

## **APPENDIX F**

# **RESOURCE AGENCIES AND NATIVE AMERICAN TRIBES CONSULTATION DOCUMENTS**

**APPENDIX F**  
**SUMMARY OF DRAFT ENVIRONMENTAL REPORT COMMENTS AND RESPONSES**  
**MCCLURE PENSTOCK REPLACEMENT**

COMMENT NO.	STAKEHOLDER	DATE OF LETTER	COMMENT	RESPONSE
1	Mike Smolinski MDEQ	1-9-09	During the review of the project on site, LWMD made the following findings regarding the need for a permit under Part 301 and 303: A permit is required.	UPPCO will work with the Agency to apply for and obtain the required permits.
2	Steve Casey MDEQ	1-23-09	The report makes no mention of a leak detection system and only mentions the possibility of a remote shut down of the penstock.	Section 3.4.2 in the Draft Environmental Report (DER) acknowledges awareness of the MDEQ concerns and describes UPPCO's proposal. UPPCO will complete a detailed design, which requires review and approval by FERC Dam Safety prior to construction. Flow monitoring instrumentation will be provided in the new penstock system at the upstream and downstream ends of the system to detect differences in flows that would indicate a significant pipe failure. Flow meters will be installed at the upstream end near the intake valve, and the downstream end near the powerhouse. Flow data will be monitored and evaluated, comparing upstream flow measurement to downstream flow measurement. When a significant difference in flow is detected between the two measurements, an alarm will trigger a response. The response could be an emergency call out for inspection an evaluation of further response actions, or the response could be penstock intake valve closure.
3	Brian D. Conway Michigan SHPO	1-27-09	On December 29, 2008 we have received follow-up correspondence from Shawn Puzen at UPPCO, notifying us of a change in the scope of work, which has expanded to include not only the replacement of the steel penstock but also the replacement of the wooden part. Previously encasing the wooden penstock in concrete, thus still leaving it in service, was proposed. The new plan of bypassing the wooden section will leave it abandoned and likely subject to future demolition as a hazard. The surge tank will also be replaced. Base on this additional	To clarify, UPPCO intends to only make minor modifications to the surge tank and not replace it. The 9550-foot segment of existing wood stave penstock is already encased in concrete and buried. As proposed the new penstock will be placed along side the existing wood stave penstock for about 7750 feet. Approximately 1650 feet of existing wood stave pipe will be removed and about 150 feet will be filled with controlled low strength material. Both the existing and new penstock will be buried except for a few stream crossings. Concrete bulk heads will be placed at the ends of the existing wood stave penstock.  As per the SHPO November 19, 2008 reply letter that is included in the

COMMENT NO.	STAKEHOLDER	DATE OF LETTER	COMMENT	RESPONSE
3 (continued)	Brian D. Conway Michigan SHPO	1-27-09	information, it is the opinion of the State Historic Preservation Officer (SHPO) that the proposed undertaking will have an adverse effect on the McClure Hydroelectric Plant, which appears to meet the criteria of listing on the National Register of Historic Places.	<p>FER SHPO is acceptable with the remainder of the Project</p> <p>Since the 01-03-09 SHPO comment letter UPPCO has and will continue to work with the SHPO as per the Programmatic Agreement. UPPCO will develop a proposal outlining the alterations, file the proposal with SHPO and allow thirty days within receipt of the proposal for comment. The public may comment during the same thirty day period. UPPCO will not act upon the proposal until the thirty day comment period has expired and will cooperate with the SHPO to further clarify plans and specifications at their request. Further clarifications and plans will include relevant photographs and other needed documentation, a description of the planned and proposed alternative and mitigative measures, and a project plan and schedule. At the expiration of the thirty-day comment period, UPPCO will proceed with the proposal after incorporation of appropriate suggestions only if the SHPO does not object to the plan. If UPPCO feels some of the suggestions or objections are inappropriate, it will attempt to resolve the conflicts through direct consultation with the SHPO. If the issue cannot be resolved FERC will resolve the dispute.</p>
4	Jessica Mistak MDNR	2-5-09	<p>Executive Summary Aesthetic Resources- Noise Impacts - The statement that “There are a handful of primary and secondary (vacation) residences on Hoist and McClure Reservoirs” is incorrect. For example, there are approximately 400 homeowners along the Hoist Basin.</p> <p>Section 5.12.1 Affected Environment- Noise - See previous comments under Executive Summary Aesthetic Resources- Noise Impacts.</p>	<p>The Final Environmental Report (FER) has been revised as follows: “There are a handful of primary and secondary (vacation) residences within the near vicinity of the Project area”.</p>

COMMENT NO.	STAKEHOLDER	DATE OF LETTER	COMMENT	RESPONSE
5	Jessica Mistak MDNR	2-5-09	Section 3.1 Description of Original McClure Dam - According to the October 3, 2002 FERC license, the bypassed reach downstream of McClure Dam is to receive 20 cfs, not 5 cfs as listed in the report.	The FER has been amended to read “The bypassed reach downstream of the McClure Dam receives a 20 cfs minimum flow.
6	Jessica Mistak MDNR	2-5-09	Section 3.2.2 Handling of Existing Materials - According to the report, the recommended alternative for handling the existing penstock is to abandon it in place. In particular, much of the wood stave penstock will be abandoned while the steel segments will be removed. From reviewing Figures 3-4, 3-5, and 3-6, it appears that the abandoned penstock may be buried; although this is not mentioned in the text. The environmental and aesthetic effects of abandoning sections of the penstock should be clearly stated within the text.	<p>Section 3.3.6 of the DER States  The existing wood stave pipe is currently covered with approximately 2 – 3 feet of soil. The proposed pipe (both CCFRPM and steel sections) will be covered with approximately 3 feet of fill. (except at stream crossing at Stations 9+75 and 11+50). Inspections will evaluate and document any deterioration, stability, safety, and repair needs.</p> <p>Section 3.2.3 describes the pipe installation. To further clarify this, a detailed description of the existing and proposed penstock soil covering has been added to section 3.2.2 of the Final Environmental Report (FER) complete with specific locations. The majority of the existing wood stave pipe will remain buried and the majority of the new penstock will be buried resulting in improved aesthetics as several portions of the existing steel penstock are now exposed. The recommendation is to abandon a majority of the existing wood stave pipe in place rather than demolish and remove the pipe. This results in very little disruption when compared with the demolition and exposure of over 2 miles of 7-foot diameter wood stave pipe bound with steel bands and encased in concrete and grout. A more detailed description of the possible demolition has been added to the FER in section 3.2.2.</p>
7	Jessica Mistak MDNR	2-5-09	Section 5.3.3 Invasive Species -Since new roads are frequently a vector for introduction of invasive species such as purple loosestrife and spotted knapweed, we recommend that precautions be put into practice to reduce this risk. These precautions may include, for example, cleaning of equipment prior to entering the construction site.	UPPCO will require that construction equipment is cleaned prior to entering the job site.

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8	Jessica Mistak MDNR	2-5-09	Section 5.5.1.2 Environmental Impacts and Recommendations - Please clarify the acreage of wetlands that will be disturbed as a result of invasive activity along the penstock route.	These wetland impacts are summarized in Table 3-4 and shown on Figures 3-3 through 3-8, and Appendix E, Sheets 1-13 of the FER
9	Jessica Mistak MDNR	2-5-09	<p>Section 5.5.1.3 Effects of No Action Alternative - The report states that, without the penstock, erosion may occur in the Dead River bypassed reach as a result of the increased flows from McClure Dam. We agree that increased sediment movement would occur over the short-term as the river readjusts itself to remove sediment accumulated over the past 90 years during which minimal to no flow was passed through this stretch of river from McClure Dam to its powerhouse approximately 6 miles downstream. This sediment movement would be part of a natural recovery process and would not lead to permanent habitat loss as asserted in the report. Furthermore, the report classifies natural flows as “potentially damaging”. It should be clarified that the no action alternative would restore more natural flows, including channel forming bankfull flows, similar to pre-dam conditions. Natural flows would provide optimal benefits for both recreation and the environment.</p> <p>Section 5.5.2.3 Effects of No Action Alternative - See previous comments under Section 5.5.1.3 Effects of No Action Alternative</p>	<p>This proposed project is an integral part of a regulated river where flow is controlled. The McClure Reservoir is situated between two up-stream reservoirs and a down-stream reservoir and all regulate water flows. Should one reservoir be removed the others would continue to control the flow of water along the river system. The benefits and prescriptions of natural flows were evaluated as part of the FERC licensing process for the existing Dead River License. Currently flows prescribed in the license allow for the control of storm and spring runoff. Furthermore the license requires that the project be kept in-service and continue to generate electricity.</p> <p>UPPCO believes that existing permanent habitat loss is inevitable if control of the river is left to the unpredictability of Nature’s forces. Erosion and flooding is a very real part of all uncontrolled natural waterways and on this section of river, in a mere 6 miles, the river drops hundreds of feet in elevation gaining momentum. This uncontrolled momentum would have considerable negative impacts on the surrounding environment. In addition, when evaluating habitat impacts it is important to keep in mind the effects of removing a renewable generation source from the energy system. One cannot simply remove one small segment of a complex network with out expecting ramifications on another part. Each generation unit taken off-line or added has consequences, not only to the electric grid but to the natural system as well. This renewable generation source, if lost will require a replacement with new and potentially greater environmental degrading impacts. It may not impact this section of river but it will impact our environment and habitat will be lost somewhere on the system.</p>

COMMENT NO.	STAKEHOLDER	DATE OF LETTER	COMMENT	RESPONSE
9 (continued)	Jessica Mistak MDNR	2-5-09	<p>Section 5.13.3 Effects of No Action Alternative - See previous comments under Section 5.5.1.3 Effects of No Action Alternative.</p> <p>Section 5.1.6 Summary of Impacts from the No Action Alternative - See previous comments under Section 5.5.1.3 Effects of No Action Alternative.</p>	<p>In regard to the recreation benefits, the McClure Penstock is a permitted use under an easement agreement. UPPCO has very little fee ownership in the McClure Project Area. Landuse, including development, access, and recreational activities are up to the discretion of the land owner and not UPPCO. It is possible that if the land-use were to change the property owners, at any time, could choose to develop this property for a much different use thereby altering the existing habitat along the river</p>
10	Jessica Mistak MDNR	2-5-09	<p>Section 5.5.2.1 Affected Environment-Fisheries Resources - The statement that “The Michigan DNR has historically managed and stocked the Dead River Hydroelectric Project Reservoirs for trout fishing” is not completely accurate. While Silver Lake Basin, Dead River Storage Basin, and McClure Basin were all managed as coldwater fisheries in the past and we continue to pursue experimental programs related to coldwater fisheries management, the current strategy in all of the reservoirs focuses on sustainable warmwater fisheries management.</p>	<p>The FER Section 5.5.2.1 has been amended to read: “ <i>In the past the Michigan DNR has managed and stocked the Dead River Hydroelectric Project Reservoirs as coldwater fisheries and will continue to pursue experimental programs related to coldwater fisheries management, the current strategy in all of the reservoirs focuses on sustainable warm-water fisheries management.</i>”</p>
11	Jessica Mistak, MDNR	2-5-09	<p>Section 5.7.3 Discussion- Stream #1-9 - Existing streams should be clearly mapped on the Conceptual Layout Figures 3-4 to 3-8.</p>	<p>Figures 3-4 through 3-8 have been revised.</p>

COMMENT NO.	STAKEHOLDER	DATE OF LETTER	COMMENT	RESPONSE
12	Jessica Mistak MDNR	2-5-09	<p>Section 5.11.3 Effects of No Action Alternative – According to the report, the right-of-way is currently maintained for access to the Penstock and for the 33 kV power line. As a result, the maintained right-of-way allows opportunities for public recreational access. The report also concludes that the right-of-way would no be maintained if the Penstock is not replaced and would “soon grow over limiting recreational access”. This seems to contradict previous statements regarding continued maintenance along the right-of-way for the 33 kV power line regardless of the remedy for the McClure Penstock. In order to accurately characterize limitations of public access if the Penstock is not replaced, please clarify what type of vegetation management is required for the 33 KV power line and what portions of the Penstock are in proximity to the power line.</p>	<p>Presently the 33 kV electric distribution line is all within the 400-foot wide McClure Penstock FERC Project Boundary. As stated in the DER approximately 8000 feet of this electric line may need to be relocated to safely construct the replacement penstock. If this relocation is necessary the new line will remain within the said Right-of-Way/Project Boundary or within 200 feet of the penstock. Included in the proposed project are existing and new construction and maintenance roads along the penstock. In certain areas the electric line and roadways may share a maintained corridor. Under the No Action Alternative UPPCO would not need to maintain the roadways but would only be required to maintain the electric line corridor. This maintenance would permit low-growing shrub and tree species to occupy the corridor making pedestrian travel much more difficult.</p> <p>To minimize impacts UPPCO is investigating the possibility of taking the existing power line out of service during construction and reducing the sections of power line needed for relocation. In the interim UPPCO will add the preliminary route for the relocation sections to figure 3-3 though 3-8. UPPCO will also add the following text to Section 3.3.5 of the DER; Typical clearances for an UPPCO 33 kV distribution line are in the range of twenty five feet (25') from the center line. This clearance distance corresponds with both the easements and the established tree line. Typical corridor vegetation management includes the removal of all tall growing species from the corridor with follow-up herbicide treatment scheduled two years after the initial maintenance.</p> <p>As noted in the response to Comment 04 it is important to remember that the McClure Penstock is a permitted use under an easement agreement. UPPCO has very little fee ownership in the McClure Project Area. Land-Use, including access, and recreational activities are up to the discretion of the land owner and not UPPCO. It is possible that if the land-use were to change the property owners, at any time, could choose to restrict access to the property.</p>





**From:** Senso, Russell G  
**Sent:** Thursday, September 11, 2008 2:56 PM  
**To:** 'smolinsm@michigan.gov'  
**Cc:** 'Matt Macgregor'; 'Melissa Dubinsky'; Egtvedt, Gregory W; Krueger, Jeffrey E

**Attachments:** 20080911 Pre-Application Meeting Request Form.pdf  
Mike:

Attached is the application for the **preapplication meeting** with you to discuss the McClure Penstock Replacement Project. I look forward to meeting with you at the McClure Power House (Near the Wood Carver's) on **September 16, 2008 at 9:30 EST**. Matt Macgregor will also attend our meeting. If you have any questions or concerns call anytime. My office phone number is 920.433.1733 and my cell phone number is 920.621.8996.

Thank you,



20080911  
e-Application Meeti.

Russ G. Senso  
Environmental Consultant  
Integrays Business Support, LLC  
700 N Adams Street  
Green Bay, WI 54307-9002  
Phone: (920) 433-1733  
Fax: (920) 433-1176  
E-mail: rgsenso@integraysgroup.com

***Providing support for Integrays Energy Group,  
Integrays Energy Services, Michigan Gas Utilities,  
Minnesota Energy Resources, North Shore Gas,  
Peoples Gas, Upper Peninsula Power and Wisconsin Public Service***

Confidential Communication

This email message and any attachments are intended only for the use of the addressee named above and may contain information that is privileged and confidential. If you are not the intended recipient, any dissemination, distribution, or copying is strictly prohibited. If you received this email message in error, please immediately notify the sender by replying to this email message or by telephone. Thank you



**DEPARTMENT OF ENVIRONMENTAL QUALITY  
LAND AND WATER MANAGEMENT DIVISION  
PRE-APPLICATION MEETING REQUEST FORM**

The Department of Environmental Quality's (DEQ) Land and Water Management Division (LWMD) has established a voluntary process for meeting with staff prior to submitting a permit application under Part 303, Wetlands Protection, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended. If you would like to request a pre-application meeting with LWMD staff, please submit the following information to your local LWMD district office:

1. The Pre-application Meeting Request Form.
2. A map indicating the location of your project site (a county map or one obtained from an internet mapping system, is acceptable). This map should include all streets, roads, intersections, highways, and a north arrow.
3. If the applicant is not the property owner, a letter from the landowner authorizing the DEQ to meet with the applicant and/or agent and enter the property described on this form for the purposes of the pre-application meeting.
4. The appropriate fee (as shown below).
5. A preliminary site plan, if available.

Please keep in mind that providing any other available information may allow staff to better evaluate your project. Other information that may be helpful in LWMD's review includes photographs of the site, aerial photos, more detailed site plans, etc. You may also provide a draft permit application. (The permit application is available at [www.michigan.gov/jointpermit](http://www.michigan.gov/jointpermit).)

Indicate on the form whether you wish to meet in the district office or at the project site. A current district contact information map may be viewed on the DEQ Web site above. Please submit the form to the address provided on the Web site for your local district office, or you may also submit the form to: Department of Environmental Quality, Land and Water Management Division, Permit Consolidation Unit, P.O. Box 30204, Lansing, Michigan 48909-7704.

Staff of the LWMD will contact you to schedule a meeting at a mutually convenient time. Meetings will be scheduled as soon as staff time and/or weather conditions allow. A meeting may be rescheduled if you provide at least 24 hours advance notice. If you need to cancel a pre-application meeting, you may do so up to 24 hours (not including weekends or holidays) prior to the scheduled meeting with a full refund. No refund will be given if the meeting is canceled by you with less than 24 hours notice.

**FEES**

TYPE OF PRE-APPLICATION MEETING	FEE
<b>Single-family residential lot less than 1 acre in size</b>	
Meeting in district office	No Charge
Meeting on site	\$ 100.00
<b>Other pre-application meeting in district office</b>	\$ 150.00
<b>Other meeting on project site</b>	
First acre or portion of acre of project area	\$ 250.00
Each additional acre or portion of acre	\$ 50.00
Maximum	\$ 1,000.00
Example: 4.7 acres = \$250 + (4 x \$50) = \$450.	

**DEPARTMENT OF ENVIRONMENTAL QUALITY  
LAND AND WATER MANAGEMENT DIVISION  
PRE-APPLICATION MEETING REQUEST FORM**

DEQ FILE NO.-FOR OFFICIAL USE

<b>Applicant Name</b> Integrys Business Suport, LLC - Russ Senso			<b>Agent Name</b> King & MacGregor Environmental, Inc. -		
Address 700 N. Adams Street			Address 2520 Woodmeadow SE		
City Green Bay	State WI	Zip 54307-9002	City Grand Rapids	State MI	Zip 49546
Area Code/Telephone 920-433-1733			Area Code/Telephone 616-957-1231		
Fax Number 920-433-1176			Fax Number 616-957-2198		
E-mail rgsenso@integrysgroup.com			E-mail mmacgregor@king-macgregor.com		
<b>Owner Name</b>			Location Information (attached location map)		
Address			Address (if available)		
City	State	Zip	City	State	Zip
Area Code/Telephone			County	Town: Range: Section:	
<b>Directions (nearest major intersection and directions from major intersection):</b> SEE ATTACHED MAPS					

**PRE-APPLICATION MEETING REQUEST**

1. The meeting is requested at the  Project site or  DEQ district office
2. DEQ staff should contact  the Applicant or  Agent
3. Is the proposed project a single family residential lot one acre or less in size?  Yes  No

**GENERAL INFORMATION**

Project description (use additional sheets if necessary):

The Upper Peninsula Power Company is proposing to repair and/or improve the existing McClure Penstock. The project will likely include the construction of access road(s), equipment staging and laydown areas and replacements of some portions of the Penstock.

Estimated total project area (acres): Approx 80

Will wetlands be involved?  No,  Unsure Circle one

Estimated acreage of impact Unknown at this time

Has a wetland delineation been conducted?  Yes,  No Circle one

Estimated cubic yards of fill Unknown at this time

Will inland lakes and streams be involved?  Yes,  No,  Unsure Circle one

Waterbody name Dead River Tributaries

Will floodplains be involved? (Yes, No,  Unsure) Circle one

Other resources involved (Critical Dunes, High Risk Erosion Areas, etc.): \_\_\_\_\_

**SIGNATURE**

I hereby certify that I am familiar with the information contained in this application, that it is true and accurate. I understand that there are penalties for submitting false information and that any finding pursuant to this request may be revoked if information on this request is untrue.

Signed Russell S. Senso

Date 9/11/2008

DEQ FILE NUMBER \_\_\_\_\_

**MEETING HELD**

Date \_\_\_\_\_

Location \_\_\_\_\_

**ATTENDEES**

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

**STAFF COMMENTS**

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

**FINDINGS REGARDING THE NEED FOR A PERMIT UNDER PART 303, WETLANDS PROTECTION, OF THE NATURAL RESOURCES AND ENVIRONMENTAL PROTECTION ACT, 1994 PA 451, AS AMENDED**

The Department of Environmental Quality has determined that:

- A permit is required. Please reference the file number at the top of this form when submitting a permit application.
- A permit is not required. **(This can only be determined for meetings on the project site.)**
- It can not be determined whether a permit is required given the information presented.

