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June 30, 2005

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FEDERAL ENERGY
REGULATORY COMMISSION

Ms. Magalie R. Salas
Office of the Secretary
Federal Energy Regulatory Commission
Mail Code: DHAC, PJ-12
888 First Street, NE
Washington, DC 20426

Subject: *Water Quality Monitoring and Fish Tissue Plan*
License Article 404
Order Issuing New License – January 6, 2005
Sturgeon Falls Hydroelectric Project; FERC Project No. 2720-042
City of Norway, Michigan – Licensee

Dear Ms. Salas:


On behalf of the City of Norway, we are hereby filing one original and eight copies of the *Water Quality Monitoring and Fish Tissue Plan* for the Sturgeon Falls Hydroelectric Project. The plan is being submitted in accordance with License Article 404 of the project license issued on January 6, 2005.

A copy has also been submitted to the Michigan Department of Natural Resources, the U.S. Fish and Wildlife Service, and the Commission's Chicago Regional Office. A *Certificate of Service* attesting to distribution of the plan is enclosed. Resource agency review comments are included as an appendix to the plan document.

Thank you for your time and consideration in this matter. If you have any questions, please contact me.

Sincerely,

MEAD & HUNT, Inc.



Linda D. Mitchell
Project Manager

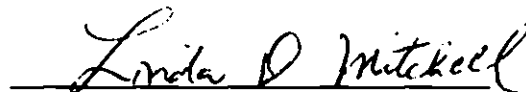
Enclosures

cc: See attached list

Certificate of Service
Water Quality Monitoring and Fish Tissue Plan

I hereby certify that I, on behalf of the City of Norway, Michigan, have this day served the foregoing document upon all entities specified in License Article 404 of the *Order Issuing New License* dated January 6, 2005, to be consulted on matters related to this Commission filing.

Dated this 30 day of June, 2005.



Linda D. Mitchell
MEAD & HUNT, Inc.

Distribution List
Sturgeon Falls Hydroelectric Project
FERC Project No. 2720

Water Quality Monitoring and Fish Tissue Plan

Ms. Magalie R. Salas, Secretary
Federal Energy Regulatory Commission
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Washington, DC 20426

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Regional Engineer
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Habitat Management Unit
Fisheries Division
Michigan Department of Natural Resources
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Field Supervisor
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Fish & Wildlife Service
Green Bay Field Office
2681 Scott Tower Drive
New Franken, WI 54229-9565

John Suppnick
Michigan Department of Environmental Quality
Surface Water Quality Division
P.O. Box 30273
Lansing, MI 48909

**Water Quality Monitoring and Fish Tissue Plan
Sturgeon Falls Hydroelectric Project
FERC Project No. 2720**

**Menominee River
Dickinson County, Michigan and
Marinette County, Wisconsin**

Prepared for:

**CITY OF NORWAY
NORWAY, MICHIGAN**



Prepared by:

**MEAD
HUNT**

June 2005

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Water Quality Monitoring and Fish Tissue Plan Sturgeon Falls Hydroelectric Project FERC Project No. 2720

1. Introduction

On January 6, 2005, the Federal Energy Regulatory Commission (FERC) granted an *Order Issuing New License* to the City of Norway, Michigan (City), for its Sturgeon Falls Hydroelectric Project, FERC Project No. 2720, located on the Menominee River in Dickinson County, Michigan, and Marinette County, Wisconsin. The Order includes License Articles specifying actions the City must take to comply with terms and conditions of the license. This *Water Quality Monitoring and Fish Tissue Plan* has been prepared in accordance with requirements of License Article 404, the entire text of which is included as Appendix A. License Article 404 references certain elements of the project's Certification under Section 401 of the Clean Water Act. A copy of this Certification is included as Appendix B, with referenced elements shown in highlighted text for ease of reference.

2. Temperature and Dissolved Oxygen Monitoring

A. Monitoring Schedule

Temperature and dissolved oxygen (DO) monitoring will be conducted from May 1 through September 30 in year 2010, and from May 1 through September 30 at 5-year intervals thereafter for the duration of the term of the current FERC license.

B. Monitoring Locations

Temperature and DO monitoring will be conducted at representative locations upstream and downstream of the Sturgeon Falls Project. The following three locations are targeted for sampling: (1) the tailrace of the Sturgeon Falls Project, (2) the Sturgeon River at or near Highway 2, and (3) the Menominee River at or near Highway 8. Specific sampling locations will be determined in consultation with the Michigan Department of Environmental Quality (MDEQ).

C. Quality Assurance

Measurements will be taken using portable continuous recording instruments that record monitoring data at hourly intervals (24 measurements per day per location). Before deployment, the DO probe's measurements will be calibrated in accordance with the manufacturer's specifications, and temperature readings will be checked across a range of temperatures against those of a laboratory thermometer certified by the National Institute of Standards Technology (NIST).

Upon retrieval, hourly measurements will be downloaded to a laptop computer or other appropriate data storage device. The data will be scanned for violations of the project-specific *Water Quality Standards* specified in Appendix B of this *Water Quality Monitoring and Fish Tissue Plan*. At the end of the downloading process, the calibration of monitoring instruments will be checked again in accordance with the manufacturer's specifications. Maintenance frequency for DO monitors will be scheduled to target an ending calibration error of no more than ± 1.0 milligram per liter at least 70 percent of the time.

