,

I've been continuing to track shorebird migration through Alger County and have found that Cleveland Cliffs Basin continues to support far more shorebirds than any other site. The high counts of each species encountered last week are listed below for your records. The visit on August 22nd was made with Skye Hass. I'm afraid that I didn't pay much attention to waterfowl, but include a couple of species which I did note. Hope you are all enjoying a fine end to your summer. Scott

High counts for the basin (Aug 20 - 27) include:

Wood Duck - over 50 August 26
Blue-winged Teal - Stayed at about the same as on 22nd, 200? more? Well over 300 "sandpipers" (plovers, tringines, & calidridines) on the 20th Black-bellied Plover - 1 Aug 22 Semipalmated Plover - over 60 Aug 20 Killdeer - over 30 Aug 25 Spotted Sandpiper - over 2 on the 20 Solitary Sandpiper - over 10 Aug 20, 22 Greater Yellowlegs - 2 on Aug 20 Lesser Yellowlegs - 26 Aug 27 Semipalmated Sandpiper - over 60 Aug 20 Least Sandpiper - over 100 Aug 20 Baird's Sandpiper - 5 Aug 22 Pectoral Sandpiper - over 76 Aug 22, more, but not counted Aug 20 Buff-breasted Sandpiper - 2 Aug 22 (plus one same day AuTrain) Wilson's Snipe - 6 Aug 27 Caspian Tern - 8 Aug 22 Trumpeter Swan - 3 Aug 22 & 27

Other than that, 1 N. Harrier on the 27th as well as Peregrine Falcon (1) on the 26th and 27th.

Attachment 40
28 August 2006
PUBLIC COMMENTS FROM DOUGLAS R. CORNETT

Douglas R. Cornett
P.O. Box 122
Marquette, MI 49855
doug@northwoodswild.org
ph. 906-226-6649

August 28, 2006

UPPCO Environmental Studies
c/o Janet Wolfe
PO Box 130
Houghton, MI 49931

Dear Ms Wolfe:

I am writing as an alternative committee member representing the Upper Peninsula Public Access Coalition for the eastern UP group. I have reviewed the environmental studies for all 6 flowages under review. I am particularly concerned that only a few days of field studies have been conducted for each area. As a biologist I have reviewed many environmental assessments and impact statements and believe the work done so far by E-PRO is too limited in scope to properly assess the resources that could be impacted by development of the shoreline that Naterra plans for project lands and waters.

By limiting the studies to project lands, the likely effects, and cumulative effects, of development of non-project lands is not being taken into consideration. Naterra is planning to, and perhaps have even started, logging and road-building. Considering the fact that building dozens of miles of roads at each project, and logging most merchantable timber (this *is* the *modus operandi* of Naterra of all their other developments in the UP and northern Wisconsin) will affect project lands and the waters contained in these impoundments. These actions can cause long-term deleterious effects for decades to come, affecting both project and non-project lands.

By trying to limit the scope of comments to just project lands is ludicrous considering all the resources that can potentially be impacted. Raptors that might be found in the project area, especially sensitive species like the Northern Goshawk and Red-shouldered Hawk, would likely have nesting habitat outside the project area and move back and forth between project and non-project land. How can these resources be assessed properly without looking at both land categories?

The assessments, hastily completed in just a matter of days, captured only a snapshot overview of some of the natural features and resources of the project lands and waters of the impoundments. Many species require much more time just to locate. As mentioned above, Northern Goshawk can require many hours to find, *if* proper research protocol is observed. E-PRO said they did their raptor surveys using a helicopter. How can meaningful data be obtained when such a disturbing method is employed? Raptors are

especially sensitive to disturbance. I am unaware of any good data being obtained through such an intrusive method. With that in mind, I request that E-PRO provide peer-reviewed research that substantiates this method of data collection.

Additionally, E-PRO chose to redact entire sections of the reports, citing that "sensitive species" information might be revealed to those seeking to collect or harm in other ways rare, sensitive and endangered species. While I understand that site-specific information is not good to release, there still is the need to present information that can assure the public that sensitive species are being protected. E-PRO's treatment of this was completely unprofessional and might lead the public to believe that there is something to hide.

UPPCO recently released information speculating increased tax revenues to townships if your proposed non-project uses of project lands are approved. This data was also distributed at the public meetings giving the impression these increased revenues would be net gains. However, you failed to allow any public questions or discussion of increased cost of services. This is unethical and inappropriate, considering the studies you commissioned might influence the scale of development and result in a reduction in the number of lots the developer can build on. This might also lead one to believe that you are fitting your studies into a pre-determined framework that has no flexibility to be altered.

I believe you should be consulting with the Federal Energy Regulatory Commission and work to prepare a new and comprehensive environmental impact study that will consider ALL resources.

Thank you for the opportunity to comment.

Sincerely,

Douglas R. Cornett

Attachment 41
28 August 2006
PUBLIC COMMENTS FROM STEVE GARSKE

-----Original Message-----
From: Steve and Nancy [mailto:asimina@ecoisp.com]
Sent: Monday, August 28, 2006 8:43 PM
To: Wolfe, Janet
Cc: magalie.r.salas@ferc.fed.us; asimina@ecoisp.com
Subject: PUBLIC COMMENT ON "ASSESSMENT" REPORTS FORUPPCO-OPERATED FLOWAGES.

August 28, 2006

UPPCO Environmental Studies
c/o Janet Wolfe
PO Box 130
Houghton MI 49931
jwolfe@wpsr.com

PUBLIC COMMENT ON "ASSESSMENT OF THE RECREATION, WILDLIFE, LOON, AND AESTHETIC RESOURCES" REPORTS FOR BOND FALLS AND VICTORIA (FERC Project P1864), BONEY FALLS (P2506), CATARACT (P10854), AU TRAIN (P10856), AND PRICKETT (P2402) FLOWAGES.

Dear Janet Wolfe,

I would like to comment on the Upper Peninsula Power Company / WPS Resources environmental assessment reports for the above 6 flowages, all of which are operated by UPPCO and regulated by FERC. As most of my experience has to do with floristic surveys (including rare plant surveys), I will primarily comment on the "Wildlife and Aquatic Habitat" section (Section 3) of each report.

Unfortunately I must say that I have read a significant number of environmental assessments by both public agencies and private consultants over the years, and that these cookie-cutter reports for UPPCO are probably the most superficial and poorly done of all of them. Indeed they use a significant portion of their meager "results" sections to report the presence of sand, rock outcrops, course woody debris (old logs) and other features that all flowages would be expected to have. They make arbitrary statements and draw baseless conclusions with little or no data to back them up. And perhaps most importantly, they don't adequately address the potential impacts that the planned massive residential developments will have on the natural, recreational, and aesthetic qualities of these flowages.

The assessment reports all state that wetland types were classified in accordance with "Cowardin et al. (1979)". This source is not included in the references for any of the reports, however. Thus it becomes difficult for interested readers without access to a university library to track down this source, or to ascertain whether the methodology is appropriate for classifying the wetlands found around these flowages.

The reports all purport to have included adequate surveys for rare plants and animals on these flowages. The most widely accepted method for assessing the floristic quality of a site is to conduct surveys 3 times during the growing season - in early spring (typically May) to find spring ephemerals and early-flowering plants, in midsummer (July) for certain sedges and other plants flowering at that time, and in late summer (late August-September) to find late-flowering plants including many aster family species. When time or resources are limited, organizations sometimes cut corners by having an early survey (May or
June) and a late survey (August-September). Unfortunately UPPCO's consultants have taken this corners-cutting process to a new low, by surveying each area only once - from June 15-19 for Bond Falls (p. 3-2), June 22-23 for Victoria Flowage, 6 days between May 26 and June 22 for Prickett, etc. These visits were too early in the season to reliably detect rare aquatic plants such as Vasey's pondweed (Potamogeton vaseyi) and Farwell's water milfoil (Myriophyllum farwellii), both listed as Michigan "threatened". They are also too early to be effective in finding major invasives such as Eurasian water milfoil (Myriophyllum
spicatum) and purple loosestrife (Lythrum salicaria), all of which generally much easier to find later in the year. Furthermore, the plant inventory lists (for example, "Vallisneria, Potamogeton, Polygonum, Najas, Ceratophyllum, Utricularia, Elodea, and native Myriophyllum" for Bond Falls, p. 3-3) could apply to nearly every lake over 1 acre in size in the UP. Similarly the Prickett report (p 3-4) lists "Potamogeton, Elodea, native Myriophyllum, Vallisneria, and Polygonum", the Victoria report (p 3-3) list ("Potamogeton, Elodea, native Myriophyllum, and
Polygonum.") and so on. [Apparently the consultants were not interested in emergent or shoreline vegetation at all, such as that appearing in abundance in their photo of "SAV" (submergent aquatic vegetation) on page 3-5 of their Bond Falls report, page 3-4 of the Victoria report, etc.] These lists are ridiculously inadequate for describing the aquatic plant communities of each of these flowages.

Several of the reports have entire sections blacked out. Most environmental assessments at least let the public know what rare species may have been searched for and whether any were found, blacking out only locationally-related information. But the UPPCO reports black out essentially all the information they might have on rare species in these flowages (but see discussion on the merlin below), giving the public no way to judge whether rare species were found and what impacts UPPCO's and Naterra's development plans may have on these species.

Naterra's plans to place numerous homes around these flowages (474 houses around Bond Falls Flowage alone, as I understand it) will likely lead to significant eutrophication of these reservoirs due to increased erosion from paths and shoreline use, as well as removal of natural vegetation, installation and fertilization of lawns within the watersheds, and leaking septic tanks within their respective watersheds. This degradation of water quality in turn can be expected to lead to a decrease in diversity of native plants and animals in the flowages.

The reports claim to assess the presence and impacts of "nuisance" species, but never defines what these species are. In fact the "nuisance species" found in each flowage seems to be arbitrarily chosen. For example, on P 3-12: of the Bond Falls report, they unilaterally declare reed canarygrass (Phalaris arundinacea) a non-invasive species: "Although not considered a nuisance plant species for purposes of this study, reed canary grass was widespread and common along the shorelines and within most of the wetlands of the Bond Falls impoundment." This highly aggressive invader of natural wetlands and other habitats is not native to the Great Lakes region, and is considered a major invasive by every state and federal agency in the region.

The use of a helicopter to conduct aerial surveys for nesting and non-nesting bald eagles, ospreys, and great blue herons and the presence of potential nesting sites seems like a questionable practice to me. While this method may have certain advantages in terms of expediency, it has the potential to be highly disruptive to these birds precisely during the time that the are nesting, when they are most sensitive to disturbance. The public is frequently reminded (and rightly so) by the Michigan DNR and others of the risks involved in disturbing these birds at their nests, yet the consultants had no qualms about flying over their nests and perching and foraging sites with helicopters at this time. Beyond a list of bird species that happened to be encountered during their brief surveys (which, by the way, included nothing on use of these areas by migrating birds) and some simple and obvious textbook statements about the favored habitats of a few of them, little useful quantitative information about the importance of habitats around these flowages to these birds is given.

In the Bond Falls report (page 3-11), the consultants mention the presence of merlins (Falco columbarius) near the flowage. They even give the locations of these sightings, on map P-3-5. The same is true for the Victoria report, where a merlin "acting aggressively" (an indication that the consultants were near its nest) is mentioned on page 3-8, with the location plotted on map P-3-4. A similar encounter with an aggressive merlin is mentioned in the Cataract report (page 3-6 and maps P-3-3 and P-3-4). Despite the consultant's purported concern about endangered species on these flowages, they seem unaware that the merlin is listed as "threatened" in Michigan (MNFI 1999).

The poor quality of these assessments must be obvious to even the most casual reader. The Bond Falls report even states that (page 3-3) "Bond Falls is a relatively large impoundment with extensive open-water areas and associated wind fetches. As a result, the majority of nearshore aquatic habitat at Ani Train generally consisted of coarse sands. Sandy areas were ubiquitous throughout the impoundment." And on page 3-7 of the same report: "No sandhill cranes or suitable sandhill crane nesting habitat areas were observed at Bond Falls. In the Upper Peninsula, sandhill Cranes nest most commonly in sphagnum bogs (Tacha et al., 1992), a habitat that is not present at Ani Train Basin." This sort of carelessness indicates that the consultants did not try to thoroughly describe the unique features and environmental characteristics of each flowage, but simply used a boilerplate, fill-in-the-blank form, not even bothering at times to change the name of the flowage supposedly being assessed.

Whether the consultants doing these "assessments" were unfamiliar with the geography and natural habitats of the area, were not given enough time to do the needed surveys, or were simply incompetent (or some combination of all three), these reports are wholly inadequate for assessing the impacts of the large-scale residential developments planned for these flowages. They are an insult to local residents and others who care about these areas and should be thrown out, and full Environmental Impact Statements done for each of these areas by a qualified and impartial organization.

Thank you for considering my comments.

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Cc: Magalie Roman Salas, Secretary
Federal Energy Regulatory Commission
(Hard copy also sent USPS)

References consulted include:

[MNFI] Michigan Natural Features Inventory. 1999. Michigan's Special Animals. http://web4.msue.msu.edu/mnfi/data/animal_list.pdf (August 2006).

[FERC] Federal Energy Regulatory Commission. December 2001. Draft Environmental Impact Statement for Hydropower Licensing. Bond Falls Project. FERC Project No. 1864-005.

Attachment 42
29 August 2006
PUBLIC COMMENTS FROM TROUT CREEK

August 7th Trout Creek Pubic Meeting

"Once again, UPPCO shows total disregard for the people of the U.P. Your objective in the aesthetic value of the impoundment was "why these areas have high aesthetic value and who values them and why," yet the only people you ask about this was a couple of park rangers and two campers. Your total failure to contact any local people on this subject confirms my thoughts on your extreme greed. If I were you I'd leave the U.P. out of your name. Maybe Wis. Power Company would be better" - Bruce Crossing, MI.

"The land (Bond) has been with us for 50+ years. The people that choose to recreate also understand this. Those that purchased property on Bond should have known this. Good job on Enviro Studies. Project should proceed!" - Trout Creek, MI.

"Aesthetics - Most important item is the protection of the wild appearance of the shoreline and piers will detract from that wild appearances. Study should include the aesthetics related to water quality. Clean water exists today but proposed use likely will reduce water quality." - Watersmeet, MI.

"It is not appropriate to use acres per boat because much of the reservoir surface has submerged stumps which makes many acres unsuited to boats - remove stumpage acres from calculations. Wildlife studies need to account for future changes in the old growth buffer and project lands - will be different 100 years from now." - Watersmeet, MI.

Attachment 43
Late August 2006
WEBSITE ADDITION – AU TRAIN TOWNSHIP SCENARIO

AUTRAIN TOWNSHIP

$48,457,500 (Fair Market Value) x 50% = $24,228,750 (Taxable Value)

Assumptions

Since no final development plan has been created, lot numbers, sizes, prices, etc. are subject to change.

- 229 lots
- Average Lot Price - $91,600
- Average Home Cost - $120,000
- Water Access
- Docking rights

Without water access and docking rights, the estimates will likely drop by 50-75%, and the development will likely take much longer to complete.

The following is an estimate of taxes to be collected (in 2005 dollars) on the non-project AuTrain land sold and to be sold by UPPCO. The estimate assumes that all the lots are sold and homes are constructed on the lots, which may take several years. It also assumes water access.

Summer Taxes

Description	Millage	Amount	Used For
State Education Tax	6.0000	$ 145,372.50	
County Operate	1.7503	$ 42,407.58	
TOTAL		**$ 187,780.08**	

Winter Taxes

Description	Millage	Amount	Used For
School Voted	17.8295	$ 431,986.50	
MARESA Allocate	0.2123	$ 5,143.76	
MARESA Voted	1.8084	$ 43,815.27	
County Allocate	3.5007	$ 84,817.59	
County Ambulance	0.9845	$ 23,853.20	
County Aging Voted	0.2408	$ 5,834.28	
MSU Voted	0.2360	$ 5,717.99	
Township Operate	0.7879	$ 19,089.83	
Twp Solid Waste	1.0000	$ 24,228.75	
Twp Fire	2.9337	$ 71,079.88	
TOTAL		**$ 715,567.05**	

AUTRAIN TAX INFORMATION

AD VALORUM* TAXES PAID BY UPPCO ON NON-PROJECT LANDS
(Land sold or to be sold)

AuTrain Township
2005 Summer Taxes ..... $ 2,636.00
2005 Winter Taxes..... $11,459.00

Total 2005 Taxes $14,095.00

AD VALORUM* TAXES PAID BY UPPCO ON PROJECT LANDS
(Land that will not be sold and will remain open to the public)

AuTrain Township
2005 Summer Taxes ..... $ 1,963.00
2005 Winter Taxes..... $ 8,083.00

Total 2005 Taxes $10,046.00

UPPCO will continue to pay taxes on in the future.

* Ad valorem taxes fall under two classes: 301 [Industrial] and 501 [Timber Cutover]. None of UPPCO's property is in any type of managed forest program that could result in a tax reduction.

August 2006

Attachment 44
Late August 2006
WEBSITE ADDITION – LIMESTONE TOWNSHIP SCENARIO

LIMESTONE TOWNSHIP

$37,322,500 (Fair Market Value) x 50% = $18,661,250 (Taxable Value)

Assumptions

Since no final development plan has been created, lot numbers, sizes, prices, etc. are subject to change.

- 181 lots
- Average Lot Price - $86,200
- Average Home Cost - $120,000
- Water Access
- Docking rights

Without water access and docking rights, the estimates will likely drop by 50-75%, and the development will likely take much longer to complete.

The following is an estimate of taxes to be collected (in 2005 dollars) on the non-project AuTrain land sold and to be sold by UPPCO. The estimate assumes that all the lots are sold and homes are constructed on the lots, which may take several years. It also assumes water access.

Summer Taxes

Description	Millage	Amount	Used For
State Education Tax	6.0000	$ 111,967.50	
County Operate	1.7503	$ 32,662.79	
TOTAL		**$ 144,630.29**	

Winter Taxes

Description	Millage	Amount	Used For
School Voted	17.4400	$ 325,452.20	
School Debt	8.1100	$ 151,342.74	
MARESA Allocate	0.2123	$ 3,961.78	
MARESA Voted	1.8084	$ 33,747.00	
County Allocate	3.5007	$ 65,327.44	
County Ambulance	0.9845	$ 18,372.00	
County Aging Voted	0.2408	$ 4,493.63	
MSU Voted	0.2360	$ 4,404.06	
Twp Allocate	0.4801	$ 8,959.27	
TOTAL		**$616,060.12**	

LIMESTONE TAX INFORMATION FACTS

AD VALORUM* TAXES PAID BY UPPCO ON NON-PROJECT LANDS
(Land sold or to be sold)

2005 Summer Taxes ..... $ 886.00
2005 Winter Taxes..... $3,776.00

Total 2005 Taxes $4,662.00

AD VALORUM* TAXES PAID BY UPPCO ON PROJECT LANDS
(Land that will not be sold and will remain open to the public)

2005 Summer Taxes ..... $ 311.00
2005 Winter Taxes..... $ 1,326.00

Total 2005 Taxes ..... $ 1,657.00

UPPCO will continue to pay taxes on in the future.

* Ad valorem taxes fall under two classes: 301 [Industrial] and 501 [Timber Cutover]. None of UPPCO's property is in any type of managed forest program that could result in a tax reduction.

August 2006

Attachment 45
31 August 2006
FOCUS GROUP MEETING AGENDA

Upper Peninsula Hydroelectric Project:
August 31, 2006 Eastern Focus Group Meeting Agenda

Focus Group Purpose

The Focus Group is an advisory group. While it is neither a decision making body, nor will you be asked to reach consensus on any issues, your input is important. We ask that you:

- Provide feedback on the topic being presented
- Share what your learn with others in the community

UPPCO thanks you for taking the time to be a part of the process.

6:00 p.m. - 6:02 p.m.	**Welcome & opening comments:** Susan Finco
6:02 p.m. 6:15 p.m.	**Focus group member introductions** (Approx. 1 - 2 minutes each) • Name and organization(s) you are representing • What are you hearing in the community / from your associates?
6:15 p.m. 6:18 p.m.	**Overview comments about environmental reports**: • Susan Finco
6:18 p.m. - 7:00 p.m.	**Au Train, Boney Falls and Cataract areas Environmental reports presentation**: E/PRO • David R. Dominic • Gary Edmond
7:00 p.m. – 7:30 p.m.	**Focus group member comments / questions**
7:30 p.m.	**Meeting adjourns**

UPCOMING MEETING DATES:

- Thursday, September 28: Eastern Focus Group Meeting
- Thursday, October 19: Eastern Focus Group Meeting

Draft SMP Public Open Houses

Tentative dates pending upon availability / confirmation of site locations

- Tuesday, October 17: Western Meeting
- Wednesday, October 18: Eastern Meeting

Attachment 46

Early September 2006

WEBSITE ADDITION – FOCUS GROUP MEETING NOTES

Susan Finco opened up meeting, went over the ground rules and the agenda, reminding everyone this meeting was about the environmental studies recently conducted.

Susan wanted to make comments before starting the initial comments. There was some confusion about the studies being draft documents - and the fact that there were some editing and grammatical errors in the draft versions that were shared. The editing and draft errors are being cleaned up -- but nothing substantive in the draft will change.
Emphasized these are draft documents and there may be some changes before the final document is issued.
Input provided may result in changes before a final document is issued. UPPCO did receive helpful insights from open houses that are being considered for the reports.
One example is that it was pointed out Little Falls was overlooked as an aesthetic feature. As a result, Little Falls was visited and the information will be included in the final document.

She also mentioned the blacked out, or redacted, lines in the document. Explained this is because UPPCO is not allowed to publicly identify habitats of rare, sensitive, threatened or endangered fish and wildlife.
This information is given to the state and federal agencies UPPCO is working with and can be obtained by contacting one of the following agencies:

- National Park Service
- USDA Forest Service
- US Fish & Wildlife
- Michigan DNR
- Michigan DEQ
- Great Lakes Indian Fish & Wildlife Commission
- Keweenaw Bay Indian Community
- Michigan Hydro Re-licensing Coalition
- Michigan Attorney Generals office
- FERC - Federal Energy Regulatory Commission

The environmental studies themselves focus on items including wildlife and aquatic habitat, loon nesting, recreation resources and aesthetic.

Another example from the Eastern UP is some information provided to us by focus group member Dave, who pointed out a recreational access site. It was visited and will be included in the final report.

Susan reiterated that this meeting was not about non-project lands or the development of non-project land by Naterra. Naterra is in the process of creating its initial design and is proceeding on a parallel path with UPPCO even though it cannot finalize those plans until UPPCO, along with the agencies, and with FERC approval, decides what is appropriate for the use of project lands.

The results of the studies along with the agency consultation process, and public input, will be used to develop a proposed Shoreline Management Plan or SMP.

The SMP will cover non-project land use issues – and the draft SMP will be the subject of future public open houses and, if you so desire, focus group meeting. The draft SMP is anticipated to be completed sometime in October.

Initial Comments
The basin doesn't have any water left in it so the campers are gone. Not hearing too much, just wondering where all the water is. Said it would be nice to have a sign that said 'we're working on dam, be patient.' It's bad publicity if people don't know what's happening.

From LSCP representative members are looking at making money, they see an opportunity to build houses, it's a positive thing. They don't like taxes but on other hand, townships and municipalities have more and more mandates, so they get less money and the only way to continue is to raise mileages or broaden tax base. The opportunity to broaden the tax base is something we support over increased mileages. Want to make sure we support area for tourists, quality of life. It's not just about money and profit.

Wanted to know if people were still going to be able to fish at Cataract. Said it is a big concern.

Not hearing anything different from before. Said the people he represents are not welcoming of intense development of lakeshore and stream areas. Referred to previous comment on tax base, saying with development comes more expenses whether there is development or no development, there will be expenses; it is not the answer to the economic problems of the U.P.

Environmental Presentations
David R. Dominie - E/PRO - Recreation and Aesthetics
Back in February and March of this year, the resource agencies provided an extensive list of recommended studies they would like to see conducted in relation to the development of the six impoundments. Tonight will be regarding Boney Falls, Au Train and Cataract.

The studies were divided into three categories - recreation, aesthetics and wildlife aquatic habitat. In the last category, a special section was given to the Loons as a specific separate study. Loons were only investigated in Au Train. David Dominie presented the recreation and aesthetic portions of the study while Gary Emond presented the wildlife aquatic habit and loon portions of the study.

Recreation and Aesthetics
Recreation the purpose of the recreation study was to assess the quantity and types of facilities on the impoundments. They looked at existing information developed in relation to the FERC licensing process.

Site visits were conducted at each impoundment, primarily by boat. They photographed each site, filled out a survey form for each site as well, recording the location, what was at the site, erosion, amenities, if any, and whether it was a formal or informal site. Formal meaning actively managed by UPPCO, the DNR of another institution and having amenities such as toilets, parking areas, boat launches, picnic tables, etc.

Informal would be sites that were not officially managed by an institution but has been frequented over the years by people. Each site is pictured in the report (figure 2.1) with a brief narrative.

One other thing that they did was desktop exercise to look at boating carrying capacity. Based on literature, they tried to get a handle on how many boats or what boating density these impoundments could handle.
First, a usable lake surface was determined by subtracting a 100-200 foot area around the shore as a buffer for safety and/or environmental reasons. The usable lake surface was then divided by a boating density.
This came from literature and varied from each place. Places where motorboats could be used would have more acres than places that would have people powered boats, like canoes and kayaks.

Findings of recreation study

Boney Falls There was an UPPCO campsite with a boat launch, toilets and parking. There was also an informal site with a launch.

Cataract There was a boat launch at the dam as well as a fishing area, pier and a picnic area off Route 35.
There were also a couple informal sites off 35 and then off an old bypass where people launch boats.

Au Train – There was a significant campground, a boat launch, toilets, capacity for vehicles and trailer rigs and also other smaller sites. There were informal sites with a boat launch and camping.
"We think we've covered that thoroughly, but people brought forward information and we may have missed some."

Aesthetics -- There was a fairly specific scope from the agencies regarding aesthetics. They wanted to map the areas that have high aesthetic values and then know who values them and why.

Research has shown that people have a clear visual preference when it comes to aesthetics. They like to look at water and dramatic relief and when those two are combined, the ranking goes up significantly.
These were looked at and a quantitative assessment was undertaken. Each impoundment was subdivided into subunits because each impoundment has distinct areas with different characteristics.
Some of the criteria used for the aesthetic study:

Relief - long distance views (hills, watershed, ridgelines, dramatic relief)

Physical features - beaches, rocks, ledges, cliffs, coves, etc.

Mystery - If you aren't quite sure what's out there or what's around the bend, it makes you want to keep going.

Vegetation diversity the number of types, if there's coniferous or deciduous or a mix of both, are there special emergent wetlands, super story trees, fall color, etc.

Special feature wildlife such as waterfowl, raptors, eagles, wading birds, moose, deer, etc.

Also, if a place has unusual cultural or historical features like an old cabin that has been nicely maintained, or historic feature that is associated with the area, that is something people look for. It brings memory or meaning.

Detractors Excessive residential, recreational and/or industrial development that has been poorly done and doesn't go with the area – people don't like that. Poorly sited facilities that are out of scale, wrong color, doesn't fit, the lines are just wrong with what you see around you.

Where these situations existed, points were taken off of the rating.

Au Train seven subunits, a couple high, the rest medium.

Cataract – most were medium, a couple were low

Boney – most were low

When something's rated low, it doesn't mean it's unattractive, it's just that relative to other areas, it didn't rate as high.

All of this information is in the report. Some of it has been modified.

Gary Emond – Wildlife and Aquatic Habitat.

The purpose of this part of the study was to conduct a habitat inventory and develop a baseline of not just the habitats out there but the species of interest to the resource agencies. A listing of habitats, both aquatic and land was developed. In order to accomplish this, a team of consultants was formed consisting of wildlife biologists. They worked with King McGregor, a consultant group based in Michigan that has a lot of experience in the U.P. Basically they worked with agencies to develop work scopes based on established protocol and sample protocol.

In May, helicopter flights were conducted, looking for suitable and existing bald eagle, osprey and great blue herring habitats. They watched for large pine trees, snags and wetlands and suitable perch trees.

Following up on that, in June, they did boat surveys and field surveys, walking the shoreline and examining the vegetation. Underwater cameras, typography, GPS devices, video cameras and digital cameras were all used in the study. A number of types of wetlands and habitats were noted. The team did not look for a species unless an agency specifically asked them to look for it but they did note the absence of certain species. What they found was all three wetlands with aqua vegetation were found in areas with shallow typography because it was protected from harsh waves. The soils conducive to that kind of veg are sand, silt, mud, etc. In higher energy areas, they found cobble, gravel, coarse woody debris, old dead floating trees, etc. They mapped all of that with the idea that you need to know what's out there for habitats to avoid impacts on the land and protect it.

Loons They did not look at Cataract or Boney Falls because the agencies were not interested in those areas. They observed loons at Au Train, but no nests. The loons weren't acting territorial like they typically do so it was concluded that they were just foraging. The southern part is used extensively by sand hill cranes for feeding and roosting at night. They also observed different waterfowl species and woodland raptors/birds of prey at all three. They didn't find much about any of the impoundments that was unusual – they were typical areas of the Midwest and the northeastern U.S. From the results of the study, they developed a template of habitats, knowing where it is so that later on any impacts could be minimized

Comments/questions regarding presentations
Susan Finco started off by saying they would start with comments regarding the presentation and then go around again to get people's perspectives on the aesthetics of the impoundments.

Where is the best fishing?
Gary: We have information that is on the way to us from the DNR. We don't have any data for Cataract, but we sampled Boney and Au Train. We don't know what the data says, we don't' know the typical size of fish species. We do know all 3 impoundments contain warm water fish, perch, walleye, pike, etc.

Will this information be forthcoming at the end of November? Will it be at hand then?
Gary: I don't know how the DNR would feel about us releasing field data. What we will do is report what's out there, not so much the health of the fishery.
Shawn: Whenever I have visited Cataract, I have observed people catching fish. It doesn't always happen to see people catching from the shore. We're expecting Cataract would be very good.

Table 4.2 - referring to aesthetics, the degree of naturalism, what are they referring to?
David: The natural setting, how undisturbed it is.
It's showing negative figures for Cataract.
David: If one assumes a lake is natural in character, things that disrupt that nature would get negative points. You can see power lines at Cataract. The dams were considered an integral part of the landscape. If have other areas are incongruent with the setting, the area gets negative points.

Is it explained anywhere – I can't see it. Is there something other than the power lines (that would give Cataract negative points)? It is pretty aesthetically pleasing and relatively undisturbed except for power lines. It is hard to understand how they arrived at that.
David: We can add a definition of naturalism. An area is assumed natural and anything perceived not natural gets negative points. If you have something that detracts from that natural character, it gets negative points.
Shawn: If you look at section 4.5, it divides natural character into three categories: low, moderate, and high. I think that's what you're looking for, for a definition of why it's this or that score.
Is it entirely because of power lines?
David: I don't remember exactly… there are houses that come down to the shore. An example of a detractor of natural character – we were driving along Shoreline Drive in Marquette and suddenly there's big power plant with large stacks. Aesthetically, it isn't attractive. That would definitely get negative points.

Shawn: Table 4-3 goes through each subunit and describes where detractors come from.
I just took a ride and a walk yesterday at the Au Train basin; it's kind of low because of maintenance. In comments talking about aquatic weeds and stuff… Being in lower shallow water, the southern end is nothing but a large mudflat and weed bed. When that study was done, there were at least 3 different types of weeds you could see, floating dead mats of weeds. How

much of an impact does something like that --- when you have that many diff types of aquatic life in shallow area, how is that set up in your study?
Gary: We took straight lines across the basin, if we get to a point where it gets deep. What we're able to do is map areas of submergent aqua vegetation. We mapped emergent vegetation too and different species types.