This determination is based on the attached project plans prepared by \_\_\_\_\_ and dated \_\_\_\_\_ and other attached information provided at the time of this meeting only. Provided that the proposed project and location are not altered, this determination is binding for a period of two years from the date of this meeting.

\_\_\_\_\_  
DEQ Staff Signature

\_\_\_\_\_  
Date

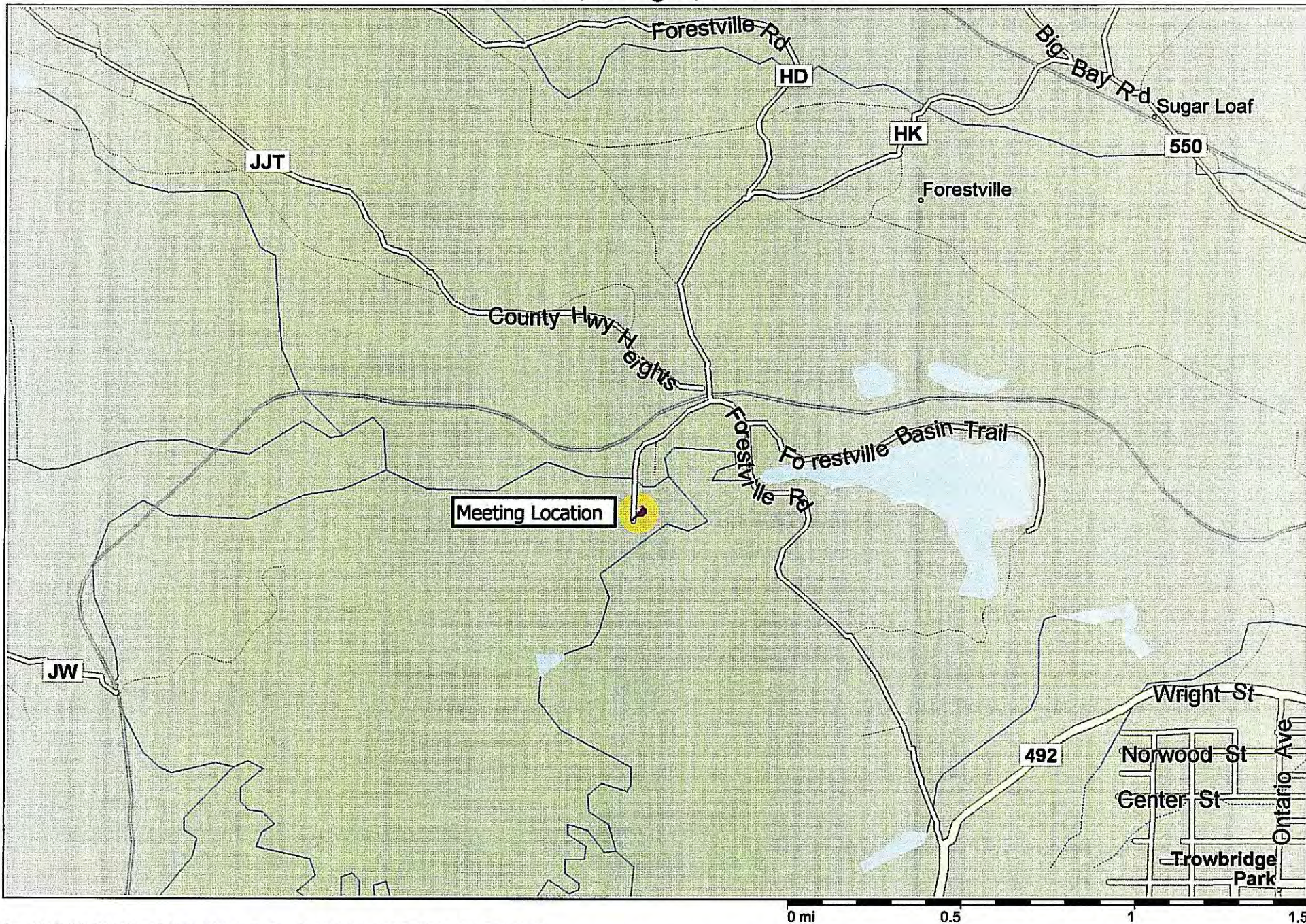
**THIS DOCUMENT IS NOT A PERMIT** Staff can not indicate during a pre-application meeting whether or not a permit will be issued. The DEQ cannot make a decision regarding a permit until it has considered all of the information provided in the final permit application, and, in some instances, has also considered comments received in response to a public notice of the project. Therefore, staff cannot legally tell you whether your project will be authorized in advance of a permit application. They can, however, give you information that will improve the likelihood that it will meet regulatory standards, and thus be authorized, or they may also be able to identify issues which will be of significant concern.

# Sugar Loaf, Michigan, United States

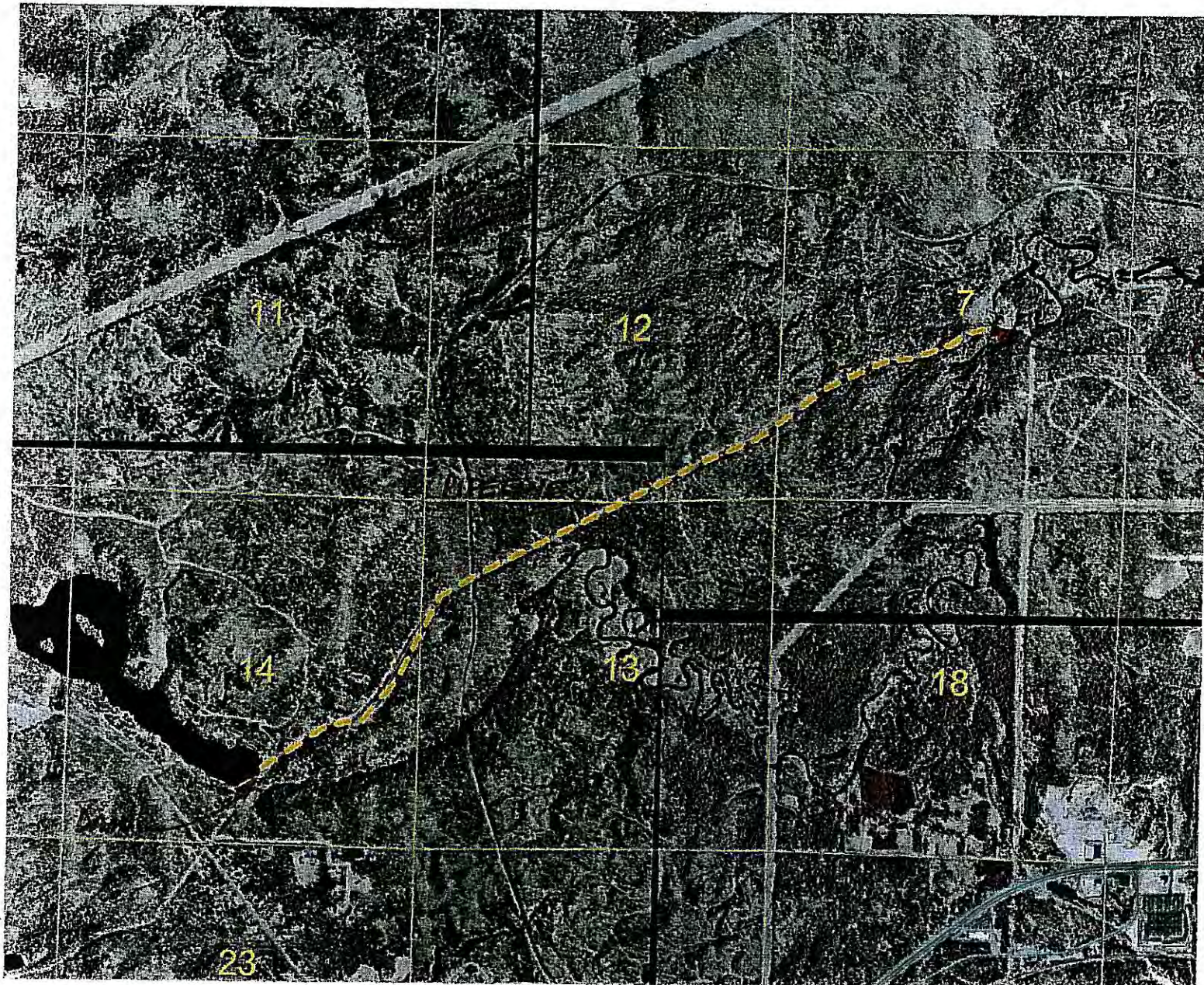


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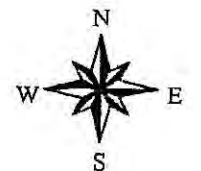
# Forestville, Michigan, United States



# UPPCO - McClure Penstock



POWER  
STATION



Aerial Source: State of Michigan, 1998



STATE OF MICHIGAN  
DEPARTMENT OF ENVIRONMENTAL QUALITY  
UPPER PENINSULA DISTRICT OFFICE



JENNIFER M. GRANHOLM  
GOVERNOR

STEVEN E. CHESTER  
DIRECTOR

January 9, 2009

Mr. Russ Senso  
Integrus Business Support, LLC  
700 N. Adams Street  
Green Bay, Wisconsin 54307

Dear Mr. Senso:

Subject: Pre-Application Meeting  
Michigan Department of Environmental Quality (DEQ)  
File Number 08-52-0103-P

This letter is a follow-up to our , pre-application meeting regarding the proposed project in Marquette Township, Marquette County. The purpose of a pre-application meeting is to provide you with information that will clarify the permit process, answer preliminary questions about your specific project in order to avoid delays at a later date, and to determine, if possible, the need for wetland or inland lakes and streams permits.

During this meeting we reviewed the need to obtain a permit under Part 301, Inland Lakes and Streams, and Part 303, Wetlands Protection, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended. The review was based on discussion of the proposed project and/or draft permit application, the proposed site, and potential modifications to the project discussed during our meeting.

During the review of the project on site, LWMD staff made the following findings regarding the need for a permit under Part 301 and Part 303:

- A permit is required for the project as proposed.
- A permit is not required for the project as proposed.
- It cannot be determined whether a permit is required given the information presented at this time.

This determination is based on the attached project plan prepared by King & MacGregor Environmental, Inc and dated December 5, 2008. Provided that the proposed project and location are not altered, this determination is binding for a period of two years from the date of this meeting.

Please note that this is not a permit. The LWMD can not indicate during a pre-application meeting whether or not a permit will be issued. The LWMD cannot make a



decision regarding a permit until it has considered all of the information provided in the final permit application, and, in some instances, has also considered comments received in response to a public notice of the project. Therefore, LWMD staff cannot legally tell you whether the project will be authorized in advance of a permit application.

The file number assigned to this project is 08-52-0103-P. Please keep a record of this file number, and use it when submitting a final application or otherwise corresponding with our office on this project, as this will help to expedite future processing of the application.

We appreciate the opportunity to meet with you or your representative to address these concerns. We have established a file for this project, and the information submitted to date will be used to facilitate processing of the final application. If you should have follow up questions before then, please contact me at 906-346-8562 or smolinskim@michigan.gov.

Sincerely,



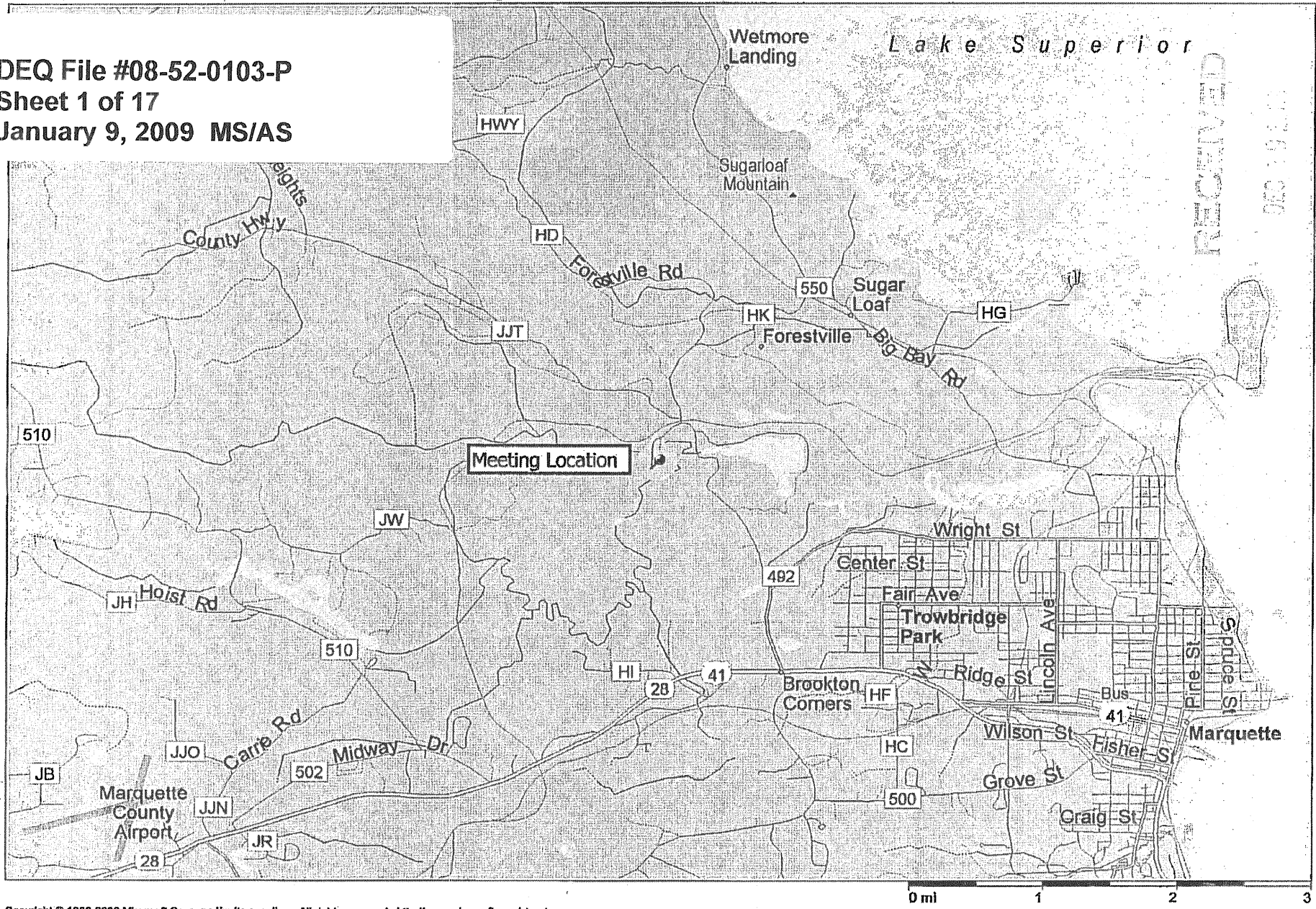
Mike Smolinski  
Field Representative  
Land and Water Management Division