D. Reporting

Temperature and DO data will be summarized and submitted to the MDEQ and the Michigan Department of Natural Resources (DNR) within 3 months of the completion of sampling. The report will include a summary of quality assurance data. The following information will be provided in the report:

- Daily minimum, maximum, and average DO for each day monitored.
- Daily minimum, maximum, and average temperature for each site monitored.
- All raw data.
- An explanation of any data gaps.

- A presentation of any DO and temperature values that exceed or violate the water quality standards specified in Appendix A, including an evaluation of the relationship between any water quality violations and environmental factors such as time of day, stream flow, project operations.
- A summary of quality assurance data, including a report of recalibration events and any observed variance in recorded and actual DO readings based on results of recalibration.

Analytical methods used shall be those approved by the U.S. Environmental Protection Agency (EPA) pursuant to Title 40 of the Code of Federal Regulations.

3. Sediment Monitoring Analysis

A. Monitoring Schedule

Beginning in 2015 and every 10 years thereafter until the expiration of the license period, the City will analyze the sediments in the Sturgeon Falls impoundment for the following parameters:

- Oil and grease
- Total cadmium
- Total copper
- Total mercury
- Total selenium
- Total zinc
- Total PCB
- Total arsenic
- Total chromium
- Total lead
- Total nickel
- Total phosphorus
- Total silver

Sediment samples will be analyzed by a licensed laboratory using U.S. Environmental Protection Agency (EPA) methods.

B. Methods

The sampling location will be determined in consultation with the MDEQ or other state environmental protection entity charged with water quality protection. The selected sampling location will be mapped and water depth will be recorded.

Sampling equipment, sample containers, and instruments that will contact the sample during collection will be thoroughly cleaned prior to sample collection. Sample containers used will be appropriate for the sample type (i.e., glass for oil and grease and total PCBs, plastic for other listed parameters). Following sample collection, sample containers will be immediately labeled with sample location, time, date, sampler's signature, and type of analysis requested. Samples will then be placed on ice.

Samples will be accompanied by a chain-of-custody record that includes the sampler's signature, sampling location, date, time, type of sample, and analysis required. When turning over possession of samples, the transferor and transferee will sign, date, and time the record sheet.

Sediment samples will be analyzed using U.S. EPA methods for the following parameters: Oil and grease, total cadmium, total arsenic, total chromium, total copper, total lead, total mercury, total nickel, total selenium, total phosphorus, total zinc, total silver, and total polychlorinated biphenyls (PCBs).

Maximum holding time will be as follows:

- Oil and grease, total cadmium, total arsenic, total chromium, total copper, total lead, total nickel, total selenium, total zinc, and total silver 6 months
- Total mercury and total phosphorus.....28 days
- Total PCBs.....14 days



C. Reporting

A report of the data generated as a result of sediment sampling will be submitted to the MDEQ and the Michigan DNR within 3 months of completing the sampling and analysis. The report will include a summary of quality assurance data, including documentation of sample chain of custody.

4. Fish Tissue Monitoring Analysis

A. Monitoring Schedule

Beginning in 2006 and every 10 years thereafter until the termination of the license period, the City will collect data on total mercury and PCBs occurring in the edible portion of fish from the Sturgeon Falls impoundment. However, data less than 3 years old collected from nearby impoundments on the Menominee River may be substituted for data collected on the Sturgeon Falls impoundment on a case-by-case basis.

B. Monitoring Methods

At least 1 month prior to the planned collection of sample fish, the City or its contractor will consult with an MDEQ staff biologist or other designated natural resource agency representative to determine the availability of substitute fish tissue data from other nearby impoundments on the Menominee River. Tissue data that meets the geographic and temporal criteria may be substituted for tissue data obtained from sampling of the Sturgeon Falls impoundment predator fish species, bottom-dwelling fish species, or both predator and bottom-dwelling species as deemed appropriate.

In the event that substitute data from other impoundments is not available, a site-specific collection plan for the Sturgeon Falls impoundment will be developed. The collection plan will include sampling location, sampling season, and the type of fishing gear to be employed will be identified. A copy of the collection plan will be provided to the MDEQ staff biologist or other designated natural resource agency representative for review at least 2 weeks prior to the start of collection.

The desired sample will consist of ten resident predator fish of one species (such as walleye or northern pike) that meet minimum legal size limits, and ten bottom-feeder fish of one species (such as sucker) that are representative of the sizes normally consumed by anglers. If ten legal-size resident predator fish cannot be collected after a reasonable effort (e.g., 4 or more hours of electrofishing or trap netting), smaller fish may be substituted. To the extent practicable based on field sampling schedules and conditions, the modified sample will be determined in consultation with an appropriate resource agency representative. Field data pertaining to collection, including data, time, location, and field technician name, will be recorded.

