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GOVERNOR

STATE OF MICHIGAN  
DEPARTMENT OF NATURAL RESOURCES  
LANSING



DR. WILLIAM E. MORITZ  
DIRECTOR

March 30, 2016

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

**RE: WATER QUALITY MONITORING REPORT FOR THE SECORD (FERC NO. 10809), SMALLWOOD (FERC NO. 10810), EDENVILLE (FERC NO. 10808) AND SANFORD (FERC NO. 2785) HYDROELECTRIC PROJECTS ON THE TITTABAWASSEE RIVER, MICHIGAN.**

Dear Ms. Bose,

The Michigan Department of Natural Resources (Department) has reviewed the Boyce Hydro Power LLC (Boyce) annual water quality monitoring report for 2015. The report indicates that Boyce is still not fully complying with the water quality requirements for the licenses of the above mentioned projects. The Department notes that Boyce did continue efforts to evaluate potential mitigation measures and proposes to continue those efforts in 2016. We appreciate those efforts, however, more aggressive measures may be required to fully comply with the license articles for water quality. Depending on conditions, more spill may be required at some of the projects to comply with the license requirements. Potentially other measures may need to be evaluated.

Boyce has indicated that they will have all the data loggers for the projects connected to their SCADA system by June 1 this year which will assist them in addressing any water quality issues as they arise and in a timely manner which was not the case last year. The report's executive summary provides analysis by Boyce's consultant which points out a number of problematic issues with the data and data collection. We suggest that Boyce review and revise their QA/QC procedures for data collection and monitoring to avoid potentially confusing data during the 2016 monitoring season.

The report indicates that in September of 2015 Boyce employed a pump to supply water to the tailrace of the Smallwood Project, but did not provide any specifics about the pump, the capacities of the pump and how that was used to supplement the DO levels in the tailrace. We would like additional information regarding the use of this pump.

Boyce has also indicated they are considering using siphons to provide supplemental flows to the tailrace and potentially reduce temperatures in the tailrace facilitating DO levels. We would like additional information on these proposed siphons. In previous water quality reports, impoundment profiles indicated low DO at depth. We are unsure

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if the introduction of water from deeper portions of the impoundment would help resolve the low DO levels in the tailraces at the projects.

The Department anticipates seeing improvements in water quality below these projects in 2016 with Boyce's proposed efforts to move directly to spilling during the periods they anticipate low DO levels at the projects and having the monitoring equipment connected to the SCADA system to alert the company when unexpected problems arise at the projects.

The Department appreciates the opportunity to comment on this report. If you have any questions or need clarification, feel free to contact me at:

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Sincerely,



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Cc TJ LoVullo, FERC, DC  
Koren Carpenter, MDEQ, Lansing  
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