ams  
Attachments

cc: Mr. Matt MacGregor, Agent

Sugar Loaf, Michigan, United States

DEQ File #08-52-0103-P  
Sheet 1 of 17  
January 9, 2009 MS/AS



RECEIVED

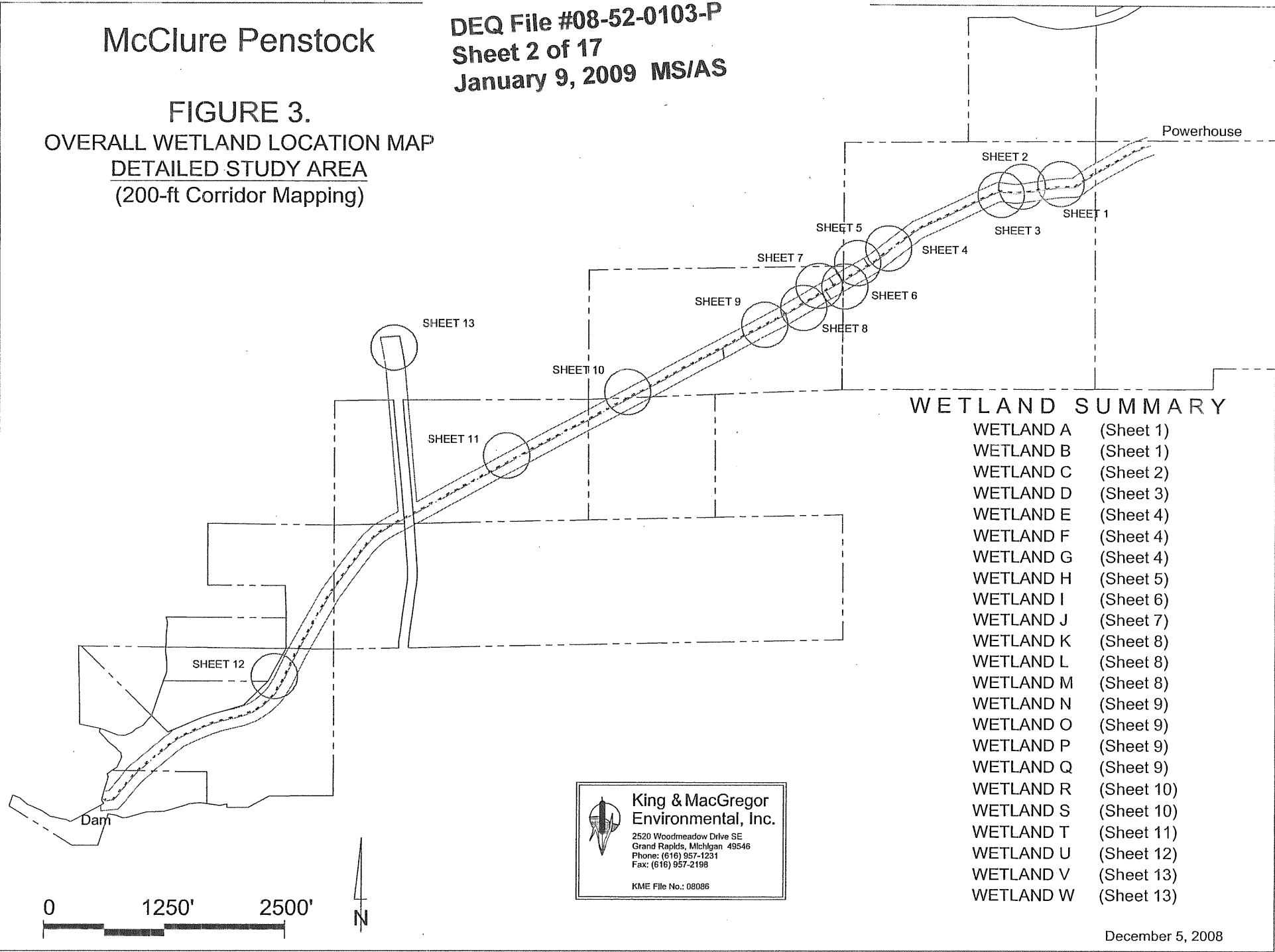
DEC 19 2008

ENVIRONMENTAL QUALITY  
LAKES & WATER MANAGEMENT

# McClure Penstock

DEQ File #08-52-0103-P  
 Sheet 2 of 17  
 January 9, 2009 MS/AS

**FIGURE 3.**  
 OVERALL WETLAND LOCATION MAP  
DETAILED STUDY AREA  
 (200-ft Corridor Mapping)



### WETLAND SUMMARY

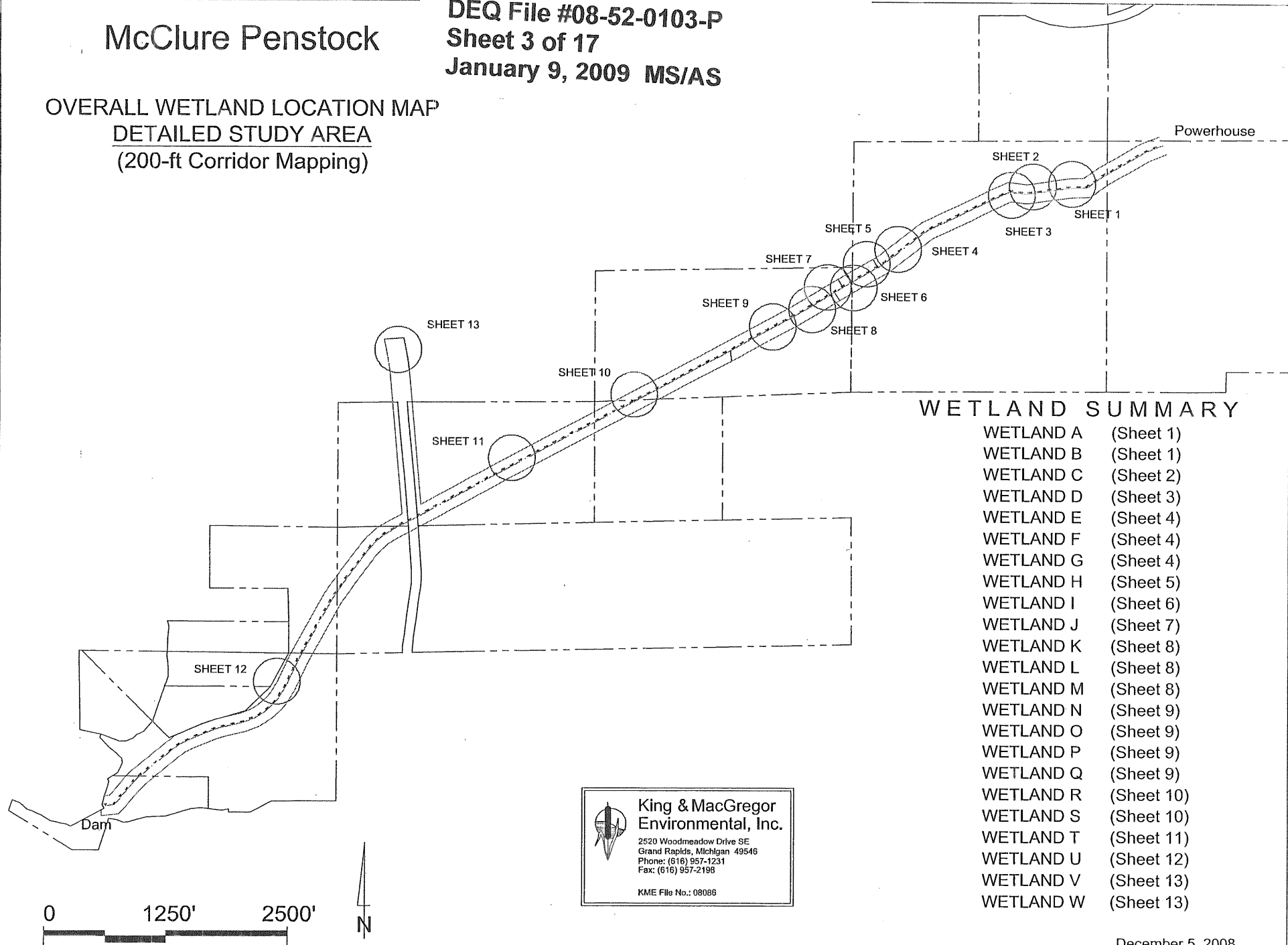
- WETLAND A (Sheet 1)
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- WETLAND D (Sheet 3)
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- WETLAND S (Sheet 10)
- WETLAND T (Sheet 11)
- WETLAND U (Sheet 12)
- WETLAND V (Sheet 13)
- WETLAND W (Sheet 13)

**King & MacGregor Environmental, Inc.**  
 2520 Woodmeadow Drive SE  
 Grand Rapids, Michigan 49546  
 Phone: (616) 957-1231  
 Fax: (616) 957-2198  
 KME File No.: 08086

# McClure Penstock

DEQ File #08-52-0103-P  
Sheet 3 of 17  
January 9, 2009 MS/AS

OVERALL WETLAND LOCATION MAP  
DETAILED STUDY AREA  
(200-ft Corridor Mapping)

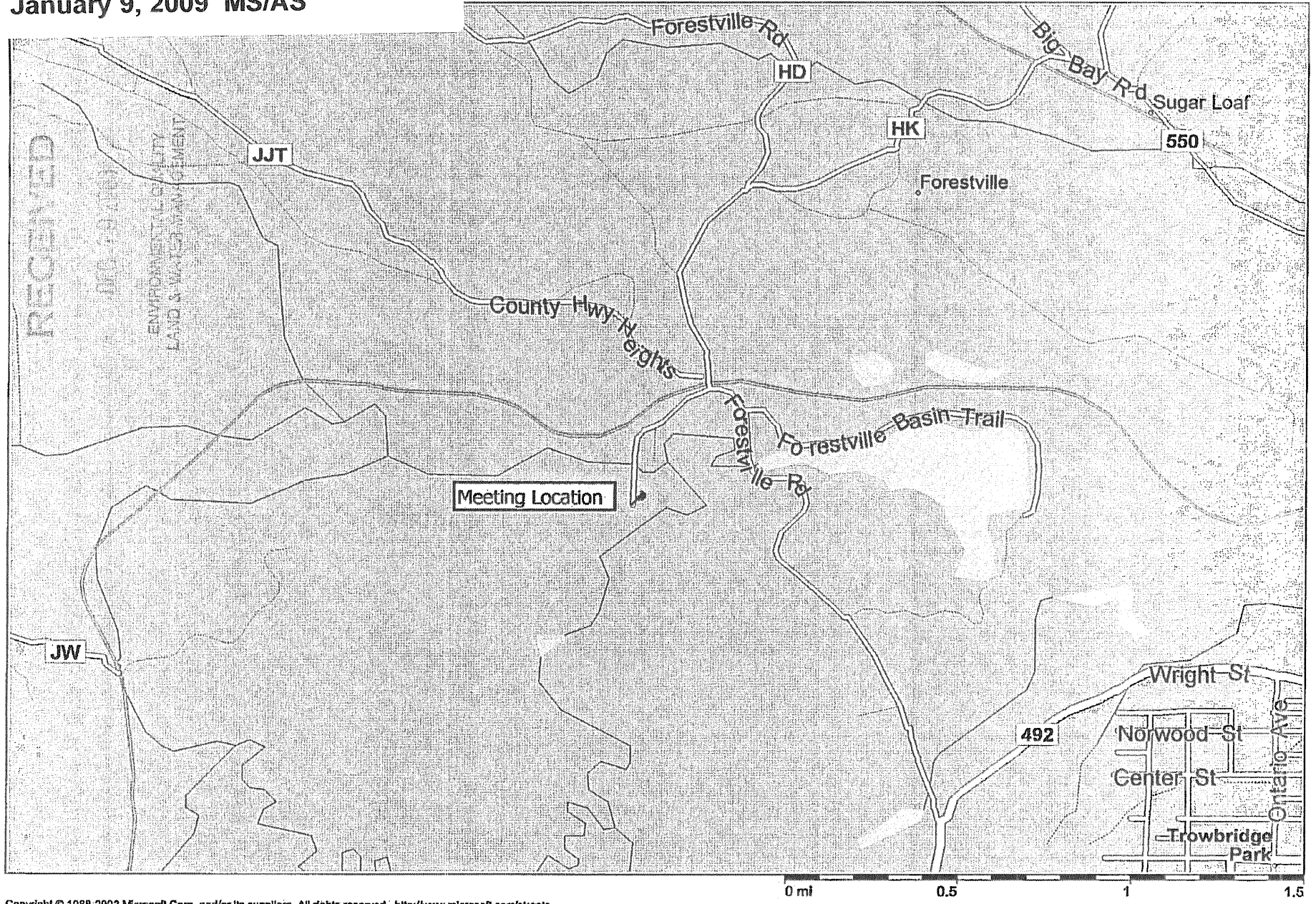


## WETLAND SUMMARY

- WETLAND A (Sheet 1)
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- WETLAND R (Sheet 10)
- WETLAND S (Sheet 10)
- WETLAND T (Sheet 11)
- WETLAND U (Sheet 12)
- WETLAND V (Sheet 13)
- WETLAND W (Sheet 13)

**King & MacGregor  
Environmental, Inc.**  
2520 Woodmeadow Drive SE  
Grand Rapids, Michigan 49546  
Phone: (616) 957-1231  
Fax: (616) 957-2195  
KME File No.: 08065

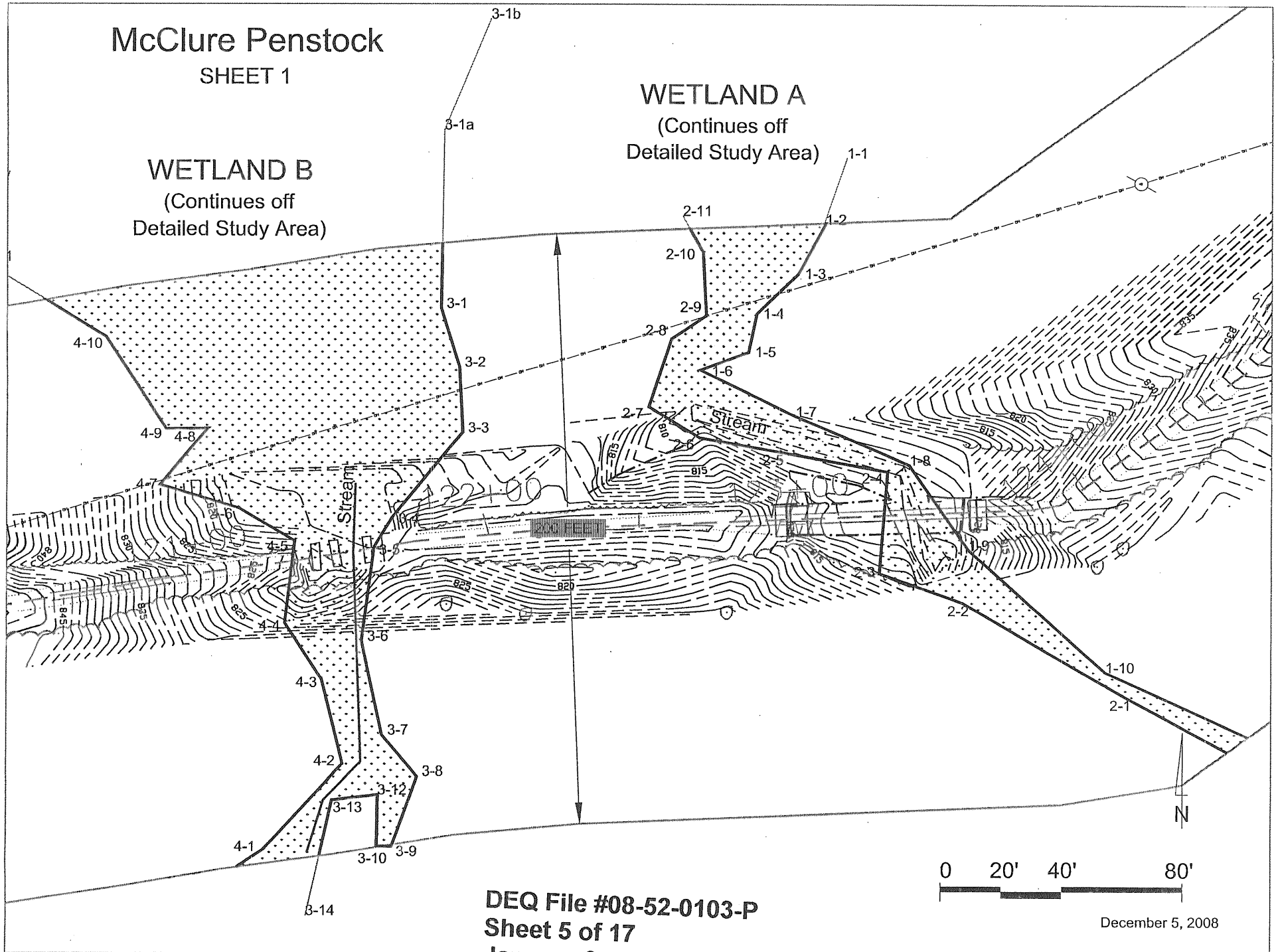
Forestville, Michigan, United States



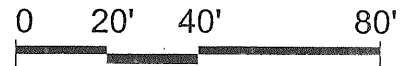
McClure Penstock  
SHEET 1

WETLAND B  
(Continues off  
Detailed Study Area)

WETLAND A  
(Continues off  
Detailed Study Area)



DEQ File #08-52-0103-P  
Sheet 5 of 17  
January 9, 2009 MS/AS

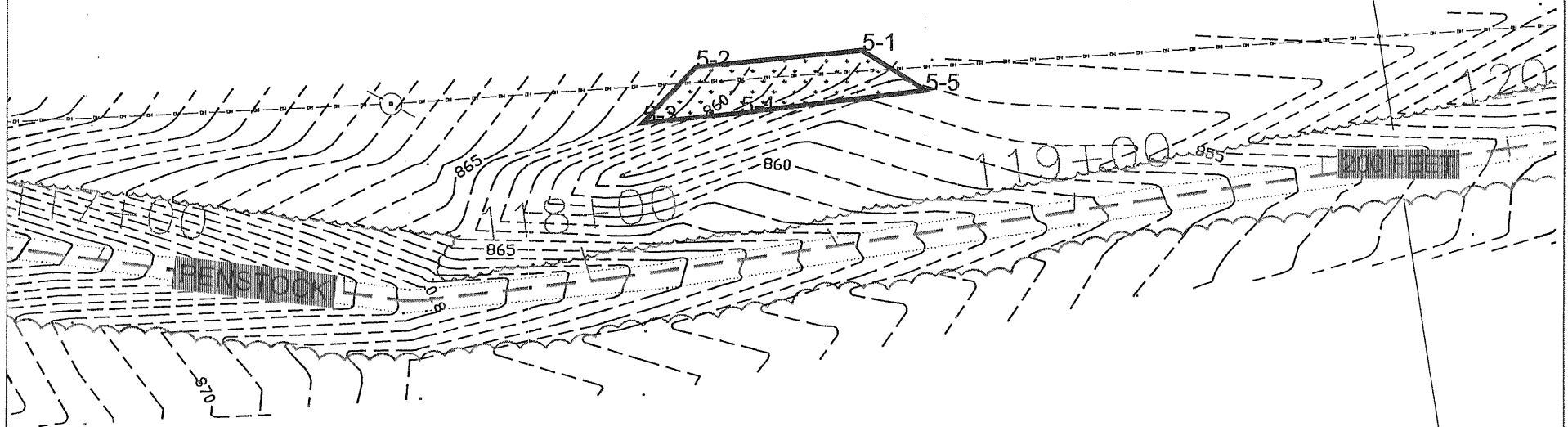


December 5, 2008

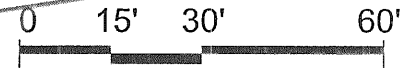
# McClure Penstock

SHEET 2

## WETLAND C



DEQ File #08-52-0103-P  
Sheet 6 of 17  
January 9, 2009 MS/AS

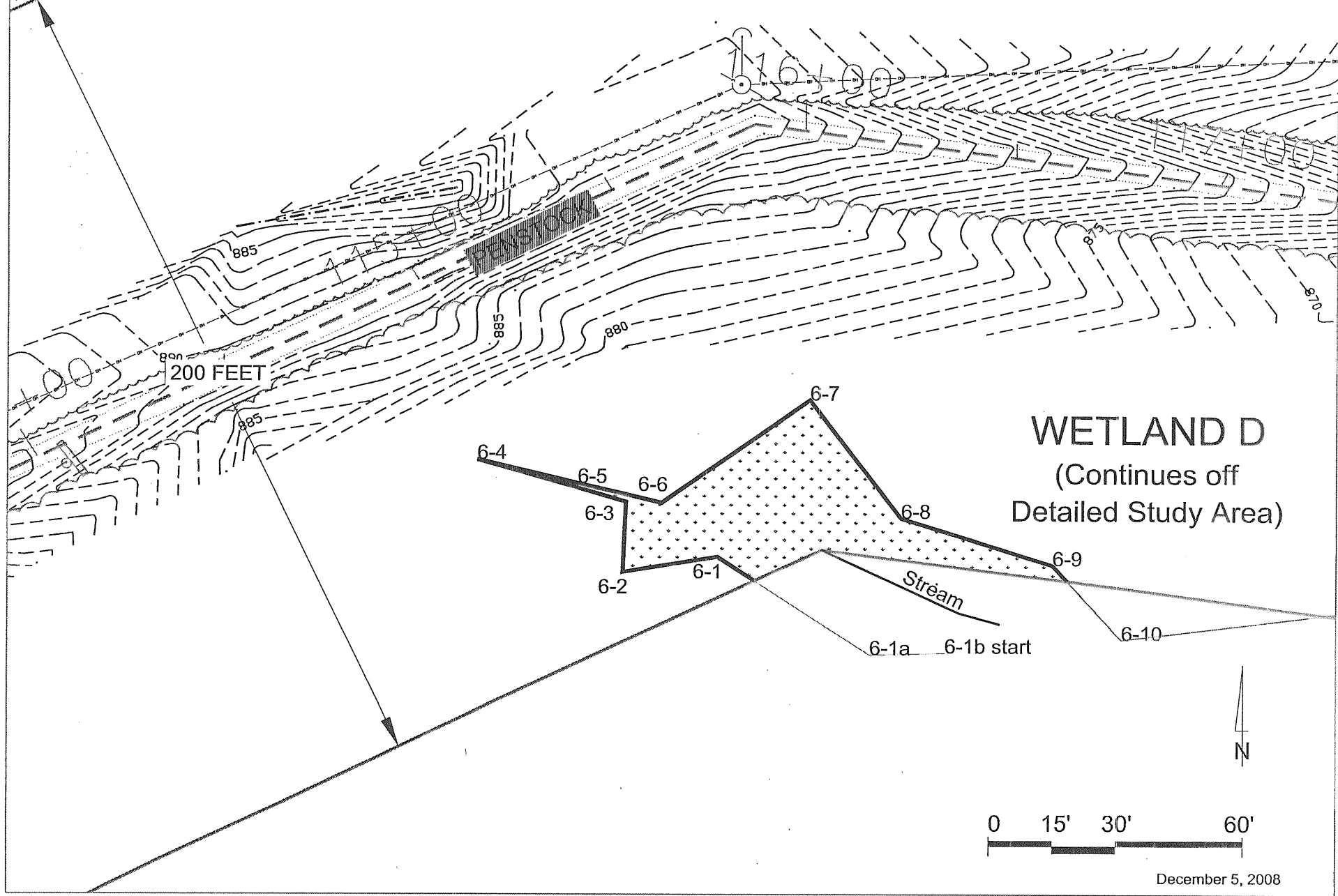


December 5, 2008

# McClure Penstock

SHEET 3

DEQ File #08-52-0103-P  
Sheet 7 of 17  
January 9, 2009 MS/AS



**WETLAND D**  
(Continues off  
Detailed Study Area)

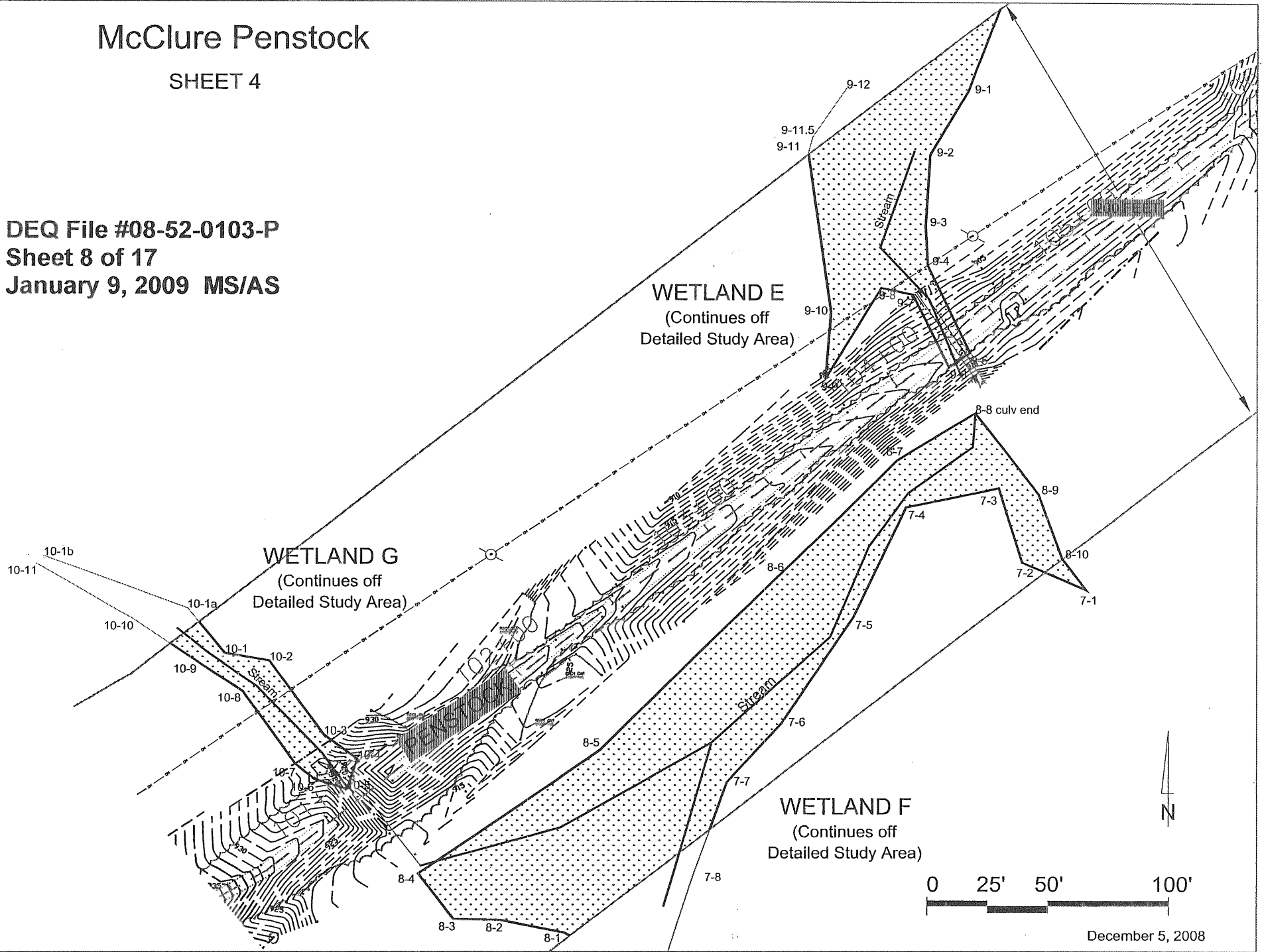
December 5, 2008



# McClure Penstock

SHEET 4

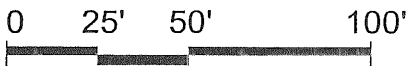
DEQ File #08-52-0103-P  
Sheet 8 of 17  
January 9, 2009 MS/AS