Other question I have anyone who's lived around that area knows that within that land to be sold, it has probably two to four major migration routes for deer. Will there be any type of studies done on what kind of impact development would have on that?
Gary: That is outside of our study.
So no studies done on lands that would be sold or developed?
Gary: We didn't do any work outside of FERC project lands.

Do you folks plan to come back and study the basins during waterfowl season? I know you saw a few Canadian geese, but you're not hitting the right time of year.

Gary: This wasn't a conductive use study. We did a habitat inventory, taking the assumption that if a habitat is there and is usable; the species is there as well. Just because we weren't there, doesn't mean we wouldn't consider the species inhabiting that area.
If you're assuming, you should assume waterfowl hunters are there. You didn't list any waterfowl hunters.
Gary: That would have been tied to recreation work.
You did list recreational users, but you didn't list hunters.
Greg: We have been working on that.
Gary: At Cataract and Au Train we were just looking at habitat characteristics. Certain areas are very good for migrating waterfowl; we worked that approach with DNR. That was one of their concerns can you determine what is used by waterfowl? If the habitat is there, we assumed they are there.

On the south end, did you list rough grouse and sharptails?
Gary: If we heard drumming or whatnot, it would have been noted.
Shawn: One of the things this report is designed to do is to collect data we didn't have. When we get to planning non-project uses, we'll use available data. If we have other information about waterfowl use, in making decisions, whether that existing data gets into report or not, it won't matter for documenting purposes.

I see your point, but if we could get our hands on other information you're using, that would be useful. We only have reports It's good to be better informed.
Shawn: One thing we will be doing in developing the SMP is indicating why decisions were made, that's where other data will come into play.

I found the studies it very interesting. But everybody knows water has fish in it. I didn't see a lot about migrating birds.
Gary: We could certainly beef that up.

You waited till after fishing season started to do studies. All the people are on the lakes and the wildlife disappears. It matters because you gave more points to areas that had more wildlife. Some places rated lower because there were more people, which means less wildlife. Also, erosion is a big concern of yours, but if you plan on putting 400 houses on an impoundment, how would that help?
Shawn: One of the things that we will be required to do is to make sure whatever gets proposed does not accentuate the erosion problem. As we've said in earlier meetings, once something gets approved, it doesn't mean we can walk away and say so what if it's causing erosion. Environmental impacts will have to be dealt with. If non-project use is affecting shoreline, we will have to look at that. I can give you some examples – if somebody is frequently using a spot by shoreline, we will have to take measures, stabilizing it or providing alternative access with a stairway or something. It's good you brought it up. We do have to take that into account.

There are no people there right now using it, but we still have an erosion problem. The more people you stick in there, the more erosion you have. As far as the aesthetics of the place, Boney Falls is in last place because of rooftops and houses and Au Train scored a lot higher because there are no houses. If you stick 400 houses there, what will happen to the aesthetics of the area? How are you going to deal with that? Also, no nests were found for sand hill cranes and blue herrings but most of the study was done in a boat. You probably won't find nests floating in water. In order to study 200 feet of land you would have to go 20 people wide and go around the basin.
Gary: We did conduct helicopter flights to look for nests; we scoured those impoundments looking for those. Sand hill cranes have special habitat requirements, wet meadows, bugs, etc. There wasn't any of that type of habitat in the project boundary. In Cataract, there was one area that is a possible nesting area but we couldn't find anything.

Comments on Aesthetic Values
Everyone was asked, "What do you use the impoundments for and what do you value about them aesthetically?

[I like] their relatively natural conditions. If you want to go canoeing or fishing, it's nice to look at nature around you. On most lakes, you're looking at some guy's big house, there's too many docks, boats. These places (the impoundments) are a nice place to get away from development. I've been to all three – Cataract is the closest one. That's a neat spot; there are lots of nooks and crannies to go in around there. Other than that power line, it seemed pretty natural, lots of wildlife, didn't seem like a lot of boating pressure. The trend is more and more of these lakes are being lost. Fence Lake got bought up and closed up. Hate to see the protections not enforced.

I live less than a quarter mile north of the end of the (Au Train) basin. There are two great things you can enjoy. You can walk along the river at the north end, across the dam, the fall colors are unbelievable. A number of people stop to take pictures. The other thing is in the fall, you can take a canoe when there's water and there's always wildlife – deer, bear, waterfowl... it's great to go down on old tower hill, you can watch anything you want to see go flying through there. It's just been natural enough where you can go down there and there's always something to see.

I value quiet and darkness. I go down to Au Train at dusk especially during waterfowl migrations. I canoe down the shore and just sit there it's the lack of human activity that makes it precious.

Familiar with boney falls but never used it.

Never been to Boney. But Au Train and Cataract... there isn't a nicer spot in the fall. By Au Train, you got the hills and the water, it's beautiful. I don't care if I catch fish; bouncing around out in the boat, you look around and you're lost in the whole world. Once it gets all built up, it'll take that away.

Au Train basin there's nobody there, the fishing is excellent, the walleyes there are gigantic. It's recognized in many national magazines for its walleye and pike. There are no houses, no lights at night, I go ice fishing at midnight, just go sit out there. I'm only one, that's what I like.

If it comes to aesthetics, when you make a change, you talked about number of people using areas. When I lived in lower Michigan, in some areas it was hard to see the lake. Depends on the degree of development.

More question comments on the Environmental Studies
Regarding the system they used to determine a carrying capacity and using a 200-foot buffer, the report showed very few boats or no boats in some areas. I'm not sure how that will affect UPPCO's plans on filling the lots up. Cataract doesn't have the capacity of handling very many boats yet 58 lots are projected.
What effect would a low carrying capacity have on plans to develop that area?
David: The carrying capacity was done to give a sense of the appropriate number of boats. On Cataract, that's not the kind of place to have jet skies and speedboats on. Person powered boats would be okay. That was just in there to give examples, it's not definitive.

Right now, we're worrying about the number of docks on these basins. If anyone wanted to do follow up check on Au Train basin, now would be a good time because there's no water out there. As shallow as it is, now is the time to see the impact of docks; you can really see that bottom. Another question. The east side of basin is quite hilly – if homes are put in that area, has any consideration been giving to water quality due to runoff and sewage in that area
Shawn: One of the things that when Naterra plans development, they have to make sure each lot has an acceptable location for that. That combined with the distance from the actual impoundment should take into account those concerns.

What kind of problems did you run into on the eastside? 150 little springs, all come down the sides of those hills. You can be an appropriate distance away from the water, but what happens on top of that hill imports that water and that basin. The people in the community are concerned about this because of the typography.
Greg: Naterra has not developed any plans yet but info like that is very import for future consideration

As part of these studies, you didn't make any conclusion of the development of project lands on habitats?
Gary: No. We're working for UPPCO, not Naterra. We're just looking within the FERC boundaries.

Is anyone doing studies on project land?
Greg: That would be directed towards Naterra.
Brad: We don't do individual environmental impact studies. We work with the health department and septic systems.

You could wipe out these streams because you're on private land?
Shawn: No. They are protected regardless because of state law.
Brad: We involve DEQ and other proper authorities before we do any development.

Are there any raptors nesting?
Brad: Not on our property.

No development has been proposed on the eastside of Boney: When Naterra plans on that, I will have something to say.
Naterra: There are no roads. It will probably be sold to an adjacent property owner. We can't sell lots where they have canoe or boat access only."

Regarding the environmental study – it seems more and more that all we're doing is building better brochure for Naterra to sell land. The more aesthetically pleasing the land is and the more animals you find, it drives up lot prices.
Greg: I understand why you would think that, but the real purpose was to identify the features on the reservoirs, so we can determine where things should be done, where they should not be done and get an inventory. What you have been telling us is this is beautiful place, we know that, but the inventory tells us there are areas where nothing should be done and maybe areas that should be developed. That is the purpose. Understand where you're coming from because you had nice secret on the Au Train. It's documented now that this is nice place.
It's not only water we're concerned with, lots all around places people can't get. There's nobody on that land, no access, so once people have houses and lots, it will be taken over. It will be there backyard. We'll lose the lake AND the woods.

Hunting pressure – I see how a number of people using the land will have an adverse affect. It's DNR policy too. An example could be Ewen township, the timberlands development, I haven't heard anything to the negative on that where people have complained, seems like it would be with policies related to hunting and fishing.

Shawn's comments on the Au Train drawdown
Shawn: We need to do another news release on the Au Train drawdown. It's unique from an environmental standpoint and a dam standpoint. The only way we can draw down is 100 CFS through the powerhouse.

We began in early June and we did a news release. We probably need to do an update because that was a long time ago. We're still viewing it as working on the same project but those not familiar with the process don't view it like that. As we did begin maintenance work on the south levy, we needed to do some testing in the basin itself. That testing has not yet begun because we're waiting for bed to dry out. It is a mud hole right now. That testing is to look for depth to bedrock, that is something FERC has asked us to do. Based on that, we would have to propose changes to the dam. We're doing maintenance and testing. Maintenance started on the 21st. We will get out a news release to say how long we expect it to continue. Some areas of the dyke are slightly lower than other areas, so FERC has asked us to raise the elevation. It settled because some of the organic material has decomposed – that's a theory. In addition to that, when we reached the lower level, if we would continue as the license says, that reservoir would continue to drop. So what we have asked the resource agencies for is to reduce the amount of water to try to keep it from dropping. It's been a dry year, so we have very little water coming in. Evaporation in the summertime is a big factor, too.
We may see it continue to drop slowly, but we're trying to reduce that. As soon as we're done, we will gladly begin to refill.

Is the Federal Government tightening down on levy control since what happened in New Orleans?
Greg: No, it's part of dam safety program. Not to say dams aren't safe by the standard they were built by, but they implemented a program 10 years ago to prepare for the "probable maximum flood." It was mathematically calculated, based on run off officiated and the worst rain event. We have had to modify most of the dams in WPS's resources. We own 34 dams under 24 FERC licenses and most had to have some sort of modification. We're rebuilding dykes. When a humungous flow is coming over, the concern for the maximum flood is that dam will tip over. It's not just the dams in Midwest, all across U.S. They're doing replacements of major dykes, concrete work, etc. It started way before the poor levies issue in New Orleans.

How are you balancing that – I assume you're dumping warmer water in the basin
Shawn: When weather was forecasted to be above 80 degrees, we did daily temperature readings, but if water got above certain temperature, we wouldn't release the full CFS. Under normal full elevation, you're drawing water from bottom where it's colder. In all the years we've dealt with draw downs, during warm nights, but now we're having colder nights so it is less of a concern. We're trying to get drawdown, but if get rain, go backwards, if you slow down, that effects temperatures, delays drawdown. It's good for drawdown to be a dry year.

In the papers sent in last mailing it say without water access and docking rights, the value drops 50%. The condos in Marquette sold before they were built. There's some by the arena, these were sold and they're building more. They're not worrying about having docks, they just want to see water. Just using the condos as an example. These people don't have any water rights but those buildings were sold before they were completed. If you can see water, it's just as good as putting a dock in the water.

Susan: The topic of the next meeting, which is September 28, same time, same place, will be economic impacts.

Attachment 47
5 September 2006
PUBLIC COMMENTS FROM DOUG SCHEUNEMAN

From: Doug Scheuneman [mailto:dscheune@ner.timberproducts.com]
Sent: Tuesday, September 05, 2006 12:31 PM
To: Puzen, Shawn C
Cc: Lesley.Kordella@ferc.gov; john.estep@ferc.gov
Subject: E-Pro Environmental Assessment of Hydro Projects (1864, 10854, 2506, 2402, 10856)

Shawn:
The Alger County Fish and Game Alliance has read thru comments made by the Michigan Hydro Relicensing Coalition to your company and FERC on August 28, 2006 regarding the Environmental Baseline Assessments conducted by E-Pro Consulting on your firm's behalf.
Our organization is extremely concerned that these studies were too superficial and lacked the necessary intensity to provide the type of information that will be necessary for lifelong decisions to be made regarding non-project use of project lands. Although we certainly agree that your firm should be able to sell your non-project lands, we are very concerned that whatever you ask to do within the project boundaries will have a negative effect on all current recreational users of the project lands.
From here forward all of my comments will be restricted to the AuTrain Basin Hydro site (#10856):
The study of the Autrain Basin was too broad for this large flowage, it only skimmed the surface. The time period of the E-Pro work was not only short in duration but was taken at a period when "normal" recreational use was at a minimum compared to other months. While there were some fishermen and a few campers, peak use of the campgrounds does not occur until after the first of July.
Perhaps the most significant use of shoreline (project) land areas, along this impoundment, is waterfowl hunting and bird watching during the fall migration. From Sept 1 through the first two weeks of November use of project lands, on both sides of this flowage, peaks Other important recreational uses of project land such sightseeing, hiking, and canoeing or kayaking occur mainly from spring thru fall. However, there is some winter ice fishing and snowmobiling.
All of these users could be negatively impacted by non-project uses of project lands and nothing was covered in the E-Pro study to address this issue.
The problem this year in the Basin for trying to study recreational use in all seasons, is that the present drastic "drawndown", for whatever reason, has altered and even eliminated a lot of the "normal" recreational use of the impoundment.
We suggest that additional studies be set up for next year, if normal water levels permit, to measure the current recreational use of the Basin. Then perhaps intelligent decisions can be made regarding the real impact that non-project uses of project lands on this flowage will have on all recreational users. Then, and only then, can a sound SMP be written for the AuTrain Basin. A plan that will insure any shoreline development occurring within project boundaries be consistent with the requirements and purposes of the Federal License that is in place for this Hydro site.

Sincerely,

Doug Scheuneman Sr.
Vice President, ACFGA
Munising, Mi

Attachment 48
28 September 2006
FOCUS GROUP MEETING AGENDA

Upper Peninsula Hydroelectric Project:
September 28, 2006 Eastern Focus Group Meeting Agenda

Focus Group Purpose

The Focus Group is an advisory group. While it is neither a decision making body, nor will you be asked to reach consensus on any issues, your input is important. We ask that you

- Provide feedback on the topic being presented
- Share what your learn with others in the community

UPPCO thanks you for taking the time to be a part of the process.

6:00 p.m. 6:02 p.m.	**Welcome & opening comments:** Susan Finco
6:02 p.m. 6:15 p.m.	**Focus group member introductions** (Approx. 1 - 2 minutes each) • Name and organization(s) you are representing • What are you hearing in the community from your associates?
6:15 p.m. – 6:45 p.m.	**Presentation on Economic Impact Analysis** • Tom Baade • Roger Trudeau
6:45 p.m. 7:30 p.m.	**Focus group member comments / questions**
7:30 p.m.	**Meeting adjourns**

UPCOMING MEETING DATES:

- Thursday, October 19: Eastern Focus Group Meeting
- Thursday, November 2: Eastern UP: Draft SMP Open House
- Thursday, November 20: Eastern Focus Group Meeting

Attachment 49
2 October 2006
E-MAIL CORRESPONDENCE - MICHIGAN DNR COMMENTS
RE: REVISED SMP GOALS AND OBJECTIVES

From: "[illegible]"
To: "[illegible]"
Date: [illegible]
Subject: RE: [illegible]

[illegible]

[illegible]

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-----Original Message-----
From: Norman Nass [mailto:nnass@fs.fed.us]
Sent: Friday, September 15, 2006 8:31 AM
To: Puzen, Shawn C
Cc: Jessica Mistak; ddominie@eproconsulting.com; gemanc@eproconsulting.com; kgosselin@eproconsulting.com; wcampbell@eproconsulting.com; john.estep@ferc.gov; lesley.kordella@ferc.gov; Dena Clark; kplehler@fs.fed.us; christie_peloria@fws.gov; Ann McCammon Seltis; gmensch@kbic-nsn.gov; Chris Freiburger; Gary Gustafson; Pamela Stevenson; angie_torres@nps.gov; jdschramm@oceana.net; troutkpr@up.net; Snyder, Gil E; Eqtvedt, Gregory W; Bartman, Kathryn A; Spees, Kerry A; Moyle, Keith E; Trudeau, Roger J; Heizel, Richard R; Carla Lenz; Mark Federa
Subject: Revised SMP Goals and Objectives

Shawn, thank you for the opportunity to provide additional input for the SMP Goals and Objectives. The revisions you have already made, especially to the Purpose section, help to address concerns previously expressed by the Agencies regarding license compliance. The purpose section now is stated in a manner which clarifies that the SMP will provide guidance for multiple shoreline uses in a way that is consistent with license requirements.

I have a few additional comments which are intended to more closely link the SMP goals and objectives to the license requirements.

The introduction includes the following statement (3rd sentence) which should be considered for deletion:

"Economic benefits received for non-project lands around these Projects
would help maximize the potential for continued protection/conservation
of other lands in the region that are of equal or greater recreational,
aesthetic or environmental significance/value as the non project lands
being proposed for sale, or project lands proposed for alternative private/public uses".

This statement addresses the economic value of non-project lands and the non-commodity values associated with other lands located in the region. While it is recognized that this may be of interest to UEPCO, the relationship to the Shoreline Management Plan is not clear. Therefore, removing this statement would improve the clarity of the introduction statement.

CC: "Jessica Mistak" <mistakj1@michigan.gov>, <jdamrie@eproconsulting.com>, <gemond@eproconsulting.com>, <kgansslin@eproconsulting.com>, <wcampbell@eproconsulting.com>, <john.stoep@ferc.gov>, <lesley.kordella@ferc.gov>, "Doug Clark" <dclark@foley.com>, <kpiehler@fs.fed.us>, <christie.deloria@fws.gov>, "Ann McCammon Seitz" <amseitz@glifwc.org>, <gmensch@kbic-nsn.gov>, "Curtis Fransburger" <FRANSBURGC1@DNR.FIS.DNR.STATE.MI.US>, "Gary Nystrom" <GUSTAFSONG@michigan.gov>, "Pamela Stevenson" <StevensonP1@DOI.AG.michigan.gov>, <angie_barnes@fws.gov>, <rdschramm@oceana.net>, <troutspr@up.net>, "Snyder, Gil E" <GESnyder@wpsr.com>, "Eqtvedt, Gregory W" <GWEqtvedt@wpsr.com>, "Hartman, Kathryn A" <KAHartman@wpsr.com>, "Spees, Kerry A" <KASpees@wpsr.com>, "Moyle, Keith E" <KEMoyle@wpsr.com>, "Trudeau, Roger J" <RJTrudeau@wpsr.com>, "Heidel, Richard R" <RRHeidel@wpsr.com>, "Darla Lunz" <dlunz@fs.fed.us>, "Mark Fedora" <mfedora@fs.fed.us>, "Fuzen, Shawn C" <SCFuzen@wpsr.com>

Attachment 50
Mid October 2006
WEBSITE ADDITION – FOCUS GROUP MEETING NOTES

UPPCO FOCUS GROUP MEETING - SAWYER - SEPTEMBER 28, 2006

Susan Finco opens meeting, goes over agenda and opens the floor for initial comments.

INITIAL COMMENTS FROM FOCUS GROUP MEMBERS – ONLY THREE ATTENDING
"I don't have a whole lot to give to the group tonight."

"We have organized visits to basins that have brought people out to support for keeping things natural."

"I'm not hearing a whole lot; there is no water at the An Train basin so everyone is gone. I'm wondering where the fish went. I'd say about 3/4 of the lake is gone."

UPPCO: Did you see press release in the paper?
I just saw something that said to stay off the basin.
UPPCO: We did do one explaining the draining based on your comments at the last meeting. It's up to the papers whether they want to write a story.
It just said not to drive four wheelers on the An Train basin.

UPPCO: For us it's still one project, but to others it may not be apparent because it's been going on since June

Side note from facilitator: Regarding the date of the open house. It says on the agenda November 2. There is lots of pre- election stuff going on that week so we will be rescheduling it. We will get something out to you as soon as we know tomorrow or next week.

PRESENTATION ON ECONOMIC IMPACT ANALYSIS – TOM BAADE, NATERRA DEVELOPMENT MANAGER

Two months ago these numbers came out. I will go over how we arrived at these numbers. We used existing projects to come up with these numbers these were similar projects in Central Wisconsin. Some of them had their own piers; others had a multi-slip pier system. There are 500 units in Castle Rock. These are real recent numbers.

Timber Bay - This development had about 10,000 acres and 38 units. Of those, there were four units off the water with no view and no slip. These went for $42,950. There were 24 units with a slip - it is a multi-slip pier where each owner is entitled to tie up one boat those sold for $87,317 each. So you can see what value a slip adds. These units were roughly the same size, about two acres.. There are10 FERC frontage properties that look like lake lots and have views of the water these sold for $131,450. Q: How are the 24 units different from the 10?
The 10 had a view, the 24 didn't.

Q: Were those the $40,000?
No, those were the $131,000. The ones for $40,000 had no slip and no view. We wanted you to see most current numbers and what drives the number these units sold out in two months.
I know a guy who does real estate and he said land is not moving right now.

I'm glad you mentioned it. We have seen it slow down because of gas and interest rates. A lot of folks buy with a home equity loan, so as the interest has gone up, the sales have gone down. But we've been in business 26 years; the market goes up and down.
Also, these prices are higher than they would be in the U.P. These developments are by Chicago and Milwaukee. There is a larger pool of people making more money. We have done market studies in the U.P. and feel there are values up here but since you have to drive farther, the land is less. I sat in on a blind marketing test where they had strangers that might be interested in land in the U.P. We asked, what do you think about land in U.P. and heard a lot of words like Siberia, cold winters, desolate, isolated. But when you talk to them about it, they started to realize the same things as to why people live here. The lakes are in better shape, there's more value. We spent a couple years figuring out if this is doable and we are confident it is.

We've all heard comments about 9 months of winter and 3 months of hard sledding.
Yeah, that's the first thing that came to mind.

Another project is Twin Lakes (in Wisconsin) this development is off to the side and more difficult to get to. There are four units with no slips that went for $27,200. Fifteen units with a slip went for $46,216. There are 19 units on the FERC boundary with water view that went for $131,900. A water view is the most valuable thing. These lots are more affordable than other ones, because of the type of land. It had been logged, had bad windstorms, it wasn't nearly as nice as something else. It has a lot to do with different pieces. For example land with a lot of poplar would go for less than land with big white maples.

There is continued development at Castle Rock, so we have projected what prices will be. Lots without slips would be about $40,000, with slips $100,000 and with frontage would be about $300,000. It's kind of a trend to show you the difference of value with having or not having docks. I'm not going to shy away, obviously Naterra will try to get docks out there because it drives up value. At this point, there are so many unknowns.

GOING OVER ASSUMPTIONS
Au Train Township 229 lots are assumed. This goes with the assumption of roads being built, some individual piers, but a bulk of them would have multi-slip piers so everyone could get one slip. Just so you know, we finished calculations on Castle Rock and we're building out at 6 percent per year. It seems to be moving along. With 229 lots, it will be about 10-12 years before it approaches 90 percent buildout. We rarely get 100 percent; because lots of people buy more than one lot. This is just one assumption made if everything happened out there.

These numbers were figured at non-homestead tax rates. Naterra is a retirement and recreational home developer. Most of these I would guess - and by looking at the development we've done in the U.P. - would be 90 percent plus non-homestead, which is a higher tax rate. The total for Au Train came to about $900,000 dollars in new taxes.

Those numbers were realized based on what's happening in other areas?
It's what we've averaged in other places. The millages are from county assessments.
Is that actual tax revenue?

Yes. The biggest gain coming is in the schools. It goes directly through local schools. As a recreational developer, we rarely see school-aged children on our developments. There's lots of revenue with very little cost with regard to schools.

(Referring to the assumptions handout) One assumption is water access, what do you mean by that?
It refers to the ability to get down the water.

Everyone has the right to get on to the water on FERC land, how would you not have water access?
Perhaps we used the wrong term. The idea is to be able to keep a boat in the water. It should say water access with docking rights.

Has Naterra ever had a basin where there were no docking rights allowed?
None that I'm aware of.

Can you see how that's different than what you're looking at with these developments? As a person who likes natural things, I would pay more for lot with no boats, jet skis, etc. If I could take walk after supper and look at the lake and the loons, that would be valuable. In the last 30 years, there has been more interest in that sort of thing. There's probably not a lot available for that. Lakes have been developed; people put houses as close to water as they can, sometimes over the water. But there is a growing movement for people who want to get off couch and get out there. I worked at Yellowstone years ago and if you walked 100 feet off the road, you were alone. The last time I was there it was so different. The woods were full of people. That's changing in the country. My generation is more willing to get out there and enjoy nature and look at things. I don't know if this projection you're making from Central Wisconsin applies here.
You have a couple different thoughts here. You're right, there is a trend in quiet sports, kayaks, fishing, etc –

Especially in Marquette County, non-motorized sports are big.
We are specifically looking at that for Cataract. The bigger flowages, where there's a lot more water, people will likely want to have a fishing boat or a pontoon boat. We're appealing to different markets. Quiet sports is a much smaller market than the trend to have the ability to be on lake and have a pontoon. The values show that.

If you've never had one of these developments with no docking rights, than you never know.
We have one with much larger frontage. It's a no wake lake, that's taken a couple years to sell. We have people call and when we say you can't have a wake, they look at it and decide they'd rather have lake they could have a pontoon or fishing boat on. One last thing on quietness – it is very valuable and to me, the way we're looking at developing these areas, we won't have homes on top of the lake. FERC has boundaries.

If you have pontoon boats, that's going to kind of...
We're going to take 25 linear feet with docks. There will be plenty of space with no docks.

The picture of two pontoon boats on the lake and the one without, it's a completely different scene.
Both have a different view
Not necessarily, whenever you're doing real state appraisals, you can never get an exact..
Location, location, we won't know if it's priced appropriately or not.

About the time of depression, 80 percent of land was rural. Then there was a shift and as time goes on, we'll see more people wanting to be out in the woods.
I think you're right. I've been to town meetings, and we've been picking where they want to see public access, trails, getting input from folks that live there. Right now the town and county don't want free land. It's not like everything is going to get wrecked. It's a balancing act.

About no homestead land… This has been going on in the U.P. for a long time, lakes get developed, people keep building bigger and bigger homes and it gets zoned for seasonal use. Typically people eventually want to live here year-round. They retire here and declare residence there. Or the husband declares residence in one place and the wife declares it the other place so they can get homestead taxes in both places. It's a battle with lakeshore people and the townspeople. I'm sure you've heard of that in Watersmeet. They have kids that need the millage in school and the lake people vote it down because they don't have kids. Government people think they're going to have more money, but they never look at how the expenses wind up. From what I've seen, the more development, the higher the tax is.
We're getting a little off topic. We can get into the topic of sociology another time. The cost benefit – comparing Au Train to the Bond Falls flowage, the millages are roughly the same, but the taxes in Au Train are lower because of development. They're able to generate more taxes. There are pluses and minuses to all of it. They're coming out ahead in Au Train. There are instances on either side, we could go on all night.

Non-homestead taxes may not work.
They may not, you're right. But places will have a long time to work this out and be prepared for it. Townships will be responsible to handle what goes on.

Facilitator: Tom, maybe you can continue to go through the numbers.

Boney Falls – This is a funny development because there are four different townships in it and it's the smallest of the three developments.
In Cornell there are just two lots. In Wells - for Boney, there are 22 lots; it works the same there with the fair market value and non-homestead taxes. We assume $75,000 in tax base. Wells did have to be re-zoned, the town board approved this in anticipation for development.

If you got $3.5 million for fair market value, what is the actual tax revenue for Wells?
$74,000. That's summer taxes and winter taxes.

Ewing – there's no development planned here. It will probably be sold to adjacent landowners so there will be little increase there.

Cataract - that's one we had pictured marketing to quiet sports people. It will typically be a lower lot price - people on this type of land tend to build smaller more efficient homes.

We're still seeing water access and docking rights there so people put a boat in, tie it up, they can have kayaks; they still have to have access to get boats out of the water. If you take away docking rights, they will have to drag the canoe/kayak 600 feet. You'll see no homes while on that basin. If you don't have a place to keep boats in project lands, you would have to drag it back and forth. That value decreases for those people. All of us like to have a convenience factor. If you took away docking rights, it would lose half it's value. It would go from $5 million to $2.5 million or less.
With summer taxes and winter taxes, we would be adding $200,000 dollars.
That money isn't actually going to the townships, right?
Divided up by millages, schools and other part so of the town. What are we trying to say here jw?
And the state would get a bunch?
Yes, they would get part of it.

Regarding homestead taxes, what tax do you take away school voted or school debt?
I think school voted. Typically towns vote those for non-homestead, that's how they raise extra money. We got this information from each community.

Does anyone have questions on how we got these numbers? It's important to understand this is just an assumption. When we get there, numbers will vary. The units have to be approved by the health department, the local township has to approve we have a long way to go but this should give you a good idea on the taxes.

Facilitator: We can't finalize anything until UPPCO gets the okay on the SMP.

What will happen is as the SMP is finished up, we'll have a topographical map, soil information, we'll know where roads go and we'll cut as few trees as possible. We don't reshape the land. It's a long process. It's frustrating for a lot of people because we can't show exactly what we're planning it takes year or two.

What restrictions or involvement did the DEQ have on this?
As we develop our plans, in regards to wetlands, endangered species, etc., we have to take plans to the DEQ and get permits. For anything that was ever wet, a permit is reviewed by the DEQ and we build roads according to that. The health department is the one who determines septic systems and wells. We have to prove we have a back up septic system and a water source.
When you say back up septic, does that mean you have to have space to move something?
Yes. Michigan has the most stringent rules I have seen when it comes to septic systems. You have to prove both spots work. You have to have room for the house, and the well has to be drilled meeting health codes. It works very well for homebuyers. They apply for a septic permit and it's all set, it's all on record.

What would you say normal life of septic field is with part-time residents?

That's hard to say for part-time residents because it depends on how much water they are using and how often they are there.

When was this developed (referring to the documents with the tax information)?
August, it's on the bottom of the sheet. We worked through the summer to get all the numbers.

You give 229 lots for Au Train. That's a pretty specific number. You must have a map. I just wondered if after environmental studies the number of lots went down.
We haven't compared Au Train to the environmental studies. We have for the other ones and the number of lots has changed. The big thing out there is pier location. The locations line up good with protection of sensitive habitats. There hasn't been a big change. Our final plans for Au Train would have to react to the environmental studies.

Any more questions?

I can't think of any other questions right now.

It's nice to be able to ask questions as we go along because of the small size of the group.

We will email the correct date for the open house. It will be here in big ballroom.
Meeting Adjourned.

Attachment 51
19 October 2006
FOCUS GROUP MEETING AGENDA

Upper Peninsula Hydroelectric Project
October 19, 2006, Eastern Focus Group Meeting Agenda

Focus Group Purpose
The Focus Group is an advisory group. While it is neither a decision making body, nor will you be asked to reach consensus on any issues, your input is important. We ask that you:

- Provide feedback on the topic being presented
- Share what you learn with others in the community

UPPCO thanks you for taking the time to be a part of the process.

6:00 p.m. – 6:02 p.m.	Welcome & opening comments: Susan Finco
6:02 p.m. – 6:15 p.m.	Focus group member introductions (Approx. 1 - 2 minutes each) Name and organization(s) you are representing What are you hearing in the community – from your associates?
6:15 p.m. – 6:30 p.m.	Presentation on Recreational Enhancements: Shawn Puzen
6:30 p.m. – 7:00 p.m.	Focus group member comments – input – questions
7:00 p. m.	Meeting adjourns

UPCOMING MEETING DATES

Thursday, November 30: Eastern Focus Group Meeting

Draft SMP Public Open House Meeting Date: To be determined.

Attachment 52
25 October 2006
PRESS RELEASE – SHORELINE MANAGEMENT PLANS

UPPCO Expects Draft Shoreline Management Plans to be Complete and Presented to the Public by mid- to late November 2006

Houghton MI After gathering data from environmental studies and meeting with the public, focus groups, and numerous governmental agencies, Upper Peninsula Power Company expects to unveil its draft Shoreline Management Plan (SMP) for five U.P. Hydroelectric Projects (involving six reservoirs) by mid- to late November 2006. A 30-day comment period will follow, during which time UPPCO will hold open houses to take public comments about the SMP.

