



RICK SNYDER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF NATURAL RESOURCES
LANSING



DR. WILLIAM E. MORITZ
DIRECTOR

May 19, 2016

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

RE: WATER QUALITY MONITORING PLANS FOR THE SANFORD (FERC NO. 2785), EDENVILLE (FERC NO. 10808), SMALLWOOD (FERC NO. 10810) AND SECORD (FERC NO. 10809) HYDROPOWER PROJECTS ON THE TITABAWASSEE RIVER, MICHIGAN

Dear Ms. Bose,

The Michigan Department of Natural Resources (Department) has reviewed the May 18, 2016 filing by Boyce Hydro Power, LLC (Boyce) regarding progress and schedule for water quality monitoring for 2016. In the progress report, Boyce indicates they are planning on installing a diffuser system in the tailraces at the Secord, Smallwood and Edenville Projects. This may be an alternative that facilitates improvements in water quality, but the report lacks specific details on where the sensors will be located in relation to the air curtain and how flows in the tailrace pools will make sure water quality is maintained throughout the tailrace area with leakage flows.

The filing also indicates that all of the projects will be connected to their SCADA system by June 30. This is unacceptable. The Commission's letter to Boyce Dated April 12, 2016 clearly states all of the DO monitors are required to be connected to the SCADA system by June 1. Boyce was also informed of this requirement in the Commission's letter dated June 3, 2015, where the Commission states:

You are reminded that connecting the water quality monitoring equipment to the SCADA systems is part of the approved Water Quality Monitoring Plan under Article 407 of the Sanford license and Article 402 of the Edenville, Smallwood, and Secord licenses, therefore, the remaining three projects must be connected **prior to** [emphasis added] the June 1, 2016 monitoring season.

Clearly Boyce had almost a year warning that they would be required to have the DO monitoring equipment in place and connected to their SCADA system at all four of the projects by June 1. Given Boyce had ample warning to fulfill these requirements, this delay to the end of June is not in compliance with Commission directives to Boyce and the license articles for these projects.

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The Department respectfully requests the Commission direct Boyce to comply with the provisions for water quality monitoring and have the temperature and DO monitoring equipment connected to the SCADA system and tested prior to June 1. The Department appreciates the opportunity to comment regarding this issue. If you have any questions or need clarification, please feel free to contact me at:

MICHIGAN DEPARTMENT OF NATURAL RESOURCES
MIO FIELD OFFICE
191 S MT TOM RD
MIO MI 48647

Sincerely

A handwritten signature in black ink, appearing to read "Kyle Kruger", with a long horizontal flourish extending to the right.

Kyle Kruger
Senior Fisheries Biologist
Habitat Assessment Unit
FISHERIES DIVISION
(989) 826-3211 x 7073

cc Holly Frank, FERC
TJ LoVullo, FERC
Koren Carpenter, DEQ, Lansing
Chris Freiburger, Fisheries, Lansing

Document Content(s)

MDNR Comment Boyce water quality monitoring 2016.PDF.....1-2