WETLAND E  
(Continues off  
Detailed Study Area)

WETLAND G  
(Continues off  
Detailed Study Area)

WETLAND F  
(Continues off  
Detailed Study Area)



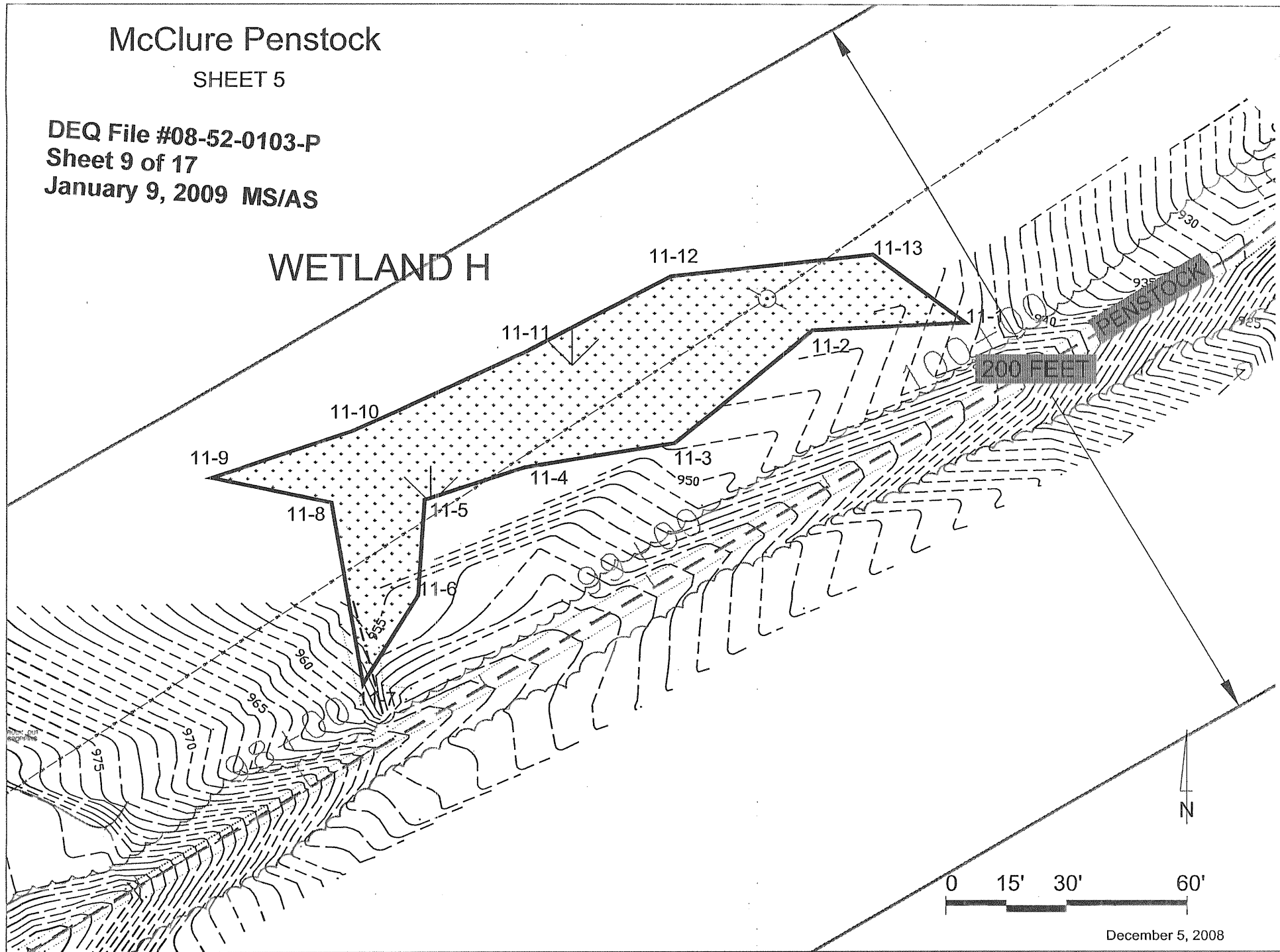
December 5, 2008

# McClure Penstock

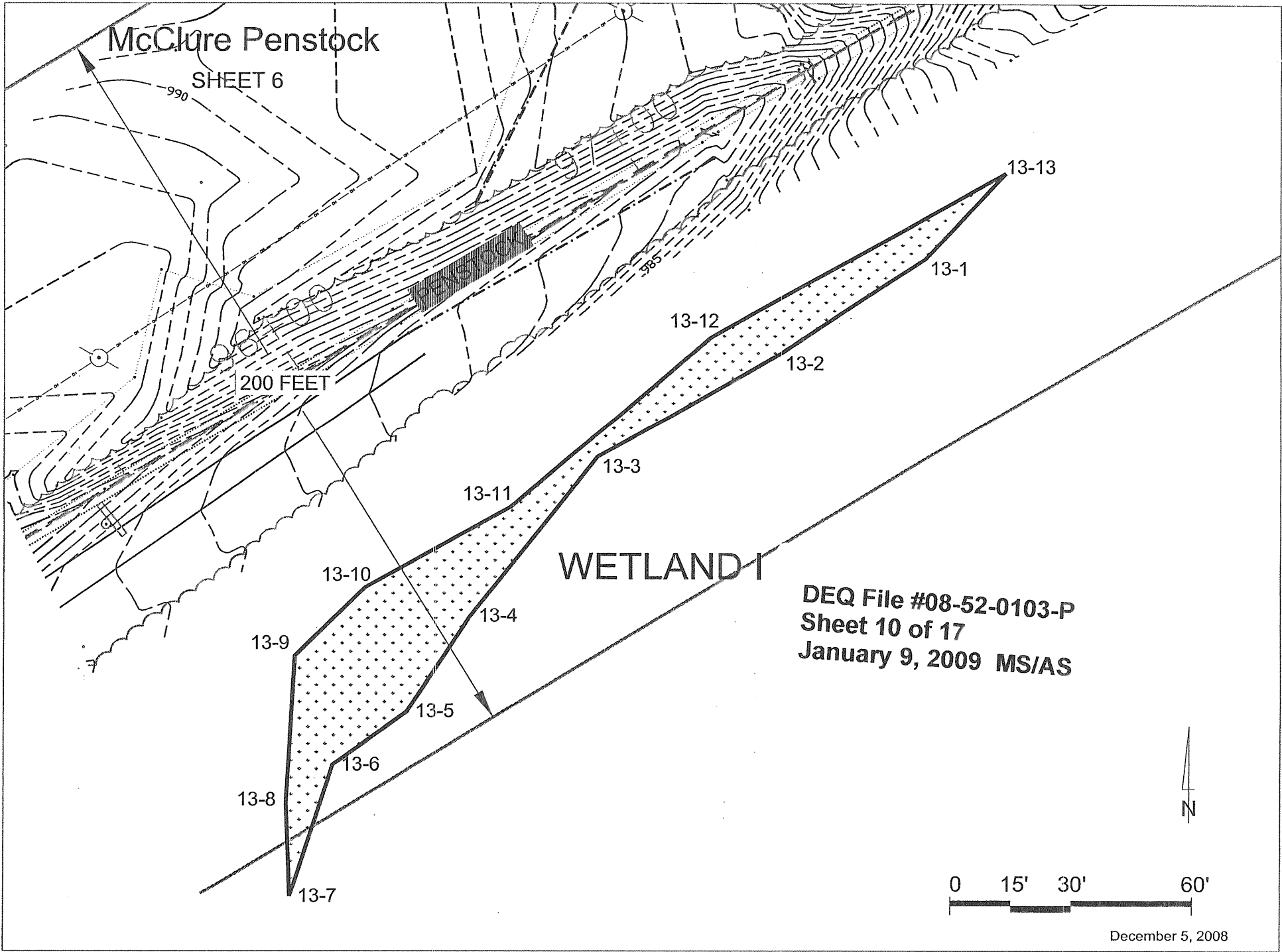
SHEET 5

DEQ File #08-52-0103-P  
Sheet 9 of 17  
January 9, 2009 MS/AS

## WETLAND H



December 5, 2008

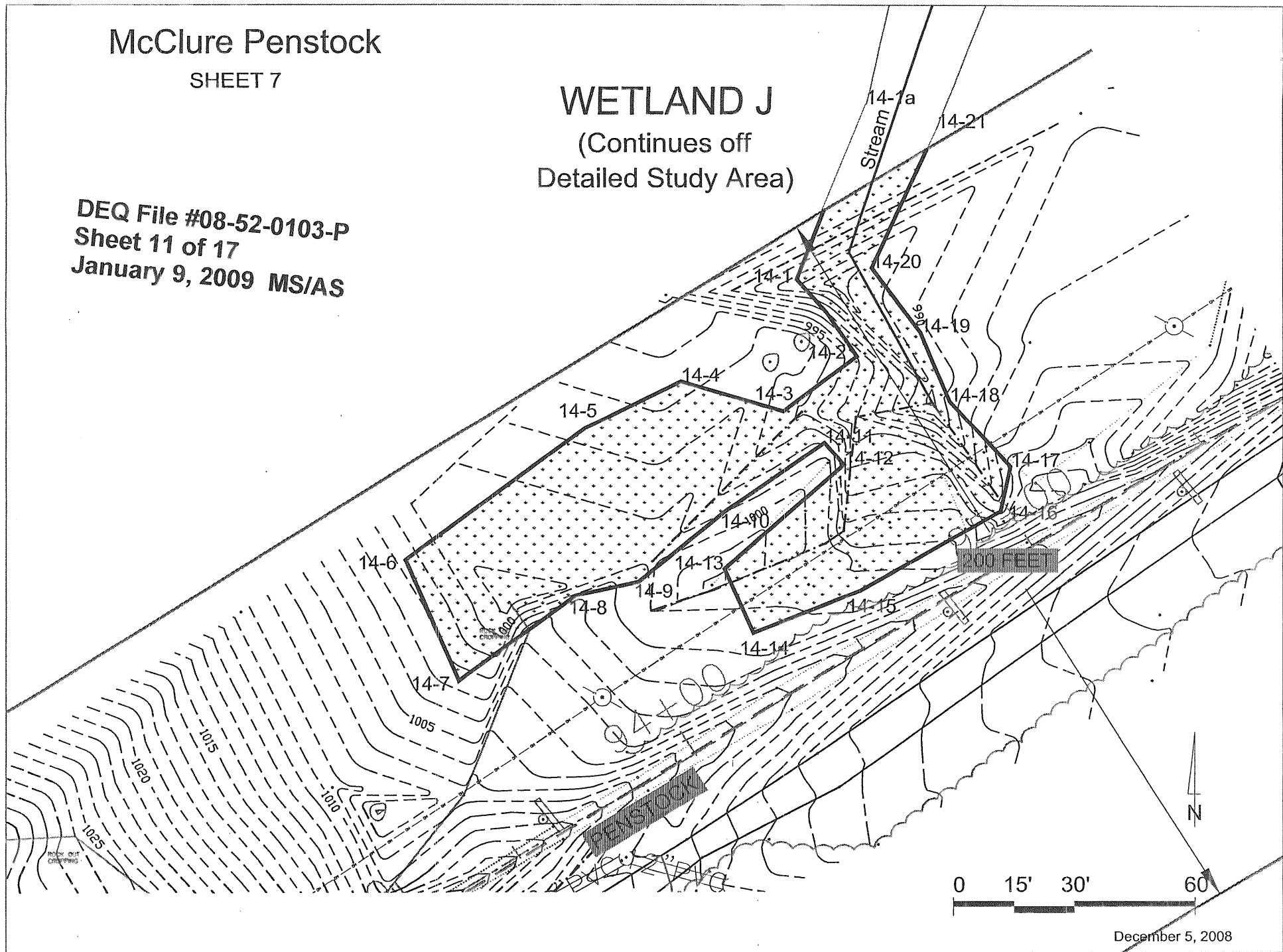


# McClure Penstock

SHEET 7

## WETLAND J (Continues off Detailed Study Area)

DEQ File #08-52-0103-P  
Sheet 11 of 17  
January 9, 2009 MS/AS



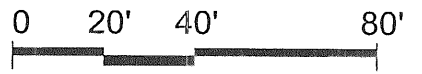
McClure Penstock  
SHEET 8

WETLAND L  
(not regulated)

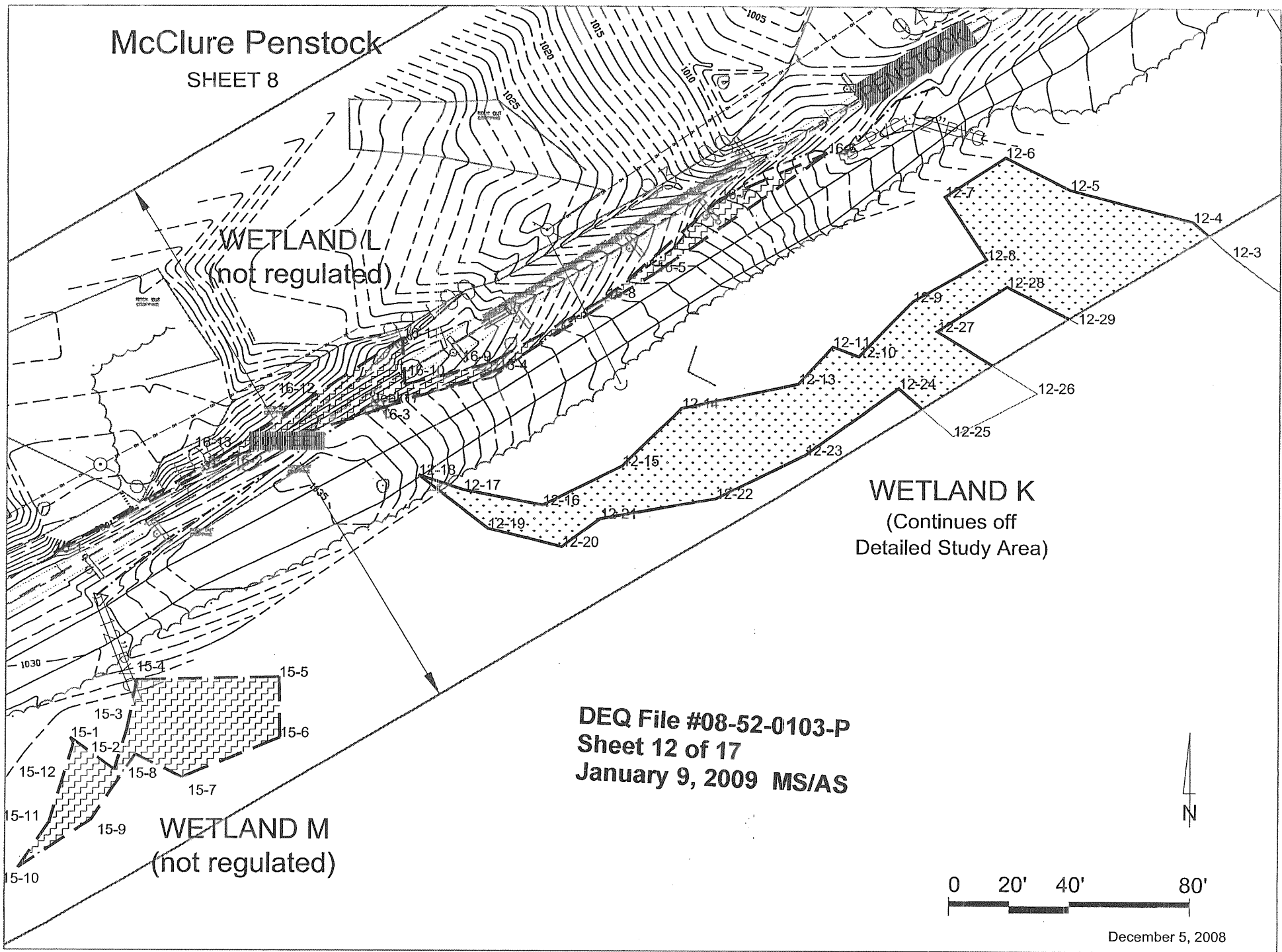
WETLAND K  
(Continues off  
Detailed Study Area)

WETLAND M  
(not regulated)