"We originally hoped to present the plan in late October," said Roger Trudeau Director of Real Estate, "but in the data-gathering and SMP-preparation stages, we're taking our time to make sure we put the best product out there we can - and that it reflects all the input we've received from various sources. We've gotten some very good ideas for public recreational enhancements at the projects. We need to analyze those suggestions and will incorporate as many as feasible. This will take additional time, because some of the public improvements will require drafting policies and procedures for implementation. SMPs are not just maps - they also require preparing a fair amount of text."

The SMP will outline what non-project uses of the lands and additional public amenities within the hydroelectric project boundaries will be proposed to the Federal Energy Regulatory Commission. UPPCO has said it expects the SMP to propose some individual and multi-slip piers and small natural pathways to the shoreline as part of the proposal.

"We're still working on the specifics of the plan," said Shawn Puzen, UPPCO Environmental Consultant. "It will designate some areas where piers might be appropriate and other areas that are not suitable. It could also contain things like recommendations for shoreline management and habitat protection. It's a work in progress."

Puzen said the company has solicited suggestions from its focus groups for improving public access to the project lands. So far, he said, suggestions include creating hiking trails, constructing pavilions, improving fishing and boating access for people with disabilities, and improving public boat launches.

"Realizing there are significant costs associated with some of the improvements, we'll do whatever is feasible, given the results of the land sale and development process," said Trudeau. "A lot will depend on FERC approval of the SMP."

Attachment 53
Late November 2006
WEBSITE ADDITION –FOCUS GROUP MEETING NOTES

UPPCO Meeting minutes
Sawyer Tail Winds
Conference Room
6:00 PM
October 19, 2006

Susan Pinco opens the meeting, goes over the agenda and opens the floor for initial comments

F= Facilitator
G = Group comment
U= UPPCO Team

Initial comments from focus group members:

G: "I haven't heard anything different recently… everyone I speak to would still like the area to stay in a natural condition."
G: "Our concerns are maintaining access to the lakes and it staying in the natural condition. I'm familiar with the area… one of the first places I canoed is this lake in 1976 or so. I worked on a hydro for a consultant on the Cataract Basin…Recently I went to the Au train basin and there was no water in it."
G: "We found out that there will be no development on the property on east side of Boney Falls, and was interested in what was happening there. Maybe the township will be interested in it but haven't heard anything from the public."
G: "I'm here to see how this project will develop. The group I'm with is interested in promoting recreation, and we have not been getting any comments from the people we work with."
G: "During the initial onset I heard a lot of comments, but they have winded down. Every so often I hear that accessibility is the most important thing, and the social structure."

G: "Where is the water in au train? It won't be back. That's about it."
UPPCO: "All I can say is that we can't make water. For a while it was coming up slowly. The last I heard what little bit was there tapered off due to rainfall. I would like to see if we could reduce the level limits for how much we can release. The powerhouse mechanical equipment limits how low our levels can be so we can't just continue to reduce the release to nothing. If the turbine starts to spin, it can spin out of control and spin apart, so we can only go so low, however the siphon works on head pressure and can siphon over the dam, and if it gets high enough we can reduce the minimum flow.

G: "Next year can we not go so low?
UPPCO: "We don't go any further than we have to."

G: "Good, because I've been hearing all kinds of rumors that they drew down the water to kill off the weeds, and make it more saleable. You know, sandy shores are more attractive than weedy water. If someone goes to buy it a sandy area looks better than a weed-bed."
UPPCO: "No, our draw-downs are a process. There's DEQ requirement and we have to file with FERC the reasons why we need it and how far. We never draw down below what we need. The lower we draw, the more money it costs UPPCO.

G: "To follow up on that, will 'El Nino' help with that? They claim we'll get more moisture from that..."
UPPCO: "I don't know."

G: "When I give reports at board meetings I haven't gotten any comments."

F: "Now we'll have a brief overview of recreational enhancements."

UPPCO: "One common theme we hear is that accessibility to reservoirs is the main focus. Providing environmental recreation is one of the SMP requirements.
Enhancements go with hydro projects. I was just talking about creating new access points and boat landings being upgraded as possibilities at Boney falls, Cataract, Au Train. I was going to develop list of possibilities and then after talking to a focus group member it occurred to me that what a better and more desirable way to do this by getting local feedback through the focus groups. When you bring it up to your groups, you act as a conduit to and from your local constituents. We'll use this focus group as we develop our plans, and will rely heavily on what you think from a recreational standpoint. What do people want to see? Trails developed? I'm not saying they can all be done, but everything you suggest will weighed in on as well as the other things like docks. This is your chance to give us ideas and tell us what you'd like to see for recreational projects as local individuals."

F: "If it were to happen, what would you like to see? If you take the stand that you want nothing to happen, you're missing out on an opportunity to benefit from what these things can be. These focus groups are occurring to give ideas like creating new boat landings, and perhaps some of the projects will happen. In Au Train, perhaps a public pavilion can be developed for rental by the locals, for anniversary parties, family reunions, things like that. A town park?"

U: "I'm kind of trying to work outside of the traditional ideas. Cataract's focus should be on quiet sports, the reservoir lends itself to that. A smaller reservoir doesn't lend itself to power boats."

UPPCO: "Other thoughts? We are open to hear what you'd like to see. We can't guarantee they will happen but can guarantee that we will look at it and will be paid for by UPPCO as benefits of sale of the land."

G: "From my perspective, I recently took a canoe trip and saw only boats on the water. I saw lots of people on foot that came from park lands that will be blocked off when Naterra takes over. Hiking or walking paths would be good. Hopefully along parallel of the shore if can't access it by traditional routes. We're speaking speculatively. When we see what will really be, we will have more to offer for replacements. Maintaining public access to sections of the reservoir that are currently available as part of the plan... we hope to have the same or better access than now."
UPPCO: "Your comment indicated that you think the area will be cut off?"

G: "Horseshoe area looks like it's cut off. I haven't explored that yet, but looks like shoreline and that direction...In that particular area."
UPPCO: "The horseshoe area - Naterra will not be cutting off as part of the development."

G: "My perspective is to have access to it by trail instead of a road. I guess the thing I'd like... I'm trying to recall the Cataract reservoir. I remember the reservoir was more conducive to small craft. I'd hate to see jet skis and that kind of thing with all that... I hate to see that, it's really a problem. So many people with those types of machines really ruin it for people who wish to fish and watch wildlife and doing that kind of a thing.
Wildlife and hunting vs. thrills-- that's why FERC has its rules. I guess that's off the top of my head never been to Boney Falls or Au Train. It's a pretty spectacular place with the waterfall and undeveloped nature of it. You get a feeling out there on a boat by yourself. I'm aware of the access that the campground... looks like access by the gate at
M-94... don't know what to say about that. We need to have whatever facilities there exist maintained. I'll leave it at that and get out and view it sometime."
G: "I'd like to see a campground and scenic interpretive trail on the east side. Plant life, wildlife, limited boating. The designated area for swimming is not easy to get to... A possible pavilion, spinning off to a parcel that wanders around it, would be a nice site.
Some type of rental facility would work well. We'll see what's proposed. The supervisor is open to that type of thing, but the neighbor is not too excited. Time will tell, things can change."
G: "Some come to mind. Trail networks are big. The County is known for access to natural areas for tourists, and I'd like to encourage lot of things that take that into consideration. Especially residents, there's always issues between motorized and nonmotorized.
I would like to see any non-motorized projects. People with speed cause trouble. People like access to include access for the physically impaired. Interpretive signage would be good, direct people to a shaded areas to have a picnic. We have to consider locals that are effected by that No one wants loud vehicles going by their home.
Shawn mentioned talking about some type of access. You can carry in at the north-east end maintaining minimal hiking trail on the eastern side. I am a big advocate on limiting horse power on these type of areas, like power boats."
UPPCO: "That rests with the town, not with us."

G: "We'd like to see recreation impacts as minimal as possible, not a boat launch per se."
G: "Go slow. Jet skis wouldn't like to see that. As far as access roads, a big highway area and basin wouldn't be good. That would be bad. I think as far as more campsites, UPPCO and the DNR could get together and could have it filled all the time. As far as more boat ramps, not more here instead of site on south?"
G: "You're talking on south west carry south-east site on south west that I can carry my boat and sit and eat... End of 26, some kind of dock, don't want it so big for a 50 ft., 14 foot or whatever is good enough. The easier you make it, you bring out the lazy people."
UPPCO: "Planks or skid pier? Like a dock when you launch a boat. It's a dock at... a moveable dock... it's there for convenience for people launching boats. Commonly put at boat landings to facilitate bigger boats? The size of the launch has to do with depth of water. It limits size of the boat. Some call it a convenience pier."

G: "My point is don't make it be a convenience."

G: "It used to be concrete planks but over the years have gone away."
G: "It's inaccessible now and scary with a camper. In the summer time you need a 4 wheel drive to get in there."
G: "Our property stops there. I know what you mean. Both good and bad... it limits size of boats and campers. if you come in you'll lose it."
G: "Can't think of too much to say on the subject of feeder roads. The road commission is in financial trouble. How much extra maintenance is needed? Will they be more focused on those? The reduction of employees and not replacing employees affect all other roads. Will there be more pressure to maintaining the roads going into the areas?"

G: "I mentioned the recreational authority. there are 7 townships and 3 cities are in it in Marquette area. When Tom Bade spoke I mentioned it to the township association that they should get his card to look for 1/10th of a mil."
UPPCO: "Are you looking for us to discuss the upkeep?"
G: "No...how can certain things be extended? Should talk to Carol Fulsher, she can be reached at 226-6591."

F: "Great input and comments! Now that you've heard what the others have said, would you like to comment on each other's comments? Discuss anything further? We've heard a lot about trails and launch sites... anything else you like a lot?

G: "The trails aspect- one thing lacking on a lot of reservoirs are trails to hike around. They have minimal impact and give access to hikers. In regards to the development of trails, I don't want to see 8 foot wide trails, we're talking minimal trails."

G: "Just wanted to say that regarding recreational projects overall, I feel lot of what we see in U.P. is poorly signed and see facilities closed down and then we see what the demand is and what could be, we could be telling people what's out there giving them good direction and signage to access it."
UPPCO: "Signage is an important component of good recreation. Everyone focuses on the site. Two thoughts-- one is *don't want to share* and the other is *share*. MDOT is not a big fan of signs on highways. I can give you an example of a sign next to the cataract dam boat landing that almost didn't happen. We found someone at MDOT and were told it was part of what have to do, so make it happen."
G: "No sign by Cataract."
UPPCO: "On M 35. UPPCO paid MDOT to put that sign up."

G: "The thing that's unique about this area is that it is not developed.. so many hundreds of lakes in U.P. So many not unique anymore. We need to minimize the loss of nature. All settings should not visible from the water. I don't want to see anything in here that would impact the populations of waterfowl and hope UPPCO will take all things into consideration to make sure the impact is minimal."
Susan Finco asked Greg to expound on his accessibility comments.

G: "Some people in wheelchairs need access. There should be some accommodations for people who are handicapped and note that the area has barrier free access."

G: "A place like Cataract-allow access, in particular to explore it from the water. If someone can't walk a great distance, from water is best, but the wetlands..."
G: "Not every site lends itself to barrier free, but will look into it."

F: "Anything not mentioned? Kerry is our key contact or Janet. Please let us know anything that comes up that you'd like us to know."

G: "On the east side of the basin, on those hills, a platform in woods to look out over basin would be nice. Before the trees grew you could see better, but I suppose to do that the trees would be impacted. But go a little bit further, and bird watching is possible..."
G: "I read something that you need a license to develop if eagles are nesting ¼ mile away."
UPPCO: "Its dependent on the time of year. Late winter it's ¼ mile and then 660 feet, others 330 feet... it has to do with nesting time. You want to avoid the nest if there are eggs. If they leave the nest in the cold weather the eggs won't survive. Au Train has an active eagle nest."
G: "There are 3 or 4 in the area...."
UPPCO: "If there is one now, we'll have to avoid it, unless the experts say its okay."
G: "This summer we had golden eagles for first time..."
UPPCO: "We see a lot of immature eagles that look like Golden eagles..."
G: "No, they're huge and I saw them together. Just a thought."

G: "One thing to mention on opposite side of bringing in tourism is also, they may overuse it and the barks get trampled. You'd have vegetation, soil erosion...that type of condition. That's what you may have to deal with if you bring too many people into the area. An example is Au Train on waterfall area on the north side of the basin, people like to see the falls and there's nothing to regulate or funnel them into where you want them to go. Waterfall areas are particularly hard to manag e because people want to look over edge Montreal falls is like that. Fishing areas are sometimes problems... they can drive to the shore and party and leave a big mess. When you do recreational planning look at those things and assess them and incorporate those into the plans Maybe if you want to build better camping areas.. "
UPPCO: "Good point. Offer stairs for steep banks. We're familiar with dealing with those types of situations. Erosion is one of the things we have to deal with in the license. If that happens we'll have to address it."

G: "I notice campgrounds people looking for firewood, they chop green trees, trees fall if not cut down, people take firewood often times. In a park situation they haul away trees when sometimes they need to stay as a natural barriers. It seems like there's a lot of things that have always been done. We get conditioned, so we're better off to observe human behavior and determine what to do, vs. put up sign of what not to do. People will do it just to defy the sign "
G: "Maybe the trails shouldn't be on the shoreline, but away from it to not impact species that occupy the shoreline. Have the trails where the ground is more stable."
UPPCO: "Terrain or wetlands will dictate where the trails go, a lot of time we cannot control human nature. We can talk about it... we've been developing land and maintaining recreational sites for many years, and are part of a large network... We can send an email and ask if someone dealt with a problem before. We always get an answer from someone who has."
F: "SMP process?"

UPPCO: "The Shoreline Management Plan in November… delayed public meetings to develop that SMP. What you did today will help enormously. We want to do a thorough job and take time before we move forward… not several months, but a month or two months…that's why we pushed the public meeting back, to take into account as many of these concerns as we can."

F: "We will notify all of you so you can plan in advance and have adequate time. We will have a draft SMP before the next public meeting. Our hope was to discuss draft a SMP at that time. We're working on a schedule… update of final environmental report, commented on draft… will be finalizing the reports."

UPPCO: "As soon as we know… we didn't change the 30th date will let you know…"

G: "Recently a draft of some recreation plans for Bond Falls went to the DEQ… as far as recreation plans…"
UPPCO: "As far as I'm aware the DEQ does not have a draft of the recreation plans. The DEQ has a plan that we need to obtain a permit for Shoreline Stabilization."

G: "Do you anticipate any of the projects?"
UPPCO: "The DEQ needs to permit any kind of work below the ordinary high water mark. We'll have to obtain a permit, county sendimentation permit… similar permits… trail building doesn't require one…"

F: "Thank you all for joining us tonight…"

G: "I have a question about power generation demand. How's the situation for UPPCO, and demand increase… is there a question?"
UPPCO: "There is a required reserve, we're working on a plan to strengthen our ability to bring power to the U.P., I don't think there is anything worrisome about getting electricity… ATC (something about how the grid works and access to Wisconsin and the UP)… no cause for concern for power supply… (system?) still very constrained… working on it, always working on it, looking at it…If someone shoots something out, we're in trouble."

G: "What if other states ask for power from us?"
UPPCO: "If you have a contract, no one can take it away from you. Last year St. Louis, Ohio needed power, and we asked our customers to conserve so we could send power to them. We wouldn't be in a position to cut off power to our customers, only conserve so we can send when needed… but we wouldn't deny our own customers so we can give a way power to someone else."

G: "Is there a plan to strengthen the grid?"
UPPCO: "We're building in Wausau in 2008. Wisconsin and U.P. both need it; we only have 4 links coming in… (laughing) We're a power company, and are glad we can answer questions about power."

F: "We will keep you posted about the dates and thank you!"
Adjourned.

Attachment 54

30 November 2006

PRESS RELEASE - SHORELINE MANAGEMENT PLANS DELAYED

UPPCO Hydroelectric Projects' Shoreline Management Plans Delayed, Perhaps Until March 2007

UPPCO cites additional time needed to incorporate data gathered, the holidays, and its desire to provide a comprehensive overview of shoreline plans for all its U.P. project lands

Houghton, MI – Upper Peninsula Power Company has revised the timeline for completing the draft Shoreline Management Plans (SMP) for project lands at Au Train, Bond Falls, Boney Falls, Cataract, Prickett, and Victoria reservoirs to allow time to incorporate information gathered from the public, focus groups, the environmental studies, and resource agencies. The company now says its plans to complete the SMPs by December 1 were optimistic and adds that no rights to use the project lands would be conveyed until a final SMP is approved by the Federal Energy Regulatory Commission.

UPPCO is planning more detailed SMPs for submittal to the Federal Energy Regulatory Commission (FERC), and the process is time consuming.

"We could submit general SMPs relatively quickly," said Shawn Puzen, a WPS Resources Environmental Consultant working with UPPCO, "but the plans wouldn't provide the level of detail the public and agencies indicated they'd like to see. It also makes more sense to us to submit the complete, detailed SMPs initially. We think providing an overall view of the plans will be more meaningful to stakeholders. The plans will provide continuity while still recognizing the individual characteristics at each of the projects."

Puzen also believes it is important for stakeholders to see the plans as a whole. "To some degree, the plans are dependent on one another," he said. "Certain activities may be proposed at one location that are not proposed at all locations."

Puzen explained that the company would present its plans at public meetings in the eastern and western Upper Peninsula. "That's consistent with how we've approached this in the past," he said. "It makes sense to hold meetings for Bond, Victoria and Prickett in the west and Au Train, Boney Falls, and Cataract in the east so that local people won't have far to drive."

After the draft SMPs are presented, UPPCO will take public and agency comments before finalizing the plans and submitting them to the FERC.

UPPCO said it wouldn't wait until the end of the first quarter of 2007 to present the SMPs if they're completed before then. "We'll get them out to the public as soon as possible when they're finished," Puzen said. "We understand that people will be disappointed in the delay, and we appreciate their patience, especially those entities eagerly awaiting the final product. Nevertheless, we think everyone would agree that it's more important to do this right than do it fast."

Attachment 55
As of 21 December 2006
DIRECT MAIL – COMMENTS RECEIVED

Comments on Scope of Environmental Studies: Once Again UPPCO shows its total disregard for the people of the U.P. Your objective in the Aesthetic value of the Impoundments was "why these areas have high aesthetic values and whose values they are" but the only people you ask about this was a couple of part-timers & two campers. Your total failure to contact ANY local people on this subject confirms my thoughts on your extreme greed. If I were you I'd take the U.P. out of your name. (Wayne Wisconsin Power Company would be better.

Name: WAyne JoKisALo

Address: 11384 U.S. 45

City/State/Zip: Bruce Crossing, Michigan 49912

Phone: 906-827-3762

UPPCO

Comments on Scope of Environmental Studies: The lake (Bond) has been with us for 50+ years. The people that choose to recreate also understand this. Those that purchased property on Bond should have known this. Good job on Enviro studies Project should proceed!

Name: John Rebula

Address:

City/State/Zip:

Phone:

UPPCO

Comments on Scope of Environmental Studies:

It is ~~not~~ appropriate to use acres per boat because much of the reservior surface has submerged stumps which makes many acres unsuited to boats— remove stumpage acres from calculations.

Wildlife studies need to account for future changes in the old growth buffer & project lands - will be different 100 yrs. from now.

Name: Tom Church

Address: PO Bx 778

City/State/Zip: Watersmeet MI 49969

Phone:

UPPCO

Comments on Scope of Environmental Studies:

Your ideas for BOND and Victoria are INSANE

Name: DOES NOT MATTER - OS

Address: You do NOT Listen Anyway

City/State/Zip:

Phone:

UPPCO

Comments on Scope of Environmental Studies: Aesthetics — Most important item is the protection of the wild appearance of the shoreline and piers will detract from that wild appearance.
- Study should include the aesthetics related to water quality. clean water exists today but proposed use likely will reduce waters quality.

Name: Tom Church
Address: PO Box 778
City/State/Zip: Watersmeet, MI 49969
Phone:

UPPCO

Comments on Bond Falls Land Sale: I am opposed to this sale and the Natera development. Until public outcry developed, UPPCO and WPS tried to hide this land sale and subdivision from the public. Now you are "backtracking" and trying to please us (placate us). This does not strike me as a good way to win the public trust. A full environmental review is needed and the terms of the FERC license strictly followed.

Name: Jeff Niese
Address: 1202 School Rd.
City/State/Zip: Tomahawk Wi. 54487
Phone: (715) 453-7290

My daughter and family have used Bond Falls for the past few years for camping, recreation and cross-country training camp.

UPPCO

Comments on Scope of Environmental Studies: I found it quite amusing that your E-pro people could only find 3 sites on the whole Bond Impound that contain hen mallard with a brood. On any given summer day I can walk the shores of Bond lake and spot 3 broods of MALLARDS in A 200yard walk. MAYBE that means A two to three day studied just doesn't tell you whole story about an Area. One more thing, the CANADA goose is not consider A nuisance bird in the U.P. The U.P. is not yet the same as A park IN GREEN BAY!

Name: WAYNE JOKISALO

Address: 11384 US 45

City/State/Zip: Bruce Crossing Michigan

Phone: 906-827-3762

UPPCO

Comments on Scope of Environmental Studies: SHAUN PUZEN'S comments At the end of meeting in Ewen tonight were of much concern to me. He said there can be NO Conclusions to ANY of these studies because "we don't know whats going to be there". Well that MAKE me come to this Conclusion - you really could care less about the environmental studies all you want is 10 times better then fair market value for your land. Someone must be looking for A CHRISTMAS BONUS!

Name: WAYNE JOKISALO

Address: 11384 US. 45

City/State/Zip: Bruce Crossing, Michigan 49912

Phone: 906-827-3762

UPPCO

Comments on Bond Falls Land Sale: Being a land owner in Haight Twp, my main concern is public access on Bond Falls Flowage, & the inevitable increase in property taxes. To subdivide non project lands is one thing but to allow docks on public lands is another thing. I do not agree with docks of any kind on Bond Falls Flowage! If allowed, law enforcement problems alone will use up any dollars gained in new tax receipts. Please don't allow docks!!

Name: James A. Pietila

Address: 8890 Della Dr

City/State/Zip: Woodruff WI 54568

Phone: 715-356-7076

UPPCO

Comments on Bond Falls Land Sale: We believe UPPCo has made changes to a former agreement. Therefor a new Environmental Impact Statement is needed before our precious wild areas are converted to another suburbia!

Name: Charles Waters

Address: 18896 Frantz Road

City/State/Zip: Ewen, Mich. 49925

Phone: 906-988-2428

UPPCO

Comments on Bond Falls Land Sale: I understand you have a right to sell property that belongs to you, but land that is considered public project lands should remain completely public no private structures whatsoever docks buildings or any structures, please follow the committment to the Ferc license as it was intended, Do not accomadate a developer above the common good.

Name: James Bieniewski

Address: 3281 Old US 45

City/State/Zip: Paulding Mi 49911

Phone: 906-827-3616

UPPCO

Comments on Bond Falls Land Sale: Forget what the DNR, the environmentalists, and developers want. What is needed is a state wide ballot proposal to turn it all into a state park. In other words, this should be looked at in terms of 50-100 years, and not just 5-10 years.

Name: Paul Olson

Address: 11602 CHOATE ROAD

City/State/Zip: EWEN MI 49925

Phone: 906-988-2744

UPPCO

Comments on Bond Falls Land Sale: I recommend that you complete an independent cost of community services study for the the Bond Falls development. I don't believe any of these parcels adjacent to the project boundary with access to the shoreline will actually be taxed (assessed) at shoreline values (vs. backland values). A cost of community services study would likely show that the increase in property values (tax revenues) would not be sufficient to offset the costs the local communities will need to bear to service the development but at least the study would provide a quantitative indication one way or the other.

Name: Bryan Pierce

Address: 2701 Military Rd.

City/State/Zip: Eagle River, WI 54521

Phone: (715) 479-7530

UPPCO

Comments on Bond Falls Land Sale: To Naterra Rep:
If a lake is deemed environmentally sensitive, as in your example & if Naterra "lives for connections to nature" as you suggested, why then would you deem shoreline development an appropriate and respectable thing to do?

Name:

Address:

City/State/Zip:

Phone:

UPPCO

Comments on Bond Falls Land Sale: Well presented at the school, it will all come out in the wash. We had a lot years ago bought from Upper next to the longest lot at Herb's. We sold it years back, we did not use it much. Every body else used it. We kept our small boat on it. Interior township needs the tax base, we have lived on Trout Creek for years, before moving to Ironwood. I went through T.C. High School

Name:

Address:

City/State/Zip:

Phone:

Electronic Sales
Stanley W. Stemple KB9YIT
12216 Stemple Rd., PO Box 118
Paint Crossing, MI 49932-0118

UPPCO

Comments on Bond Falls Land Sale: I would discourage the provision for docks on Bond Falls Flowage. docks are a privilege of shoreland owners who pay taxes based on that ownership. Unless these new owners pay taxes at the shoreland rate, they shouldn't be allowed personal access. It is not common practice for the public living adjacent to public land, to place personal property or structures on that public land - including piers.

Name: Gail Gilson Pierce

Address: 2201 Military Rd

City/State/Zip: Eagle River, WI 54521

Phone: (715) 479-7530

UPPCO

Thank you for considering this comment.

Comments on Bond Falls Land Sale:

Have any studies been Conducted on the effect to trout & wildlife below the reservoir due to the increased pollution due to Boat & Human presence? Exotic Species protections etc?

Name: Pat Indermuehle

Address: 4464 Pioneer Rd

City/State/Zip: Conover WI 54519

Phone:

UPPCO

Comments on Bond Falls Land Sale:

Does Natterra's building plans for Bond Falls include ~~[illegible]~~ or address ~~[illegible]~~ terrestrial & aquatic plant species

e.g. weed free building materials?

e.g. Req. "new" land owners to inspect boats?

e.g. Boat washes?

e.g. Seed source for roadsides?

Name:

Address:

City/State/Zip:

Phone:

UPPCO

Comments on Bond Falls Land Sale: Have you studied what the max. # of boats the lake can handle?

Name:

Address:

City/State/Zip:

Phone:

UPPCO

Comments on Bond Falls Land Sale:

I would like to make a comment on our need for development in the UP-

Name: Maggie Schepper

Address:

City/State/Zip:

Phone:

UPPCO

Comments on Bond Falls Land Sale: This Shouldn't have started without public hearings, and without seriously perusing sale to a conservancy.

Name: M. Schuppe

Address:

City/State/Zip: Iron River, Mi 49935

Phone:

UPPCO

Comments on Bond Falls Land Sale: I believe the controversy and disagreements and division among this County, due to this sale will have lasting effects that will go down in history. It is shameful that most of us found out about the effect of the sale, from someone other than UPPCO! UPPCo will be remembered in history as someone who divided the County.

Name: [redacted] Ms. Bernita Lee Bieniewski

Address: [redacted] 3281 Old Us 45 Paulding, MI 49912

City/State/Zip:

Phone: 827-3616

UPPCO

Comments on Bond Falls Land Sale: I don't want anyone to tell me that I can or cannot sell my property and I try to live by the rule – Do unto others as you would have others do unto you. Lifetime resident of Ewen

Name: THOMAS M PLATSKE

Address: PO Box 271

City/State/Zip: Ewen, Mi 49925

Phone: 988-2558

UPPCO

Comments on Bond Falls Land Sale: An excellent proposal. Property needed on the ad valorum tax roles is sorely needed here, keep public acess available to the respective flowages. I hope your land sale is a huge success.

Name: Carl Nykanen

Address: 15613 North Cemetery Road

City/State/Zip: Ewen, Mi. 49925

Phone: 906: 988-2274

UPPCO

Comments on Bond Falls Land Sale: This should remain public land. This meeting at Trout Lake School on 2/2/06 is an after the fact public relations bandaid. This sale has all the appearance of a closed door done deal to a ~~der~~ private developer with a poor track record. It will remain a public relations nightmare for UPPCO. Too many people care.

Name: Barb Bates

Address: 7515 No Fish Bay

City/State/Zip: St. Germain, WI 54558

Phone:

UPPCO

Comments on Bond Falls Land Sale: I UNDERSTAND UPPCO SIGNED A LICENSE AGREEMENT WITH FERC, HOW CAN UPPCO NOT ADHERE TO THE AGREEMENT

Name: RICHARD SLOAT

Address: 223 8TH AVE

City/State/Zip: IRON RIVER, MI. 49935

Phone: 906-265-0751

UPPCO

Comments on Bond Falls Land Sale: What log does is the property list now for current purpose.

Name: Pat Kitzmon

Address:

City/State/Zip:

Phone:

UPPCO

Comments on Bond Falls Land Sale: Besides Potlatch, what other companies, developers, were interviewed regarding the sale of UPPCO lands?

Name: L. Kuehne

Address:

City/State/Zip:

Phone: (906) 524-6288

UPPCO

Comments on Bond Falls Land Sale: is the Corporation for paying taxes on the timber valuation

Name: Pat Kitzman

Address:

City/State/Zip:

Phone:

UPPCO

Comments on Bond Falls Land Sale: What 'deal' did you use for all these years - what I ask you coming to 'negay' to the Ontonagon for the 'deal'

Name:

Address:

City/State/Zip:

Phone:

UPPCO

Comments on Bond Falls Land Sale: FERC

From my reading of your FERC licence, any development or sale such as this pretty clearly requires a new Environmental Impact Statement. Has Taylor Investment done one of these so that it is sure that its investment will give a good return? How can Taylor be sure they'll be able to make a Killing on this investment?

Name:

Address: Jake Barton

City/State/Zip: PO Box 243

Phone: Land O'Lakes WI 54540

4

UPPCO

Comments on Bond Falls Land Sale:

How much of this land was originally obtained through the power of Eminent Domain By of Power or with Power

TAX CLASS

what Tax class is the property in now

why is not it in developed

Name:

Address: is this tax on the Timber going

City/State/Zip: around Bow

Phone:

Pat Mattson

UPPCO

Comments on Bond Falls Land Sale:

When did they change their name to Naterra?

Karen Anderson
Conover, Wi 54519

Name:

Address:

City/State/Zip:

Phone:

UPPCO

Comments on Bond Falls Land Sale:

How much of this land was originally got by UP through Eminent domain

Price paid for land By Naterra

Name: Pat N. Ty Moore

Address:

City/State/Zip:

Phone:

UPPCO

Comments on Bond Falls Land Sale: How long will UPPCO/Natera be involved w/ the non-project lands? Who will be responsible to assure that land owners meet their agreements?

Name: Zoms

Address: N4550 Morrison Rd

City/State/Zip: Watersmeet, MI 49969

Phone:

UPPCO

Comments on Bond Falls Land Sale: Natera After the property owner on Loon Lake or elsewhere is in their home, how do you manage to enforce your "do" + "don't" requirements? How about 5 years later, 10 years, 25 years and so on? What happens if a violation is uncovered?

Name: Don Savela

Address: 1111 10th Ave

City/State/Zip: Houghton MI 49931

Phone: 906-487-6619

UPPCO

Comments on Bond Falls Land Sale:

Q What is minimal number of Docks Anticipated —

What would be maximum number of Docks anticipated —.

Name: Jay Ibsen

Address: PO Box 43

City/State/Zip: Trout Creek MI

Phone: 906-852-3471

UPPCO

Comments on Bond Falls Land Sale:

Considering the mean income of Ontonagon Co. is less than 24K per year. Who will buy this property? What will the lots cost?

Will the taxes become so high that local folks won't be able to afford to live there — like what is on Lake Gogebic?

Name: James

Address: 106 n 4th St.

