

BOYCE HYDRO POWER LLC

A W.D. Boyce Trusts Legacy Enterprise

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6 September, 2018

Mr. John Zygaj, P.E. Regional Engineer
Chicago Regional Office
Federal Energy Regulatory Commission
230 S Dearborn St, Suite 3130
Chicago, IL 60604

Secord Dam P-10809, Smallwood Dam P-10810, Edenville Dam P-10808, Sanford Dam P-2785 Focused Spillway Preparation Issues

Mr. Zygaj: Your CEII letter dated 16 August, 2018 which was received by me on 24 August, 2018, and your subsequent letter of 30 August, 2018 requested certain responses from Boyce Hydro Power, LLC (Boyce) concerning matters pertaining to the planned focused spillway inspection that is scheduled to commence on 1 October, 2018, subject to final approval from the Commission. This letter is provided in response to three specific items and comments contained in your correspondence.

1. MDNR comments about the planned 4' drawdown requested the licensee to conduct a stranded mussel survey during the drawdown period and additional actions pertaining to stranded marine life.

Boyce does not intend to undertake the suggested actions as it is not in the business of conducting these types of activities, and more importantly, no objective criteria has been established by the MDNR which justifies the course of action so described. If the MDNR genuinely believes that such activities are necessary and vital to the preservation of marine life in the Tittabawassee River watershed, then it is the agency that is both empowered and equipped by the state of Michigan to undertake these activities. Moreover, the MDNR, upon occasion, retains the services of a non-profit environmental conservation organization, Huron Pines, funded by MDNR grants for these types of projects. It should also be noted that the duration of the 4' drawdown will be less than seven days, unlike the 4' drawdown conducted in September 2016 for the Sanford reservoir when the Edenville Dam slab repairs were conducted between October 1st and December 9th. For some reason the MDNR did not demand a stranded mussel survey for that project.

2. With respect to minimum flows during the inspections, only the Tobacco River spillway and the Sanford Dam have license requirements for minimum flows. These will be maintained during the draw down period except for the few hours when the spillway slabs will be undergoing the actual inspections. Therefore, I see no issue with this license requirement that will only be interrupted for a very brief time.

3. Request for additional time to implement the 4' drawdown was made based on the best judgment and ten years of experience in managing water levels as considered by senior Boyce operator, Ron Heilig. He is responsible for the implementation of water levels, and he anticipates that inclement weather and rain events in the later part of September may well make it nearly impossible to draw the reservoir levels down the full four feet in only ten days. In retrospect it would have been better to make the initial request for commencing the drawdown as of September 16th or 17th. Given the history of the Commission's sensitivity to public pressure about preserving recreational use of the water impoundments that are funded entirely by the electrical generation of the dam operations, Boyce withdraws its request for an earlier start date, as it is obvious that the request will be denied. The inspections will take place under whatever conditions are possible to effectuate given the time constraints for adjusting the water levels.

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The Water Management Plan is being revised by the consultant and will be filed with the Commission on Monday, 10 September, 2018. The constructive suggestions provided will be incorporated in the revised plan.

With respect to the spillway gate tests, Boyce personnel have undertaken dive inspections of the gate bridle chains and have found some of them to be in deteriorated condition from rub wear against the rivets in the curved gate plates. Consequently Boyce is in the process of ordering new chains for those gates that are deemed suspect and will have new chains installed before the gate opening tests are conducted.

Sincerely yours,

A handwritten signature in black ink, appearing to read "Lee W. Mueller", written over a horizontal line.

Lee W. Mueller, Architect

Co-Member Manager

Boyce Hydro Power, LLC.

Cc: Dee Purkeypile
Rollin Reineck

Document Content(s)

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