DEQ File #08-52-0103-P  
Sheet 12 of 17  
January 9, 2009 MS/AS



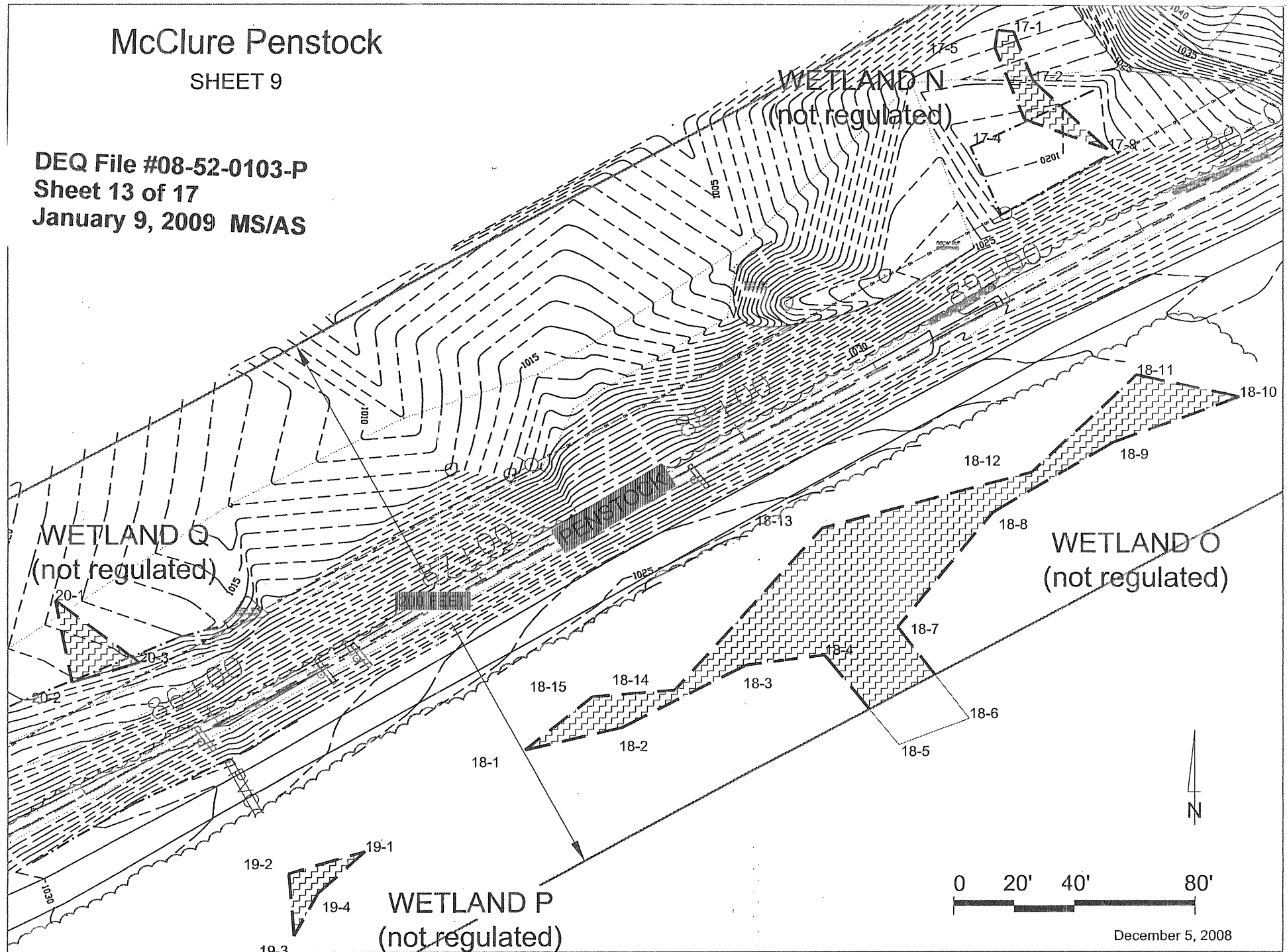
December 5, 2008



# McClure Penstock

SHEET 9

DEQ File #08-52-0103-P  
Sheet 13 of 17  
January 9, 2009 MS/AS



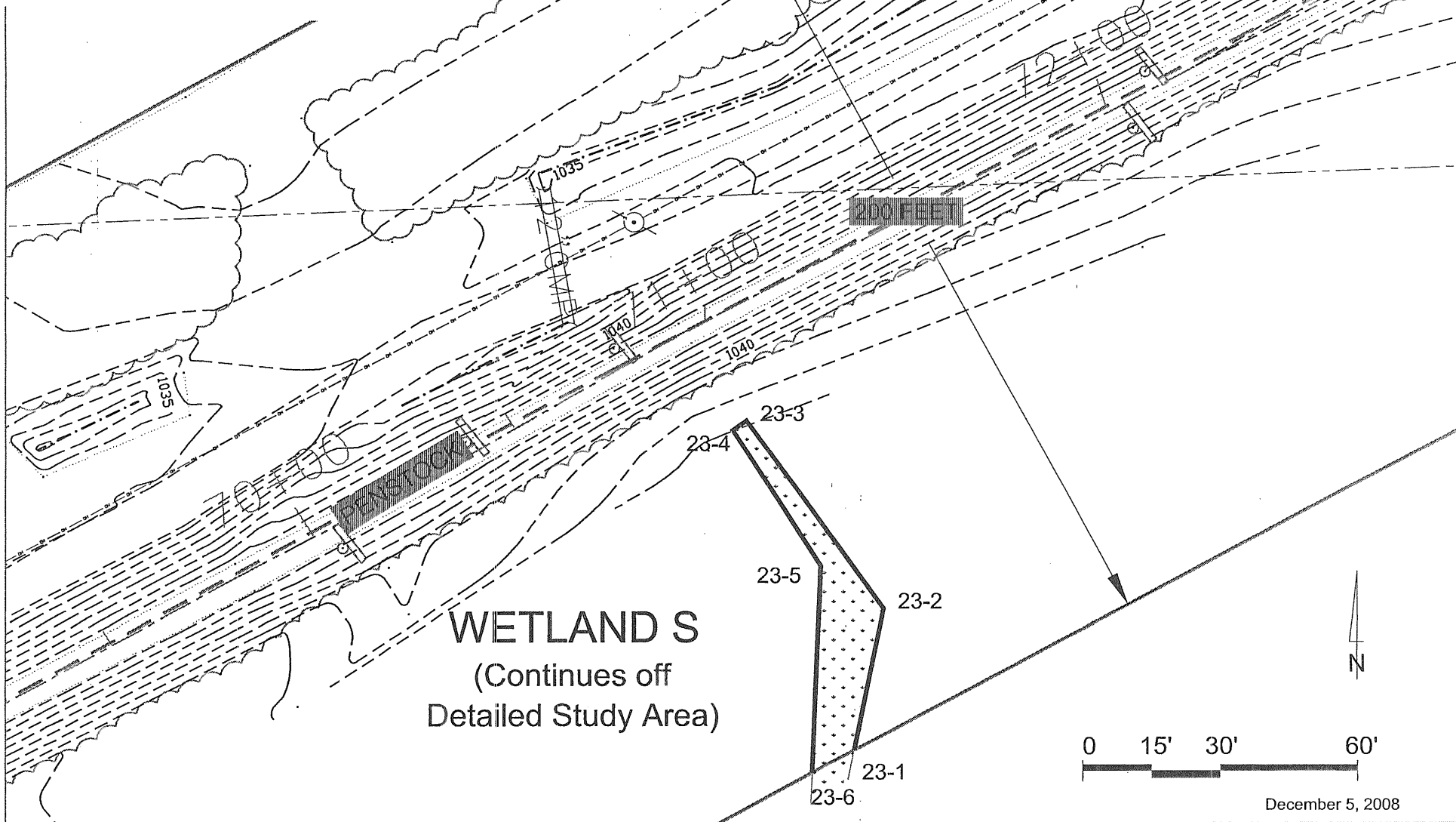
December 5, 2008

# McClure Penstock

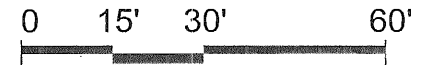
SHEET 10

DEQ File #08-52-0103-P  
Sheet 14 of 17  
January 9, 2009 MS/AS

## WETLAND R



## WETLAND S (Continues off Detailed Study Area)

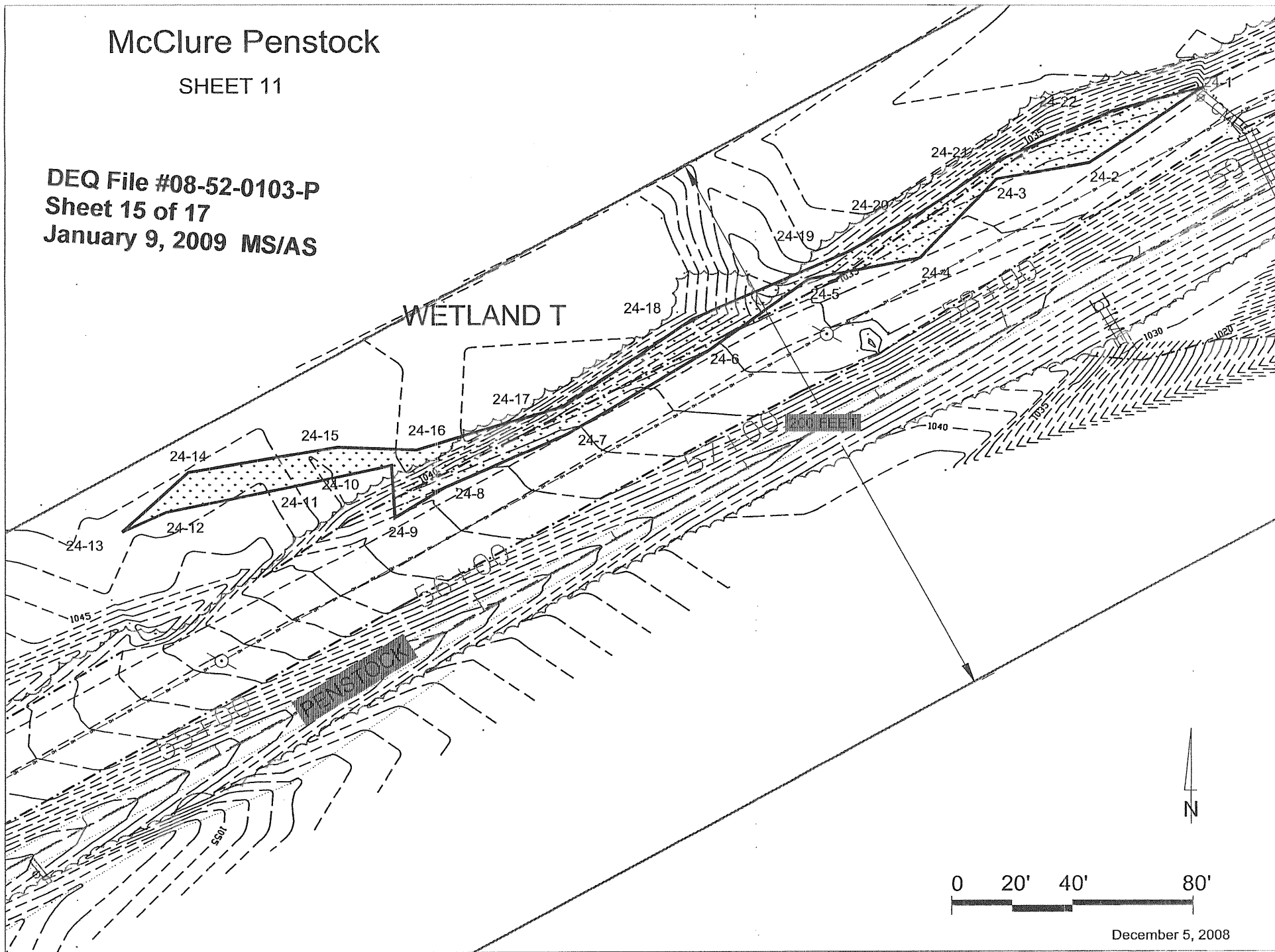


December 5, 2008

# McClure Penstock

SHEET 11

DEQ File #08-52-0103-P  
Sheet 15 of 17  
January 9, 2009 MS/AS



December 5, 2008

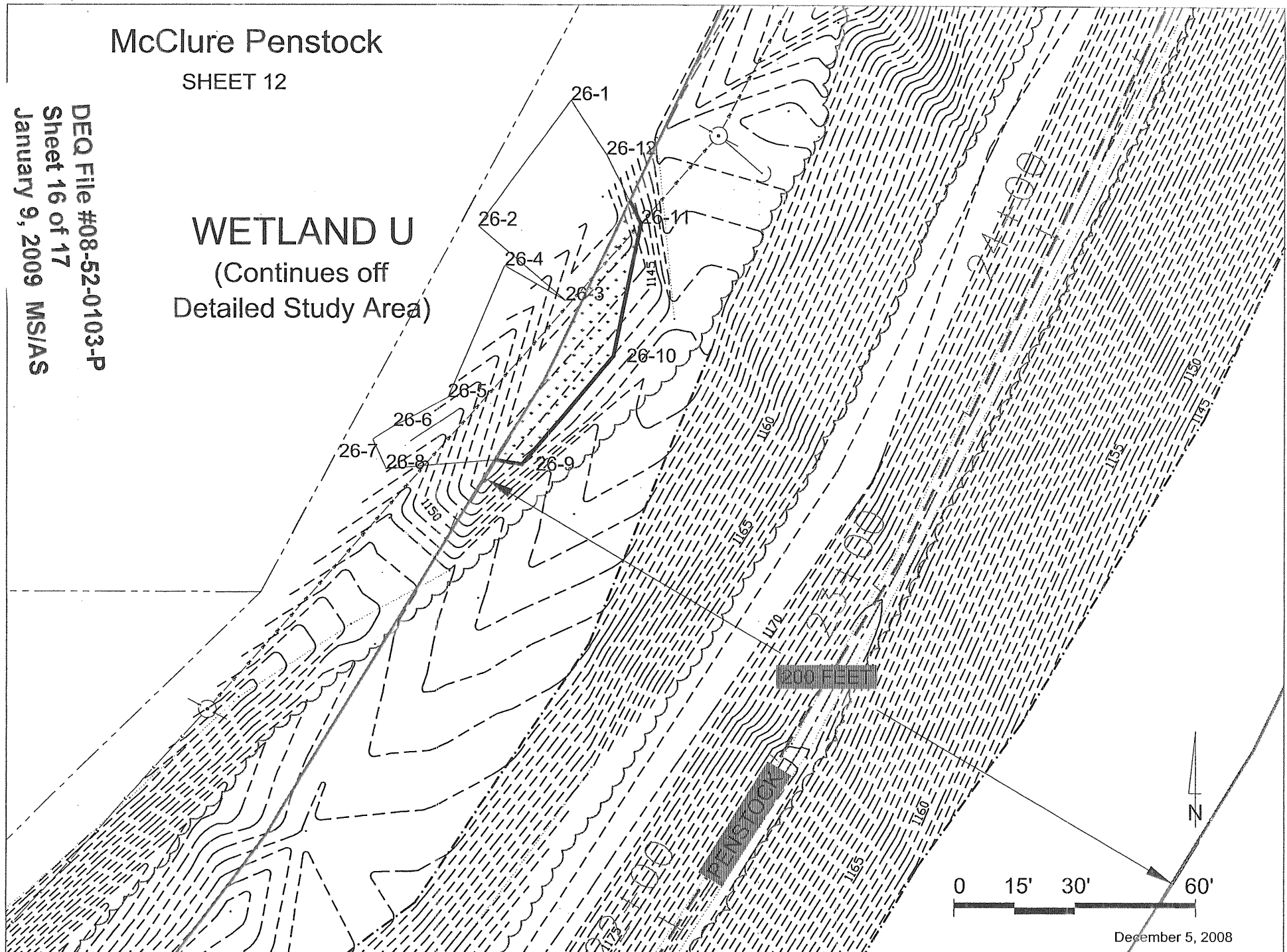


# McClure Penstock

SHEET 12

## WETLAND U (Continues off Detailed Study Area)

DEQ File #08-52-0103-P  
Sheet 16 of 17  
January 9, 2009 MS/AS

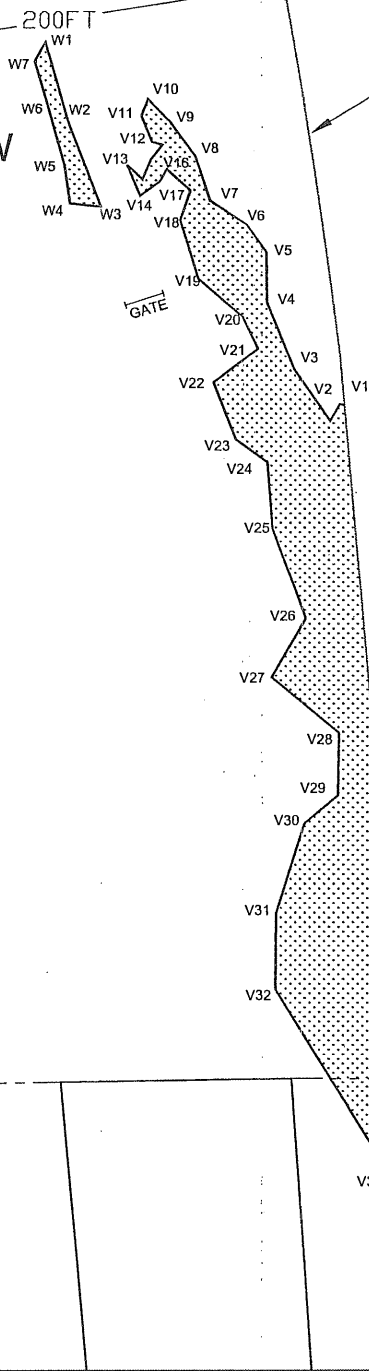


December 5, 2008

McClure Penstock  
SHEET 13

Approximate  
Study Area Boundary  
Along Railroad

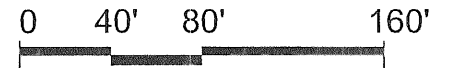
WETLAND W



WETLAND V  
(Continues off  
Detailed Study Area)

Approximate  
Study Area Boundary  
Along Railroad

DEQ File #08-52-0103-P  
Sheet 17 of 17  
January 9, 2009 MS/AS



December 5, 2008



**Upper Peninsula Power Company**

(a subsidiary of Integrys Energy Group)  
P. O. Box 19001  
Green Bay, WI 54307-9001

October 27, 2008

FERC Project No. 10855  
NATDAM Number MI-00183

Agency  
Department  
Street Address  
City, State Zip

To Whom This May Concern:

**Upper Peninsula Power Company's Proposal to Repair the Damaged Penstock at the McClure Hydroelectric Facility (Dead River Hydroelectric Project-FERC Project No. 10855)**

In November 2007, Upper Peninsula Power Company (UPPCO) experienced a failure on the penstock feeding the McClure Powerhouse. The McClure penstock is part of the Dead River Hydroelectric Project (FERC Project No. 10855).

UPPCO is currently developing a plan to return the penstock to service.

The design of the penstock repair is still being developed. However, it is envisioned that all activities, with the exception of some road development, will take place within UPPCO's current 400-foot right of way along the penstock.

As part of this process, UPPCO is required to describe the impacts to the environment and to address the potential construction and operating impacts of the proposed repair in an environmental report. The environmental report will be distributed for consultation to interested parties.

**If you would like to receive a copy of the report for the purposes of providing comments, please contact me within 30 days of receiving this letter. If you do not contact me within the 30 day time period, UPPCO will assume you are not interested in commenting on the environmental report before it is submitted to the FERC.**

If you have any questions relative to this material, please feel free to contact me at (920) 433-1733 at your earliest convenience.

Sincerely,

Russ Senso  
Environmental Consultant  
for Upper Peninsula Power Company

syx

Mr. Kirby Juntala  
Board of Light and Power  
City of Marquette  
2200 Wright Street  
Marquette, MI 49855

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

Ms. Jessica Mistak  
Michigan Department of Natural Resources  
Marquette Fisheries Research Station  
488 Cherry Creek Road  
Marquette, MI 49855

Ms. Christie Deloria-Sheffield  
US Fish and Wildlife Service  
3090 Wright St.  
Marquette, MI 49855

Mr. James Schramm  
Michigan Hydro Relicensing Coalition  
P.O. Box 828  
Pentwater, MI 49449

Mr. John Suppnick  
Michigan Dept of Environmental Quality  
Surface Water Quality Division  
P.O. Box 30273  
Lansing, MI 48909

Mr. Mike Smolinsky  
Michigan Dept of Environmental Quality  
420 5th Street  
Gwinn, MI 49841



**Upper Peninsula Power Company**  
(a subsidiary of Integrys Energy Group)  
P. O. Box 19001  
Green Bay, WI 54307-9001

January 7, 2009

FERC Project No. 10855

Mr. James Schramm  
Michigan Hydro Relicensing Coalition  
P.O. Box 828  
Pentwater, MI 49449

Dear Mr. Schramm:

Environmental Report: The McClure Penstock Replacement Project as part of the Dead River Hydroelectric Project (FERC Project No. 10855)

As you are aware, Upper Peninsula Power Company (UPPCO) is replacing the McClure Penstock.

The enclosed Environmental Report is intended to provide information on the Environmental Impacts associated with the rebuilding of the McClure Penstock.

A hard copy of the Environmental Report is being provided to all individuals listed in Appendix 1.

Please provide any comments you may have on the document to me, by no later than February 7, 2009. If you have any questions relative to this material, please feel free to contact me at (920) 433-1733 at your earliest convenience.

Sincerely,

Russ Senso  
Environmental Consultant  
for Upper Peninsula Power Company

syx

Enc.

cc: Cover Letter and Enclosure

Mr. Robert Meyers, UPPCO - UISC  
Ms. Joan Johaneck, WPSC - D2  
Mr. Gil Snyder, WPSC - D2  
Mr. Todd Poehlman, WPSC - REG

Cover Letter only

Mr. Keith Moyle, UPPCO - UISC  
Mr. Ben Trotter, WPSC - REG  
Ms. Janet Wolfe, UHGO  
Mr. Jeff Krueger, WPSC - A3  
Ms. Peggy Harding, FERC - Chicago



**Upper Peninsula Power Company**  
(a subsidiary of Integrys Energy Group)  
P. O. Box 19001  
Green Bay, WI 54307-9001

January 7, 2009

FERC Project No. 10855

Mr. Kirby Juntila  
Board of Light and Power  
City of Marquette  
2200 Wright Street  
Marquette, MI 49855

Dear Mr. Juntila:

Environmental Report: The McClure Penstock Replacement Project as part of the Dead River Hydroelectric Project (FERC Project No. 10855)

As you are aware, Upper Peninsula Power Company (UPPCO) is replacing the McClure Penstock.