City/State/Zip: Ontonagon MI 49953

Phone: 906-884-6103

UPPCO

Comments on Bond Falls Land Sale: As an 18 year landowner on Bond Falls Flowage we and all of our neighbors have NEVER been permitted to place any structure on the Shoreline, Including Ramps docks or piers. What is different NOW? the FERC license is the same - the environmental laws are the same. Is it BIG MONEY TALKING?

Name: Linda Rein

Address: Bond Falls and Ontonagon

City/State/Zip:

Phone: 906 884 2903

UPPCO

Comments on Bond Falls Land Sale:

~~Here~~ ~~Natera~~

How MANY ACRES OF LAND HAS NATTERA PURCHASED FROM UPPCO AT THIS PRESENT TIME

Name: RICHARD SLOAT

Address: 223 8TH AVE

City/State/Zip: IRON RIVER, MI 49935

Phone: 906-265-0751

UPPCO

Comments on Bond Falls Land Sale:

QUESTION: CAN HAIGHT TWP. EFFECTIVELY ZONE OUT DOCKS ON THE FLOWAGE (BOND) OR ARE THEY PROHIBITED FROM DOING THIS ~~BY~~ BY FERC?

THANK YOU

Name:

Address:

City/State/Zip:

Phone:

UPPCO

NATIVE

Comments on Bond Falls Land Sale: WILL THE PROPOSED LANDS HAVE ANY COVENANTS SUCH AS MINIMUM DWELLING SIZES OR NUMBER OF BUILDINGS ALLOWED PER LOT? - THIS WOULD BE IN ADDITION TO OR OVER AND ABOVE CURRENT LOCAL ZONING?

Name: Dudley Pierce

Address: E18441 Grace Lake Rd

City/State/Zip: Watersmeet MI 49969

Phone: 906 358 4506

UPPCO

Comments on Bond Falls Land Sale: JUST A WEEK AGO I READ ~~THAT~~ THAT UPPCO ANNOUNCED "ALL REMAINING NON-PROFIT LANDS ARE CLOSED FOR BID, NO ONE WILL BE PERMITTED TO BUY ALL OF IT" TODAY YOU SAID YOU ARE "STILL TALKING" WITH THE NATIVE CONSTITUENCY, WHAT ARE YOU STILL TALKING ABOUT?

Name: AL WARREN
Address: PO BOX 102
City/State/Zip: EWEN, MI 49925
Phone:

UPPCO

2/2/05 6:35 PM

Comments on Bond Falls Land Sale: SHAWN P. JUST CONTACTED IN FOR MOTION GIVEN BY TOM AT INTERIOR YOUR LAST MON / TOM SAID 300-400 DOCKS, MARS, 2 BOAT LIFTS! NOW SHAWN SAYS THERE'S NO "WELA" I HAVE A COPY OF IT & THE DATE TO BE FILED IN WAS DEC '05 WHAT IS THE TRUTH?

Name: AL WARREN
Address: PO BOX 102
City/State/Zip: EWEN MI 49925
Phone:

P.S. — TOM TOLD INTERIOR "300-400" — 04/30/05 TRANS / CHECK
NOW STEVE SAYS "NO PLANS YET" 2005

UPPCO

Comments on Bond Falls Land Sale:

1) Will the final development plans be presented to the Township officials prior to its implementation and will there be flexibility to change from the subsequent inputs?

2) In what ways will public access be enhanced on the project lands as the result of the non-project development?

Name:

Address: FRANK KOCHEVAR PO Box 127

City/State/Zip: WATERSMEET, MI 49969

Phone: 906 358 4501

fkuchevar@charter.net

UPPCO

Comments on Bond Falls Land Sale: REGARDS FERC

WHAT CHANGES ARE YOU SEEKING TO THE FERC AGREEMENT (DOCKS FOR EXAMPLE)?

Name: ZOARS

Address: N4550 MARION LK ROAD

City/State/Zip: WATERSMEET, MI

Phone:

UPPCO

Comments on Bond Falls Land Sale: Thanks for asking for input after the land is already sold. Uppco used to be a class act. Not Anymore. I know snakeoil salesmen when I hear them and Naterra fits the discription.

Queston – Bond Falls was created for Public use totally. When did the wealthy get exclusive dock rights?

Name:

Address:

City/State/Zip:

Phone:

UPPCO

Comments on Bond Falls Land Sale: The map for Bond Falls Flowage shows both lands that have been sold (orange) and lands that haven't yet been sold (green). Would uppco still consider selling these lands to the State of Michigan, the US Forest service or a Conservation organization

Name: Steve Gawle

Address: PO Box 4

City/State/Zip: Marquisco, MI

Phone: 906-842-3587 (late eves & weekends)

UPPCO

Comments on Bond Falls Land Sale: I'm glad that we have a chance to increase the tax base. Our school district is 300,000 in deficit. Our ambulance service could use more milage for running expenses. We need job opportunities – building trades, etc.

Name: Patricia L. Talsma (Pat)
Address: 16468 Shively Rd.
City/State/Zip: Bruce Crossing, MI 49912
Phone: 906 - 827-3827

UPPCO

Comments on Bond Falls Land Sale:

See attached

Name: Nancy Warren
Address: PO Box 102
City/State/Zip: Ewen MI 49925
Phone:

UPPCO

A lot has been said about Naterra's track record & reputation

Comments on Bond Falls Land Sale:

Has Natterra Land or Taylor Investment Co. been involved in any wetland non-compliance issues in your 26 year history of sensitive ecological development? Please explain. ~~Have you~~ Thank you

Name:

Address:

City/State/Zip:

Phone:

UPPCO

Comments on Bond Falls Land Sale:

Shaun gave excorrect information

① I got the NELA from Roger Trudeau not a resource agency

② There have already been 2! I have both

Name:

Address:

City/State/Zip:

Phone:

UPPCO

Comments on Scope of Environmental Studies: Whatever Amount of money you paid to have E-Pro do these studies (you paid too much!). It would appear with all the pretty little pictures and high school like description of Informal campsites that your trying to prove there is some erosion at Bond lake. Well yes there is, but do you expect me to believe it will be better will 400 to 500 hoses around Bond! Come on how can 30 to 40 campsite that have been there for 60 years be worse.

Name: Wayne Jokisalo
Address: 11384 U.S. 45 South
City/State/Zip: Bruce Crossing, Michigan 49912
Phone: 906-827-3762

UPPCO

Comments on Scope of Environmental Studies: _____
Fishing, a lot use of the Flowage was not valuated. Objective data on bait usage, fuel sales + other camping supplies. I agree Debbie Wilkie does not decide the environmental quality will be improved by Natural development.

Name: C.A. Murray III M.D.
Address: P.O. Box 38
City/State/Zip: Bruce Crossing, Mich. 49912
Phone: None. I live in a wilderness spot which I own West of Paulding.

UPPCO

Comments on Scope of Environmental Studies: Fishing, a/c use of the flowage was not evaluated. Objective data on boat usage, fuel sales & other camping supplies could be obtained from Debbie Wirkie at the Paulding Store.

Does UPCo believe the environmental quality will be improved by Waterras Residential development?

Name: C. A. Marra III M.D.

Address: P.O. Box 38

City/State/Zip: Bruce Crossing, Mich 49912

Phone: 200 - Am Resident of Ottawa Dell forest west of Paulding & am in a wilderness area.

UPPCO

Tom Baade stated the current Snowmobile trail may be rerouted but will stay on Waterra lands. When can we expect a decision for the new Snowmobile trail?

Warren
Ewen Jr.

Shouldn't UPPCO's present proposal for Significant Development Now be addressed in a New Environmental Impact Study (NOT an EA selected by UPPCO) followed by a public comment period before FERC rules on this?

Warren
Ewen MI

UPPCO keeps talking about "improved access" for the public as a result of this development yet this is not an objective of the Bond Falls license. Many local residents prefer the shoreline be left in an undeveloped state as stated in the license agreement. Why is UPPCO changing the conditions of the 40 year license? Warren
Ewen MI

A Shoreline Management Plan was not done during relicensing because UPPCO stated they had no plans to develop the lands.

Now that UPPCO has changed their plans, when can we expect the process to begin to develop a Shoreline Management Plan?

Warren
Ewen MI

Are the current home owners on Bond Lake (who do not have docks) contributing to shoreline erosion?

Robert Kunicki
P.O. Box 78
Trout Creek

UPPCO's 4/20/06 letter to FERC states that NATERRA is proceeding with land planning activities for non project land and that NATERRA will use certain assumptions relative to non-project use of project lands. What are these assumptions?

Warren
Ewen Yri

Q: What are plans for the historic town of Barclay and its town cemetery, now owned by Naterra? (was nominated for historic site status in 2002)

Michael Genich
106 N. 4th St
Ontonagon 49953
884-6103

NEED SPECIFICS ON DOCKS, BOAT LIFTS, ETC FOR RESERVED CAMPSITES.

[redacted] GEDDICK
106 N. 4TH ST.
OTTAWA, OH
[redacted]-6103

How much is 68 years of free public water use worth to Oppco

HAS ANY CONSIDERATION BEEN GIVEN TO DOCUMENTING OR POSTING WITH A HISTORICAL DISPLAY AND/OR IDENTIFYING THE TOWNSITE OF CALDERWOOD which WAS FLOODED OVER IN THE CREATION OF THE FLOWAGE.

R KNIOLA

Q: Will UPPCO stop the 20 foot [illegible] water drawdowns of Bond and Begin complying with the drawdown restrictions of the new 2003 Hydro License?

M. Gearhart
Ontonagon

(Will the new landowners near the waterfront have to pay for lakefront taxation if there are paths made down to the lakefront?

Pat Oltz
P.O. Box 643
Watersmeet, MI 49969

Numerous agencies have written in opposition to UPPCOs proposed plans, how are you addressing their Environmental & wildlife Concerns?

Warren
PO Box 102
Ewen MI

How do you believe the proposed conveyances for private lighted docks & walkways are consistent with Section 5.4.3 of the DHHC which states Conveyances must be consistent with the scenic recreational & other Environmental Values of the project?

Warren
Ewen Yu

An objective of the aesthetic Study is to describe why these areas have high aesthetic value, who values them & why

How will this be determined & how will the public be involved

Warren
Ewen Yu
99925

What impact will increased Camping on the islands have on the bear population?

Warren
POBx 102
Ewen 99925

8/05
UPPCO has stated that moving camp sites would advance the project values of promoting old-growth forests, protecting loons & preventing Shoreline Erosion.

Explain how hundreds of private lighted docks & walkways (instead of campsites) meets the goals of promoting old-growth forests, protecting loons & preventing Shoreline Erosion?

The current NELA allows for cutting dead trees & live vegetation 2" in diameter at the 5 ft level. How is this activity consistent with old growth designation agreed in the license?

Warren
Ewen 49925

The UPPCO website claims Naterra has a tradition & Commitment for quality projects.

Within the Wisconsin Circuit Court System, Naterra was cited for 14 violations, mostly for failure to obtain appropriate permits for various activities. Please Comment Warren
Ewen Pic

Why wasn't a Michigan Company chosen to Conduct the Environmental assessment in Michigan?

What Specific Studies will be Conducted regarding the impact this development will have on the Wild & Scenic River Qualities of the Ontonagon River Watershed?

Warren Ewen Sr.

Why has UPPCO ignored the Request from over 1200 Individuals Requesting an Independent Comprehensive Environmental Impact Assessment?

Warren Ewen Sr.

What is the Status of the Shoreline Management Plan Requested by Michigan DNR US Fish & Wildlife, US Forest Service, KBIC, National Park Service & MHRC?

Warren Evenson

Why has UPPCO Refused to Conduct an independent Environmental assessment, instead relying upon E-PRO, an Electricity broker, aggregator in Maine to Conduct the study?

Warren Evenson

On August 2005 UPPCO gave wild rice restoration as one of the reasons why campsites will be relocated. How will private lighted docks & walkways impact this wild rice restoration?

Why is the sale price Naterra is paying UPPCO being kept secret in a sealed affidavit at the courthouse? Is Naterra counting on UPPCO to deliver private NON-project uses of the project lands to increase the value of their new properties? Will the final price to UPPCO be determined by how many private NON-project uses of project lands (trails, lighted docks) UPPCO will be able to sign over to Naterra?

Warren
Ewen Yu

The new lot owners will not be purchasing waterfront lots, yet UPPCO plans to convey the rights to private docks & trails through project lands that are supposed to be managed for the public. Why can't the general public use the docks for our boats?

Warren
Ewen Yu

UPPCO told the Ontonagon EDC that new tax income would exceed $2 million/year assuming all lots have "water access" Are these figures gross or net? Has the cost of new services for the development been estimated? What are they?

Warren
Ewen Yri

In August 2004 UPPCO filed a new Recreation Plan with FERC recommending two designated campsite locations that would replace dispersed campsites along the shoreline at Bond. UPPCO told FERC the plan was designed to be consistent with the Buffer & Wildlife & Land Management Plan. It now appears the consolidation could benefit Naterra's plans for lot sales & placement of docks on the shoreline previously used for public campsites.

What month & year did UPPCO & Naterra first begin discussions for sale of the non-project lands?

Warren
Ewen Yri

The flowage is surrounded by project lands, that according to UPPCO's license are to be managed for the public. What Exactly does UPPCO mean by "water access" will Naterra's lot owners be given Exclusive Rights NOT afforded to the general public?

Warren
Ewen Jr.

The Shoreline Management Plan would allow for setting goals & objectives and input from key stakeholders to address key concerns and issues that must be considered. Why has this democratic process been Eliminated by UPPCO?

Warren
Ewen Jr.

IF UPPCO EXPECTS TO PREPARE LICENSE AMENDMENTS, HOW WILL THE PUBLIC AND AGENCIES BE INVOLVED IN THAT AMENDMENT PROCESS?

Warren
Ewen Jr.

DOES UPPCO ANTICIPATE THAT EVERYTHING IN THE PROPOSAL THEY WILL EVENTUALLY SUBMIT TO FERC WILL BE CONSISTENT WITH THEIR FERC LICENSE OR IS UPPCO EXPECTING TO HAVE TO PREPARE LICENSE AMENDMENTS TO COVER ANY INCONSISTENCIES ?

Warren
Ewen Yu

QUESTION FOR UPPCO/WPS:

In August, 2004 UPPCO filed a new Recreation Plan with FERC recommending two designated campsite locations that would replace dispersed campsites along the shoreline at Bond. UPPCO told FERC that the plan was designed to be consistent with the Buffer Zone and Wildlife and Land Management Plans. It now appears this consolidation could benefit Naterra's plans for lot sales and placement of docks on the shoreline previously used for public campsites. What month and year did UPPCO & Naterra first begin discussions for sale of the non-project lands?

Al Warren
Ewen

Question for UPPCO/WPS
Re: FERC Process

The project land study scopes to be conducted by UPPCO were a result of Michigan DNR and other agencies. All the proposed studies are identified in FERC's Guidance for Shoreline Management Planning (SMP). The DNR has asked FERC (3/23/06) to urge UPPCO to follow the SMP guidance to provide adequate protection to environmental, recreational and public interests.
Does UPPCO agree with this recommendation?

Al Warren
Ewen

QUESTION FOR UPPCO/WPS 2

Why is the sale price Naterra is paying UPPCO being kept secret in a sealed affidavit at the Courthouse?
Is Naterra counting on UPPCO to deliver private non-project uses of the project lands to increase the values of their new properties? Will the final price to UPPCO be determined by how many private non-project uses of project lands (trails, lighted docks) UPPCO will be able to sign over to Naterra?
Al Warren
Ewen

Keith Moyle
General Manager
Upper Peninsula Power Company

Mr Moyle,

I have already spoken to my Township officials. I have made very clear my opposition to any docks on the Bond Falls Flowage. I have also written FERC.

I reached this opinion before I had ever heard of UPPAC. I don't need UPPAC or you to tell me what I should think.

Receiving 50 percent revenue is more than we are getting now, and I don't believe you or your company care about our local economy. Nor do I believe that you have a crystal ball and can predict how much tax revenue will ultimately be generated.

Feel free to include my comments in the information you submit to the FERC as part of the process.

Sincerely,
Judith Fleming-Berger
Judith Fleming-Berger
16021 Taylor Road
Bruce Crossing, Mi. 49912

UPPCO,

I'm writing in regards to the development of Bond Falls Flowage and the other flowages that will unfortunately will have the same outcome. I'm absolutely against peers, any type of lighting on the flowage or visual view of any buildings from the flowage.

I'm very disapporinted and upset in the sale and development of the lands around the flowages. You have dammed a free flowing river, which belongs to everyone, and made a profit from it for many years. The least you could do is to keep the land yourself or sell it at a very reasonable price to the state of Michigan. This land should be kept for the general public and not for a select few people, land owners. If you disagree with this, than why dont you hand over the profits from the dam(s) to the people of Michigan.

Sincerely,

Jerry Johnson

Attachment 56
January 2006 - December 2006
E-MAIL CORRESPONDENCES

From: Spees, Kerry [mailto:KSPEES@wpsr.com]
Sent: Friday, January 13, 2006 12:51 PM
To: Haight, Mr.
Subject: Re: UPPCO Customer Service (Contact Us)

Mr. Haight: I apologize for my earlier email. I meant to respond to Roger Trudeau, who originally received your message from our customer service department.

I'm familiar with the UPPCO land sale and was offering to respond to your email.

The land that was sold is not within the hydroelectric project boundaries but you're absolutely right, we have an obligation to meet all the requirements of our FERC license for that property which will remain with UPPCO and within the project.

To date, there seems to be a significant amount of rumor and speculation as to what will be allowed within the project boundaries, which vary from about 110 feet to almost 1,100 feet from the shoreline to the property that was sold.

We're working with the FERC and other agencies to determine what may be allowed within those project boundaries. Nothing is cast in concrete at this point, except to assure you that there will be no "view" corridors at Bond Falls. There aren't being considered because to create a view corridor would be in violation of the specific requirements of that project license.

Currently in the Upper Peninsula, more than 60% of the land is open to the public - since it is owned by governments and land trust/conservancy agencies. While we've heard from many people who share your feelings about development, we've also heard from a number of people who believe that the economic development of the region is also very important.

As far as the land within the project boundaries - UPPCO has not and will not violate or attempt to violate any of the FERC restrictions in the license. We'll continue working with the FERC and other agencies to satisfactorily resolve any issues that arise.

Thank you for your comments.

Sincerely,

Kerry Spees
Public Affairs
Wisconsin Public Service
920-433-1589

>>> "Mr. Haight" <tom@gladon.com> 1/12/2006 8:46:35 PM >>>
An e-mail was sent from the Contact Us section of the UPPCO website by 10.16.0.9 at 1/12/2006 8:46:35 PM.

Name: Mr. Thomas J Haight
Company Name:

Address: 8980 South 42nd St
City: Franklin
State: WI
Zip Code: 53154

Account Number:

E-mail Address: tom@gladon.com
Home Phone: () -
Work Phone: () -
Cell Phone: () -

Contact By: Email

Comments: I am writing to express my dismay at your decision to sell land for development near the resevoirs you operate. Your action is NOT in the public interest. You had an obligation to protect the natural resources found there. You failed miserably. Your FERC application was obviously a sham. I urge you to do the best possible thing now. DO NOT permit docks, lights, access routes, etc. across the shorelines you control under your FERC permits. Keep these shoreline wild.

From: Joseph LeBouton [mailto:lebouton@msu.edu]
Sent: Saturday, June 24, 2006 6:32 AM
To: Spees, Kerry A
Subject: Re: Lincoln County

Mr. Spees,

I don't like to be the screaming greenie, but I do think WPS and UPPCO could do better than they are doing by the local and extended communities that surround our hydro projects. Don't you see anything inconsistent, looking at it from outside, with WPS suing Lincoln County communities for democratic zoning decisions that changed what you see as the status quo in Lincoln County on the one hand, while holding fast against groups that insist that UPPCO follow its own actual and implied responsibility to maintain the status quo at the UP flowages on the other?

I like to see WPS being a good corporate citizen. I don't like seeing you resorting to money-grubbing using high-priced lawyers against grass-roots democracy in action. Municipal planning and zoning is a difficult enough process on its own! It pains me to see successful zoning processes that actually set aside conservation areas being challenged by big corporate lawyers for the sake of a greasy buck.
Conservation zoning is looking into the future. Development of low-density residential subdivisions is holding on to the past, as land becomes more and more scarce. WPS needs to take the long view as it divests of its lands, as it does when working on green energy and other community outreach.

My suggestion: have a change of heart, and issue a huge press release saying that WPS has decided to honor the democratic zoning decisions in Lincoln County. Fire the misguided lawyer who suggested otherwise. In the same press release you could say that, in keeping with the trio of WPS priorities for restructuring its assets, WPS will over the next... 5 or 10 years? 1) Divest of un-needed lands, 2) Do so in a way that maintains the historical public access on 100% of these lands, and 3) foster SUSTAINABLE local economic growth instead of one-off subdivisions and house construction that results in a forever-altered landscape.

In this new initiative, which is merely re-stating the divestiture plan in the terms you're already throwing around to justify our present course, WPS would commit to working exclusively with conservation organizations (both public and private) in divesting of its lands. The lands will go as a first priority to organizations that will maintain them as WORKING FORESTS, the only primary natural resource we've got up here that can be sustainably harvested. Only as a distant second priority would WPS consider selling lands for preservation. WPS would establish a grant program for proven locally-based natural-resource industries to do value-added manufacturing or processing on sustainably-utilized resources that exist on the land. WPS would ALSO establish "speculative grants" programs to help locals think outside the box and start unique industries. Maybe we wouldn't supply a lot of money, just help folks get in touch with existing federal and state funds. In the UPPCO case it would be forestry and hunting, fishing, and river guides, snowmobile and xc ski trails, and maybe races and events year-round. Custom value-added wood products, from traditional saw mills to on-site biomass plants. Help create green zones in existing local communities with the goal of making them energy self-sufficient.
WPS is uniquely situated to be energy consulutants to local communities in terms of conservation and self-sufficiency. Create a new profit-making arm along those lines! Since you're so far along with Bond Falls, make it a green model community with high-density housing in a small area and 90% productive forest, by covenant, that feeds a local sawmill that really will provide added local revenue from a sustainable source. Think outside the box! Go out on a limb. But please don't contribute to land fragmentation and the loss of high-quality spaces available for renewable resources and sustainable development.

Point-by-point to your last communication:

When I most recently visited the UPPCO website, the majority of the comments were negative on the Bond Falls issue. That website is the closest thing to a survey instrument I've seen on this issue. The town boards of Haight and Interior may well be biased sources when reporting on local sentiment, because they are apparently on board with the development. On the other hand, one would expect UPPCO to be a biased source, and the letters and comments they've received and posted are against the project by almost 2:1. Folks who justify the Bond Falls et al projects on the basis of increasing local tax revenue probably haven't seen the studies on cost-of-services from around the entire nation that always show that isolated residential subdivisions cost local communities more in maintenance than they ever can possibly bring in tax revenue. With so much data to the contrary, how can you put forward the idea that these types of development are good for the local tax base? Will the Lincoln County issue be any different for WPS?

60% of UP land, perhaps, is public-access; but how much wild lakeshore is available for public use? (even around artificial lakes?) How much of that wild lakeshore is around lakes as large as Bond or Victoria flowages? UPPCO and WPS are in a unique position as large land-owners to maintain to our grandchildren's legacy of 60% of the land and, ...
can you give me a number? I'll pull one out of the air... 10% of the wild lakeshore on water bodies >40 acres in size. You are SCREWING IT UP, one parcel at a time. Project that into the future for 10, 50, 100, 200 years. Once parcel boundaries are drawn, they are seldom erased. WPS and UPPCO have a unique opportunity, not to solve land fragmentation and opportunistic subdivision issues, but to HOLD THE LINE by preferentially divesting of OUR large tracts to conservation agencies instead of to land developers. Make that our PR coup, instead of the PR nightmare that is this real estate development.

As far as private landowners maintaining public-access lands: with the Bond Falls deal, UPPCO would maintain project lands and grant license for single-user and multi-user private piers in the Bond Falls et al.
project. UPPCO is begging for the opportunity to put private piers on the land. Will the same happen in Lincoln County?

As for conservation agencies being better-placed to be stewards of public-access land, you are absolutly correct. However, in the UPPCO case, the USFS offered to purchase 800 acres, and UPPCO turned them down. UPPCO's explanation for WHY it turned down the USFS offer casts aspersions on UPPCO's sincerity when it says it's trying to DIVEST of unneeded lands, don't you think? A land exchange instead of a cash sale, is the explanation I heard, maybe even from you at the first Ewen meeting re: Bond Falls. Have similar things happened in Lincoln County that haven't yet come to light? If WPS is trying to divest of land, and I fully support that policy, WHY IGNORE THE POLICY?

Please consider and pass along the points and suggestions raised in the first half of this letter. I do appreciate your communication on this issue. I think the public is constantly becoming more aware of these issues, and if I were you I wouldn't feel comfortable assuaging my conscience by calling the people you actually hear from on these issues a "vocal minority." The letters and comments you actually receive are the only finger you have on the pulse of what people are thinking. You ignore that on your own peril.

Some believe that WPS and UPPCO are so limited in terms of talent, interest, and energy that finding anything to do with our lands OTHER THAN selling to Naterra Land for short-term mutual profit is impossible.

I think WPS is better than that, however, and I think WPS could profit greatly from using more imagination in the way it divests of its lands.
Somebody is obviously able to think of giving back to communities, as witnessed by your scholarship and grant programs in other areas. Why not leverage your greatest resource, the land, in something positive and long-term that does not result in a loss of productive land for local and extended communities?

thank you again for your attention,

12/29/2006

-Joseph LeBouton

Spees, Kerry A wrote:
> Mr. LeBouton:
>
> It's clear that you and I have different viewpoints regarding the
> development and of the sentiments of the majority of people in the
> affected areas. Just recently, for example, the DAILY MINING GAZETTE
> ran a story in which a Interior Township Planning Commission member
> indicated that the majority of township opinion was in favor of the
> development. That said, however, I know that you would, likewise, be
> able to find information to the contrary. But from the UPPCO
> perspective, those seeking to maintain the status quo seem to be in
> the minority - a very vocal minority.
>
> While I understand your concerns about the development of land, I must

> point out that more than 60% of the land in the Upper Peninsula of
> Michigan is already open to the public.
>
> In general, I don't think it's appropriate for the public to expect a
> private landowner to maintain its lands for their use. A Wisconsin
> Public Service land transaction a couple years ago resulted in the
> Wisconsin DNR buying a large tract that will continue to be maintained

> for the public. Holding land in the public interest is better done by

> a conservancy agency or similar organization. Unfortunately, in the
> case of the U.P. and Lincoln County lands, no organization has stepped

> to the plate with an interest in acquiring the lands at a fair price.
>
> Again, thank you for your comments.
>
>
>
> -----Original Message-----
> From: Joseph LeBouton [mailto:lebouton@msu.edu]
> Sent: Thursday, June 22, 2006 7:27 PM
> To: Spees, Kerry A
> Subject: Re: Lincoln County
>
> Mr. Spees,
>
> Thank you for your long letter explaining WPS's position on this

matter.
>
> Contrary to your assumption, I have no problem whatsoever with WPS's

> policy of divesting of non-productive and un-needed lands. I just
> don't think we should shove development down the throats of
> communities that are trying to define their own destiny. There are
> plenty of models for setting aside such rare, undeveloped land for
> uses other than ownership fragmentation, paving, building, and forever

> changing the character of the ecosystems that surround WPS holdings.
> WDNR, the Nature Conservancy, various local conservancies perhaps.
> You are correct, I am not in favor of developing ever-more-rare large
tracts of land.
>
> I haven't yet studied this case as I have the Bond Falls case.
> However, in this case it's painfully apparent that WPS has gone over
> the top by bringing a lawsuit against communities who have made clear

> their zoning preferences. In the Bond Falls area, UPPCO claims that
> the locals have spoken in favor of the development, and ignores the
> larger community that is speaking out against the development. In the

> Lincoln County case, in your letter below you claim that the locals'
> voices have no merit precisely because they live too close to the
> affected area to matter, and it is ONLY the extended community that
> matters. You are left whining that, despite local townships' desires,

> the land was once zoned differently and therefore the zoning change is
against the law.
>
> No doubt you will batter and bruise the townships and draw out this
> legal fight until it's too expensive for the townships to continue,
> and you'll win by attrition. What township or local community will
> dare to go against you then? And since you choose the number and
> scope of people to include in each of your public relations coups, you

> will always (albeit transparently) play the good corporate citizen
> card regardless of the shamefulness of your tactics. This is not
> being a good corporate citizen; this is being an economic bully. Are
> WPS shares plummeting because all of its departments are run by bulls
> in china shops, or is real estate the only blunder? WPS has some
> wonderful "green" initiatives, and some very admirable
good-corporate-citizen
> initiatives. Overall I like the company; that's why I'm a
shareholder.

>
> But WPS is wrong, wrong, wrong in this case, as it is in the Bond
> Falls et al. cases.
>
> As for your point about UPPCO and WPS being different companies, 1)
> who owns UPPCO, and 2) is Mr. Trudeau working on this WPS land sale as

> well as the UPPCO land sale? What precisely is the distinction
> between these two situations, other than that in the northern case
> UPPCO has already sold the land, while in the southern case WPS got
out-foxed by zoning?
>
> Mr. Spees, if we don't protect the value of our natural resources,
> what will your grandchildren have left to call home? A big fat wad of

> land value money wrapped around them to ward off the piles of human
> excrement through which they'll be forced to crawl to and from work
every day?
> How quaint. WPS and UPPCO both have wonderful parcels that have been
> protected from fragmentation and suburbanization. The value of the
> land thus far has been protected precisely because it never occurred
> to anyone to develop it. So divest, divest, divest! But do so in a
> way that protects the character and the ecological integrity that
> remains of these pieces.
>
> That is my vote as a shareholder. May the others who feel differently

> please feel free to address my points above.
>
> Sincerely,
>
> -Joseph LeBouton
>
> Spees, Kerry A wrote:
>
>
>>Mr. Lebouton:
>>
>>Thank you for your comments regarding the Wisconsin Public Service
>>land in Lincoln County. I'm sorry you do not agree with the company's
>
>
>>course of action regarding the selling of land not needed, and not
>>included in the Federal Energy Regulatory Commission project boundary,
>
>

>>for the safe, reliable operation of our hydroelectric facilities. The
>
>
>>issues in Lincoln County are in no way connected to those at Bond
>>Falls. In fact, the assets are owned by two different companies.
>>Townships in the Bond Falls area have gone on record supporting the
>>sale and development. In Lincoln County, opposition to the rezoning
>>generally comes from other property owners on Lake Alexander who seek
>>to deny the benefits they receive from the lake to others. An
>>influencial group, they have successfully persuaded the towns to deny
>>returning our land to its prior zoning status.
>>
>>As you are a shareowner, you are likely aware of the company's asset
>>management strategy, developed several years ago, to divest of
>>unneeded properties. In Lincoln County, we are planning to sell 200
>>acres that are outside the project boundaries. About a year ago, as
>>part of a County-wide land planning effort, several towns rezoned our
>>property to classifications that would effectively prohibit
>>development of the land, significantly reducing its value - and
>>affecting shareowner return, in turn. Public Service appealed to the
>>towns to return the land to the prior zoning but was rebuffed.
>>
>>Prior to December 2004, all of the property associated with the
>>Alexander hydro project was zoned Residential, Rural Residential or
>>Recreational. These designations would have allowed the type of
>>development the company is now proposing and in fact, even more
>>aggressive development than the company's proposal. The development is
>
>
>>rcereational in nature and consistent with existing development on the
>
>
>>river and Lake Alexander.
>>
>>The Town of Merrill placed one parcel into RR-2 zoning but the
>>Company's requests to restore the rights it had under the zoning it
>>held for many years prior to December 2004 in the townships of Harding
>
>
>>and Scott were denied. Unfortunately at the point, our only option to
>
>
>>protect the value of the land is in suing the county and the towns.
>>We believe we have a strong case.
>>
>>Utilities do not pay local property taxes. Restoring the company's

>>legitimate property rights and allowing reasonable development of the
>>200 acres as the company is proposing would mean a substantial
>>addition to the property tax base for local governments, Lincoln
>>County and the Merrill Area Public School System, while preserving
>>public access and protecting the environment. The land itself is
>>estimated to be worth approximately $4 million with the proper zoning
>>and following development, it could provide more than $20 million in
>>new property tax base. Again, nearly 85 percent of the company's
>>property associated with the Alexander hydro project will remain
>
> undeveloped.
>
>>Mr. Lebouton, it is clear from your correspondences that you do not
>>support development of any of our property near hydroelectric
>
> projects.
>
>>Others hold a different viewpoint.
>>
>>Again, thank you for your comments.
>>
>>Sincerely....
>>

--
****
Joseph P. LeBouton
Forest Ecology PhD Candidate
Department of Forestry
Michigan State University
East Lansing, Michigan 48824

Office phone: 517-355-7744
email: lebouton@msu.edu

From: Mr. koski [mailto:eandishop@mblp.org]
Sent: Wednesday, March 22, 2006 3:12 PM
To: Spees, Kerry A
Subject: UPPCO Land Sale Comments

An e-mail was sent from the Land Sale Comment Form section of the UPPCO website by 10.16.0.9 at 3/22/2006 3:12:11 PM.

