



United States Department of the Interior

FISH AND WILDLIFE SERVICE

Green Bay ES Field Office
2661 Scott Tower Drive
New Franken, Wisconsin 54229-9565
Telephone 920/866-1717
FAX 920/866-1710

March 7, 2005

Dr. Noel J. Cutright
WE Energies
231 West Michigan Street
Milwaukee, Wisconsin 53203

re: Piping Plover Monitoring
Point Beach Nuclear Plant
Manitowoc County, Wisconsin

Dear Dr. Cutright:

The U.S. Fish and Wildlife Service (Service) received your letter dated February 17, 2005, with a proposed monitoring framework for piping plovers at the Point Beach Nuclear Plant in Manitowoc County.

The framework includes: conduct of an annual survey, following the International Piping Plover Breeding Census guidelines, between June 1 and June 15; contact and coordination with the Service and the Wisconsin Department of Natural Resources in the event that plovers are discovered nesting; and an increase in the number of surveys in the event of nesting.

The Service concurs with framework points 1 through 5 as described in your letter. However, we suggest the following changes to point 6. "If piping plovers *are observed* [on the property], follow up surveys will be conducted in the same year; earlier and repeated surveys will be conducted the next year, continuing for as long as piping plovers *are observed* at [the property]."

It is our belief that increased surveys would be warranted if birds are observed because of the difficulty in detecting nests. We also emphasize that if birds are observed on-site, nest searches should only be conducted by trained personnel because of the potential for causing abandonment or for crushing or damaging cryptic plover nests.

We appreciate the opportunity to respond. Questions pertaining to these comments can be directed to Mr. Joel Trick at 920-866-1737 or Ms. Leakhena Au at 920-866-1734.

Sincerely,

Janet M. Smith
Field Supervisor