The enclosed Environmental Report is intended to provide information on the Environmental Impacts associated with the rebuilding of the McClure Penstock.

A hard copy of the Environmental Report is being provided to all individuals listed in Appendix 1.

Please provide any comments you may have on the document to me, by no later than February 7, 2009. If you have any questions relative to this material, please feel free to contact me at (920) 433-1733 at your earliest convenience.

Sincerely,

A handwritten signature in black ink that reads "Russell S. Senso". The signature is written in a cursive style.

Russ Senso  
Environmental Consultant  
for Upper Peninsula Power Company

syx

Enc.

cc: Cover Letter and Enclosure

Mr. Robert Meyers, UPPCO - UISC  
Ms. Joan Johaneck, WPSC - D2  
Mr. Gil Snyder, WPSC - D2  
Mr. Todd Poehlman, WPSC - REG

Cover Letter only

Mr. Keith Moyle, UPPCO - UISC  
Mr. Ben Trotter, WPSC - REG  
Ms. Janet Wolfe, UHGO  
Mr. Jeff Krueger, WPSC - A3  
Ms. Peggy Harding, FERC - Chicago



**Upper Peninsula Power Company**

(a subsidiary of Integrys Energy Group)  
700 North Adams Street  
P.O. Box 19001  
Green Bay, WI 54307-9001

October 27, 2008

FERC Project No. 10855  
NATDAM Number MI-00183

Chairperson  
Tribe  
Mailing Address  
City, State Zip

To Whom This May Concern:

**Upper Peninsula Power Company's Proposal to Repair the Damaged Penstock at the McClure Hydroelectric Facility (Dead River Hydroelectric Project-FERC Project No. 10855)**

In November 2007, Upper Peninsula Power Company (UPPCO) experienced a failure on the penstock feeding the McClure Powerhouse. The McClure penstock is part of the Dead River Hydroelectric Project (FERC Project No. 10855).

UPPCO is currently developing a plan to return the penstock to service.

The design of the penstock repair is still being developed. However, it is envisioned that all activities, with the exception of some road development, will take place within UPPCO's current 400-foot right of way along the penstock.

UPPCO is also evaluating potential impacts upon the historical, traditional, and cultural properties of the area. UPPCO completed shovel testing on all areas within the 400-foot right-of-way and has not identified any areas that it believes need to be protected.

Also as part of this process, UPPCO is required to describe the impacts to the environment and to address the potential construction and operating impacts of the proposed repair in an environmental report. The environmental report will be distributed for consultation to interested parties.

**If you would like to receive a copy of the report for the purposes of providing comments, please contact me within 30 days of receiving this letter. If you do not contact me within the 30 day time period, UPPCO will assume you are not interested in commenting on the environmental report before it is submitted to the FERC.**

If you have any questions relative to this material, please feel free to contact me at (920) 433-1733 at your earliest convenience.

Sincerely,

Russ Senso  
Environmental Consultant  
for Upper Peninsula Power Company

syx

Bad River Chippewa Tribe – Chairperson  
Bad River Community Center  
P.O. Box 39  
Odanah, WI 54861

Grand Portage Chippewa Tribe – Chairperson  
P.O. Box 428  
Grand Portage, WI 55605

Bay Mills Indian Community of Michigan – Chairperson  
12140 W. Lakeshore Dr.  
Brimley, WI 49715

Lac du Flambeau Chippewa Tribe – Chairperson  
418 Little Pines  
Lac Du Flambeau, WI 53538

Fond du Lac Chippewa Tribe – Chairperson  
RBC Building  
105 University Rd Cloquet, WI 55720

Menominee Indian Tribe – Chairperson  
P.O. Box 910  
Keshena, WI 54135

Lac Courte Oreilles Chippewa Tribe of Wisconsin – Chairperson  
13394 W Trepania Rd.  
Bldg No.1  
Hayward, WI 54843-2186

US Bureau of Indian Affairs – Hydropower Program Manager  
911 NE 11th Avenue  
Portland, WI 97232

Mille Lacs Chippewa Tribe – Chairperson HCR 67  
P.O. Box 194  
Onamia, MN 56359

Mole Lake Tribal Office – Chairperson  
Route 1  
Crandon, WI 54520

Red Cliff Tribal Office – Chairperson  
Box 529  
Bayfield, WI 54814

St. Croix Chippewa Office – Chairperson  
P.O. Box 287  
Hertel, WI 54845



**No comments received.**



**Upper Peninsula Power Company**  
(a subsidiary of Integrys Energy Group)  
P. O. Box 19001  
Green Bay, WI 54307-9001

January 7, 2009

FERC Project No. 10855

Agency  
Department  
Street Address  
City, State, Zip

To Whom It May Concern:

Environmental Report: The McClure Penstock Replacement Project as part of the Dead River Hydroelectric Project (FERC Project No. 10855)

As you are aware, Upper Peninsula Power Company (UPPCO) is replacing the McClure Penstock.

The enclosed Environmental Report is intended to provide information on the Environmental Impacts associated with the rebuilding of the McClure Penstock.

A hard copy of the Environmental Report is being provided to all individuals listed in Appendix 1.

Please provide any comments you may have on the document to me, by no later than February 7, 2009. If you have any questions relative to this material, please feel free to contact me at (920) 433-1733 at your earliest convenience.

Sincerely,

Russ Senso  
Environmental Consultant  
for Upper Peninsula Power Company

syx

Enc.

cc: Cover Letter and Enclosure

Mr. Robert Meyers, UPPCO - UISC  
Ms. Joan Johaneck, WPSC - D2  
Mr. Gil Snyder, WPSC - D2  
Mr. Todd Poehlman, WPSC - REG

Cover Letter only

Mr. Keith Moyle, UPPCO - UISC  
Mr. Ben Trotter, WPSC - REG  
Ms. Janet Wolfe, UHGO  
Mr. Jeff Krueger, WPSC - A3  
Ms. Peggy Harding, FERC - Chicago

Mr. Kirby Juntala  
Board of Light and Power  
City of Marquette  
2200 Wright Street  
Marquette, MI 49855

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

Ms. Jessica Mistak  
Michigan Department of Natural Resources  
Marquette Fisheries Research Station  
488 Cherry Creek Road  
Marquette, MI 49855

Ms. Christie Deloria-Sheffield  
US Fish and Wildlife Service  
3090 Wright St.  
Marquette, MI 49855

Mr. James Schramm  
Michigan Hydro Relicensing Coalition  
P.O. Box 828  
Pentwater, MI 49449

Mr. John Suppnick  
Michigan Dept of Environmental Quality  
Surface Water Quality Division  
P.O. Box 30273  
Lansing, MI 48909

Mr. Mike Smolinsky  
Michigan Dept of Environmental Quality  
420 5th Street  
Gwinn, MI 49841



JENNIFER M. GRANHOLM  
GOVERNOR

STATE OF MICHIGAN

DEPARTMENT OF NATURAL RESOURCES

LANSING



REBECCA A. HUMPHRIES  
DIRECTOR

Refer to: 4202.2.7

February 5, 2009

Russ Senso  
Upper Peninsula Power Company  
P.O. Box 19001  
Green Bay, WI 54307-9001

Dear Mr. Senso:

**SUBJECT: MCCLURE PENSTOCK REPLACEMENT PROJECT ENVIRONMENTAL REVIEW (FERC No.10855)**

The Michigan Department of Natural Resources (DNR) has reviewed your Draft Environmental Report for the McClure Penstock Replacement on the Dead River. The project will involve replacing the entire 2.5 miles of penstock leading to the McClure Powerhouse. We have the following comments:

**Executive Summary Aesthetic Resources- Noise Impacts**

- The statement that “There are a handful of primary and secondary (vacation) residences on Hoist and McClure Reservoirs” is incorrect. For example, there are approximately 400 homeowners along the Hoist Basin.

**Section 3.1 Description of Original McClure Dam**

- According to the October 3, 2002 FERC license, the bypassed reach downstream of McClure Dam is to receive 20 cfs, not 5 cfs as listed in the report.

**Section 3.2.2 Handling of Existing Materials**

- According to the report, the recommended alternative for handling the existing penstock is to abandon it in place. In particular, much of the wood stave penstock will be abandoned while the steel segments will be removed. From reviewing Figures 3-4, 3-5, and 3-6, it appears that the abandoned penstock may be buried; although this is not mentioned in the text. The environmental and aesthetic effects of abandoning sections of the penstock should be clearly stated within the text.

**Section 5.3.3 Invasive Species**

- Since new roads are frequently a vector for introduction of invasive species such as purple loosestrife and spotted knapweed, we recommend that precautions be put into practice to reduce this risk. These precautions may include, for example, cleaning of equipment prior to entering the construction site.

NATURAL RESOURCES COMMISSION  
Keith J. Charters, Chair • Mary Brown • Hurley J. Coleman, Jr. • John Madigan • J. R. Richardson • Frank Wheatlake

STEVENS T. MASON BUILDING • P.O. BOX 30028 • LANSING, MICHIGAN 48909-7528  
[www.michigan.gov/dnr](http://www.michigan.gov/dnr) • (517) 373-2329

***Great Lakes, Great Times, Great Outdoors!***

#### Section 5.5.1.2 Environmental Impacts and Recommendations

- Please clarify the acreage of wetlands that will be disturbed as a result of invasive activity along the penstock route.

#### Section 5.5.1.3 Effects of No Action Alternative

- The report states that, without the penstock, erosion may occur in the Dead River bypassed reach as a result of the increased flows from McClure Dam. We agree that increased sediment movement would occur over the short-term as the river readjusts itself to remove sediment accumulated over the past 90 years during which minimal to no flow was passed through this stretch of river from McClure Dam to its powerhouse approximately 6 miles downstream. This sediment movement would be part of a natural recovery process and would not lead to permanent habitat loss as asserted in the report. Furthermore, the report classifies natural flows as “potentially damaging”. It should be clarified that the no action alternative would restore more natural flows, including channel forming bankfull flows, similar to pre-dam conditions. Natural flows would provide optimal benefits for both recreation and the environment.

#### Section 5.5.2.1 Affected Environment- Fisheries Resources

- The statement that “The Michigan DNR has historically managed and stocked the Dead River Hydroelectric Project Reservoirs for trout fishing” is not completely accurate. While Silver Lake Basin, Dead River Storage Basin, and McClure Basin were all managed as coldwater fisheries in the past and we continue to pursue experimental programs related to coldwater fisheries management, the current strategy in all of the reservoirs focuses on sustainable warmwater fisheries management.

#### Section 5.5.2.3 Effects of No Action Alternative

- See previous comments under Section 5.5.1.3 Effects of No Action Alternative.

#### Section 5.13.3 Effects of No Action Alternative

- See previous comments under Section 5.5.1.3 Effects of No Action Alternative.

#### Section 5.1.6 Summary of Impacts from the No Action Alternative

- See previous comments under Section 5.5.1.3 Effects of No Action Alternative.

#### Section 5.7.3 Discussion- Stream #1-9

- Existing streams should be clearly mapped on the Conceptual Layout Figures 3-4 to 3-8.

#### Section 5.11.3 Effects of No Action Alternative

- According to the report, the right-of-way is currently maintained for access to the Penstock and for the 33 KV power line. As a result, the maintained right-of-way allows opportunities for public recreational access. The report also concludes that the right-of-way would not be maintained if the Penstock is not replaced and would “soon grow over limiting recreational access”. This seems to contradict previous statements regarding

continued maintenance along the right-of-way for the 33KV power line regardless of the remedy for the McClure Penstock. In order to accurately characterize limitations of public access if the Penstock is not replaced, please clarify what type of vegetation management is required for the 33 KV power line and what portions of the Penstock are in proximity to the power line.

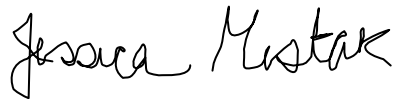
Section 5.12.1 Affected Environment- Noise

- See previous comments under Executive Summary Aesthetic Resources- Noise Impacts.

If you have any questions about this matter, please contact me at 906-249-1611 ext 308 or [mistakjl@michigan.gov](mailto:mistakjl@michigan.gov). If you wish to contact me in writing, my address is:

Marquette Fisheries Station  
Michigan Department of Natural Resources  
484 Cherry Creek Rd  
Marquette, MI 49855

Sincerely,



Jessica Mistak, Senior Fisheries Biologist

cc: Gene Mensch, KBIC  
Jim Schramm, MHRC  
Christie Deloria, FWS  
John Suppnick, DEQ  
Mike Smolinski, DEQ  
George Madison, DNR  
Chris Freiburger, DNR



STATE OF MICHIGAN  
DEPARTMENT OF ENVIRONMENTAL QUALITY  
UPPER PENINSULA DISTRICT OFFICE



JENNIFER M. GRANHOLM  
GOVERNOR

STEVEN E. CHESTER  
DIRECTOR

January 23, 2009

Mr. Russell Senso  
Environmental Consultant, UPPCO  
P.O. Box 19001  
Green Bay, Wisconsin 54307-9001

Dear Mr. Senso:

Staff from the Michigan Department of Environmental Quality (MDEQ), Water Bureau, has reviewed the Draft Environmental Report for the McClure Penstock Replacement that was submitted with your January 7, 2009, letter. The only comment we have deals with the lack of information regarding leak detection and remote shutdown of the penstock. The report makes no mention of a leak detection system and only mentions the possibility of a remote shut down of the penstock. While we understand that this issue might be covered by Upper Peninsula Power Company (UPPCO) in a different forum, we believe it is important to consistently communicate our position. As stated in our December 11, 2007, letter to Mr. Keith Moyle, MDEQ's position is that effective leak detection with a means for quickly shutting down the penstock is necessary.

Please feel free to contact me if you have any questions.

Sincerely,

Steve Casey  
UP District Supervisor  
Water Bureau  
906-346-8535

SC:TC

cc: Mr. Todd Hill, FERC (Chicago office)  
Mr. John Suppnick, MDEQ  
Ms. Jessica Mistak, MDNR  
Mr. Cary Gustafson, MDEQ  
Mr. Mitch Koetje, MDEQ  
File: NPS, Dead River, UPPCO FERC file



**Upper Peninsula Power Company**

(a subsidiary of Integrys Energy Group)  
700 N. Adams Street  
P. O. Box 19001  
Green Bay, WI 54307-9001

January 7, 2009

FERC Project No. 10855

ATTN: Mr. Gary Lee  
U.S. Department of Agriculture  
Natural Resource Conservation Service  
3001 Coolidge Rd Ste 250  
East Lansing, MI 48823-6362

Dear Mr. Lee:

The McClure Penstock Replacement Project as part of the Dead River Hydroelectric Project  
(FERC Project No. 10855)

As you are aware, Upper Peninsula Power Company (UPPCO) is replacing the McClure Penstock.

The enclosed plans, requested by your office are intended to provide you with information associated with the replacement of the penstock. It is important to note that the project will be constructed within the existing penstock right-of-way and that the access roads shown on the Site Plan (Figure 2-2) are also coupled with existing roadways.

UPPCO will require several approvals from various resource agencies and the Federal Energy Regulatory Commission prior to moving forward with the project.

If you have any comments concerning the Project please provide them to me no later than February 7, 2009. If you have any questions relative to this material, please feel free to contact me at (920) 433-1733 at your earliest convenience.

Sincerely,

Russ Senso  
Environmental Consultant  
for Upper Peninsula Power Company

syx

Enc.



## **Appendix 1**

### CONSTRUCTION PLANS

## Michigan State Historic Preservation Officer Correspondence

**STATE HISTORIC PRESERVATION OFFICE**  
**Application for Section 106 Review**

SHPO Use Only	
<input type="checkbox"/> IN	Received Date ____ / ____ / ____ Log In Date ____ / ____ / ____
<input type="checkbox"/> OUT	Response Date ____ / ____ / ____ Log Out Date ____ / ____ / ____
	Sent Date ____ / ____ / ____

Submit one copy for each project for which review is requested. This application is required. Please type. Applications must be complete for review to begin. Incomplete applications will be sent back to the applicant without comment. Send only the information and attachments requested on this application. Materials submitted for review cannot be returned. Due to limited resources we are unable to accept this application electronically.

**I. GENERAL INFORMATION**

THIS IS A NEW SUBMITTAL       THIS IS MORE INFORMATION RELATING TO ER#

- a. Project Name: McClure Penstock Replacement
- b. Project Address (if available): 800 Forestville Road
- c. Municipal Unit: Forestville County: Marquette
- d. Federal Agency, Contact Name and Mailing Address (If you do not know the federal agency involved in your project please contact the party requiring you to apply for Section 106 review, not the SHPO, for this information.): FERC Heather Campbell 202-502-6182
- e. State Agency (if applicable), Contact Name and Mailing Address:
- f. Consultant or Applicant Contact Information (if applicable) including mailing address: Shawn Puzen 920-433-1094

**II. GROUND DISTURBING ACTIVITY (INCLUDING EXCAVATION, GRADING, TREE REMOVALS, UTILITY INSTALLATION, ETC.)**

DOES THIS PROJECT INVOLVE GROUND-DISTURBING ACTIVITY?  YES  NO (If no, proceed to section III.)

Exact project location must be submitted on a USGS Quad map (portions, photocopies of portions, and electronic USGS maps are acceptable as long as the location is clearly marked).

- a. USGS Quad Map Name: Negaunee and Marquette
- b. Township: 48 N Range: 26 W Section: 13,14,12,49 N 25 W Section: 7
- c. Description of width, length and depth of proposed ground disturbing activity: 200 feet wide 13,400 feet long
- d. Previous land use and disturbances: Original Installation
- e. Current land use and conditions: Utility Corridor
- f. Does the landowner know of any archaeological resources found on the property?  YES  NO  
Please describe: The facility is eligible for the NRHP

**III. PROJECT WORK DESCRIPTION AND AREA OF POTENTIAL EFFECTS (APE)**

**Note: Every project has an APE.**

- a. Provide a detailed written description of the project (plans, specifications, Environmental Impact Statements (EIS), Environmental Assessments (EA), etc. cannot be substituted for the written description): See Attached
- b. Provide a localized map indicating the location of the project; road names must be included and legible.
- c. On the above-mentioned map, identify the APE.
- d. Provide a written description of the APE (physical, visual, auditory, and sociocultural), the steps taken to identify the APE, and the justification for the boundaries chosen. Boundary of Construction Project

#### IV. IDENTIFICATION OF HISTORIC PROPERTIES

- a. List and date all properties 50 years of age or older located in the APE. If the property is located within a National Register eligible, listed or local district it is only necessary to identify the district: McClure Hydroelectric Project
  - b. Describe the steps taken to identify whether or not any historic properties exist in the APE and include the level of effort made to carry out such steps: Already evaluated for NRHP
  - c. Based on the information contained in "b", please choose one:
    - Historic Properties Present in the APE
    - No Historic Properties Present in the APE
  - d. Describe the condition, previous disturbance to, and history of any historic properties located in the APE: Original or limited modifications
- 

#### V. PHOTOGRAPHS

**Note: All photographs must be keyed to a localized map.**

- a. Provide photographs of the site itself.
  - b. Provide photographs of all properties 50 years of age or older located in the APE (faxed or photocopied photographs are not acceptable).
- 

#### VI. DETERMINATION OF EFFECT

- No historic properties affected based on [36 CFR § 800.4(d)(1)], please provide the basis for this determination.
- No Adverse Effect [36 CFR § 800.5(b)] on historic properties, explain why the criteria of adverse effect, 36 CFR Part 800.5(a)(1), were found not applicable.
- Adverse Effect [36 CFR § 800.5(d)(2)] on historic properties, explain why the criteria of adverse effect, [36 CFR Part 800.5(a)(1)], were found applicable.

**Please print and mail completed form and required information to:**  
State Historic Preservation Office, Environmental Review Office, Michigan Historical Center, 702  
W. Kalamazoo Street, P.O. Box 30740, Lansing, MI 48909-8240

September 19, 2008

Mr. Brian Conway  
State Historic Preservation Office  
Michigan Historical Center  
702 West Kalamazoo Street  
Lansing, MI 48909-8240

Dear Mr. Conway:

McClure Penstock Replacement Project

In accordance with the Approved Historic Properties Management Plan for the Dead River Hydroelectric Project (FERC Project No. 10855) approved March 12, 2004, Upper Peninsula Power Company (UPPCO) is consulting with the SHPO regarding potential impacts to historic resources. UPPCO is planning the potential replacement of the entire penstock (both the buried wood-stave portion and the partially exposed steel portion) from the dam to the power house and the surge tank. The McClure penstock is a contributing factor to the eligibility of the McClure Hydroelectric Development. The penstock and surge tank is described in Section 7, Pages 2 and 3 of the NPS Form 10-900-a and depicted in pictures 18, 19, 23 and 24 (See Appendix 1).