Name: Mr. david koski
Company Name:

Address:
City: limestone
State: mi
Zip Code:

E-mail Address: eandishop@mblp.org
Home Phone: () -
Work Phone: () -
Cell Phone: () -

Contact By: Email

Comments: uppco and the autrain basin-

Imagine the great publicity uppco would get if it saved the largest and most centrally located lake from development. The autrain basin should not be developed. If uppco needs money and wants to spur the local economics, then hire local loggers to select cut the forest around the lake. This would generate a cash flow forever, not just one quick sale. Naterra land is not local and the people buying the land won't be local. If the land gets developed and the water level is like last summers level, uppco will be receiveing complaints by the thousands. What if all the houses get built, the dam fails and drains the lake?
lawsuit,lawsuit lawsuit!! Why does uppco want the headache? Selling or leasing to a local logging company is the best for everyone, the wildlife, the locals, uppco and naterra. I feel uppco has dropped enough gifts in naterra's lap already. Now do something good for the upper peninsula, spare the basin and save yourself a headache.

from:
local rate payer
and basin user

is anybody reading these?

From: Spees, Kerry A
Sent: Friday, December 08, 2006 6:30 AM
To: 'alwarren'
Subject: RE: Information

Good morning, Nancy. The study you refer to is "Recreational Homes and Regional Development - A case study from the Upper Great Lakes States" by David W. Marcouiller, Gary R. Green, Steven C. Deller, and N.R. Sumathi of the Universities of Minnesota and Wisconsin Extensions. On page II of the Executive Summary, you'll find this section "Recreational housing in a region appears to contribute more to a local government's ability to generate revenues than to place demands on services, as measured by public expenditures."

It's important to distinguish between regular residential development and recreational development when you consider impacts to services.

Sincerely

Kerry Spees
Public Affairs
920-433-1589

From: Spees, Kerry A
Sent: Friday, December 08, 2006 6:46 AM
To: 'alwarren'
Subject: RE: Information

In addition, Nancy, we should not discount "multiplier" effect of money spent in the area. Additional people means additional spending - even after the influx of dollars for construction, etc. Dollars spent generally turn over several times in the region, bringing a significant economic benefit to the people of the area. Refer to the "Regional Multipliers" handbook by the U.S. Department of Commerce.

Kerry Spees
Public Affairs
920-433-1589

Attachment 57
March 2007
RESPONSE TO AGENCY COMMENTS AND TRANSMITTAL OF FINAL RESOURCE REPORTS

UPPCO Response to Comments on
Assessment of the Recreation, Wildlife, Loon, and Aesthetic Resources of the Bond Falls, Boney Falls, Victoria, Prickett, Cataract, and Au Train Impoundments
March, 2007

PREFACE

In response to comments presented below, it should be noted that many of the comments received criticize the Assessment of the Recreation, Wildlife, and Aesthetic Resource Reports for the six impoundments for not meeting the standards of an "Environmental Assessment". Specifically, some commentors state the reports do not address the impacts of potential development on non-project lands and/or the impacts of such development on project lands and the impoundments.

The resource reports were never intended to be environmental assessments. Rather, as clearly indicated in the scopes of work that were reviewed and commented on by the resource agencies, ***the objectives of the studies were to gather readily available existing information, to conduct field work to verify the presence and condition of existing data, to document existing conditions, and to assimilate and provide the collected information in the form of GIS-generated resource inventory maps and reports.***

Furthermore, it needs to be made clear that any future assessment of impacts to project lands will be limited to just that – impacts to project lands. Such impacts might be due to such things as footpaths down to the water's edge, limited view enhancement areas, and/or the placement of docks along the shore. There will not be any residential housing or other conspicuous development on project lands (i.e., within the FERC boundary). Until such time when development proposals at each of the impoundments are put forth, it is not possible to assess the potential resource impacts on project lands and waters.

Commenting Entity	Comment	UPPCO/EPRO Response	Response ID
Combined Agency Comments: **Michigan Hydro Relicensing Coalition** **Keweenaw Bay Indian Community** **National Park Services** **Department of Natural Resources** **Forest Services, US Dept. of Agriculture** **US Fish & Wildlife Services** **August 28, 2006**	We recommend that UPPCO not identify these studies as "Environmental Assessments." Environmental Assessment (EA) has a specific meaning under the National Environmental Policy Act (NEPA). These assessments do not meet the requirements of an EA as defined under NEPA. In general, an EA includes brief discussions of the following: the need for the proposal, an analysis of alternatives, environmental impacts of the alternatives, and a listing of agencies and persons consulted. FERC will likely be completing an EA as part of reviewing and approving a Shoreline Management Plan (SMP). In order to reduce confusion regarding the purpose of the studies by E-PRO, we suggest that the studies be referred to as "Environmental Baseline Assessments."	The commentor is correct in stating that these assessments "do not meet the requirements of an EA as defined under NEPA". These assessments, as scoped in consultation with the resource agencies, were designed to be resource/habitat baseline inventories, not NEPA-level environmental assessments. See Preface.	1
	The study results do provide an overview of some of the resources of each flowage and surrounding project land. This information has improved our understanding of the location and extent of important environmental features at each basin. The information, however, is limited in scope as it was gathered during a brief period during May and June 2006. The reliability of the data collected is also questionable since standard protocols, as suggested by the resource agencies, were not utilized for some resources (raptors, substrate mapping, etc.) Other resources, such as old growth, hemlock, and oak stands were not identified and therefore the studies are not useful in identifying these important habitat features. These caveats will need to be considered as the SMP is developed.	As explained in our response to agency comments on the scopes of work, not all agency-suggested protocols were going to be performed. Specifically, substrate mapping and raptor calls. We believe our methods to identify and map various habitats within the impoundments are more than adequate for informed decision-making on non-project uses of project lands.	2
	Study Overview		
	For many of these impoundments the reservoir target elevation or minimum elevations varies. Because of this we propose the minimum pond elevation that could be experienced during the boating season be utilized to conservatively estimate surface area and shoreline.	Three of the impoundments (Boney, Prickett, and Au Train) are operated as run-of river, meaning that water levels do not fluctuate much during the boating season. The others experience drawdowns of varying degrees during the boating season. Because each resource may be impacted differently by water level change (both timing and magnitude), setting a single level is not practical.	3

UPPCO Response to Comments on
Assessment of the Recreation, Wildlife, Loon, and Aesthetic Resources of the Bond Falls, Boney Falls, Victoria, Prickett, Cataract, and Au Train Impoundments
March, 2007

Recreation Resources		
Michigan Hydro Relicensing Coalition/River Alliance of Wisconsin (MHRC/RAW) and National Park Service should be included in the list of agencies and NGO's.	The Michigan Hydro Relicensing Coalition has been added. The recommendations from the "agencies" as referenced in the report Introductions did not include the River Alliance of Wisconsin or the National Park Service. These groups will be added to future references to "agencies".	4
At the basins many informal recreation sites were identified; most basins had a much higher number of informal recreation sites compared to formal recreation sites. Please clarify whether UPPCO plans to keep the informal sites open for public use or if these sites will be closed.	This issue will be addressed during the development of Shoreline Management Plans for the Projects.	5
The Recreation Plan does not discuss any nearby formal or informal trails. These features should be included and mapped.	The reports have been revised to include formal and informal trails, within the Project boundary, on the maps.	6
For all of the sites a relative measure of compaction was provided. How was compaction measured or observed?	The reports have been revised to reflect only the presence or absence of compaction.	7
There are many other forms of recreation on these flowages that do not involve direct use of recreation sites identified and inventoried. Fishing, waterfowl hunting, hiking, birdwatching, canoeing/kayaking, and other forms of recreation occur on and around these flowages. The impact on non-project use of project land on these recreational activities must be analyzed.	As identified in the agency-reviewed scope of work, the objective of the recreation assessments was to review and map existing recreation facilities within the project boundary. The assessments were not designed to analyze impacts. See response ID 1.	8
(Bond Falls) Site R-1 is described as a formal boat launching, picnicking, camping, and bank fishing site. There is one nearby campsite (No. 11), but no picnicking or bank fishing facilities are available here. Additionally, two formal boat launching sites are noted. The second site (R-18) is listed on page 2-19 as an informal site. Please clarify whether these sites are formal or informal.	Site R-1 encompasses information for all the dispersed camping and recreation sites that are considered to be part of the campground; thus the picnicking may not occur at site R-1 but does occur at a site associated with the dispersed camping area. The report has been revised to clarify R-18 is a formal site.	9
(Bond Falls) The 15 informal recreation facilities on Map 2-1 and description are confusing. For 9 of these sites (1-4, 5, 9, 10, 11, 12, 13, 15, and 19) you specifically note "no erosion" at the site. However, under 2.2.3 Areas Not Conducive to Recreational Development, you state that "field crews observed eroded banks in 15 different areas around the lake." Do these 15 areas include the recreation sites? Please map these sites so that the location of the recreation sites and erosion sites are shown together.	The 15 areas of erosion that were noted in section 2.2.3 of the report and shown on Map 2-1 do not include erosion at the recreation sites. As noted in the last sentence of the section "In addition to the eroded banks listed above, over half of the recreation sites exhibited moderate to major amounts of erosion." The erosion associated with recreation sites is described in the narrative description of the relevant recreation site.	10
(Bond Falls) Descriptions of the informal sites notes that the site "appears to be associated", "may be associated", or "is associated" with a formal campsite. How was the relationship between campsite and informal areas determined? In our observations, many of the informal campsites are closely associated with formal campsites.	The relationship between the informal recreation sites and the formal campsites was determined by comparing the information collected in the field with the map of the Bond Falls Flowage formal recreation sites. A judgment was then made by the observer.	11
(Prickett) The Michigan Recreational Boating Information System directory (available from Michigan.gov/dnr website) lists Prickett Dam Backwaters site as having parking area for 15 car/trailer units. Please correct this information for site R-2 on page 2-3 and make the necessary	The Michigan Boating Information System listed a parking area for 15 car trailer units. The site visit, however, determined that there are 6 trailer units and 6 single car parking spaces. The site visit determination is based upon actual measurements.	12

	calculation corrections in section 2.3.3 Lake Use Rate on page 2-8.		
	A description of average recreational use of the campgrounds, as well as purpose of campground visit, should be included.	As identified in the agency-reviewed scope of work, the objective of the recreation assessments was to review and map existing recreation facilities within the project boundary, not to investigate recreational use patterns. See also response ID 8.	13
	Include a description of how the existing recreational use may be affected by proposed non-project use of project land.	As identified in the agency-reviewed scope of work, the objective of the recreation assessments was to review and map existing recreation facilities within the project boundary, not to analyze impacts to recreational use. See also response to ID 8.	14
	It should be noted that Michigan Department of Natural Resources staff have observed increased use of the basins during waterfowl hunting season (September through November) and during deer hunting season (October through December). This increased use is not captured in the short time frame of visits in May and June.	See response ID 14.	15
	Please note the days of the week and duration of visits to the impoundments. Boating observations may have missed users who were out in the early morning or evening. Also weekend days may have more usage and may not have been captured during the study.	The reports have been revised accordingly.	16
	A description on how proposed non-project uses of project land will impact recreation, including hunting, should be included.	As identified in the agency-reviewed scope of work, the objective of the recreation assessments was to review and map existing recreation facilities within the project boundary, not to analyze impacts to recreational use. See also response ID 8.	17
	A thorough description of recreational use by anglers, hunters, and trappers should be included.	See response ID 14.	18
	Passive recreational use, such as mushroom and berry picking or bird watching, should be described.	See response ID 14.	19
	The use of the phase "natural wave action" is misleading, since the effects of wave action on these flowages is magnified by the artificial manipulation of water levels, which does not allow vegetation to become established in shoreline areas, thus making many areas more prone to erosion from wave action than they would normally be on a natural lake.	To avoid confusion and speculation on causes of erosion noted at sites, the reports have been revised to remove all references to probable causes.	20
	A discussion of site conditions not conducive to the development of dock structures and marinas including shallow water areas that limit ingress and egress to the shore, wetlands, and other sensitive areas should be included. In addition, a map of shoreline site conditions not conducive to the development of dock structures or marinas should be included. According to Wagner (1991), shallow areas of lakes (e.g., less than 5 feet) are most likely to exhibit negative impacts associated with boating. These impacts include sediment re-suspension, reduced water quality, and reduced habitat for aquatic and terrestrial species.	Recreational development constraints (erosion areas and wetlands) are mapped and included in the reports. Sensitive areas information was also mapped, but only provided to state and federal resource agencies. All this information will be taken into consideration during the development of the Shoreline Management Plans. Mapping of shallow water areas was not conducted as contemplated in the agency-reviewed scope of work. As development proposals for docks and marinas are made available, shallow water areas will be assessed.	21
	(Prickett, Victoria) Please provide a detailed topographic map to help visualize the steep bank areas around the reservoir.	The two reports have been revised to include maps with topographic features (see Map 2-2 for each respective report).	22
	(Bond Falls) For the various sites described, the causes for any erosion observed are stated (human use, natural wave action, etc). This is somewhat speculative, and it would be more appropriate to refer to the	See response ID 20.	23

	Bond Falls Erosion Control Plan (and subsequent contractor report) for information on probable causes of erosion at each site.		
	(Au Train, Boney Falls, Prickett) The Recreation Plan does not discuss any bank fishing sites. These features should be included and mapped.	The reports already include discussions, photos, and mapped locations of bank fishing sites.	24
	An important step in determining acceptable boating densities and desired types of water-based recreational use is lacking: developing a "desired condition" for the reservoirs. The desired condition details the setting and type of recreation experiences desired. There are accepted methods for developing the desired condition, such as Water Recreation Opportunity Spectrum (WROS). WROS helps determine the niche of a particular water body in the region. Without determining the desired condition, calculating possible numbers of boats on a water body lacks meaning and context. Any number (or range of numbers) that is arrived at, and any specific watercraft type, may or may not fit with the desired condition. The Forest Service can provide more information on the use of WROS for developing a desired condition for particular basins.	We are familiar with the Water Recreation Opportunity Spectrum method. The Boating Carrying Capacity analyses, however, were only meant to identify a range of recreational boating carrying capacity at each reservoir. It was beyond the scope of this literature based desk-top exercise to determine the "desired condition" at each impoundment.	25
	User perceptions of acceptable boating density in similar settings are missing from the discussion (this is part of WROS process described above).	This study was scoped as a literature-based, desk-top exercise. User perceptions were not included.	26
	A discussion on the type of watercraft commonly used on the impoundment needs to be included.	The report will include mention of the type of watercraft observed and reported to be commonly used on the impoundments.	27
	The density estimates do not take into account potential for increased public use of the basin and associated facilities over the term of the FERC license.	The reports were never intended to speculate about the potential for increased public use.	28
	The "Recreation Resources" map does not include constraints to recreational development (e.g., docks and marinas) such as shallow water areas, areas of aquatic vegetation, and wetlands.	Recreational constraint factors cited will be addressed in the development of Shoreline Management Plans.	29
	Please clarify the elevation of "full pond". We suggest the minimum pond elevation during the open water boating season be utilized to provide a conservative estimate. See comment under "Study Overview: Impoundments" above.	Full pond is the areal extent of the waterbody as obtained from the Michigan DNR Fisheries Division on-line shape file lake polygons as of March 2004. Three of the impoundments (Boney, Prickett, and Au Train) are operated as run-of river; meaning that water levels do not fluctuate much during the boating season. The others have drawdowns of varying degrees during boating season. Because each resource may be impacted differently by water level change setting a single level is not practical.	30
	(Au Train) The southern portion, or approximately 1/5, of the basin is considered a wildlife refuge and is closed for over 2 months of the year. This needs to be taken into account when calculating the useable lake surface area.	The refuge area is closed to boating from September 1 through November 10, which is outside the normal boating season.	31
	Since this section is based largely upon Boating Carrying Capacity as determined by the previous section, and since there are serious questions about the methodology used to estimate Boating Carrying Capacity (see comment above), the range of boat numbers arrived at, and the type of watercraft, has no meaning or context. Again, a "desired condition", detailing the setting and types of desired recreational experiences, needs to be determined before making calculations of acceptable boating densities and types of watercraft.	See response ID 25.	32
	User perceptions of acceptable boating density at the flowages, or in	This study was scoped as a desk-top exercise. User perceptions were not included.	33

	similar settings are missing from the discussion. No interviews were conducted with boaters on this flowage to help determine acceptable boating densities.		
	Information on the type of watercraft actually used on the impoundments should have been provided, rather than speculating as to what types of boats/motors represent the "most likely" users.	The "most likely" users covers pretty much all the potential users of the impoundments. The reports have been revised to include mention of the type of watercraft observed and reported to be commonly used on the impoundments.	34
	The studies referenced (in table 2-1 for Bond Falls) may not be relevant to the discussion, depending on user perceptions in those areas and their history. Using an average of the figures obtained from these studies, is probably overly simplistic and not appropriate for determining appropriate boater densities for this flowage.	The table cited represents information that is in the literature. This information and the approach used represent potential tools for future use in assessing boating densities.	35
	Please include a note in the study that the Resource Agencies and UPPCO, while team evaluating impacts to project resources, will need to agree in the Shoreline Management Plan upon an acceptable boating density standard.	It is not known if a boating density standard will be included in the SMP. The boating capacity study is designed to provide planning guidelines.	36
	Please note that fishing boats (and boats used for waterfowl hunting) often have motors greater than 25 HP.	Boats used for fishing and waterfowl hunting may have motors of greater than 25HP. The larger point here is that fishing and hunting boats on these impoundments generally are not traveling at a high rate of speed.	37
	(Prickett) The analysis should take into account the presence of stumps and floating snags in this flowage, which are abundant and which are one of the major "defining characteristics" of this flowage (p. 5-7). These stumps and snags are one of the main features that attract fishermen to the flowage, and fishing is the dominant recreational use at this time (p. 5-10).	The report has been revised accordingly.	38
	(Prickett) The presence of stumps and floating snags, and the ways these features shape the current recreational use of Prickett Flowage, needs to be included in the analysis. This would logically be part of the WROS assessment discussed above.	Comment noted.	39
	Wildlife & Aquatic Habitat		
	The main objectives of the Wildlife and Aquatic Habitat study should be clarified to reflect the objectives listed in the Scope of Services: 1) gather all readily obtainable, existing information on wildlife and aquatic habitat/species associated with the subject impoundments and project lands, 2) conduct field work to verify the presence and condition of existing data, 3) map and document (on a broad-scale) new occurrences of habitat and species of interest observed during the field work effort, and 4) use these data to develop natural resource constraint maps/databases for each impoundment.	The report has been revised to clarify the objectives.	40
	In addition to possible nesting platforms, potential nesting sites should also be included in the list of study objectives.	The report objectives have been revised to include potential nesting sites.	41
	Gray wolf and gray wolf habitat should be included in the list of study items.	The reports have been revised to address the comment.	42
	Fisheries assessments were either lacking or were incorrect. Information on the current status of the fish community should be included.	Fish community information has recently been provided by the Michigan DNR and the reports have been revised to reflect this information.	43
	The presence and distribution of littoral fisheries habitat such as gravel lenses, woody structure, and aquatic vegetation is described in general terms within the assessments. The assessments indicate that habitat	We feel that the littoral habitat data that was collected is sufficiently specific for determining potential impacts associated with shoreline alteration, dock placement, etc.	44

	conditions were documented using GIS-based field maps and GPS, however the data displayed within the assessments was not site specific. Further detail of specific habitat types with GPS mapping aspects will be necessary if any habitat alteration proposals are entertained. The data displayed within the assessments lacks specificity that would allow for determining the impact any proposals seeking shoreline alterations, dock construction, or woody habitat manipulation.		
	(Bond Falls) Please provide a map showing the location for the photo in Figure 3-1.	The site in the photo is located on Map 3-3..	45
	(Au Train) Please clarify intent of the third sentence in the first paragraph under 3.2.1.	The report has been revised accordingly.	46
	Include information on the typical altitude above ground level at which the helicopter was flown, as well as the separation between transects.	The report has been revised to address this comment.	47
	(Bond Falls) The information obtained (re. existence of suitable bald eagle nest trees on the large peninsula along the eastern shore) is new information and needs to be considered in reference to the new campground unit planned for that peninsula.	Comment noted.	48
	(Bond Falls) A discussion of whether any natural suitable osprey trees currently exist in or around the flowage is missing.	The report has been revised to address this comment.	49
	(Prickett) It is unclear what criteria were used to evaluate nesting habitat potential for great blue heron. The large wetland complex at the south end of the flowage would appear to provide good habitat in general for herons (and herons were observed there), yet the statement is made (p. 3-5) that there is a "lack of suitable natural nesting habitat for great blue heron." Herons are colonial nesters and will utilize a wide range of tree species and tree sizes for their nests (Atlas of Breeding Birds of Michigan, 1991), so it is unclear why there is a lack of nesting habitat.	The report has been revised to address this comment.	50
	(Victoria) It is concluded that "no suitable natural nesting habitat was observed" for ospreys, please define suitable osprey nesting habitat.	The report has been revised to address this comment.	51
	According to the Michigan Audubon Society cranes are not dependent on using traditional bogs with sphagnum and leatherleaf for nesting and often use smaller wetlands with a greater variety of vegetation cover types. Therefore is it not correct to conclude that there is no crane nesting habitat on project lands around the flowage.	The report has been revised to address this comment.	52
	Although evidence of waterfowl and sandhill crane nesting was limited during the assessments, the large number of goslings, ducklings, and juvenile sandhill cranes indicated that nearby nesting locations are present.	Comment noted.	53
	These surveys were conducted at the wrong time of year to accurately reflect migratory wildlife usage.	One of the objectives of these studies was to inventory and map existing habitats and, based on habitat characteristics, determine if these habitats would be generally suitable for certain species' life stages such as staging and foraging for migratory wildlife. These studies were not scoped or designed to determine habitat utilization by migratory wildlife, just the presence of habitat itself.	54
	(Prickett) The very brief period of observation for wildlife on this flowage (2 days in June) must be considered when reviewing the data obtained. For example, we have observed several different species of waterfowl on Prickett flowage over the years (including mallards, black ducks, wood	Comment noted. The emphasis of the assessments was on suitable habitat for species identified by the agencies, not solely on the observed presence of species.	55

	ducks, etc.), yet the brief visit revealed only one waterfowl species: common merganser. We would consider the information provided in this report anecdotal.		
	(Au Train) Please clarify the intent of the last sentence of the last paragraph under 3.2.3.	The report has been revised to address this comment.	56
	Documentation of the prominent plant species in each wetland cover type and documentation of the hydrological condition of the wetlands including extent of inundation and general water depths is missing.	The reports have been revised to address prominent plant species and general hydrological condition.	57
	(Bond Falls) On 3-7 it states that sandbar willow along the shoreline is typically flooded, providing excellent habitat for wildlife. This may be true in May, but by July, this habitat is gone, as water levels are generally much lower and far below this vegetation.	The report has been revised to address this comment.	58
	(Bond Falls) On p. 3-9 it states that ..."no other unique or significant upland habitat was observed at Bond Falls". This is somewhat misleading, since surveys were not conducted for some upland habitat types recommended by the agencies (stands with old growth characteristics or stands with hemlock/white pine component).	The report has been revised to address this comment.	59
	(Prickett) The sizeable cedar/yellow birch/hemlock wetland and the stand of mature hemlock is an important forest component that was noted in the study. Were these areas identified from a boat or examined on shore?	The entire area was examined and mapped on foot by walking throughout the interior of the wetland and using GPS to map the approximate outer limit of the area.	60
	(Victoria) There is no discussion of Significant Upland Habitats. Were any project lands surveyed for significant upland habitats?	A brief discussion of the survey results specific to significant upland habitats has been included in the revised report.	61
	(Bond Falls) There appears to be an error in this section; Interior Creek does not empty into Bond Flowage, but rather into the M. Branch of the Ontonagon River, some distance south of the flowage. The location for the wood turtle observation should presumably be where the M. Branch flows into the impoundment.	The report has been corrected.	62
	(Bond Falls) We are familiar with the area around where the M. Branch flows into the impoundment, and the area with the most potential for wood turtle nesting is on the steeper sandy banks along the east side of this narrow bay, not the west side, as labeled in the figure. The angle of slope, sparsity of vegetation, and greater exposure to the sun on the east side of this bay would likely be preferred by wood turtles for nesting.	The comment is acknowledged and the map and text have been revised accordingly.	63
	(Victoria) Please clarify whether the south or southeast facing slopes that were identified as possible wood turtle nesting habitat were checked on-the-ground for evidence of use by nesting wood turtles or just observed from a distance.	These areas were examined on-the-ground by several biologists.	64
	It is not clear what distance interval was used to sample for woodland raptors, and how much of this survey was conducted while on land, versus from a boat. Also, please provide time of day the woodland raptor surveys were conducted.	In general, at the Bond Falls, Victoria, Prickett, Boney Falls, and Cataract impoundments, woodland raptor call back surveys were primarily conducted from a boat. However, these surveys were also occasionally conducted from land. At these impoundments, distance intervals were up to a ¼-mile and surveys were generally completed by mid-morning. At the Au Train basin, woodland raptor surveys were conducted while on land.	65
	The search protocol to detect woodland raptors and their nests is insufficient and poorly timed to accurately determine their presence (raptor surveys should occur between April 15 and 30). Additional raptor surveys	We concur that the timing of the woodland raptor surveys was somewhat late in the season to fully and accurately determine the presence of nesting woodland raptors in the assessment area. However, we believe the methods used to determine raptor presence are more than	66

	should be conducted, as well as surveys of raptor nests in absence of foliage, to accurately determine raptor presence.	adequate for informed decision-making on non-project uses of project lands.	
	Although grazing by Canada geese can impact wild rice beds, U.S. Forest Service (USFS) has restored wild rice beds on other water bodies within the Ottawa National Forest where geese are relatively abundant. The USFS has not had to employ geese exclusion methods in those areas. Therefore, we suggest replacing the word "likely" with "possible."	The reports have been revised accordingly.	67
	The conclusion that orange hawkweed is widely distributed yet relatively uncommon is confusing and needs clarification.	The reports have been revised accordingly.	68
	Reed canary grass is typically considered a non-native invasive species in this area. Why is it not considered a nuisance species in this study?	Reed canary grass was not on the list of nuisance species provided by the resource agencies during the study scoping process. However, the report authors acknowledge in the report that this species is generally considered nuisance. The reports have been revised to specifically describe Reed canary grass as a nuisance species.	69
	It is not clear whether any sampling was done to detect aquatic invasive plant species such as Eurasian water milfoil and curly-leaf pondweed. These and other invasive plant species could easily be missed if the only surveys performed were observational, rather than using a weed-rake or similar device to sample vegetation.	Sampling for the presence of Eurasian water milfoil and purple loosestrife, including collecting and analyzing samples, was routinely conducted at all six impoundments. The reports have been revised to further clarify this.	70
	It is incorrect to routinely classify Canada geese as nuisance species. Although they are capable of becoming a nuisance in urban/suburban settings, they are not considered a nuisance at these projects.	Canada goose was described by the resource agencies as a "nuisance species" during the study scoping process. That is the reason it is also described as a nuisance species in the reports.	71
	(Bond Falls) Spotted knapweed occurs in many locations on project lands around Bond Flowage, including the campground areas, boat landings, etc. Non-native honeysuckle also occurs on project lands in the area. Yet, there is no mention of either of these nuisance species in the report.	None of the resource agencies expressed concern about these species during the study scoping process. Therefore, field surveys did not specifically focus on these species.	72
	(Bond Falls) Rusty crayfish, an invasive animal species, are known to be very abundant within Bond Flowage, yet there is no mention of them in the report. Was any sampling for rusty crayfish, spiny water-flea or other invasive animals conducted?	See response ID 72.	73
	A discussion of the general length of the erosion sites as well as the potential causes is missing.	Information on the general lengths of erosion sites has been added to the revised reports. The potential causes of erosion are assessed in a separate study, unrelated to this effort, and previous comments identified concerns about determining the cause. Therefore, cause will not be discussed in the revised report.	74
	It should be mentioned that some erosion does occur naturally and this type of erosion is of less concern than erosion caused by project operations or use.	The reports have been revised to address this comment.	75
	A description of the scale used to define erosion as major, minor, or moderate should be included.	The reports have been revised to remove all references to the extent of erosion.	76
	Include a description of where eroded material is being deposited.	The reports do not include this information as it outside of the agency-reviewed scopes of work.	77
	(Bond Falls) On 3-12 it states that "most of the active erosion did not appear to be a result of wave action or ice floes". This statement is rather speculative, with no connection to data gathered during this study. It also contradicts some earlier statements (Sec. 2.2.1) that wave action appeared to be a contributing factor in erosion observed at recreation sites.	These statements have been clarified in the revised reports.	78

