



RICK SNYDER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF NATURAL RESOURCES
LANSING



KEITH CREAGH
DIRECTOR

August 1, 2018

Mr. Lee Mueller, Co-Manager Member
Boyce Hydro Power LLC
6000 S M-30
PO Box 15
Edenville, MI 48620

RE: CONSULTATION REGARDING TEMPORARY RESERVOIR DRAWDOWN FOR FERC MANDATED FOCUSED SPILLWAY INSPECTIONS FOR SANFORD (FERC NO. 2785), EDENVILLE (FERC NO. 10808), SMALLWOOD (FERC NO. 10810) AND SECORD (FERC NO. 10809) PROJECTS ON THE TITTABAWASSEE RIVER, MICHIGAN

Dear Mr. Mueller,

The Michigan Department of Natural Resources (Department) has reviewed your notice dated July 25, 2018 regarding planned inspections at the Boyce Projects, listed above, scheduled for October 2018. The Department has the following comments:

Timing – The Department does not object to the dates proposed for the inspection. We do note that late September and early October are still popular for fishing activity. We recommend a vigorous public information campaign to alert the public regarding the proposed drawdown. The lowered impoundments could create new navigation hazards.

Drawdown\Refill Rate – The Department accepts Boyce's proposed rate of drawdown, not to exceed 0.67 feet (8 inches) per 24-hour period. The Department also accepts Boyce's proposed rate of refill of not more than 0.75 feet (9 inches) per 24-hour period.

Habitat Protection – Given the proposed action will lower three of the impoundments below the annual minimum levels the possibility of extensive dewatering of habitat could occur. To minimize negative impacts to the habitat, especially to the more riverine habitat directly below the projects, the Department requests that minimum flows of 30 cfs be provided below Secord, Smallwood and Edenville. The mandated minimum flows below Sanford and the Tobacco Spillway should be maintained. These minimum flows should be maintained at all times while the impoundments are below the FERC mandated minimum elevations, with the exception of the periods where staff are onsite conducting the inspections at each respective spillway.

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Stranded Fish\Mussel Survey – Since the proposed action will lower the impoundments below the levels required in the licenses, the potential for more extensive dewatering of shoreline and littoral zone habitat will be created and have the potential to strand fish and other aquatic organisms. The Department requests that when the elevations of the ponds are lowered to 3 feet below normal pool and at the final low elevation (4 feet below normal pool) that Boyce conduct stranded fish and mussel surveys around the three impoundments with lowered water levels. Any fish or mussels found stranded should be moved into the main waterbody. A summary of the sizes, species and location of the fish and mussels should be provided to the Department.

The Department also recommends you contact the Michigan Department of Environmental Quality for any permits that may be required to perform the requested drawdown and inspection.

The Department appreciates the opportunity to comment on your proposal. If you have any questions, need clarification or would like guidelines for fish or mussel surveys, please feel free to contact me at: Michigan Department of Natural Resources, Mio Field Office, 191 S. Mt. Tom Rd., Mio, MI 48647.

Sincerely,



Kyle Kruger
Senior Fisheries Biologist
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cc Kimberly Bose, FERC, DC
John Zygaj, FERC, Chicago
Brian Rudolph, MDEQ, Bay City
Amira Oun, DEQ, Lansing
James Baker, Fisheries, Bay City

Document Content(s)

MDNR Response to Boyce RE Inspectoins proposal 8-1-2018.PDF.....1-2