The entire route has been surveyed for archaeological resources and none have been identified (See Appendix 2). The McClure penstock is a contributing factor to the eligibility of the McClure Hydroelectric Development.

In addition to removal of the penstock, another contributing factor to the eligibility will be impacted through the excavation to remove and replace the bifurcation leading into the powerhouse and the inlet valve (the inlet valve is located in the pit below the floor of the powerhouse and its replacement will not be visible to the general public nor will it require any major modifications within the powerhouse). The additional contributing factor that will be impacted is part of the landscaping of the powerhouse grounds. The landscaping (garden beds and stone terrace) is described in Section 8, Page 1 of the NPS Form 10-900-a and is partially depicted in picture 12 (See Appendix 3). Only a portion of the garden beds (the portion containing the stone terrace) will be impacted by the construction. The majority of the garden beds will remain intact (See Appendix 4).

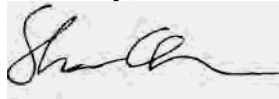
UPPCO has been maintaining the original penstock since it acquired the project in the late 80's. However, in late 2007, the steel portion of the penstock failed at an expansion joint. UPPCO retained a structural engineering firm to inspect the entire penstock to see if it could be repaired instead of replaced. The report from the structural engineer determined that the steel and wood stave portions are at the end-of-life and could not be repaired to assure its integrity in the future. The report recommended replacement of the entire penstock (Please note: UPPCO would prefer to repair the penstock versus replace it because the cost of replacement far exceeds any repair. However, replacement is believed to be the safe alternative).

Mr. Brian Conway  
September 19, 2008  
Page 2 of 2

Under 36 CFR § 800.5 (a)(1) UPPCO believes the proposed project is not expected to alter directly, or indirectly, any of the characteristics that qualify it for inclusion in the National Register in a manner that would diminish the integrity of the property's location, design, setting, materials, workmanship, feeling or association. Therefore, UPPCO does not expect the project to provide an adverse affect upon historic properties.

Please provide your comments on this project within 30 days. If a response is not received within 30 days, UPPCO will continue to proceed with the project as proposed. Should you have any questions or need additional information, please contact me at [SCPuzen@integrysgroup.com](mailto:SCPuzen@integrysgroup.com) or at (920) 433-1094.

Sincerely,



Shawn C. Puzen  
Environmental Consultant

syx

Enc.

cc: Mr. Russ Senso, WPSC - D2  
Mr. Jeff Krueger, WPSC - A3

STATE HISTORIC PRESERVATION OFFICE  
Application for Section 106 Review

SHPO Use Only				
<input type="checkbox"/> IN	Received Date	___/___/___	Log In Date	___/___/___
<input type="checkbox"/> OUT	Response Date	___/___/___	Log Out Date	___/___/___
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GENERAL INFORMATION

THIS IS A NEW SUBMITTAL  THIS IS MORE INFORMATION RELATING TO ER# 870169

- Project Name: McClure Penstock Replacement
- Project Address (if available): 800 Forestville Road
- Municipal Unit: Forestville County: Marquette
- Federal Agency, Contact Name and Mailing Address (If you do not know the federal agency involved in your project please contact the party requiring you to apply for Section 106 review, not the SHPO, for this information.): FERC Heather Campbell 202-502-6182
- State Agency (if applicable), Contact Name and Mailing Address:
- Consultant or Applicant Contact Information (if applicable) including mailing address: Shawn Puzen 920-433-1094

II. GROUND DISTURBING ACTIVITY (INCLUDING EXCAVATION, GRADING, TREE REMOVALS, UTILITY INSTALLATION, ETC.)

DOES THIS PROJECT INVOLVE GROUND-DISTURBING ACTIVITY?  YES  NO (If no, proceed to section III.)

Exact project location must be submitted on a USGS Quad map (portions, photocopies of portions, and electronic USGS maps are acceptable as long as the location is clearly marked).

- USGS Quad Map Name: Negaunee and Marquette
- Township: 48 N Range: 26 W Section: 13, 14, 12, 49 N 25 W Section: 7
- Description of width, length and depth of proposed ground disturbing activity: 200 feet wide 13,400 feet long
- Previous land use and disturbances: Original Installation
- Current land use and conditions: Utility Corridor
- Does the landowner know of any archaeological resources found on the property?  YES  NO  
Please describe: The facility is eligible for the NRHP

III. PROJECT WORK DESCRIPTION AND AREA OF POTENTIAL EFFECTS (APE)

Note: Every project has an APE.

- Provide a detailed written description of the project (plans, specifications, Environmental Impact Statements (EIS), Environmental Assessments (EA), etc. cannot be substituted for the written description). See Attached
- Provide a localized map indicating the location of the project; road names must be included and legible.
- On the above-mentioned map, identify the APE.
- Provide a written description of the APE (physical, visual, auditory, and sociocultural), the steps taken to identify the APE, and the justification for the boundaries chosen. Boundary of Construction Project

#### IV. IDENTIFICATION OF HISTORIC PROPERTIES

- a. List and date all properties 50 years of age or older located in the APE. If the property is located within a National Register eligible, listed or local district it is only necessary to identify the district: McClure Hydroelectric Project
  - b. Describe the steps taken to identify whether or not any historic properties exist in the APE and include the level of effort made to carry out such steps: Already evaluated for NRHP
  - c. Based on the information contained in "b", please choose one:
    - Historic Properties Present in the APE
    - No Historic Properties Present in the APE
  - d. Describe the condition, previous disturbance to, and history of any historic properties located in the APE: Original or limited modifications
- 

#### V. PHOTOGRAPHS

**Note: All photographs must be keyed to a localized map.**

- a. Provide photographs of the site itself.
  - b. Provide photographs of all properties 50 years of age or older located in the APE (faxed or photocopied photographs are not acceptable).
- 

#### VI. DETERMINATION OF EFFECT

- No historic properties affected based on [36 CFR § 800.4(d)(1)], please provide the basis for this determination.
- No Adverse Effect [36 CFR § 800.5(b)] on historic properties, explain why the criteria of adverse effect, 36 CFR Part 800.5(a)(1), were found not applicable.
- Adverse Effect [36 CFR § 800.5(d)(2)] on historic properties, explain why the criteria of adverse effect, [36 CFR Part 800.5(a)(1)], were found applicable.

**Please print and mail completed form and required information to:**  
State Historic Preservation Office, Environmental Review Office, Michigan Historical Center, 702  
W. Kalamazoo Street, P.O. Box 30740, Lansing, MI 48909-8240





**Upper Peninsula Power Company**

(a subsidiary of Integrys Energy Group)  
700 North Adams Street  
P.O. Box 19001  
Green Bay, WI 54307-9001

October 27, 2008

File No. ER-870169

Mr. Brian Conway  
State Historic Preservation Office  
Michigan Historical Center  
702 West Kalamazoo Street  
Lansing, MI 48909-8240

Dear Mr. Conway:

McClure Penstock Replacement Project-Supplemental Information

This letter is intended to serve as a supplement to Upper Peninsula Power Company's (UPPCO's) original letter dated September 19, 2008.

The McClure Penstock Replacement Project is continuing to be designed. As a result, UPPCO is providing the current information on the proposed impacts associated with the replacement of the penstock.

UPPCO is proposing to slip-line (place a sleeve inside the existing penstock) the wood-stave portion that is currently encased in concrete. The slip-line process involves demolition of a 40-foot section of penstock every 800 to 1000 feet to install the sleeve inside the existing penstock. In addition, each vent and inspection port would need to be replaced.

For the steel portion of the McClure Penstock Replacement Project, UPPCO proposes to replace the riveted steel portion with a spiral-weld steel penstock of approximately the same diameter. The new steel penstock will be installed in approximately the same location as the existing penstock.

UPPCO is still proposing to replace the surge tank, the bifurcation, and the inlet valve as described in the September 19, 2008 letter.

Regarding impacts to the landscaped grounds, UPPCO has determined it can avoid impacting the stone terrace (See Appendix 1). UPPCO has also determined that it will need to relocate the existing substation in the near future (2010) because the current configuration and location of the substation poses a potential safety threat to workers maintaining the substation. No detailed design information is available about the substation at this time.

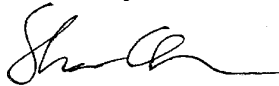
Therefore, it will be the subject of future consultation with your agency. However, based upon the topography of the site UPPCO is going to propose to build the substation in the exact same location of the proposed laydown area for the penstock replacement project.

The location of the laydown area and future substation will impact a portion of the gardens created designed by Warren H. Manning. However, UPPCO does not believe the impact to be adverse because the plantings have not been maintained and are not immediately apparent.

Under 36 CFR § 800.5 (a)(1) UPPCO believes the proposed project is not expected to alter directly, or indirectly, any of the characteristics that qualify it for inclusion in the National Register in a manner that would diminish the integrity of the property's location, design, setting, materials, workmanship, feeling or association. Therefore, UPPCO does not expect the project to provide an adverse affect upon historic properties.

Please provide your comments on this project within 30 days. Should you have any questions or need additional information, please contact me at [SCPuzen@integrysgroup.com](mailto:SCPuzen@integrysgroup.com) or at (920) 433-1094.

Sincerely,



Shawn C. Puzen  
Environmental Consultant

syx

Enc.

cc: Mr. Russ Senso, IBS - D2  
Mr. Jeff Krueger, WPSC - A3  
Mr. Donald Wengerter, WPSC - A3

# Appendix 1

## McClure Powerhouse



STATE HISTORIC PRESERVATION OFFICE  
Application for Section 106 Review

SHPO use Only				
<input type="checkbox"/> IN	Received Date	___/___/___	Log In Date	___/___/___
<input type="checkbox"/> OUT	Response Date	___/___/___	Log Out Date	___/___/___
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- State Agency (if applicable), Contact Name and Mailing Address:
- Consultant or Applicant Contact Information (if applicable) including mailing address: Shawn Puzen 920-433-1094

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- Description of width, length and depth of proposed ground disturbing activity: 200 feet wide 13,400 feet long
- Previous land use and disturbances: Original Installation
- Current land use and conditions: Utility Corridor
- Does the landowner know of any archaeological resources found on the property?  YES  NO  
Please describe: The facility is eligible for the NRHP

III. PROJECT WORK DESCRIPTION AND AREA OF POTENTIAL EFFECTS (APE)

Note: Every project has an APE.

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#### V. PHOTOGRAPHS

**Note: All photographs must be keyed to a localized map.**

- a. Provide photographs of the site itself.
  - b. Provide photographs of all properties 50 years of age or older located in the APE (faxed or photocopied photographs are not acceptable).
- 

#### VI. DETERMINATION OF EFFECT

- No historic properties affected based on [36 CFR § 800.4(d)(1)], please provide the basis for this determination.
- No Adverse Effect [36 CFR § 800.5(b)] on historic properties, explain why the criteria of adverse effect, 36 CFR Part 800.5(a)(1), were found not applicable.
- Adverse Effect [36 CFR § 800.5(d)(2)] on historic properties, explain why the criteria of adverse effect, [36 CFR Part 800.5(a)(1)], were found applicable.

**Please print and mail completed form and required information to:**  
State Historic Preservation Office, Environmental Review Office, Michigan Historical Center, 702  
W. Kalamazoo Street, P.O. Box 30740, Lansing, MI 48909-8240



**Upper Peninsula Power Company**

(a subsidiary of Integrys Energy Group)  
700 North Adams Street  
P.O. Box 19001  
Green Bay, WI 54307-9001

December 24, 2008

File No. ER-870169

Mr. Brian Conway  
State Historic Preservation Office  
Michigan Historical Center  
702 West Kalamazoo Street  
Lansing, MI 48909-8240

Dear Mr. Conway:

McClure Penstock Replacement Project-Supplemental Information

This letter is intended to serve as a supplement to Upper Peninsula Power Company's (UPPCO's) original letters dated September 19, 2008 and October 27, 2008.

As stated in the previous letters, the McClure Penstock Replacement Project is continuing to be designed. As a result, UPPCO is providing the current information on the proposed impacts associated with the replacement of the penstock.

UPPCO originally proposed to slip-line (place a sleeve inside the existing penstock) the wood-stave portion that is currently encased in concrete.

For technical reasons, the slip-lining process is not possible. Therefore, UPPCO will be abandoning the wood-stave portion of the penstock in place. The replacement composite penstock will be buried within 11 feet of the abandoned wood stave penstock. At this time, the majority of the wood stave portion will not be demolished. However, it will not be maintained according to its original design. It will only be maintained / demolished to eliminate any future safety hazards.

All other portions of the project will remain as originally proposed in the previous letters.

Under 36 CFR § 800.5 (a)(1) UPPCO believes the proposed project is not expected to alter directly, or indirectly, any of the characteristics that qualify it for inclusion in the National Register in a manner that would diminish the integrity of the property's location, design, setting, materials, workmanship, feeling or association. Therefore, UPPCO does not expect the project to provide an adverse affect upon historic properties.

UPPCO apologizes for the change in its proposal. Please provide your comments on this project within 30 days. Should you have any questions or need additional information, please contact me at [SCPuzen@integrysgroup.com](mailto:SCPuzen@integrysgroup.com) or at (920) 433-1094.

Sincerely,

Shawn C. Puzen  
Environmental Consultant

syx

cc: Mr. Russ Senso, IBS - D2



JENNIFER GRANHOLM  
GOVERNOR

STATE OF MICHIGAN  
DEPARTMENT OF HISTORY, ARTS AND LIBRARIES  
LANSING

DR. WILLIAM ANDERSON  
DIRECTOR

January 27, 2009

HEATHER CAMPBELL  
FEDERAL ENERGY REGULATORY COMMISSION  
888 FIRST STREET NE  
MAIL CODE PJ12.1  
WASHINGTON DC 20426

RE: ER-870169 McClure Hydroelectric Project Penstock Replacement, FERC #10855, Section 7,  
T48N, R25W, Forestville, Marquette County (FERC)

Dear Ms. Campbell:

Under the authority of Section 106 of the National Historic Preservation Act of 1966, as amended, we have reviewed the above-cited undertaking at the location noted above. We initially reviewed this project and responded on November 19, 2008 with an opinion that the project would have *no adverse effect* on the McClure Hydroelectric Plant, which appears to meet the criteria for listing in the National Register of Historic Places.

On December 29, 2008 we have received follow-up correspondence from Shawn Puzen at UPPCO, notifying us of a change in the scope of work, which has now expanded to include not only the replacement of the steel penstock but also the replacement of the wooden part. Previously encasing the wooden penstock in concrete, thus still leaving it in service, was proposed. The new plan of bypassing the wooden section will leave it abandoned and likely subject to future demolition as a hazard. The surge tank will also be replaced. Based on this additional information, it is the opinion of the State Historic Preservation Officer (SHPO) that the proposed undertaking will have an adverse effect on the McClure Hydroelectric Plant, which appears to meet the criteria for listing in the National Register of Historic Places.

This undertaking meets the criteria of adverse effect because: *the undertaking may alter, directly or indirectly, any of the characteristics of a historic property that qualify the property for inclusion in the National Register in a manner that would diminish the integrity of the property's location, design, setting, materials, workmanship, feeling, or association [36 CFR § 800.5(a)(1)]* Specifically, the undertaking s will result in:

- Alteration of a property, including restoration, rehabilitation, repair, maintenance, stabilization, hazardous material remediation and provision of handicapped access that is not consistent with the Secretary of the Interior's Standards for the Treatment of Historic Properties.

The finding of adverse effect will prompt FERC's, hereinafter referred to as "Agency", to consult further to resolve the adverse effect pursuant to 36 CFR § 800.6 by proceeding with the following steps:

(1) Per 36 CFR § 800.6(a), the Agency shall continue consultation with the SHPO and other consulting parties to develop and evaluate alternatives or modifications to the undertaking that could avoid, minimize or mitigate adverse effects on historic properties. The Agency shall submit a case study outlining these efforts for review by the SHPO.

(2) In accordance with 36 CFR § 800.6(a)(4), the Agency shall make information regarding this finding available to the public, providing the public with an opportunity to express their views on resolving adverse

effects of the undertaking. Pursuant to 36 CFR § 800.11(e), copies or summaries of any views provided by consulting parties and the public shall be made available to the SHPO as part of the case study outlined in (1).

(3) The Agency shall immediately notify the Advisory Council on Historic Preservation (Advisory Council), Old Post Office Building, 1100 Pennsylvania Avenue, NW, Suite 809, Washington, D.C. 20004, of the adverse effect finding per 36 CFR § 800.6 (a)(1). The notification to the Advisory Council should be similar to the project information submitted to this office and should include the following documentation as outlined in 36 CFR § 800.11(e).

- A description of the undertaking, specifying the federal involvement, and its area of potential effects, including photographs, maps and drawings, as necessary.
- A description of the steps taken to identify historic properties.
- A description of the affected historic properties, including information on the characteristics that qualify them for inclusion in the National Register of Historic Places.
- A description of the undertaking's effects on historic properties.
- An explanation of why the criteria of adverse effect were found applicable or inapplicable, including any conditions or future actions to avoid, minimize or mitigate adverse effects.
- Copies or summaries of any views provided by consulting parties and the public.

(4) The Agency shall invite the Advisory Council to participate in consultation if the undertaking will affect a National Historic Landmark, if a Programmatic Agreement will be developed as a result of the finding of adverse effect, or if the Agency wants the Advisory Council to participate in consultation. The Advisory Council will advise of its decision to participate in consultation within fifteen (15) days of receipt of this notification or other request. If the Advisory Council chooses not to participate in consultation, the Agency shall resolve the adverse effect without Advisory Council participation and pursuant to 36 CFR § 800.6(b)(1).

(5) If the Agency, the SHPO and, if applicable, the Advisory Council agree on how the adverse effects will be resolved, they shall execute a Memorandum of Agreement (MOA) pursuant to 36 CFR § 800.6(c).

(6) If the Agency and the SHPO fail to agree on the terms of the MOA, the Agency shall request the Advisory Council to join the consultation. If the Advisory Council decides to join the consultation, the Agency shall proceed in accordance with 36 CFR § 800.6(b)(2). If the Advisory Council decides not to join the consultation, the Advisory Council will notify the Agency and proceed to comment in accordance with 36 CFR § 800.7.

The views of the public are essential to informed decision making in the Section 106 process. Federal Agency Officials or their delegated authorities must plan to involve the public in a manner that reflects the nature and complexity of the undertaking, its effects on historic properties and other provisions per 36 CFR § 800.2(d). We remind you that Federal Agency Officials or their delegated authorities are required to consult with the appropriate Indian tribe and/or Tribal Historic Preservation Officer (THPO) when the undertaking may occur on or affect any historic properties on tribal lands. In all cases, whether the project occurs on tribal lands or not, Federal Agency Officials or their delegated authorities are also required to make a reasonable and good faith effort to identify any Indian tribes or Native Hawaiian organizations that might attach religious and



cultural significance to historic properties in the area of potential effects and invite them to be consulting parties per 36 CFR § 800.2(c).

Please note that the Section 106 process will not conclude according to 36 CFR § 800.6 "Resolution of Adverse Effects" until the consultation process is complete, an MOA is developed, executed and implemented, and, if applicable, the formal comments of the Advisory Council have been received.

The State Historic Preservation Office is not the office of record for this undertaking. You are therefore asked to maintain a copy of this letter with your environmental review record for this undertaking. If the scope of work changes in any way, or if artifacts or bones are discovered, please notify this office immediately.

If you have any questions, please contact Martha MacFarlane Faes, Environmental Review Coordinator, at (517) 335-2720 or by email at ER@michigan.gov. **Please reference our project number in all communication with this office regarding this undertaking.** Thank you for this opportunity to review and comment, and for your cooperation.