	We agree that wolves can be found throughout the Upper Peninsula. We would expect that wolves periodically use the areas around the basin for foraging and pup rearing. Because of this we believe that wolves should be considered in developing the SMP. As previously discussed, the review and approval of the SMP by FERC will require section 7 consultation with the U.S. Fish and Wildlife Service.	Comment noted.	79
	(Au Train, Boney Falls) A discussion of the gray wolf is missing.	Although requested, we have not received information from the DNR other than that stating that wolves are habitat generalists and may or may not use project lands. As a result, we are unaware of any benefits that a vague discussion of gray wolves would provide.	80
	A discussion of rare, threatened, and endangered species is missing.	There is no separate section entitled Rare, Threatened and Endangered Species. Rather, individual species are discussed as appropriate e.g., bald eagles, wood turtles. Information regarding the locations and presence of rare, threatened, and endangered (RTE) wildlife species associated with project lands and waters has been provided to the resource agencies. Since these species are protected by laws, it is generally not good practice (and potentially irresponsible) to release information on the locations of RTE plant species and immobile life stages of wildlife species to the general public. Members of the general public interested in such information should submit a formal request to state and/or federal agencies regarding the release of this information. The reports have been revised to limit the redacting to sensitive species locations	81
	It should be noted that the agencies had suggested that more detailed information should be obtained on vegetation within the project lands (specifically stands with old growth characteristics, stands with mesic conifers, stands with red oak), but this information was not obtained during the study.	Comment noted. See response ID 59.	82
	It should be noted that recommended agency protocol for collection of aquatic habitat data, and conducting raptor surveys, was not utilized. This unfortunately makes the data obtained of lesser quality for assessing impacts from non-project use of lands and waters on these resources.	Protocol methods were modified to allow for greater distances between survey points, and to enable field crews to do the majority of the calling from boats. Since sound carries well on water, it was felt that this approach would not diminish the effectiveness of the surveys. In addition, we believe that the aquatic habitat data collection methods employed allowed for the collection of data of equal or better quality than if agency recommended methods were followed.	83
	Please make a note under the list of "Other Wildlife Species Observations" that this is not an all inclusive list. Many wildlife and fish species commonly observed on project lands or waters (e.g., Nashville warbler, Northern oriole, blackburnian warbler, song sparrow, veery, rose-breasted grosbeak) are missing.	Comment noted. The emphasis of the assessments was on suitable habitat for species identified by the agencies, not solely on the observed presence of species.	84
	(Prickett) The "Other Wildlife Species Observation" list appears to be in the wrong section (currently in the Gray Wolf Consultation section).	The report has been revised accordingly.	85
	Please provide, in addition to the detailed maps, a habitat constraints map showing an overview of the entire basin.	The reports do not include habitat constraints maps for areas outside of the assessment areas (i.e., lands and waters within the FERC project boundary). See approved scopes of work.	86
	On the "Species Observations and Habitat Components," please color-code the species observations so that it is easier to identify important areas for different suites of organisms. For instance bald eagle observations in one color, waterfowl observations in another color, etc.	Report maps have been revised to make them easier to read and interpret. However, it was determined that identifying suites of organisms as suggested would make the maps too busy and the benefits would be outweighed by the distractions.	87
	(Au Train) Trumpeter swans are expanding their range and have been	Comment noted.	88

	documented by MDNR biologists at the Au Train Basin. MDNR staff believe that trumpeter swan nesting potential at the basin has increased and will be realized within the next few years.		
	Qualitative Assessment of Potential Impacts of Stump Removal (Prickett Basin)		
	This section attempts to assess environmental impacts of implementing a proposal to remove stumps at Prickett. We suggest the environmental effects analysis provided in this document is not sufficient for NEPA. The analysis would need to be more comprehensive looking at all proposed non-project uses of project lands and the direct, indirect, and cumulative impacts of these actions on all affected resources.	Comment noted. See response ID 1.	89
	The month of July would be considered part of the fish spawning or bird nesting/brood rearing seasons for several fish or bird species that utilize the snags and submerged wood. August and early September would be considered staging and migration period for many bird species.	Comment noted.	90
	Two possible ways that downstream sturgeon could be impacted by movement of sediment are discussed. A conclusion is reached that little or no effect to sturgeon would result if high water flows move sediment downstream of spawning beds. A more thorough analysis is necessary to determine the potential impacts of stump removal on downstream sturgeon. Please provide documentation or data to verify the conclusion.	We disagree with the characterization that the text in the draft Prickett report stating "it is possible that high flows exiting the impoundment, combined with the spring flows, would carry sediments downstream of spawning beds. This could result in relatively little effect to lake sturgeon spawning habitat," is a conclusion. Rather, it is a qualitative statement describing that this is a possibility given certain seasonal conditions.	91
	Several other fish species likely spawn in the Sturgeon River downstream of the Prieken basin. An analysis of impacts of downstream sediment movement resulting from stump removal should address these species as well.	The report has been revised to address this comment.	92
	The conclusion reached in this section…"Removal of the trees outside the nesting and rearing season likely would not result in direct impacts to individuals of these three species," is misleading. Snags were heavily used by these species for nesting and other activities and contributed significantly to their local production. Please clarify how removal of flooded snags outside of the nesting and rearing season will not result in impacts to kingbirds, tree swallows, and common grackles.	We disagree that the text is misleading.	93
	On page 3-15 it states "…it is also possible that the flooded snags provide an excessive amount of cover and spawning habitat. This could result in an overabundance of fish, leading to stunted game fish populations. Removal of some flooded snags could help to alleviate stunting problems." The statement that the fishes of Prickett Impoundment are stunted is inaccurate and the assumption that removing woody structure would alleviate stunting is also inaccurate. Michigan DNR fisheries survey data from 1954 – 1999 has clearly documented a quality sport fishery within the Prickett Impoundment. Only one survey effort in 1962 found bluegills that were considered stunted. Fisheries surveys since that period have documented a healthy fishery composition with many predators (northern pike, walleye, and largemouth bass) and forage species (bluegill, yellow perch, black crappie, white sucker, and golden shiners). Data from a May 1999 survey documented a mean growth index for walleye to be +2.4	The statement on stunting was derived from an undated DNR report, the only fisheries information that had been provided to UPPCO during the time that the draft report was being prepared. The DNR has since provided UPPCO with more recent fisheries data. The report has been revised to incorporate these data and all text referring to stunting has been removed.	94

	inches above State average. The report's speculation that removal of flooded snags could alleviate stunting is unsubstantiated by fact. A literature review has failed to find scientific studies that support removal of woody debris to enhance fish populations. We recommend this paragraph be removed from the final report.		
	In addition to providing cover for bait fish, flooded snags provide a substrate for aquatic invertebrates. Invertebrates are a major ecosystem component and source of food for fish and other animals. Because of the large amount of flooded wood in Prickett basing, the contribution of this wood to the total available habitat for invertebrates is significant. The potential effect of removing this wood on the aquatic ecosystem is not adequately analyzed in this document	The revised report includes a qualitative analysis of the potential effect of the removal of flooded snags on aquatic macro-invertebrates.	95
	Please define "dri-ki."	The term dri-ki has been removed from the report. This material is now referred to as coarse woody debris.	96
	We suggest re-wording the concluding statement to: "Removal of flooded snags would eliminate a significant source of fish habitat from the impoundment."	Comment noted.	97
	Common Loons (Victoria, Bond, Au Train, Prickett)		
	We agree that "human disturbance is well known to affect loon nesting and productivity" (p. 4.2), which is why the agencies included "shoreline areas with minimal road access" within our definition of potential loon nesting habitat. Despite this, there was no attempt made during this study to map and describe shoreline areas with limited road access, which would have provided additional valuable information with which to assess loon habitat suitability.	For the purpose of this assessment, a more comprehensive set of known parameters necessary for loon nesting were considered. These parameters (which are detailed in the reports) are based on published data, recently and thoroughly summarized by David Evers of BioDiversity Research Institute in his Status Assessment and Conservation Plan for the Common Loon (*Gavia immer*) in North America, as prepared for the U.S. Fish and Wildlife Service in 2004 (Evers, 2004). It is interesting to note that the single active loon nest that was identified during these assessments (and was successful in hatching one chick) was located in close proximity to a public boat launch, and a shoreline area near road access.	98
	The short time frame of the surveys (1/2 day in some instances) is inadequate to evaluate loon use of the flowages.	As identified in the agency-reviewed scope of work, the objective of this assessment study was to evaluate and map potential nesting habitat, not to evaluate loon use.	99
	(Au Train) In general we would like to point out the high amount of loon activity on the basin. We recommend that UPPCO pursue an amendment to the Au Train FERC license for the protection and enhancement of the common loon population.	Loons were observed by E/PRO consultants on Au Train on several occasions during the summer of 2006. UPPCO is unaware of any evidence which supports the need to amend the Au Train license for the protection and enhancement of common loon populations.	100
	In addition to possible nesting platforms, potential nesting sites should also be included in the list of study objectives.	As identified in the agency-reviewed scope of work, the objective of the assessments was to evaluate and map potential nesting habitat, not to identify nesting platforms.	101
	According to the Scope of Services, aerial reconnaissance was to occur in May. Please explain how only conducting a boat survey in mid-June may have impacted the results.	Aerial observations of loons on the reservoirs simply serve to augment our observations of whether loons were present on each lake. Note that the overall purpose of this study was to identify areas of suitable loon nesting habitat, *not* loon use and abundance. Observed loon presence was merely used as a tool to help identify those areas that not only contain suitable habitat, but may potentially be occupied by loons as well.	102
	Explain how conducting loon surveys in mid-June could have impacted the	As identified in the agency-reviewed scope of work, the objective of the assessments was to	103

	results. The optimal time for loon survey is the last two weeks of May and early June.	evaluate and map potential nesting habitat, not to conduct surveys for loons. Given this, the results were not impacted by the timing of the habitat surveys (June 12, 13 and 14).	
	(Bond Falls) The mouth of Interior Creek (p. 4-4) should be the mouth of the M. Branch Ontonagon River.	The river has been re-labeled the *Middle Branch of the Ontonagon River*.	104
	(Bond Falls) It is possible that other adult loons observed during the study had attempted to nest before the surveyors were there, and failed for one or more (unknown) reasons. Also, the FERC license includes conditions which should enhance potential for loon nesting over time; this would need to be considered in any environmental assessment that analyzes the potential impact of non-project use of project lands and waters on loons. This is supported by the statement on 4-5: "If (loons) are resident, and are using specific territories, then protection of those areas may encourage their success".	As identified in the agency-reviewed scope of work, the objective of the assessments was to map and evaluate potential nesting habitat, not to analyze impacts on loons. UPPCO believes that Article 414 of the current FERC license for Bond Falls is adequate to enhance loon nesting potential.	105
	A discussion of water levels maintained by UPPCO during the time of loon nesting would be beneficial in determining potential success.	As identified in the agency-reviewed scope of work, the objective of the assessments was to evaluate potential nesting habitat, not to determine potential loon nesting success.	106
	(Bond Falls) The statement "....it was determined that there are no limiting factors which affect loons' use of the impoundment for nesting" is not supportable, considering the very limited scope and duration of the study. A wide variety of factors such as reservoir water level fluctuation, human disturbance, forage quality and quantity, etc., could have easily come into play as factors limiting loons' use of the impoundment, but these would have not been detected on a visit to the flowage of one day.	UPPCO disagrees. The very fact that a pair of loons was documented to be actively nesting on the reservoir indicates that all the parameters are acceptable (at least in one location) for loons to select this water body for nesting purposes. The parameters listed by the commenting agency may affect nesting density and/or success, however this was not the listed objective in the agency-reviewed scope of work.	107
	(Victoria, Bond Falls, Au Train, Prickett,) The assumption that loons cannot be assumed to breed or will do so in the future because only 50% of the highly suitable breeding lakes are currently being used in the northern two-thirds of the State is flawed for two reasons: 1) The assumption could just as easily be made that loons can be assumed to nest at these flowages now or in the future; and 2) The use of the reference is misleading since the term "northern two-thirds of the State" refers to the northern Lower Peninsula and not the Upper Peninsula. The actual point of the reference is that too few loons exist in the NLP to utilize all available habitats. We suggest that this entire discussion be removed from the documents.	The reports have been revised to remove this discussion.	108
	(Prickett, Victoria) A Secchi Disk measurement of 1.85 m (6.07 ft) is noted as not being optimal for loons and approaches the point at which foraging is hindered. Please provide literature supporting this statement. USFS experience on the Ottawa National Forest is that water clarity in this region is rarely a limiting factor for loon foraging, if the lake has an adequate forage base.	The agencies mischaracterize statements in the report. The secchi disk measurement of 1.85m applies to Prickett only. The report states that "this *approaches* the point at which foraging is hindered". This statement is based on Barr (1996), which is cited among the information provided in the water quality paragraph of the introduction (page 4-1). Specifically, the citation reads: "Barr (1996) documented that secchi disk readings of 1.5m or less alter loon foraging behavior". UPPCO was/is unaware of published information on the USFS experience. The reports have been revised to indicate that existing data suggests that these relationships should be considered when assessing the overall habitat quality on a given lake.	109
	(Victoria) It is speculative to conclude that water level changes in the	The report has been revised to the address the comment.	110

	flowage are "somewhat moot" in their effects on loons. A thorough, comprehensive study would be needed to support such a conclusion.		
	Conclusions reached after short duration field observations, such as turbidity being a limiting factor for loon foraging, water level fluctuations not impacting loon nesting, or even the presence or absence of breeding pairs during the entire breeding season, are speculative. Concluding statements in the study should identify the relative uncertainty of the data and that more thorough investigations are necessary to fully understand loon use or possible use of a basin.	It was not the charge of this study to estimate loon use or possible use of a basin. The reports did not attempt to make such conclusions. The only conclusions the reports make is whether or not territorial loons (or loons in general) were observed on the impoundments at the time of this study and if there is suitable nesting habitat. The reports stress on many occasions that more thorough investigations are necessary to truly understand loon use of the impoundments. This idea is spelled out in the conclusions for Bond Falls and Au Train, where loons were frequently observed in summer 2006.	111
	Include information on prior loon nesting from the Michigan Natural Features Inventory and the Michigan Loon Preservation Association.	The Michigan Loon Preservation Association Web site was searched as part of preparation to perform this study. No useful data regarding population estimates or nesting information in the areas of the impoundments considered in this study were located. Likewise, the Michigan Natural Features Inventory (which is non-published and therefore non-public) was not located or able to be accessed online. If information regarding prior loon nesting were made available from either of these sources, it would be considered for inclusion in this assessment.	112
	(Bond Falls, Au Train) We agree with the conclusions of the assessment to continue observations and study of the common loons at Bond Falls and Au Train basins. These studies will allow for protection of preferred habitat, identification of any limiting factors, and form the basis for recommending any enhancement measures necessary to insure future nesting success.	Comment noted.	113
	Aesthetic Resources		
	Although the surveyors did talk with some land managers in the area regarding which attributes are considered to be visually special, it does not appear that any such interviews were conducted with typical users of these flowages and adjacent project lands (boaters, fishermen, hikers, birdwatchers, picnickers, hunters, etc.). This would be valuable information to include (see below). These interviews should include questions related to the current status of the project as well as the proposed development.	We acknowledge that the draft report contained little information pertaining to interviews of typical users of the flowages and adjacent project lands. The revised report will include the results of (1) interviews of focus group members who use the reservoirs; (2) in-the-field surveys of parties who were recreating on the reservoirs during the Labor Day weekend; and (3) UPPCO personnel familiar with winter use on the impoundments.	114
	Under the first bullet in Task 1, please describe what "other relevant places" were reviewed for information on scenic lake assessments.	The following studies were consulted and will be cited in the final report: Hiawatha National Forest: Assessment Report for Transition to Scenery Management System, 2003 Huron-Manistee National Forests: Scenic Variety Indicators (courtesy Thomas Kokx Associates) Maine Land Use Regulation Commission: Scenic Lakes Assessment in Maine's Unorganized Towns, 1997 Maine State Planning Office: A Comprehensive Land Use Plan for the Moosehead Lake Region (visual analysis section by H. Dominie) Millward, H. and D. Allen (1989) "The scenic resources of Nova Scotia: A macro-scale landscape assessment." As reported in: Natural History of Nova Scotia, Volume 1: Topics, Nova Scotia Museum of Natural History. National Park Service: North Country National Scenic Trail Draft NE Minnesota Route	115

		Assessment and Environmental Assessment Tahoe Regional Planning Ageney, Draft Proposed Scenic Review System for Shorezone, 2003	
	The scoring criteria for Relative Relief are not meaningful for this area, owing to the relatively low relief of the lakes being studied. We recommend changing the scale to more appropriately reflect the areas being assessed. Also, this factor should be given less weight in the scoring table.	The rating system is based upon the regional context within which the reservoirs are located, the Upper Peninsula. The presence of Relief is important in the visual appeal of Victoria, Au Train, and Prickett and so will remain a factor, but be given less weight than Natural Character	116
	In general, the scoring system used to develop total aesthetic quality scores for the different sub-units is flawed. By breaking most criteria down into various sub-components, and rating each of them separately, much more weight is given to some sub-components than they warrant, especially with regard to lakes in this region of the country. For example, physical features are broken down into six sub-components, each of which is rated with a score of from 0-15. Relief, Vegetation Diversity, and Special Features are also each broken down into three sub-components, and each given a score. By contrast, Degree of Naturalism, which was the lake characteristic most valued by every manager interviewed (p. 5-4), is weighted the same as any of the 15 sub-components above, giving it very little importance overall. Therefore, the total aesthetic quality scores for each sub-unit in Table 5-2 are very misleading, since they give much more emphasis to physical features, relief and other qualities than they do to Degree of Naturalism. We believe that the scoring system should be revamped to give the appropriate weighting to lake attributes that are the most or least important in this region (for example: Degree of Naturalism may be most important, and Relief may be least important). Interviews with actual users of the flowages (in addition to the managers already interviewed) should be done first to help gather information upon which to base this revised weighting of the criteria.	We agree that Natural Character is the most valued visual characteristic of the impoundments. Interviews with users of the impoundments confirmed what the professionals had said and the evaluation system will be refined. This factor will be given highest weight in the final scoring system. However, because existing development is not a major factor on these lakes, the scoring results for subunits may not change appreciably in relative terms. According to people using some of the reservoirs (e.g. Au Train), Relief is an important consideration and, because of this, will not be given the least weight.	117
	The scoring criteria for Natural Character does not include 0, although this number was used in Table 5-2.	The report has been revised to correct this error.	118
	Please explain how the individual resource management professionals were selected to provide input on valued qualities when considering inland lakes.	Several of the professionals were identified by agency receptionists as the "most likely to know about the lakes within the ageney's jurisdiction and why they are valued." One was consulted because she is familiar with USFS scenery management system application in Michigan (Leeann Loupe); another because he is the ranger responsible for Silver Mountain, one of the visible and noteworthy features which make Prickett Lake special.	119
	(Prickett) An attribute that may deserve greater weighting at Prickett are the flooded snags (which are a sub-component within the Special Features category). This would be supported by a statement on p. 5-7 that "flooded snags and submerged stumps....are one of the defining characteristics" of Prickett impoundment.	Agreed. The report has been revised accordingly.	120
	Please clarify where Lake Gogebic, Mountain Lake, and Lake of the Clouds are located.	The report has been revised to include this clarification.	121
	Please clarify what is meant by "draw-down regimen."	The report has been revised to include this clarification.	122

	(Au Train) The last sentence of the second paragraph (under 5.2) should be corrected to read "is managed by the Michigan Department of Natural Resources as a wildlife refuge."	The report has been revised to include this correction.	123
	This section is missing information on the types and numbers of public users at the basins; rather, it only includes the types of recreational use available. According to the Scope of Services, the assessment should include information on who uses the project and why they value it.	The reports have been revised to reflect the results of interviews with users of the reservoirs (e.g. activities engaged in/frequency of use/parts of reservoirs they value). Where information is available, user numbers (i.e. campers) will be estimated.	124
	(Bond Falls) Please include a citation for the following portion of the last sentence which refers to the waterfall(s): "most who come to see them don't stay for other activities."	The draft report included a citation (personnel communication, Tom Strietzel, USFS. The report has since been updated with a new source (i.e., campground office staff).	125
	(Boney Falls) Clarify the meaning of "the other side" under 4.3.1.	The report has been revised to clarify this issue.	126
	This section should include actual expectations of individuals who use the project, rather than expectations of general recreationists. We suggest that this information then be used to identify the objectives to be attained for the aesthetic resources of the project lands surrounding each flowage.	The reports have been revised to include the results of recent interviews.	127
	(Prickett) Please correct the information to indicate that 15 car/trailer units are provided at the public access site.	See response ID 12.	128
	Include the highest possible score in the discussion.	The report has been revised accordingly.	129
	Map 5-1 is very hard to understand. We recommend removing the colors as they appear to be a reference to individual scores in each sub-unit. These scores are presented in table 5-2.	The report maps have been revised.	130
	Since a primary use of these impoundments is by boaters and fishermen, and since ... "all parts of the lake are visually sensitive to people who are boating, informally camping, or using shoreland areas" (p. 5-18), this section on public viewpoints provides little value to the aesthetics assessment.	We disagree with the statement that the section on public viewpoints provides little value. Campers, picnickers, and people who bank fish from public access points are sensitive to changes in the areas depicted on these maps. The information is highly important, even if it is incomplete at present, because such assessment was outside of the scope of this study. Sensitive areas will be addressed during the development of the Shoreline Management Plans.	131
	Table 1. List of organizations and their involvement with Upper Peninsula Power Company owned Bond Falls, Victoria, Prickett, Au Train, Boney Falls, and Cataract basins. These basins are regulated under Federal Energy Regulatory Commission licenses.	Comment noted.	132

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Commenting Entity	Comment	UPPCO/EPRO Response	Response ID
August 7th Trout Creek Public Meeting August 29, 2006	Once again UPPCO shows total disregard for the people of the U.P. Your objective in the aesthetic value of the impoundment was "why these areas have high aesthetic values and who values them and why," yet the only people you ask about this was a couple of park rangers and two campers. Your total failure to contact any local people on this subject confirms my thoughts on your extreme greed. If I were you I'd leave the U.P. out of your name. Maybe Wis. Power Company would be better. – Bruce Crossing, MI	We acknowledge that the draft reports contained little information pertaining to interviews of typical users of the flowages and adjacent project lands. The reports have been revised to include the results of (1) comments from focus group members who use the reservoirs; (2) in-the-field surveys of parties who were recreating on the reservoirs during the Labor Day weekend; and (3) UPPCO personnel familiar with winter use on the impoundments.	133
	The land (Bond) has been with us for 50+ years. The people that choose to recreate also understand this. Those that purchased property on Bond should have known this. Good job Enviro Studies. Project should proceed! – Trout Creek, MI	Comment noted.	134
	Aesthetics – Most important item is the protection of the wild appearance of the shoreline and piers will detract from that wild appearance. Study should include aesthetic related to water quality. Clean water exists today but proposed use likely will reduce water quality. – Watersmeet, MI	The reports have been revised to give Natural Character the highest weight. Existing water quality was considered in the reports in accordance with the approved scopes of work. The assessments did not, however, consider the impacts on water quality from potential future development as it was outside of the project scope. See response ID 1.	135
	It is not appropriate to use acres per boat because much of the reservoir surface has submerged stumps which makes many acres unsuited to boats – remove stumpage acres from calculations. Wildlife studies need to account for future changes in the old growth buffer and project lands – will be different 100 years from now. – Watersmeet, MI	The Boating Carrying Capacity analysis was meant to provide perspective regarding potential boating use on the reservoirs and to provide a possible tool for further assessment of this issue. Results vary greatly based on the assumptions made. For example, if one assumes only fishing-related, or canoe/kayak boating activity then the entire reservoir, stumps included, would be suitable for use.	136

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Commenting Entity	Comment	UPPCO/EPRO Response	Response ID
Steve Garske **August 28, 2006**	I would like to comment on the Upper Peninsula Power Company / WPS Resources environmental assessment reports for the above 6 flowages, all of which are operated by UPPCO and regulated by FERC. As most of my experience has to do with floristic surveys (including rare plant surveys), I will primarily comment on the "Wildlife and Aquatic Habitat" section (Section 3) of each report.	Comment noted.	137
	Unfortunately I must say that I have read a significant number of environmental assessments by both public agencies and private consultants over the years, and that these cookie-cutter reports for UPPCO are probably the most superficial and poorly done of all of them. Indeed they use a significant portion of their meager "results" sections to report the presence of sand, rock outcrops, course woody debris (old logs) and other features that all flowages would be expected to have. They make arbitrary statements and draw baseless conclusions with little or no data to back them up. And perhaps most importantly, they don't adequately address the potential impacts that the planned massive residential developments will have on the natural, recreational, and aesthetic qualities of these flowages.	The intent of the assessments, as scoped with the resource agencies, was to conduct a resource/habitat baseline inventory of FERC project lands and waters (particularly littoral zones). This effort was not intended, nor was it designed to be, an environmental assessment or impact analysis. See response ID 1.	138
	The assessment reports all state that wetland types were classified in accordance with "Cowardin et al. (1979)". This source is not included in the references for any of the reports, however. Thus it becomes difficult for interested readers without access to a university library to track down this source, or to ascertain whether the methodology is appropriate for classifying the wetlands found around these flowages.	This source has been added to the references section of the revised reports.	139
	The reports all purport to have included adequate surveys for rare plants and animals on these flowages. The most widely accepted method for assessing the floristic quality of a site is to conduct surveys 3 times during the growing season - in early spring (typically May) to find spring ephemerals and early-flowering plants, in midsummer (July) for certain sedges and other plants flowering at that time, and in late summer (late August-September) to find late-flowering plants including many aster family species. When time or resources are limited, organizations sometimes cut corners by having an early survey (May or June) and a late survey (August-September). Unfortunately UPPCO's consultants have taken this corners-cutting process to a new low, by surveying each area only once - from June 15-19 for Bond Falls (p. 3-2), June 22-23 for Victoria Flowage, 6 days between May 26 and June 22 for Prickett, etc. These visits were too early in the season to reliably detect rare aquatic plants such as Vasey's pondweed (Potamogeton vaseyi) and Farwell's water milfoil (Myriophyllum farwellii), both listed as Michigan "threatened"). They are also too early to be effective in finding major invasives such as Eurasian water milfoil (Myriophyllum spicatum) and purple loosestrife (Lythrum salicaria), all of which generally much easier to find later in the year. Furthermore, the plant inventory lists (for example, "Vallisneria, Potamogeton, Polygonum, Najas, Ceratophyllum, Utricularia, Elodea, and native Myriophyllum" for Bond Falls,	None of the reports "purport" to have included surveys for rare plants. However, surveys to determine the presence of rare animals, particularly many of interest to the resource agencies, were conducted. Mr. Garske is correct in indicating that multiple growing season surveys are preferable when searching for rare, threatened, and endangered (RTE) plants. It is for that very reason that conducting RTE plant surveys was not a primary focus of the assessment. As such, we did not conduct surveys specifically for RTE plants because we felt the results would be less than desirable. Rather, our goal was to document the presence of rare plants if they were encountered during other surveys. Mr. Garske in incorrect in stating that the timing of the surveys was "too early to be effective in finding major invasive such as Eurasian water milfoil and purple loosestrife". Most of the submerged aquatic vegetation was well developed at the time of the surveys, and field crews were able to reliably identify the presence of Eurasian water milfoil in the waters of the Prickett impoundment. Also, some invasive plants, such as purple loosestrife, have distinct features (e.g., leaves and the previous years plant stalks) that are easily visible, making the plants easily identifiable by experienced biologists. Furthermore, monitoring of loosestrife and Eurasian milfoil is an UPPCO license requirement and is being undertaken.	140

	p. 3-3) could apply to nearly every lake over 1 acre in size in the UP. Similarly the Prickett report (p 3-4) lists "Potamogeton, Elodea, native Myriophyllum, Vallisneria, and Polygonum", the Victoria report (p 3-3) list ("Potamogeton, Elodea, native Myriophyllum, and Polygonum.") and so on. [Apparently the consultants were not interested in emergent or shoreline vegetation at all, such as that appearing in abundance in their photo of "SAV" (submergent aquatic vegetation) on page 3-5 of their Bond Falls report, page 3-4 of the Victoria report, etc.] These lists are ridiculously inadequate for describing the aquatic plant communities of each of these flowages.		
	Several of the reports have entire sections blacked out. Most environmental assessments at least let the public know what rare species may have been searched for and whether any were found, blacking out only locationally-related information. But the UPPCO reports black out essentially all the information they might have on rare species in these flowages (but see discussion on the Merlin below), giving the public no way to judge whether rare species were found and what impacts UPPCO's and Naterra's development plans may have on these species.	See response ID 81.	141
	Naterra's plans to place numerous homes around these flowages (474 houses around Bond Falls Flowage alone, as I understand it) will likely lead to significant eutrophication of these reservoirs due to increased erosion from paths and shoreline use, as well as removal of natural vegetation, installation and fertilization of lawns within the watersheds, and leaking septic tanks within their respective watersheds. This degradation of water quality in turn can be expected to lead to a decrease in diversity of native plants and animals in the flowages.	Comment noted.	142
	The reports claim to assess the presence and impacts of "nuisance" species, but never defines what these species are. In fact the "nuisance species" found in each flowage seems to be arbitrarily chosen. For example, on P 3-12: of the Bond Falls report, they unilaterally declare reed canarygrass (Phalaris arundinacea) a non-invasive species: "Although not considered a nuisance plant species for purposes of this study, reed canary grass was widespread and common along the shorelines and within most of the wetlands of the Bond Falls impoundment." This highly aggressive invader of natural wetlands and other habitats is not native to the Great Lakes region, and is considered a major invasive by every state and federal agency in the region.	A list of nuisance species of interest was provided by the resource agencies. As a result, field crews primarily focused on documenting those particular species. However, knowing that reed canary grass is generally considered to be an invasive species, field crews made sure to document its presence in the assessment areas. Based on the text in the draft reports, it is unclear how Mr. Garske came to the conclusion that the report authors "unilaterally declare reed canary grass a non-invasive species".	143
	The use of a helicopter to conduct aerial surveys for nesting and non-nesting bald eagles, ospreys, and great blue herons and the presence of potential nesting sites seems like a questionable practice to me. While this method may have certain advantages in terms of expediency, it has the potential to be highly disruptive to these birds precisely during the time that they are nesting, when they are most sensitive to disturbance. The public is frequently reminded (and rightly so) by the Michigan DNR and others of the risks involved in disturbing these birds at their nests, yet the consultants had no qualms about flying over their nests and perching and foraging sites with helicopters at this time. Beyond a list of bird species that happened to be encountered during their brief surveys (which, by the way, included nothing on use of these areas by migrating birds)	The use of helicopters and small planes by resource agencies for conducting aerial surveys for bald eagles is a common and accepted method. General field survey methods for conducting these flights to document the presence of nesting and non-nesting bald eagles, ospreys, and great blue herons were submitted to the resource agencies for review. At no time did they object to this widely accepted survey method. We disagree with the need to revise the reports to provide "quantitative information about the importance of habitats around these flowages" to birds. Rather, the reports will remain qualitative in describing that, if habitats associated with the impoundments exhibit certain characteristics, these areas may be suitable for certain	144

	and some simple and obvious textbook statements about the favored habitats of a few of them, little useful quantitative information about the importance of habitats around these flowages to these birds is given.	species' life stages (e.g., foraging and staging for migratory species).	
	In the Bond Falls report (page 3-11), the consultants mention the presence of Merlins (Falco columbarius) near the flowage. They even give the locations of these sightings, on map P-3-5. The same is true for the Victoria report, where a Merlin "acting aggressively" (an indication that the consultants were near its nest) is mentioned on page 3-8, with the location plotted on map P-3-4. A similar encounter with an aggressive Merlin is mentioned in the Cataract report (page 3-6 and maps P-3-3 and P-3-4). Despite the consultant's purported concern about endangered species on these flowages, they seem unaware that the Merlin is listed as "threatened" in Michigan (MNFI 1999).	We are aware that Merlins are a state-listed threatened species in Michigan. However, nowhere in the reports did we provide specific information on the locations of nests, young, etc. The reports simply state that Merlins were observed in flight and do not disclose any information on immobile or vulnerable life stages.	145
	The poor quality of these assessments must be obvious to even the most casual reader. The Bond Falls report even states that (page 3-3) "Bond Falls is a relatively large impoundment with extensive open-water areas and associated wind fetches. As a result, the majority of nearshore aquatic habitat at Au Train generally consisted of coarse sands. Sandy areas were ubiquitous throughout the impoundment." And on page 3-7 of the same report: "No sandhill cranes or suitable sandhill crane nesting habitat areas were observed at Bond Falls. In the Upper Peninsula, sandhill Cranes nest most commonly in sphagnum bogs (Tacha et al., 1992), a habitat that is not present at Au Train Basin." This sort of carelessness indicates that the consultants did not try to thoroughly describe the unique features and environmental characteristics of each flowage, but simply used a boilerplate, fill-in-the-blank form, not even bothering at times to change the name of the flowage supposedly being assessed.	See response ID 1. The report has been revised to correct the erroneous reference.	146
	Whether the consultants doing these "assessments" were unfamiliar with the geography and natural habitats of the area, were not given enough time to do the needed surveys, or were simply incompetent (or some combination of all three), these reports are wholly inadequate for assessing the impacts of the large-scale residential developments planned for these flowages. They are an insult to local residents and others who care about these areas and should be thrown out, and full Environmental Impact Statements done for each of these areas by a qualified and impartial organization.	See response ID 2.	147

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Commenting Entity	Comment	UPPCO/EPRO Response	Response ID
Nancy Warren August 27, 2006	From the obvious omissions and clerical errors, it seems clear the reports were completed in haste. For example, the Middle Branch of the Ontonagon River, a premier trout stream and part of the Federally designated Wild and Scenic River System was referred to as "Interior Creek".	The report has been corrected.	148
	A waterfall, popular for its recreational and aesthetic values, was missed entirely by the E-PRO team. When questioned about the failure to document the presence of spotted knapweed, honeysuckle and rusty crayfish, non-native/invasive species known to exist at Bond Flowage, the E-PRO representative state it was because the species are too common.	We agree that Little Falls was missed and is an important oversight. It was not visible during the aesthetic site visit because of the high water level. It has since been field-checked and the report has been revised.	149
	According to the UPPCO document date 4/18/06 "Scope of Services", the Agencies requested that UPPCO map and identify "aesthetic resources (areas to be considered to have high value);" and describe "why these areas have high aesthetic value and who values the aesthetic resources". This was a stated objective of the study. Yet, E-PRO never spoke to one actual user: fisherman, hunter, camper, paddler, bird watcher, picnicker, tourist, to ascertain first hand: "Who values these resources and why?"	We acknowledge that the draft report contained little information pertaining to interviews of typical users of the flowages and adjacent project lands. The report has been revised to include the results of (1) comments from focus group members who use the reservoirs; (2) in-the-field surveys of parties who were recreating on the reservoirs during the Labor Day weekend; and/or (3) UPPCO personnel familiar with winter use on the impoundments.	150
	The assessments, completed in just a matter of days, captured only a snapshot overview of some of the natural features and resources of the project lands and wafers of the impoundments.	We disagree. Assessments were conducted on 27 days over a five-month period.	151
	UPPCO recently sent letters to Interior Township residents speculating about increased tax revenues to the township and county if their proposed non-project uses of project lands are approved. This data was also distributed at the public meetings giving the impression these increased revenues would be net gains, without allowing public questions or discussion of increased cost of services. We believe this is inappropriate and an attempt to mislead the public.	This comment is irrelevant to the resource assessments.	152
	UPPCO is attempting to solicit local support for private docks, piers and trails on the project lands, without addressing the negative impacts of these uses on the project lands. Not only aesthetics but fishing, waterfowl hunting, hiking, birdwatching, animal tracking, camping and other forms of recreation will be impacted by non-project uses of project lands. None of this was addressed by these studies.	The assessments were not designed to analyze the impact of non-project uses on the current uses of project lands. See the approved scopes of work for the assessments.	153
	We believe the assessments for these impoundments should include the environmental impacts of the proposed action and alternatives. We urge FERC to force UPPCO to follow the section 5.4 handbook process and initiate a new comprehensive environmental impact study – one that incorporates seasonal habits of birds and wildlife, recreational uses, aesthetic values and the impacts of the proposed non-project use of the project lands.	See response ID 1.	154

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Commenting Entity	Comment	UPPCO/EPRO Response	Response ID
Douglas R. Cornett August 28, 2006	I am writing as an alternative committee member representing the Upper Peninsula Public Access Coalition for the eastern UP group. I have reviewed the environmental studies for all 6 flowages under review. I am particularly concerned that only a few days of field studies have been conducted for each area. As a biologist I have reviewed many environmental assessments and impact statements and believe the work done so far by E-PRO is too limited in scope to properly assess the resources that could be impacted by development of the shoreline that Naterra plans for project lands and waters.	As previously stated, these studies were not intended or designed to be environmental assessments. These studies, which were scoped in consultation with resource agencies, were resource/habitat baseline inventories. See response to 1.	155
	By limiting the studies to project lands, the likely effects, and cumulative effects, of development of non-project lands is not being taken into consideration. Naterra is planning to, and perhaps have even started logging and road-building. Considering the fact that building dozens of miles of roads at each project, and logging most merchantable timber (this *is* the *modus operandi* of Naterra of all their other developments in the UP and northern Wisconsin) will affect project lands and the waters contained in these impoundments. These action can cause long-term deleterious effects for decades to come, affecting both project and non-project lands.	See response ID 1.	156
	By trying to limit the scope of comments to just project lands is ludicrous considering all the resources that can potentially be impacted. Raptors that might be found in the project area, especially sensitive species like the Northern Goshawk and Red-shouldered Hawk, would likely have nesting habitat outside the project area and move back and forth between project and non-project land. How can these resources be assessed properly without looking at both land categories?	We acknowledge the author's comment, however, only the lands and waters within the project boundary are subject to the Federal Energy Regulatory Commission's purview.	157
	The assessments, hastily completed in just a matter of days, captured only a snapshot overview of some of the natural features and resources of the project lands and waters of the impoundments. Many species require much more time just to locate. As mentioned above, Northern Goshawk can require many hours to find, *if* proper research protocol is observed. E-PRO said they did their raptor surveys using a helicopter. How can meaningful data be obtained when such a disturbing method is employed? Raptors are especially sensitive to disturbance. I am unaware of any good data being obtained through such an intrusive method. With that in mind, I request E-PRO provide peer-reviewed research that substantiates this method of data collection.	Helicopter surveys were conducted to determine the present of nesting and non-nesting bald eagles, ospreys, and great blue herons, not woodland raptors. Nowhere in any of the reports do the authors state that helicopter surveys were conducted for woodland raptors. Rather, woodland raptor surveys were conducted using a modified version of the U.S. Forest Service protocol, which generally calls for playing recordings of woodland raptor calls in an attempt to solicit responses from nesting raptors.	158
	Additionally, E-PRO chose to redact entire sections of the reports, citing that "sensitive species" information might be revealed to those seeking to collect or harm in other ways rare, sensitive and endangered species. While I understand that site-specific information is not good to release, there still is the need to present information that can assure the public that sensitive species are being protected. E-PRO's treatment of this was completely unprofessional and might lead the public to believe that there is something to hide.	See response ID 81.	159
	UPPCO recently released information speculating increased tax revenues to townships if your proposed non-project uses of projects lands are approved. This data was also distributed at the public meetings giving the impression these increased revenues would be net gains. However, you failed to allow any public questions or discussions of increased cost of services. This is unethical and inappropriate,	This comment is irrelevant to the resource assessments.	160

	considering the studies you commissioned might influence the scale of development and result in a reduction in the number of lots the developer can build on. This might also lead one to believe that you are fitting your studies into a pre-determined framework that has no flexibility to be altered.		
	I believe you should be consulting with the Federal Energy Regulatory Commission and work to prepare a new comprehensive environmental impact study that will consider ALL resources.	Comment noted.	161

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Commenting Entity	Comment	UPPCO/EPRO Response	Response ID
D. Borcherding **August 28, 2006**	The environmental assessments regarding the Bond & Victoria Flowage sales leave much to be desired. This is far too important & valuable a habitat & natural resource to fail to do a complete & comprehensive impact study. The argument that there are no development plans at this time doesn't seem too valid, considering that Naterra Land Co. has unveiled plans to do just that, 424 lots at Bond Falls, with 35 individual piers & 40 multi-slip piers. I live on one of the Madison lakes, & I get a very sick feeling when I imagine that happening to a pristine, unspoiled flowage like the Bond. There should be NO piers, NO lights, & very little impact on this area. The people who purchase property on these bodies of water should understand what is at stake, & should be the type of people who will be happy to beach their small boats as the campers do. These waters are not suitable for large, noisy, polluting watercraft, & that should not be permitted nor expected. This area can be developed, yes, but it MUST be done responsibly & correctly with as little disturbance & human impact as possible. Thank you for your attention. D. Borcherding McFarland, WI.	Comment noted. See response ID 1.	162

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Commenting Entity	Comment	UPPCO/EPRO Response	Response ID
Scott Hickman **August 28, 2006**	I've been continuing to track shorebird migration through Alger County and have found that Cleveland Cliffs Basin continues to support far more shorebirds than any other site. The high counts of each species encountered last week are listed below for your records. The visit on August 22nd was made with Skye Hass. I'm afraid that I didn't pay much attention to waterfowl, but include a couple of species which I did note. High counts for the basin (Aug 20 - 27) include: Wood Duck - over 50 August 26 Blue-winged Teal - Stayed at about the same as on 22nd, 200? more? Well over 300 "sandpipers" (plovers, tringines, & calidridines) on the 20th Black-bellied Plover - 1 Aug 22 Semipalmated Plover - over 60 Aug 20 Killdeer - over 30 Aug 25 Spotted Sandpiper - over 2 on the 20 Solitary Sandpiper - over 10 Aug 20, 22 Greater Yellowlegs - 2 on Aug 20 Lesser Yellowlegs - 26 Aug 27 Semipalmated Sandpiper - over 60 Aug 20 Least Sandpiper - over 100 Aug 20 Baird's Sandpiper - 5 Aug 22 Pectoral Sandpiper - over 76 Aug 22, more, but not counted Aug 20 Buff-breasted Sandpiper - 2 Aug 22 (plus one same day Au Train) Wilson's Snipe - 6 Aug 27 Caspian Tern - 8 Aug 22 Trumpeter Swan - 3 Aug 22 & 27 Other than that, 1 N. Harrier on the 27th as well as Peregrine Falcon (1) on the 26th and 27th.	Comment noted. This information has been incorporated into the revised Au Train report.	163

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March, 2007

Commenting Entity	Comment	UPPCO/EPRO Response	Response ID
Joseph Kaplan **Common Coast Research & Conservation** **August 28, 2006**	We appreciate the opportunity to provide comments on the draft Assessment of the Recreation, Wildlife, Loon, Aesthetic, Resources for Victoria (FERC Project #1864), Bond (FERC Project #1864), Au Train (FERC Project #10856), and Prickett (FERC Project #2402) Impoundments. Our organization, Common Coast Research and Conservation, is a non-profit dedicated to the study and protection of loons throughout Michigan's Upper Peninsula. Our biologists work closely with public agencies, companies, and the private sector to increase understanding of this State-threatened species. Our experience with loons spans over 15 years and includes the monitoring of color-marked individuals at three principal sits in Michigan's Upper Peninsula; Seney National Wildlife Refuge, Ottawa National Forest, and Isle Royale National Park. We offer our expertise and assistance to you as UPPCO evaluates and implement measures to enhance loon usage of its Upper Peninsula reservoirs.	Comment noted.	164
	In general, we agree with the list of loon nesting requirements provided in the draft assessments but recommend you add Mercury exposure as a potential limiting factor. Elevated levels of this highly-toxic heavy metal have been documented in loons from the region, and have been shown to be significantly influenced by the type of fluctuating water levels common to managed impoundments.	Listing mercury exposure as a possible limiting factor to potential loon nesting is unfounded based on any evidence to date. While data show that high levels of exposure affect behavior to some degree, there is nothing substantial to support that mercury contamination will preclude nesting attempts.	165
	One prominent aspect of the assessment with which we do not agree is the emphasis placed on turbidity as a factor for loon use on reservoirs where territorial loons were not documented (Victoria and Prickett). We feel the references provided in the report do not support the conclusions of the consultant in this regard, and therefore be reconsidered. In the reports turbidity is referenced under "Water Quality" in the following manner: "Loons are visual hunters; therefore, clear water is crucial for efficient foraging. A Michigan study (Gostomski and Evers 1998) documented that time spent for foraging adults in turbid water was significantly greater than in clear water. Barr (1996) documented that secchi disk readings of 1.5m or less alter loons foraging behavior. A study of total suspended solids in Seney National Wildlife Refuge, Michigan, documented a preference by breeding loon pairs for lakes that have less than 28 Nephelometric Turbidity Units (NTU), while lakes over that level were not used for nesting purposes (Evers 2004)." The Evers (2004) paper cited above employed unpublished data from a study of water quality parameters at Seney National Refuge (E.J. Collier 2003). The turbidity "threshold" provided as a limit to loon nesting in this study was based on a sample of only 3 unoccupied refuge pools (lakes) during a single breeding season (1995). It should be noted that these three pools provided the highest turbidity values recorded on the refuge during an ensuing eight-year sampling period. Owing to this extremely limited sample size, and to the subsequently lower turbidity values which have not allowed for further assessment, we do not believe that the cited reference lends valid support to the report's argument concerning possible complications from excess turbidity.	The assessments include information that was published in peer reviewed and publicly available documents. The language in the reports has been edited to reflect that there is some data which suggest that water clarity may affect loon foraging efficiency, and that this parameter should be considered to some degree when assessing the overall potential habitat suitability.	166

	Citing another Michigan study (Gostomski and Evers 1998) the excerpted paragraph states that "time spent for foraging adults in turbid water was significantly greater that in clear water". We do not agree with this interpretation. Gostomski and Evers themselves state in their paper that time-budget comparisons between Isle Royale (clear water) and Seney (turbid water) loons "could only be speculative" because of differences in sample sizes which precluded statistical comparisons. Furthermore, the authors provide no actual data on water quality (Seney pools are described as "generally stained due to the inputs of tannins"), and merely speculate that the possible differences in foraging rates between the sites may originate from visible difference in water clarity and prey base.	The statement "time spent for foraging adults in turbid water was significantly greater than in clear water" is a verbatim summary by one of the cited authors in a later publication (Evers 2004). The remaining information in this paragraph is accurate. The language in the reports has been edited to reflect that there is some data which suggest that water clarity may affect loon foraging efficiency, and that this parameter should be considered to some degree when assessing the overall potential habitat suitability. The report has been revised to remove any conclusions indicating that turbidity may preclude potential loon nesting.	167
	The final reference within the report pertaining to turbidity – Barr (1986) – does provide data in support of a visibility-related parameter operating as a potential limiting factor for loon occupancy: Lakes with Secchi disc water clarity of less than 1.5 meters had lower occupancy levels (31-35%) that their more transparent counterparts (78093%). While Victoria's clarity (0.9 m) falls below this threshold, Prickett's value (1.85m) does not; the report's contention that the latter is approaching "the point at which foraging is hindered" therefore seems both inaccurate (Barr's limit refers to occupancy, not foraging capacity) and unjustifiable alarmist. Additionally, in the same paper Barr found an associate between fluctuating high water levels and increased turbidity. In view of this finding we disagree with the conclusion in the assessment report that "given the degree of turbidity observed on Victoria, and the resultant extreme likelihood that loons will not nest here, water level regimes and their potential effects on nesting loons are somewhat moot."	UPPCO believes the commenting party has mischaracterized statements in the Prickett report. The report has been revised to clarify the issue.	168
	In light of the revelations, we suggest that UPPCO's consultants establish a far more robust and defensible assemblage of peer-reviewed studies before including turbidity as a possible mitigating factor for loon occupancy on reservoirs such as Victoria and Prickett. We would also suggest including a discussion of how turbidity levels might be expected to change in response to the updated water management regulations contained within the new license agreement.	UPPCO believes, the commenting party has mischaracterized statements in the report. The report does not state turbidity is a "possible mitigating factor for loon occupancy", as stated by the commenting party. The report cites it as a possible *limiting* factor. Published, peer-reviewed literature to date supports the possibility that turbidity may be a limiting factor to overall habitat quality and resultant occupancy rates. The data cited has been upheld as part of the breeding season habitat requirements listed within the U.S. Fish and Wildlife Service's Status Assessment and Conservation Plan for the Common Loon (*Gavia immer*) In North America (Evers 2004). Given the scope of these assessments, and the clarified language within the reports, we feel that such a discussion is not necessary.	169
	Beyond the report's treatment of water clarity, we also were given pause by this repeated quotation in support of the likelihood that there may not be enough loons to occupy reservoirs in Michigan: "The Michigan DNR states that only 50 percent of 'highly suitable' breeding lakes (for common loons) are currently being used in the northern 2/3 of the State of Michigan (Michigan DNR, 2006)". As the reference derives from a state website that provides only general information on loons – with no attached data on specific regional populations, nor any definition of what constitutes a	As identified in the agency-reviewed scope of work, the objective of the assessments was to map and evaluate potential nesting habitat, not to assess loon abundance or use. General population information was sought only to get a basic idea of loon abundance throughout the Upper Peninsula. Since no technical assessments were to be based on this information, more extensive population data (Ottawa National Forest's loon occupancy database - which is not publicly accessible nor offered	170

	"highly suitable" breeding like – it seems inappropriate to the standards of a technical report. The Michigan DNR's own Loon Recovery Plan (1992) highlighted the dramatic disparity in occupancy rates between different regions of northern Michigan, and identified the western Upper Peninsula (where three of the four surveyed reservoirs reside) as an area of comparatively high loon densities. Our own extensive survey work throughout the Ottawa National Forest suggest that occupancy rates on lakes and reservoirs with viable nesting habitat runs far higher than 50%; we would recommend that UPPCO consultants access the Ottawa National Forest's loon occupancy database in GIS format – which was developed in partnership with Common Coast Research & Conservation – to determine more accurately occupancy rates in the areas surrounding the Bond Falls, Victoria and Prickett impoundments.	through consultation with the USDA FS) was not sought beyond that which is publicly available.	

Commenting Entity	Comments	UPPCO/EPRO Response	Response ID
Linda S. Rein August 27, 2006	The Bond Falls Landowners have many concerns regarding the recent assessments done on the six U.O. Flowages affected by the UPPCO/WPS/Naterra Land Sales. We have studied the assessments for Victoria, Prickett, and Bond Flowages done by EPRO Engineering & Environmental Consulting and have the following comments and concerns: We question the real purpose of the study as it appears to be nothing more than an attempt to justify the proposed campground reorganization plans, the proposed residential development and plans for private shoreline structures like PRIVATE DOCKS for the express use of the new lot owners.	Comment noted.	171
	When we all purchased our properties, we realized that we are NOT purchasing "lakefront" or "shoreline" properties, and hence we had no "exclusive rights of use" to the shoreline, as FERC License dictates that is it to be managed for the benefit of the public. Anything happening on the project lands is supposed to "protect and enhance the scenic, recreational, and environmental values of the project", and be for the benefit of the public.	Comment noted.	172
	Given that the study was conducted during such a short period of time, during only a several week period in the late spring/early summer, we believe that it is inadequate and does not represent an accurate picture of these flowages. At this early time in the season, many species of flora and fauna were not emergent at that time. These studies cannot qualify in any sense of the imagination as a comprehensive EIS of any kind. Such a short "snap-shot" cannot possible be complete as it does not take into account any yearly or seasonal variations and we believe many wildlife species were over looked, missed altogether, miscounted, and ignored.	We disagree. Assessments were conducted on 27 days over a five-month period.	173
	The invasive species known as Rusty Crayfish was not even noted in summary for Bond Falls Flowage. As Bond Falls Landowners we have documents the presence of Rusty Crayfish with the resource agencies, and we have noted their presence at Bond for at least the last 20 years. This destructive species is very prominent and we question how EPRO could overlook or discount something so obvious and important. This makes us question what else has been overlooked, omitted, miscounted, discounted or ignored.	See response ID 72.	174
	We question the methodology used in the study, and whether it can be actually considered "valid" as actual "scientific data" vs. what appears to be no more than "subjective observations: from a quick boat ride and walk around to try and document how PUBLIC USE has been so detrimental and caused so much "erosion" on the flowage. Interesting that the E/PRO assessment credits very little to the fluctuating water levels caused by the inherent way that UPPCO/WPS manages this hydro project.	As identified in the agency-reviewed scope of work, the objective of the recreation assessments was to review and map existing recreation facilities within the project boundary. The reports have been revised to remove all references to probable causes of erosion.	175
	We believe more weight should have been given to the historical fact that UPPCO/WPS fluctuates the water levels greatly and we question why the EPRO surveys for the most part overlook and minimize this fact.	Water level fluctuations within the impoundments are approved license conditions of the respective FERC licenses. The approved scopes of work never contemplated modifying existing water level license conditions.	176
	A visual observation of certain sites and then a subjective assumption such as the probable causes of erosion is not very scientific and tells you nothing about how many people actually use each site. Interestingly enough none of the notes in the survey eluded to deer or other wildlife and pathways they make to the water which can also cause "compaction" and "erosion" or "sedimentation" of the sites.	See response ID 20.	177
	A more scientific assessment would have included a look at the campground log records of the actual usage. It is our observation that most campers are conscientious and cause very little impact.	As identified in the agency-reviewed scope of work, the objective of the recreation assessments was to review and map existing recreation facilities within the project boundary, not to	178

		review and document campground usage.	
	Lets see some, "real", "authentic" data, not your qualitative analysis which amount to nothing more than subjective personal opinions on the part of the E/PRO surveyors. With the methodology used, there was a great chance things could be missed and/or omitted with the claim the "We weren't looking for that." We demand to see quantitative scientific data!	The methodologies to review and map existing recreation facilities within the project boundary were reviewed and approved by the state and federal agencies consulted with for managing recreation resources.	179
	When we questioned the methodology used regarding "Aesthetic Values" with UPPCO and EPRO at the PUBLIC MEETINGS, we were told that neither of you had ANY plans to actually survey or poll or question any of the "ACTUAL USERS" of these flowages, to see which attributes they value!	Since that time numerous users have been interviewed. The reports have been revised to include this information.	180
	If you REALLY wanted to know who uses and values these flowages and why, you could have very easily researched your data and surveyed campers, visitors to the State Park and Falls, and even visitors who used the day-use area especially on busy weekends and holidays like this past July 4, when the flowage was at peak with hundreds of users present for you to poll. Why did you not do this? It appears that no data was used from campground logs regarding campground usage by site. This would have give a more accurate idea of who uses these campsites, which sites are the most popular and why, and which ones subsequently get the most use and have the most "aesthetic value" to the public. We believe your data is flawed, incomplete and unscientific.	See response ID 180.	181
	We believe the assessments for these flowages should include the environmental impacts of the proposed residential developments and proposed plans for "non-project use of project lands" which does not appear to be compliant with the FERC License. We urge FERC to force UPPCO to follow the section 5.4 handbook process and initiate a new and comprehensive environmental impact study that accounts for seasonal variations in the flora and fauna, recreational uses, aesthetic values and the impact of the proposed non-project use of project lands.	See response ID1.	182

UPPCO Response to Comments on
Assessment of the Recreation, Wildlife, Loon, and Aesthetic Resources of the Bond Falls, Boney Falls, Victoria, Prickett, Cataract, and Au Train Impoundments
March, 2007

Commenting Entity	Comment	UPPCO/EPRO Response	Response ID
Doug Scheuneman **September 5, 2006**	The Alger County Fish and Game Alliance has read thru comments made by the Michigan Hydro Relicensing Coalition to your company and FERC on August 28, 2006 regarding the Environmental Baseline Assessments conducted by EPRO Consulting on your firm's behalf. Our organization is extremely concerned that these studies were too superficial and lacked the necessary intensity to provide the type of information that will be necessary for lifelong decisions to be made regarding non-project use of project lands. Although we certainly agree that your firm should be able to see your non-project lands, we are very concerned that whatever you ask to do within the project boundaries will have a negative effect on all current recreational users of the project lands. From here forward all of my comments will be restricted to the Au Train Basin Hydro site (#10856): The study of the Au Train Basin was too broad for this large flowage, it only skimmed the surface. The time period of the EPRO work was not only short in duration but was taken at a period when "normal" recreation use was at a minimum compared to other months. While there were some fishermen and a few campers, peak use of the campgrounds does not occur until after the first of July.	Comment noted.	183
	Perhaps the most significant use of shoreline (project) land areas, along this impoundment, is waterfowl hunting and bird watching during the fall migration. From Sept. 1 through the first two weeks of November use of project lands, on both sides of this flowage, peaks. Other important recreational uses of project lands such as sightseeing, hiking, and canoeing or kayaking occur mainly from spring thru fall. However, there is some winter ice fishing and snowmobiling. All of these could be negatively impacted by non-project lands and nothing was covered in the EPRO study to address this issue.	See response ID 1.	184
	The problem this year in the Basin for trying to study recreation use in all seasons, is that the present drastic "drawdown", for whatever reason, has altered and even eliminated a lot of the "normal" recreational use of the impoundment.	Comment noted.	185
	We suggest that additional studies be set up for next year, if normal water levels permit, to measure the current recreational use of the Basin. Then perhaps intelligent decisions can be made regarding the real impact that non-project uses of project lands of this flowage will have on all recreational users. Then, and only then, can a sound SMP be written for the Au Train Basin. A plan that will insure any shoreline development occurring within project boundaries be consistent with the requirements and purposes of the Federal License that is in place for this Hydro site.	Comment noted.	186

Attachment 58
Mid-April 2007
COMMENTS RECEIVED FROM PUBLIC MEETING

Comments on Shoreline Management Plan

The 200' buffer, is it an average [redacted] distance or a consistent 200'?

Name: Rusty Allerton
Address: E 5121 Bobs Trail, Manning 49736
Phone:

Comments on Shoreline Management Plan

Trails should be kept to a width of approx. 4' and with minimal disturbance to the natural aspect of the land.

Name: Rusty Allerton
Address:
Phone: MUNISING

Comments on Shoreline Management Plan

What is your projected timetable for restoring the water level on the Hiawatha Impoundment?

Are there Eagle Nesting sites impacted. What is their proximity to Lakeshore?

Name: Keith E. Ford
Address: N-5762 Blumenau Dr Manistique
Phone: 906-341-5954

Comments on Shoreline Management Plan

What are the economic benefits of UPPCO selling their Non Project Land? Was UPPCO's non-project land public or private property prior to the decision to sell?

Name: Jessica Brown-Kobela
Address: Marquette
Phone: 906-360-0272

Comments on Shoreline Management Plan

Would the Au Train Project have the same positive impact on local school districts as the Bond Reservoir Project is proving to have on the Twin Trout Creek School District?

Name: Maggi Brown/S.O.S. Save Our Scenic Northern Forests
Address: P.O. Box 11 Trout Creek
Phone: 906-365-0061

Comments on Shoreline Management Plan

What % of the shoreline around the Au Train Basin will be left open for recreation. Also what is the amount of shoreline that is included in the Au Train Project Land?

Name: Maggi Brown/S.O.S. Save Our Scenic Northern Forests
Address: Ironwood
Phone: ~~906-932-2363~~ 906-575-3515

Comments on Shoreline Management Plan

What Protections/Restrictions has UPPCO included in their draft SMP to protect the environment?

Name: Cindy Ellsworth (Munising SDS)
Address: Morrisdatter (Lake Gogebic)
Phone: 575-3448

Comments on Shoreline Management Plan

Will UPPCo be responsible for access roads into primary recreation areas?

Will UPPCo maintain an eradication program for Garlic Mustard? (on FERC lands)

Name: Cold Springs Forestry / Chris Fink
Address: E5539 Woodland Ave, Au Train MI 49806
Phone: 906-892-8665

Comments on Shoreline Management Plan through the SMP

The continuous trail proposed to encircle the basin will negatively affect species sensitive to fragmentation / ~~human~~ intrusion within the conservation zone. ~~Trail~~ should be placed outside of these zones at a habitat interface

Name: Scott Hickman
Address: N9550 Shore Drive, Au Train, MI
Phone: subscribe@hotmail.com

There are at least 22 species of birds considered to be either highly imperiled, of continental importance, of conservation concern, or at risk by the USFWS, DNR, USFS, or U.S. shorebird conservation Plan (list available on request) using the south end of the basin of the adjacent DNR waterfowl refuge. ~~Would it be possible~~ Given the biological significance of this area, michigan's current financial problems, & UPCO's public responsibilities, would ~~it~~ UPCO be willing to donate the south basin lands to the DNR, or sell them on a very long term contract to the DNR?

Scott Hickman
N9550 Shore Dr
Au Train, MI 49806
Subeskipper4@gmail.com

Comments on Shoreline Management Plan

The conservation areas of the SMP will be ineffective if development immediately outside them (land potentially to be sold) is not controlled/prohibited. Do SMP designations, conservation designations in particular, restrict the development allowed immediately outside their boundary?

Name: Scott Hickman
Address: N9570 Shore Dr. Au Train, MI 49806
Phone: Subsine@hotmail.com

Comments on Shoreline Management Plan

What kind of recreational enhancements have been included in the Au Train SMP?

Name: Mary Hintze (memorial S.O.S.)
Address: Burgland
Phone: 906-575-3561

Comments on Shoreline Management Plan

Will the water front shore lines of the APCC Project lands remain open to the public after APCC sells it to "non-Project" land? Will there be a number of different access points available to the public?

Name: Mary Hintze (memorial S.O.S.)
Address: Au Train
Phone: 575-3561

Comments on Shoreline Management Plan

Reference 26 Road Access -
The Alger County Road Commission maintains 26 Road the possibility of excess use of 26 Road for Basin Access could be of interest to the Rd. Commission

Name: Douglas L Miron Chair
Address: Alger County Rd Commission
Phone: 906 387 3042

Comments on Shoreline Management Plan

Referring to Roads within the proposed Basin Project - The developer should contact the Alger County Road Commission with any design plans for Roads And if they are interested in those projected Roads being within Our system

Name: Douglas L Miron Chair
Address: Alger County Road Commission
Phone: 906 387 3042

Comments on Shoreline Management Plan

[illegible]

Name: ROBERT [illegible]
Address: [illegible]
Phone: [illegible]

Comments on Shoreline Management Plan

Where does UPPCO get their ideas from when considering enhancements to be included in their draft SMP?

Name: Debi Ralston (Member of SOS)
Address: Lake Gogebic
Phone: 906-285-0077

Comments on Shoreline Management Plan

Will all of the property that UPPCO sells from the various projects across the U.P. be classified as residential or will there be some that will be available for "commercial"?

Name: Bill Ralston
Address: Bond/Victoria Project Area
Phone: 906-575-3222

Comments on Shoreline Management Plan

Appr 25% of the land included in the Ontonagon Project are classified as "conservation" What does that mean and how does UPPCO insure that?

Name: Bill Ralston (Member of SOS)
Address: Lake Gogebic (Bond Project Area)
Phone: 906-285-0077

Attachment 59
April 13, 2007 – May 21, 2007
EMAIL CORRESPONDENCES

Wolfe, Janet

From: webcommentform@uppac.com
Sent: Sunday, April 15, 2007 1:15 PM
To: Wolfe, Janet; alwarren@jamadots.com
Subject: UPPCO Shoreline Management Plan Comments

This E-mail contains comments regarding Projects 1864, 2402, 2506, 10856, 10854

Registration?
Name? Karin Andrus
Address? 13888 Cemetery Road
City? Bruce Crossing, MI 49912
State?
Zip code?
E-mail? bambam4@jamadots.com
Phone Number? (906) 827-3489
Post Comments on web site? yes

Comments? I grew up camping on Bond Lake, so did my children. It is a tragedy that the next generations of my family will have to miss out on this experience. Bond will never be the same again because of greed and lies. Let the buck$ stop here...NO DOCKS, I like Bond just the way it is.....

Wolfe, Janet

From: webcommentform@uppac.com
Sent: Sunday, April 15, 2007 2:39 PM
To: Wolfe, Janet; alwarren@jamadots.com
Subject: UPPCO Shoreline Management Plan Comments

This E-mail contains comments regarding Projects 1864, 2402, 2506, 10856, 10854

Registration?
Name? Wade Fleming
Address? 13888 Cemetery Road
City? Bruce Crossing, MI, 49912
State?
Zip code?
E-mail? wadefleming@hotmail.com
Phone Number? 906-235-0666
Post Comments on web site? yes

Comments? NO DOCKS, NO WALK WAYS, NO LIGHTED PATHS, I like Bond just the way it is! I liked the dispersed campsites.....don't care much for the new and improved.