Sincerely,



Brian D. Conway  
State Historic Preservation Officer

BDC:ROC:bgg

Copy: ~~Shawn Puzen~~, UPPCO

United States Department of Agriculture



*Helping People Help the Land*

Natural Resources Conservation Service  
3001 Coolidge Road, Suite 250  
East Lansing, MI 48823  
T (517) 324-5270/ F (517) 324-5171/ [www.mi.nrcs.usda.gov](http://www.mi.nrcs.usda.gov)

January 26, 2009

Mr. Russell Senso  
Upper Peninsula Power Company  
700 N. Adams Street  
P.O. Box 19001  
Green Bay, Wisconsin 54307-9001

**RE: The McClure Penstock Replacement Project as Part of the Dead River Hydroelectric Project (FERC Project No. 10855)**

Dear Mr. Senso:

Your proposal to replace the McClure penstock in Marquette County, Michigan, has been reviewed for the effects that it may have on prime farmland, prime forestland or farmland of local importance. This review includes changes that are anticipated to be made to present road surfaces and staging areas.

The enclosed map has most of the project area outlined showing the soil types (map units) that are present. Map units that are considered prime or of statewide importance are shown in colors other than red. In reviewing their locations to the activities proposed it is determined that your project will not have a negative impact on prime farmland, prime forestland, nor farmland of local importance.

Thank you for this opportunity to study and comment on your proposal.

Sincerely,

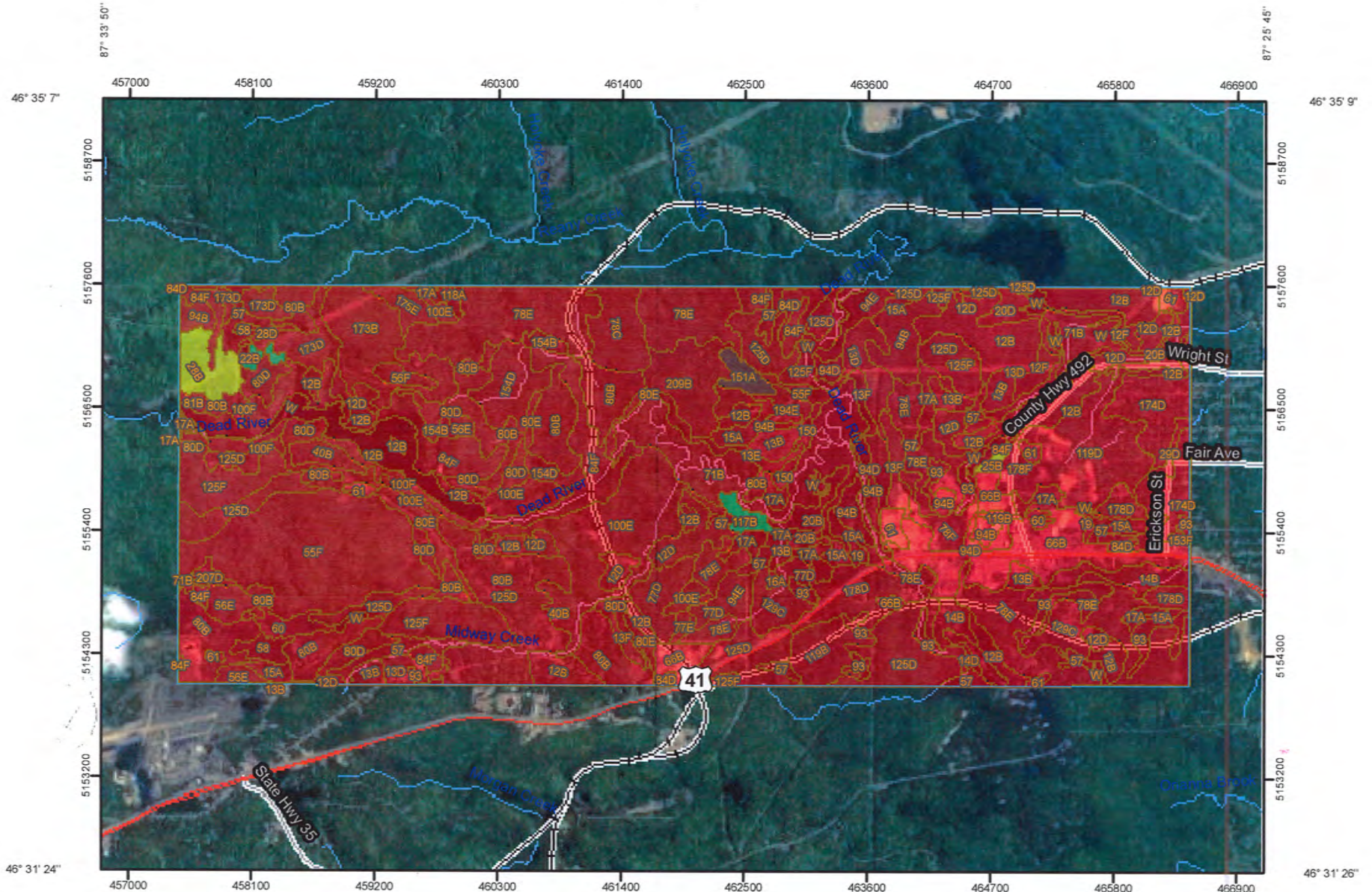
  
GARRY LEE  
State Conservationist

Enclosure

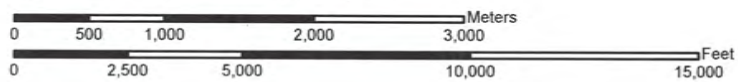
cc: w/o enclosures

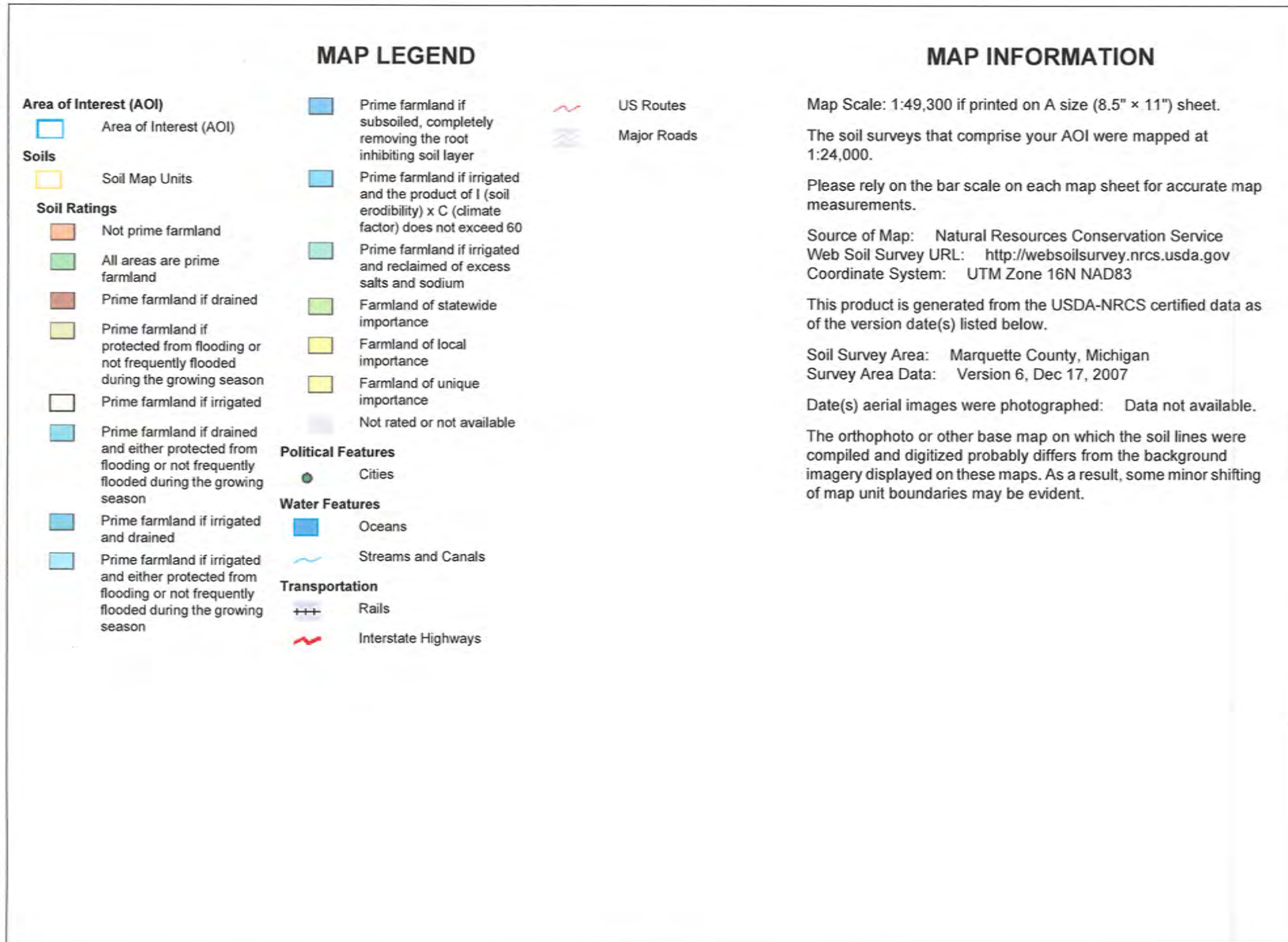
Becky Otto, District Conservationist, NRCS, Marquette, Michigan  
Mike LaPointe, Area Conservationist, NRCS, Marquette, Michigan

Farmland Classification—Marquette County, Michigan



Map Scale: 1:49,300 if printed on A size (8.5" x 11") sheet.





## Farmland Classification

Farmland Classification— Summary by Map Unit — Marquette County, Michigan				
Map unit symbol	Map unit name	Rating	Acres in AOI	Percent of AOI
12B	Rubicon sand, 0 to 6 percent slopes	Not prime farmland	402.6	5.1%
12D	Rubicon sand, 6 to 18 percent slopes	Not prime farmland	172.0	2.2%
12F	Rubicon sand, 35 to 70 percent slopes	Not prime farmland	49.6	0.6%
13B	Kalkaska sand, 0 to 6 percent slopes	Not prime farmland	102.4	1.3%
13D	Kalkaska sand, 6 to 18 percent slopes	Not prime farmland	97.5	1.2%
13E	Kalkaska sand, 18 to 35 percent slopes	Not prime farmland	18.7	0.2%
13F	Kalkaska sand, 35 to 70 percent slopes	Not prime farmland	60.5	0.8%
14B	Rousseau fine sand, 0 to 6 percent slopes	Not prime farmland	77.7	1.0%
14D	Rousseau fine sand, 6 to 18 percent slopes	Not prime farmland	17.2	0.2%
15A	Croswell sand, 0 to 3 percent slopes	Not prime farmland	105.7	1.3%
16A	Paquin sand, 0 to 3 percent slopes	Not prime farmland	3.9	0.0%
17A	Au Gres sand, 0 to 3 percent slopes	Not prime farmland	94.1	1.2%
19	Deford muck	Not prime farmland	12.4	0.2%
20B	Rousseau-Ocqueoc fine sands, 0 to 6 percent slopes	Not prime farmland	50.0	0.6%
20D	Rousseau-Ocqueoc fine sands, 6 to 18 percent slopes	Not prime farmland	25.1	0.3%
22B	Alcona loamy very fine sand, 1 to 6 percent slopes	All areas are prime farmland	12.1	0.2%
25B	Munising-Yalmer complex, 1 to 6 percent slopes	Farmland of local importance	7.7	0.1%
28B	Keweenaw loamy sand, 1 to 6 percent slopes	Farmland of local importance	67.9	0.9%
28D	Keweenaw loamy sand, 6 to 18 percent slopes	Not prime farmland	5.2	0.1%
29D	Yalmer fine sand, 6 to 18 percent slopes	Not prime farmland	13.0	0.2%
40B	Waiska cobbly loamy sand, 0 to 6 percent slopes	Not prime farmland	30.4	0.4%
55F	Michigamme-Rock outcrop complex, 25 to 70 percent slopes, very bouldery	Not prime farmland	430.7	5.4%
56E	Peshekee-Rock outcrop complex, 18 to 35 percent slopes, very bouldery	Not prime farmland	52.7	0.7%



Farmland Classification— Summary by Map Unit — Marquette County, Michigan				
Map unit symbol	Map unit name	Rating	Acres in AOI	Percent of AOI
56F	Peshekee-Rock outcrop complex, 35 to 70 percent slopes, very bouldery	Not prime farmland	17.2	0.2%
57	Carbondale and Tawas soils	Not prime farmland	113.2	1.4%
58	Greenwood and Dawson soils	Not prime farmland	27.1	0.3%
60	Histosols and Aquents, ponded	Not prime farmland	34.7	0.4%
61	Pits, borrow	Not prime farmland	48.1	0.6%
66B	Udipsamments-Urban land complex, nearly level and gently sloping	Not prime farmland	277.7	3.5%
71B	Ewart-Pelkie-Sturgeon complex, 0 to 4 percent slopes	Not prime farmland	335.4	4.2%
77D	Garlic-Alcona-Voelker complex, 6 to 18 percent slopes	Not prime farmland	87.0	1.1%
77E	Garlic-Alcona-Voelker complex, 18 to 35 percent slopes	Not prime farmland	7.4	0.1%
78C	Keweenaw-Kalkaska complex, 1 to 12 percent slopes, dissected	Not prime farmland	82.6	1.0%
78E	Keweenaw-Kalkaska complex, 8 to 35 percent slopes, dissected	Not prime farmland	585.4	7.4%
78F	Keweenaw-Kalkaska complex, 15 to 60 percent slopes, dissected	Not prime farmland	44.6	0.6%
80B	Sayner-Rubicon complex, 1 to 6 percent slopes	Not prime farmland	661.5	8.3%
80D	Sayner-Rubicon complex, 6 to 18 percent slopes	Not prime farmland	214.4	2.7%
80E	Sayner-Rubicon complex, 18 to 35 percent slopes	Not prime farmland	81.9	1.0%
81B	Pelissier gravelly sandy loam, 1 to 6 percent slopes	Not prime farmland	8.4	0.1%
84D	Rubicon-Ishpeming-Rock outcrop complex, 6 to 25 percent slopes	Not prime farmland	30.9	0.4%
84F	Rubicon-Ishpeming-Rock outcrop complex, 25 to 60 percent slopes	Not prime farmland	279.1	3.5%
93	Tawas-Deford mucks	Not prime farmland	112.4	1.4%
94B	Keweenaw-Kalkaska complex, 1 to 6 percent slopes	Not prime farmland	154.3	1.9%
94D	Keweenaw-Kalkaska complex, 6 to 18 percent slopes	Not prime farmland	44.7	0.6%
94E	Keweenaw-Kalkaska complex, 18 to 35 percent slopes	Not prime farmland	68.7	0.9%
100E	Sayner-Rubicon complex, 8 to 35 percent slopes, dissected	Not prime farmland	348.6	4.4%
100F	Sayner-Rubicon complex, 15 to 60 percent slopes, dissected	Not prime farmland	125.3	1.6%
117B	Fence very fine sandy loam, 1 to 6 percent slopes	All areas are prime farmland	21.7	0.3%

Farmland Classification— Summary by Map Unit — Marquette County, Michigan				
Map unit symbol	Map unit name	Rating	Acres in AOI	Percent of AOI
118A	Croswell-Deford complex, 0 to 3 percent slopes	Not prime farmland	7.1	0.1%
119B	Yalmer-Kalkaska complex, 1 to 6 percent slopes	Not prime farmland	86.8	1.1%
119D	Yalmer-Kalkaska complex, 6 to 18 percent slopes	Not prime farmland	228.4	2.9%
125D	Keweenaw-Kalkaska-Rock outcrop complex, 6 to 25 percent slopes, very bouldery	Not prime farmland	438.9	5.5%
125F	Keweenaw-Kalkaska-Rock outcrop complex, 25 to 70 percent slopes, very bouldery	Not prime farmland	238.5	3.0%
129C	Kalkaska-Munising complex, 1 to 12 percent slopes, dissected	Not prime farmland	196.5	2.5%
150	Shag muck	Not prime farmland	17.0	0.2%
151A	Spear very fine sandy loam, 0 to 3 percent slopes	Prime farmland if drained	26.4	0.3%
153F	Ishpeming-Rock outcrop complex, 25 to 70 percent slopes, very bouldery	Not prime farmland	3.6	0.0%
154B	Rubicon-Sayner complex, 1 to 6 percent slopes, rocky	Not prime farmland	18.2	0.2%
154D	Rubicon-Sayner complex, 6 to 18 percent slopes, rocky	Not prime farmland	102.0	1.3%
173B	Pence fine sandy loam, 1 to 6 percent slopes, rocky, bouldery	Not prime farmland	156.8	2.0%
173D	Pence fine sandy loam, 6 to 18 percent slopes, rocky, bouldery	Not prime farmland	85.4	1.1%
174D	Yalmer-Rubicon-Urban land complex, 4 to 18 percent slopes	Not prime farmland	168.0	2.1%
175E	Kalkaska-Waiska complex, 8 to 35 percent slopes, dissected	Not prime farmland	31.2	0.4%
178D	Schweitzer-Kalkaska-Rock outcrop complex, 6 to 25 percent slopes, very stony	Not prime farmland	141.4	1.8%
178F	Schweitzer-Kalkaska-Rock outcrop complex, 25 to 70 percent slopes, very stony	Not prime farmland	7.3	0.1%
194E	Sporley silt loam, 8 to 35 percent slopes, dissected	Not prime farmland	21.9	0.3%
207D	Dishno-Michigamme-Rock outcrop complex, 6 to 25 percent slopes, very bouldery	Not prime farmland	12.3	0.2%
209B	Garlic-Fence complex, 1 to 6 percent slopes	Not prime farmland	104.4	1.3%
W	Water	Not prime farmland	145.2	1.8%
<b>Totals for Area of Interest</b>			<b>7,958.8</b>	<b>100.0%</b>



## Description

Farmland classification identifies map units as prime farmland, farmland of statewide importance, farmland of local importance, or unique farmland. It identifies the location and extent of the soils that are best suited to food, feed, fiber, forage, and oilseed crops. NRCS policy and procedures on prime and unique farmlands are published in the "Federal Register," Vol. 43, No. 21, January 31, 1978.

## Rating Options

*Aggregation Method:* No Aggregation Necessary

*Tie-break Rule:* Lower





**Upper Peninsula Power Company**

(a subsidiary of Integrys Energy Group)  
P. O. Box 19001  
Green Bay, WI 54307-9001

January 13, 2009

FERC Project No. 10855

Mr. George Taylor, DHAC  
Federal Energy Regulatory Commission  
888First St. NE  
Washington, DC 20426

Dear Mr. George Taylor:

Environmental Report: The McClure Penstock Replacement Project as part of the Dead River Hydroelectric Project (FERC Project No. 10855)

As you are aware, Upper Peninsula Power Company (UPPCO) is replacing the McClure Penstock.

As per your request you will find enclosed a hard copy of the Environmental Report and an electronic copy on a CD (inside cover). This report is intended to provide information on the Environmental Impacts associated with the replacement of the McClure Penstock.

A hard copy of the Environmental Report is being provided to all individuals listed in Appendix 1. These individuals are being asked to provide comments by February 7, 2009. These comments will then be addressed in the Final Report.

If you have any questions relative to this material, please feel free to contact me at (920) 433-1733 at your earliest convenience.

Sincerely,

Russ Senso  
Environmental Consultant  
for Upper Peninsula Power Company

syx

Enc.

cc: Mr. Robert Meyers, UPPCO - UISC  
Ms. Joan Johaneck, WPSC - D2  
Mr. Gil Snyder, WPSC - D2  
Mr. Todd Poehlman, WPSC - REG  
Mr. Greg Egtvedt, IBS - D2

Mr. Keith Moyle, UPPCO - UISC  
Mr. Ben Trotter, WPSC - REG  
Ms. Janet Wolfe, UHGO  
Mr. Jeff Krueger, WPSC - A3

## **Appendix 1**

### **Environmental Report Recipients**

Mr. Kirby Juntala  
Board of Light and Power  
City of Marquette  
2200 Wright Street  
Marquette, MI 49855

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

Ms. Jessica Mistak  
Michigan Department of Natural Resources  
Marquette Fisheries Research Station  
488 Cherry Creek Road  
Marquette, MI 49855

Ms. Christie Deloria-Sheffield  
US Fish and Wildlife Service  
3090 Wright St.  
Marquette, MI 49855

Mr. James Schramm  
Michigan Hydro Relicensing Coalition  
P.O. Box 828  
Pentwater, MI 49449

Mr. John Suppnick  
Michigan Dept of Environmental Quality  
Surface Water Quality Division  
P.O. Box 30273  
Lansing, MI 48909

Mr. Mike Smolinsky  
Michigan Dept of Environmental Quality  
420 5th Street  
Gwinn, MI 49841