Wolfe, Janet

From: webcommentform@uppac.com
Sent: Sunday, April 15, 2007 7:29 PM
To: Wolfe, Janet; alwarren@jamadots.com
Subject: UPPCO Shoreline Management Plan Comments

This E-mail contains comments regarding Projects 1864, 2402, 2506, 10856, 10854

Registration?
Name? Kelly Niemi
Address? 1117 Palmer
City? Miles City
State? MT
Zip code? 59301
E-mail? kniemi@midrivers.com
Phone Number? 406-234-8084
Post Comments on web site? yes

Comments? Bond Lake will never be the same after development. Can we preserve some serenity? Docks and lighted pathways will take away the last of any remaining serenity this haven held.

Wolfe, Janet

From: webcommentform@uppac.com
Sent: Monday, April 16, 2007 12:04 AM
To: Wolfe, Janet; alwarren@jamadots.com
Subject: UPPCO Shoreline Management Plan Comments

This E-mail contains comments regarding Projects 1864, 2402, 2506, 10856, 10854

Registration?
Name? Teresa Davis
Address? 5755 Antilles Dr.
City? Sarasota
State? FL
Zip code? 34231
E-mail? keysumland@aol.com
Phone Number? 941-894-0909
Post Comments on web site? yes

Comments? To whom this may concern: I am agains the development of Bankd Falls. The docks and lights the prospective buyers want to put in will ruin the lake for the rest of the users. Although from what I understand you don't really care about the people thave raised their families on the lake. Me being one of thousands.

Wolfe, Janet

From: webcommentform@uppac.com
Sent: Tuesday, April 17, 2007 10:14 AM
To: Wolfe, Janet; alwarren@jamadots.com
Subject: UPPCO Shoreline Management Plan Comments

This E-mail contains comments regarding Projects 1864, 2402, 2506, 10856, 10854

Registration?
Name? Jon and Norma Miller
Address? 14715 US 45
City? Bruce Crossing, MI 49912
State?
Zip code?
E-mail? bambam4@jamadots.com
Phone Number? 906 827 3558
Post Comments on web site? yes

Comments? We like Bond Lake the way it is. This area will not benefit from lakes like the ones in the lower peninsula. Traverse City is a jungle. NO DOCKS, NO LIGHTS, NO WALKWAYS.....

Wolfe, Janet

From: webcommentform@uppac.com
Sent: Thursday, April 19, 2007 11:56 AM
To: Wolfe, Janet; alwarren@jamadots.com
Subject: UPPCO Shoreline Management Plan Comments

This E-mail contains comments regarding Projects 1864, 2402, 2506, 10856, 10854

Registration?
Name? Wade Fleming
Address? 13888 Cemetery Road
City? Bruce Crossing,MI.499112
State?
Zip code?
E-mail? wadefleming@hotmail.com
Phone Number? 235-0666
Post Comments on web site? yes

Comments? Bond should be left the way it is! There shouldn't be any houses, docks, paths! By putting four hundred some houses on Bond, will destroy the lake for everyone! Do you really think this will bring business to the area will it might bring some but, most of those people would probably much rather to go shopping in Eagle River! Most of them will probably go eat in Land 'O' Lakes!

Wolfe, Janet

From: webcommentform@uppac.com
Sent: Monday, April 23, 2007 10:33 AM
To: Wolfe, Janet; alwarren@jamadots.com
Subject: UPPCO Shoreline Management Plan Comments

This E-mail contains comments regarding Projects 1864, 2402, 2506, 10856, 10854

Registration?
Name? L. Ursin
Address? 6 Clearwater Court
City? Lake Zurich
State? IL
Zip code? 60047
E-mail? lursin@klaucens.com
Phone Number?
Post Comments on web site? no

Comments? I find the proposed dock plan for Bond Falls to be totally unacceptable. The idea of 424 boat slips on land that is supposed to be managed for the public is not my idea of managing the land for the public. Nor is having homes ringing the lake managing the land for the public. Nor is turning wilderness camping into camping with your neighbor right next to you managing land for the public. In fact, there is no part of your plan that takes anyone's interests into account except for UPPCO's.

Wolfe, Janet

From: webcommentform@uppac.com
Sent: Saturday, April 28, 2007 10:21 PM
To: Wolfe, Janet; alwarren@jamadots.com
Subject: UPPCO Shoreline Management Plan Comments

This E-mail contains comments regarding Projects 1864, 2402, 2506, 10856, 10854

Registration?
Name? Wade Fleming
Address? 13888 Cemetery Road
City? Bruce Crossing,MI,49912
State?
Zip code?
E-mail? wadefleming@hotmail.com
Phone Number? 906-235-0666
Post Comments on web site? yes

Comments? NO docks,no paths, no lights

Wolfe, Janet

From: webcommentform@uppco.com
Sent: Monday, May 07, 2007 11:04 PM
To: Wolfe, Janet; alwarren@jamadots.com
Subject: UPPCO Shoreline Management Plan Comments

This E-mail contains comments regarding Projects 1864, 2402, 2506, 10856, 10854

Registration?
Name? Darren Yirek
Address? 2405 Criswell Blvd
City? Beloit
State? WI
Zip code? 53511
E-mail? darrenyirek@charter.net
Phone Number? 608-295-9311
Post Comments on web site? yes

Comments? I/We have seen it time and time again. The bottom line is money. As long as "they" can turn a profit, there isn't any concern what happens to the landscape, wildlife, or serenity of this lake, or any other lake/property like it. They will conduct tests, and justify any environmental impacts, but the bottom line is the serenity of the lake will suffer no matter what they say or test. You can never get serenity or pristine shorelines back once humans dig in. We are the only species that has to protect ourselves, from ourselves, when it comes to greed. We have been raised to believe that making money by clearing and cutting Mother Earth is a good thing, a good idea, a good business venture. Since money is the driving force, it is near impossible to get an American business man to reverse his way of thinking when it comes to this topic. They believe the earth is here to bow down to them. During their working lives they (construction companies, real estate companies, etc) will try to make as much as possible off our planet to provide for their own needs and desires, and it gets justified as "good development oppurtunity". When does it stop?

Name: Mr. James A Pietila
Company Name:
Address: 8890 Della drive
City: Woodruff
State: WI
Zip Code: 54568

Account Number:

E-mail Address: jim.pietila@bcpl.state.wi.us Home Phone: (715) 356-7076 Work Phone: (715) 277-3366 Cell Phone: ( ) -

Contact By: Email

Comments: Comments regarding docks at
Bond Falls flowage. Please, no docks!!!

Wolfe, Janet

From: webcommentform@uppac.com
Sent: Friday, May 11, 2007 8:45 AM
To: Wolfe, Janet; alwarren@jamadots.com
Subject: UPPCO Shoreline Management Plan Comments

This E-mail contains comments regarding Projects 1864, 2402, 2506, 10856, 10854

Registration? project 1864
Name? Bret Hautamaki
Address? 20065 Silver Creek Terrace
City? Ashburn
State? VA
Zip code? 20147
E-mail? bhautama@umich.edu
Phone Number? 734-709-1738
Post Comments on web site? yes

Comments? As a major landowner/taxpayer in both Inerior & Haight townships, I am adamantly opposed to any development on project lands as proposed by the UPPCO SMP. It is in obvious conflict with the provisions of the FERC license agreement and poses a significant danger to a federally protected watershed and ecoeystem. At a minimum, an independent, biologically-sound, environmental impact study should be mandated before any consideration be given. Please - "do the right thing".

Wolfe, Janet

From: webcommentform@uppac.com
Sent: Monday, May 14, 2007 10:17 AM
To: Wolfe, Janet; elwarren@jamadots.com
Subject: UPPCO Shoreline Management Plan Comments

This E-mail contains comments regarding Projects 1864, 2402, 2506, 10856, 10854

Registration?
Name? Jennifer Tyminski
Address? 9118 Seminole
City? Redford Township
State? MI
Zip code? 48239
E-mail? jentyminski@hotmail.com
Phone Number? 313-715-8845
Post Comments on web site? yes

Comments? Questions:
Is the map that shows the lots at Bond Falls & posted to the uppac website accurate?

If yes, why wasn't it made available to the public by UPPCO?

Why haven't we seen the development plans for the other flowages where land has been so to Naterra?

If this map is not accurate, when will UPPCO release the preliminary development plans the lakes where land has been sold?

Whether or not the map is accurate, we all know the land will be developed. Why hasn't the impact the proposed development and private uses of the project lands will have on water quality been addressed in the draft Shoreline Management Plan.

Even though several of the lakes flow into rivers designated under the Wild & Scenic Rivers Act, the Draft SMP indicated that no special studies were planned because the flowages are not designated. This appears to be in conflict with the Wild & Scenic Riv Act & I believe the issue of water quality as it pertains to these rivers must be addressed.

Thank you
Jennifer Tyminski
jentyminski@hotmail.com

1

Wolfe, Janet

From: webcommentform@uppac.com
Sent: Monday, May 14, 2007 1:12 PM
To: Wolfe, Janet; atwarren@jamadots.com
Subject: UPPCO Shoreline Management Plan Comments

This E-mail contains comments regarding Projects 1864, 2402, 2506, 10856, 10854

Registration?
Name? Katie Alvord
Address? PO Box 516
City? Houghton
State? MI
Zip code? 49931
E-mail? ktalvord@myvine.com
Phone Number? 906-482-4364
Post Comments on web site? no

Comments? I STRONGLY OPPOSE CONSTRUCTION OF DOCKS as proposed by Upper Peninsula Power Company at Prickett Lake, Victoria, Au Train, Cataract, Boney Falls, and Bond Falls sit A full and adequate environmental impact report should be required of UPPCO in this matter.

Wolfe, Janet

From: webcommentform@uppco.com
Sent: Tuesday, May 15, 2007 5:51 PM
To: Wolfe, Janet; alwarren@chadbourne.com
Subject: UPPCO Shoreline Management Plan Comments

This E-mail contains comments regarding Projects 1864, 2402, 2506, 10856, 10854

Registration?
Name? Darren Yirek
Address? 2405 Criswell Blvd
City? Beloit
State? WI
Zip code? 53511
E-mail? darrenyirek@charter.net
Phone Number? 608-295-9311
Post Comments on web site? yes

Comments? It is beyond me how people can destroy our landscapes, environment, and our serenity all for the love of money. Once you start digging, thats it, you have taken another piece of our northwoods away forever. Money comes and goes, but what you are proposing is final and permanent. How can you think that what you are doing is "good business" or a "nice development". It is money, and thats all it ever is, it has to be No one who visits or lives in that area wants this, and if they don't then who does? Th people who it means the least to are the ones who will be developing, and those people just follow the stench of money. We are at a very critical point with our (northwoods) environment, as well as the entire planet itself. If these developments don't happen, then what, someone doesn't get the new Benz they've been eyeing. This whole thing stin of greed. If these plans go through I hope those reponsible can answer for themselves t our children and their children. Maybe the responsible party can give them a new car o something shiny, because thats what all this is about. You are not fooling anyone.

Wolfe, Janet

From: Chris Gale [cbgale@up.net]
Sent: Wednesday, May 16, 2007 10:08 AM
To: Wolfe, Janet
Subject: UPPCO impoundment sites

Janet: I have lived in the UP for nearly 40 years. My family has owned property in this area for nearly a hundred years. I have had the good fortune of being able to have access to the various impoundments within an hour or two of where I live, to go hiking, camping, fishing, boating, and picnicking with my family. The presence of docks at these locations for the benefit of a few, and to the detriment of all, is a bad idea. Removal of stumps which provide safe refuge for fish and other water-based wildlife is a mistake.

I understand the temptation to develop these lands in the short run for much needed funding to support power generation, but again, this is a bad idea. I am ready to pay for the true cost of energy, to keep what we have. As humans, we are simply the "owners" of the land for a very short time. We have a responsibility to be good keepers of the land. Think about the generations to come, the generations who have benefited to date, and what you want to leave as your own personal legacy. I cannot believe that the legacy thet you, or anyone at UPPCO wishes to leave to future generations is the destruction of the waterfront and wildlife by a few who want docks and clear boating. Chris.

Christopher Gale
Buell Consulting, Inc.
54410 Old County Road
Calumet, MI 49913
Ph. 906-281-2161
FAX 906-337-6276
email: cbgale@up.net

Wolfe, Janet

From: Matt Van Grinsven [jehrift@hotmail.com]
Sent: Wednesday, May 16, 2007 11:35 AM
To: Wolfe, Janet
Subject: Comments on the Shoreline Management Plan

Fragmentation of wild area begins with seemingly small scale development. Collectively these individual development projects lead to more and more alteration of suitable habitat. Shoreline development will have dramatic impacts on wild game such as fish and birds, which brings in money to local economies. Shorelines are incredibly productive providing food and shelter for a diverse array of wildlife including loons, wood turtles, eagles, and sturgeon just to name a few. I strongly oppose construction of docks and all associated development proposed by the Upper Peninsula Power Company at Prickett (# 2402), Victoria (# 1864), Au Train (# 10856), Cataract (#10854), Boney Falls (#2506) and Bond Falls (# 1864) sites. Providing access to the general public to appreciate such areas is quite different than catering to large scale developers, who will potentially rid these areas of the very wildlife which attract people to these places. Environmental Assessment should be required of UPPCO, as I do not believe the Shoreline Management Plan is enough to ensure that these areas are properly managed and protected.

Matt Van Grinsven
237 Wright St. Apt. #3
Hancock MI, 49930

Wolfe, Janet

From: Elaine Dougovito [eladoug@up.net]
Sent: Wednesday, May 16, 2007 5:44 PM
To: Wolfe, Janet
Subject: Plea

Please consider leaving Prickett Dam and Bond Falls as is. It is a beautiful pristine area and it would be nice if it could stay that way. If you must sell it for financial gain, consider an agency who would not develop it. Thanks for your consideration. Elaine Dougovito, East Shoreline L'Anse Bay, 16683 Bayshore Rd. L'Anse, MI 49946

Wolfe, Janet

From: webcommentform@uppec.com
Sent: Wednesday, May 16, 2007 7:06 PM
To: Wolfe, Janet; alwarren@jamadots.com
Subject: UPPCO Shoreline Management Plan Comments

This E-mail contains comments regarding Projects 1864, 2402, 2506, 10856, 10854

Registration?
Name? Thomas Hovel
Address? 6112 Creamery Court
City? McFarland, WI 53558
State?
Zip code?
E-mail? bearcub41@verizon.net
Phone Number? 608-838-3985
Post Comments on web site? yes

Comments? Dear Sir/Madam:

Please note my opposition to the development of current UPPCO/WPS property along or near the Bond Falls Flowage. In a time of rising energy costs, increased loss of natural teh natural enviornment due to development, and a decline in the overall quality of water resources, it appears that any typical ex-urban development will only exacerbate the destruction of the precious enviornment that is presented by the Bond Falls flowage. While much of the falls has been already effected by human's to produce energy, that should not provide any impetus to further effect the land area.

Instead, I would suggest, thet if development is to occur, a small eco-frendly development on a small amount of acreage that could he used as a model for other development. The development could be accomplished in accord with the new standards being developed by LEEDS. With such a development you can develop a small area, say 80 or less acres, and yet the enviornment remains protected and the resources remain in a viable long lasting manner.

Wolfe, Janet

From: webcommentform@uppac.com
Sent: Thursday, May 17, 2007 6:20 AM
To: Wolfe, Janet; alwarren@jamadots.com
Subject: UPPCO Shoreline Management Plan Comments

This E-mail contains comments regarding Projects 1864, 2402, 2506, 10856, 10854

Registration?
Name? Jim Tyminski
Address? 9364 Tecumseh
City? Redford Township
State? MI
Zip code? 48239
E-mail? jimtyminski@hotmail.com
Phone Number? 313-937-8845
Post Comments on web site? yes

Comments? After reading the Draft Shoreline Management Plan, I am very upset to see that you are still planning for private lighted docks, pedestrian paths and at some flowages viewing corridors. I believe these uses will destroy the aesthetic qualities of these lakes and project lands. The shorelines should remain undisturbed.

Wolfe, Janet

From: webcommentform@uppac.com
Sent: Thursday, May 17, 2007 7:11 AM
To: Wolfe, Janet; alwarren@jamadots.com
Subject: UPPCO Shoreline Management Plan Comments

This E-mail contains comments regarding Projects 1864, 2402, 2506, 10856, 10854

Registration?
Name? Suzanne Tyminski
Address? 9364 Tecumseh
City? Redford Township
State? MI
Zip code? 48239
E-mail? styminski@hotmail.com
Phone Number? 313-937-8845
Post Comments on web site? yes

Comments? I am opposed to all private uses of the project lands, including lighted docks and paths. These paths, while technically "open to the public" will lead from the new lot owners private property to a private lighted dock. I do not support a public trail around the flowage. I believe it will only further fragment wildlife habitat.

Wolfe, Janet

From: webcommentform@uppac.com
Sent: Thursday, May 17, 2007 6:32 AM
To: Wolfe, Janet; alwarren@jamadots.com
Subject: UPPCO Shoreline Management Plan Comments

This E-mail contains comments regarding Projects 1864, 2402, 2506, 10856, 10854

Registration?
Name? Kenneth Kraft
Address? 41209 Pike River Road
City? Chassell
State? MI
Zip code? 49916-9307
E-mail? kkraft@portup.com
Phone Number? 906 523 4748
Post Comments on web site? yes

Comments? The decision to consolidate the public campgrounds was made without public input. The elimination of the dispersed campsites and campground redesign should be re-evaluated as part of the Shoreline Management Plan process. It should be a campsite design that most benefits the public.

I am opposed to any private lighted individual and cluster docks or viewing corridors at any of the flowages. None of these activities is consistent with the current license.

I want the Federal Energy Regulatory Commission to order a new Environmental Impact Study to assess the full impact of this development on the project lands.

Registration?
Name? Raymond DaPra
Address? P.O. Box 83
City? Ironwood
State? MI
Zip code? 49938
E-mail? milo@portup.com
Phone Number? 906-932-0374
Post Comments on web site? yes

Comments? After reading the Draft Shoreline Management Plan, I am very upset to see that you are planning for private lighted docks, trails and pedestrian paths at all the six flowages. I do not support the storage of boats on the projects land or viewing corridors. I believe these uses will destroy the aesthetic qualities of these lakes and project lands. These uses are consistent with the license since the intent of the bufferzone is to protect these areas. The shorelines should remain undisturbed.

Wolfe, Janet

From: webcommentform@uppac.com
Sent: Thursday, May 17, 2007 8:22 AM
To: Wolfe, Janet; alwarren@jamadots.com
Subject: UPPCO Shoreline Management Plan Comments

This E-mail contains comments regarding Projects 1864, 2402, 2506, 10856, 10854

Registration?
Name? Pat Olejniczak
Address? 9375 Beech Daly
City? Redford Township
State? MI
Zip code? 48239
E-mail? polenick1960@hotmail.com
Phone Number?
Post Comments on web site? yes

Comments? I am not impressed with UPPCO's increased 'conservation areas'. It is just an attempt to mitigate damage caused by private docks as well as trails and viewing corridors. I cannot support private docks on the project lands. Have any of the folks involved ever stopped even if for just a moment to think about the disruption of wildlife?

Wolfe, Janet

From: Lynette Potvin [lrpotvin@mtu.edu]
Sent: Thursday, May 17, 2007 1:17 PM
To: Wolfe, Janet
Subject: Comments on Shoreline Management Plan

Janet Wolfe
Communications Manager
UPPCO
PO Box 130
Houghton, MI 49931-0130

I STRONGLY OPPOSE CONSTRUCTION OF DOCKS as proposed by Upper Peninsula Power Company at Prickett (Project No. 2402), Victoria (Project No.1864), Au Train (Project No.10856), Cataract (Project No.10854), Boney Falls (Project No. 2506), and Bond Falls (Project No.1864) sites. Given the complexity of this issue and the limited scope of the Shoreline Management Plan an Environmental Assessment should be required of UPPCO in this matter.

Sincerely,

Lynette Potvin
45304 Superior Rd
Houghton, MI 49931

MS candidate Forest Ecology and Management School of Forest Resources and Environmental Sciences Michigan Technological University

Wolfe, Janet

From: test [ngatta@jamadots.com]
Sent: Thursday, May 17, 2007 7:53 PM
To: Wolfe, Janet
Attachments: "AVG certification"

Dear Ms. Wolfe:

Please support the docks proposal for the Bond Falls development. As a teacher at Ewen-Trout Creek School, I see this development as a boon to our economy and to our school. The tax revenues generated by this can help save E-TC School, but without the docks, I cannot imagine that the land will look as attractive to potential buyers.

Thank you for your time.

Nancy Gatta

Wolfe, Janet

From: Elaine Dougovito [eladoug@up.net]
Sent: Wednesday, May 16, 2007 5:44 PM
To: Wolfe, Janet
Subject: Plea

Please consider leaving Prickett Dam and Bond Falls as is. It is a beautiful pristine area and it would be nice if it could stay that way. If you must sell it for financial gain, consider an agency who would not develop it. Thanks for your consideration. Elaine Dougovito, East Shoreline L'Anse Bay, 16683 Bayshore Rd. L'Anse, MI 49946

Wolfe, Janet

From:	webcommentform@uppsc.com
Sent:	Friday, May 18, 2007 9:22 AM
To:	Wolfe, Janet; alwarren@jamadots.com
Subject:	UPPCO Shoreline Management Plan Comments

This E-mail contains comments regarding Projects 1864, 2402, 2506, 10856, 10854

Registration?
Name? Roseanna Larrin
Address? 7998 1 1.2 Mile Road
City? Trout Creek
State? MI
Zip code? 49967
E-mail? rlarrin@nmu.edu
Phone Number? (906) 852-3224
Post Comments on web site? yes

Comments? The SMP meeting held at E-TC school was the first UPPCO public meeting that I have attended and it was very disappointing. We are used to having public meetings with some kind of open forum and the way you conduct your public meetings is very controlled. Obviously, you do not want to hear what the public has to say through an open forum. I assure you we can conduct ourselves as responsible, calm adults. Demanding that we write out questions on cards allowing you to choose which questions you answer or which part of the questions you answer is not having an open, public meeting. It is manipulative and just another way to control information— a symbol of the low regard you have for the people of this area to make informed, reasonable and rational decisions.

The SMP report itself is full of "carrots," what you think the people of this area would respond to. But, it is things that people like you and people who will be purchasing those lots, urban people, think are fine ideas. Many of us do not feel this way. We like Bond Lake as it is now, in its natural state. The things you are planning are things that may be found on any developed lake, any place in America. Bond Lake, as it is now, is not.

And, of course, everything that you are planning enhances the area for the urban people Naterra plans on enticing up here, as well as adding to your $3 million contingency fee from Naterra. It is reprehensible that you represent these plans as "for the locals" when they are no such thing.

Your doublespeak is also demeaning. For example, referring to groups of docks as "cluster docks" is ridiculous—we recognize a planned marina when we see one.

E-PRO's environmental study is flawed in major areas. I suspect that WhiteWater's is not. Please urge Naterra to release that environmental study to the public. A reality check is in order.

Wolfe, Janet

From: webcommentform@uppco.com
Sent: Friday, May 18, 2007 9:25 AM
To: Wolfe, Janet; alwarren@jamadots.com
Subject: UPPCO Shoreline Management Plan Comments

This E-mail contains comments regarding Projects 1864, 2402, 2506, 10856, 10854

Registration?
Name? Tim Krause
Address? 38585 Asbury Park
City? Clinton Township,
State? MI
Zip code? 48036
E-mail? krausemom78@hotmail.com
Phone Number?
Post Comments on web site? yes

Comments? My family for three generations have enjoyed the Bond Falls Flowage as area land owners and admirers of the natural beauty it holds. My father started coming here in the early 1950's, first hunting & then vacationing with the family, eventually buying property to insure his children & grandchildren would always enjoy this area. Now I feel the same way & my children do too. We have come to love the area, having camped & viewed the falls for 35 years. Now my grandchildren will be deprieved of this because some people want to line their pockets with a get-rich-quick development. This development is going to destroy the beauty of a very serene area that people come from all over the world to see. We need to preserve the natural wild landscape & feel of this area for future generations to enjoy & experience. The falls, lake and land surrounding the lake are rare jewels that can only be found in the UP and when that peaceful quality is gone it is gone, never to be regained though development. The land was to be retained for convervation purposes, not intented for development by a greedy few, who intend to benefit from the destruction of the natural landscape. We hope you will do the right thing & stop this act in destroying the land & instead keep it as is for future generations to come to enjoy.

Wolfe, Janet

From: Northwood Alliance [nwa@nnex.net]
Sent: Friday, May 18, 2007 10:42 AM
To: Wolfe, Janet
Subject: SMP comments

Janet Wolfe
Communications Manager
UPPCO
PO Box 130
Houghton, MI 49931-0130

Dear Ms. Wolfe;

As a coalition of citizens concerned for the integrity and quality of the UPPCO-held project lands surrounding reservoirs in the Upper Peninsula, the Northwood Alliance would like to express deep concern about recently developed Shoreland Management Plans. We feel these plans to be inconsistent with the uses described in the FERC license and unacceptable for maintaining a healthy shoreline that is also conducive to non-intrusive public use.

We strongly feel that these SMPs fail to account for important environmental characteristics of the respective shorelines. For example, the proposed shoreline uses are contradictory to maintaining the old growth forest type called for by the FERC license.
Additionally, in many cases there are no provisions to protect habitat or nesting sites of threatened or endangered species such as osprey or bald eagle. It is also widely demonstrated that human impacts such as clearing and dock building and the traffic that they allow adversely affect riparian areas and lead to erosion, loss of biodiversity, and degradation of water quality.

Proposed developments on project lands such as docks, boat slips, and viewing areas/walking paths for private landowners will inevitably impact the potential for public recreational uses of these reservoir shorelines. Hiking pathways will be impeded or interrupted, wilderness camping opportunities will be diminished, and fishing areas will be restricted. Aside from these concrete and logistic changes, the wilderness atmosphere of the area will be damaged by docks, dock lights, and cleared corridors, as well as the development proposed on the adjoining non-project lands.

The activities outlined in the SMPs do not appear to fit within the current and, in most cases, recently renewed FERC project licenses. The license objectives serve to protect and enhance the environmental, scenic, and recreational values of project lands, and proposed SMP activities on these project lands satisfy none of the above. The management plans in no way describe how docks, view corridors, or increased traffic are consistent with the federal goals for the project lands.

In all, we believe the SMPs for these flowages as they stand to be inadequate and grossly incompliant with the intended uses of these lands.

Thank you for your time and the opportunity to comment on these plans.

Sincerely,

Joe Hovel
Northwood Alliance

6063 Baker Lake Road
Conover, WI 54519

cc. FERC

Wolfe, Janet

From: David Rulison [rulisond@hotmail.com]
Sent: Friday, May 18, 2007 8:26 AM
To: Wolfe, Janet
Subject: dams

Hello Janet,
I would like to take a few moments to comment on UPPCo's proposed development of Prickett Lake and other impoundments in the UP.
Straight out, I think it's a bad idea. I feel like we don't need any more "development" of this type anywhere in the UP, instead we need to preserve and protect more wild places, because we have less and less of them.
I know, from an economic point of view, it seem to make sense, to improve tax revenues, create some jobs, etc, but I think this could be achieved without changing the personality of the area.
If the sale of the lots and the, so called, development is inevetable, then why promote this action only to a high end, noisy, polluting type market?
Instead, why not market it to customer's looking for a beautiful, quiet, low impact setting that it is now, and emphasize the natural characteristic's that currently define it, and write in sales agreements that demand it remain that way.
I feel that your proposals are really out of touch with the current demand for wild places in this county, and world for that matter, and that your short sightedness will result it degradation, not improvment, in the overall quality of life for the UP.
You need not look any further than the Grand Traverse area in the LP, to see what and why these types of actions are needed and necessary, and to see how preservation and development can work hand in hand, to benifit us all.
Thank you for your time.
Sincerely,
Dave Rulison
Pelkie, Mi

Wolfe, Janet

From: kristin tepsa [ktepsa@hotmail.com]
Sent: Friday, May 18, 2007 1:15 PM
To: Wolfe, Janet

Ms. Wolfe

I would like to voice my vehement opposition to UPPCO's proposed development of these sites. I have been fortunate enough to have been able to enjoy visiting these sites and their wild and natural beauty for many decades and hope for my offspring to be able to do the same.

Project No.1864 (Bond and Victoria)
Project No. 2402 (Prickett)
Project No.10856 (Au Train)
Project No.10854 (Cataract)
Project No. 2506 (Boney Falls)

Kristin Tepsa
Houghton, MI 49931

Wolfe, Janet

From: Diane Miller [dimiller@mtu.edu]
Sent: Friday, May 18, 2007 3:46 PM
To: Wolfe, Janet
Subject: UPPCO's plan for development (project numbers 1864, 2402, 10856, 10854, and 2506

I am registering my view on UPPCO's plan to develop lighted boat docks and viewsheds on the area reservoirs. Please do not do this. These lakes are appreciated for their wildness, and to change their character now would pose hazards to wildlife and change the spirit of the places. It would also violate the spirit (and perhaps the letter as well) of your original agreement regarding these properties.

Please allow for the continued protection of these places. Thank you.

Diane Miller

--
Diane Miller
Ph.D. Candidate
Department of Humanities
Michigan Technological University
1400 Townsend Drive
Houghton, MI 49931
(906) 370 1069

"If you can't find the truth where you are, where do you think you will find it?"--the Buddha

Wolfe, Janet

From: webcommentform@uppac.com
Sent: Wednesday, May 16, 2007 9:54 AM
To: Wolfe, Janet; alwarren@jamadots.com
Subject: UPPCO Shoreline Management Plan Comments

This E-mail contains comments regarding Projects 1864, 2402, 2506, 10856, 10854

Registration?
Name? James A. Pietila
Address? 8890 Della Drive
City? Woodruff,
State? WI
Zip code? 54568
E-mail? jim.pietila@bcpl.state.wi.us
Phone Number? 715-356-7076
Post Comments on web site? yes

Comments? Re: Draft Shoreline Management Plan for Bond Falls Flowage. I've read most o. the proposals for development of the flowage & certainly have no real concerns regarding the subdividing of private property. It's your property, do with it as you will. According to my understanding, the shoreline is a different story. The license granted the FERC for impounding of water dictated that the shoreline be used by the public & was signed by UP Power Co. officials and FERC. Now GREED enters the picture & UP Power want to get really rich (as does Natarra). If FERC would allow this change in shoreline management & allow docks of any kind on any of those flowages, it would be just another example of political corruption enhancing the rich. Please don't let this happen!

Wolfe, Janet

From: webcommentform@uppco.com
Sent: Friday, May 18, 2007 4:21 PM
To: Wolfe, Janet; alwarren@jamadots.com
Subject: UPPCO Shoreline Management Plan Comments

This E-mail contains comments regarding Projects 1864, 2402, 2506, 10856, 10854

Registration?
Name? Raymond DaPra
Address? P.O. Box 83
City? Ironwood
State? MI
Zip code? 49938
E-mail? milo@portup.com
Phone Number? 906-932-0374
Post Comments on web site? yes

Comments? After reading the Draft Shoreline Management Plan, I am very upset to see that you are planning for private lighted docks, trails and pedestrian paths at all the six flowages. I do not support the storage of boats on the projects land or viewing corridors. I believe these uses will destroy the aesthetic qualities of these lakes and project lands. These uses are consistent with the licenses since the intent of the bufferzone is to protect these areas. The shorelines should remain undisturbed.

Wolfe, Janet

From: pfredendall [phyllis.fredendall@finlandia.edu]
Sent: Thursday, May 17, 2007 10:38 PM
To: Wolfe, Janet
Subject: lighted docks

Dear Ms. Wolfe,

I would encourage you to rethink the proposed developments on the dam sites Project Numbers 1864, 2402, 10856, 10854, and 2506.

I am particularly opposed to lighting areas that are not now lit. The habit is adversely affected as is for me the most precious and least appreciated asset we are quickly losing on this peninsula - the night sky.

Thank you for your time and consideration.

Phyllis Fredendall
936 Summit Street
Hancock, MI 49930
906-487-9271