Fish collected for sampling will be placed on ice and processed on-site or transported to a facility for freezing and subsequent processing. Fish to be processed at a later date will be placed in bags made of plastic or other appropriate material, and labeled as to collection location, date, and species. Before thawed fish are processed, cleaning equipment and surfaces will be thoroughly rinsed with water. As each fish is processed, site information, sample number, species name, length, weight, gender, and sample type will be recorded. Fish will be filleted with skin on or off, depending on species, so that samples are representative of the edible portions of fish. Cleaning equipment will be thoroughly rinsed between processing of each fish.

Each sample fillet will be wrapped in suitable protective film (e.g., aluminum foil, with dull side to fish) and secured with tape placed lengthwise along the foil seam. Each fish will be wrapped and labeled individually. Each package will be labeled with date, water body, species, and sample I.D. number using a waterproof marker. Individual packages will be placed in a clear bag made of plastic or other suitable material, and the bag will be labeled with the sample I.D. number using a waterproof marker. Samples will be frozen prior to shipping to the analytical laboratory. Analyses will be conducted at a state-sponsored or state-licensed laboratory using EPA-approved analytical methods. The analytical method used for measuring mercury content of the fish tissue will be capable of achieving a quantification level of 0.01 parts per million (ppm).

C. Reporting

If substitute data obtained from another impoundment is utilized to satisfy fish tissue monitoring requirements, the City will submit a letter to the MDEQ and the Michigan DNR, citing the data source, no later than July 31 of each year that is a designated fish tissue sampling year (year 1 in 2006 and every 10 years thereafter for the duration of the license period).

If data utilized to satisfy fish tissue monitoring requirements is obtained by conduct of analysis of fish samples obtained from the Sturgeon Falls impoundment, results of analysis will be submitted to the MDEQ and the Michigan DNR within 60 days of the date that laboratory analysis results are obtained.

5. Monitoring Alternatives

The City may request changes in the monitoring schedule, methodology or reporting schedule outlined in this *Water Quality Monitoring and Fish Tissue Plan* at a future date based on monitoring results and workability of the plan. Alternatives to the monitoring procedures specified in this plan will be implemented only upon written approval from the MDEQ.

Appendix A. License Article 404

Appendix A

Article 404

Water Quality Monitoring and Fish Tissue Plan

Within 6 months of license issuance, the licensee shall file for Commission approval, a plan to monitor water quality according to water quality certification conditions 2.1 and 2.2; analyze impoundment sediments according to water quality certification condition 3.2; sample fish tissue according to water quality certification condition 3.4; and if needed, an alternative plan to monitor water quality and sample sediment and fish tissue according to condition 3.5. The plan shall be prepared after consultation with the Michigan Department of Environmental Quality, the Michigan Department of Natural Resources, and the U.S. Fish and Wildlife Service.

The licensee shall include with the *Water Quality Monitoring and Fish Tissue Plan* documentation of agency consultations, including copies of agency comments and recommendations on the draft plan, and specific descriptions of how the agencies' comments are accommodated by the plan. The licensee shall allow a minimum of 30 days for the agencies to comment and to make recommendations, before filing the plan with the Commission. If the licensee does not adopt a recommendation, the filing shall include the licensee's reasons, based on project-specific information.

The Commission reserves the right to require changes to the plan. The *Water Quality Monitoring and Fish Tissue Plan* shall not be implemented until the licensee is notified that the plan is approved. Upon approval, the licensee shall implement the plan according to the approved schedule, including any changes required by the Commission.

Appendix B. Section 401 Water Quality Certification

**MICHIGAN DEPARTMENT OF ENVIRONMENTAL QUALITY
CERTIFICATION UNDER SECTION 401 OF THE
CLEAN WATER ACT**

On July 24, 2002, the Michigan Department of Environmental Quality (MDEQ) granted water quality certification under section 401 of the Federal Clean Water Act to the City of Norway, Michigan for the Sturgeon Falls Hydroelectric Project with the following conditions:

1.0 Sturgeon Falls Project - Operational Requirements:

1.1 The City shall maintain the level of the Sturgeon Falls Impoundment at an elevation of 829.8 feet National Geodetic Vertical Datum (NGVD) and any fluctuation shall normally not exceed +/- 1 foot, except during events beyond the control of the City including naturally high or low flows.

1.2 Upon FERC license issuance, the City shall operate the Sturgeon Falls Project in a reregulation mode consistent with the Wilderness Shores Settlement Agreement and in coordination with the Wisconsin Electric Power Company (WE). On a daily basis, the Sturgeon Falls Project shall release a continuous flow that is approximately equal to the upstream daily average flow. The flow downstream of the Sturgeon Falls Project shall not change by more than 20 percent in any two hour period or by more than 50 percent in any 24 hour period. These downstream flow change restrictions shall not apply when natural changes to Sturgeon Falls Project inflows occur that exceed the specified rates.

1.3 The City shall, within six months of the FERC license issuance, install a calibrated staff gage at a location clearly visible to the public that shows the Sturgeon Falls Impoundment level referenced to the NGVD. The Sturgeon Falls Impoundment level shall be recorded hourly and any gate opening changes shall be recorded in a log. An annual summary report of all recorded Sturgeon Falls Impoundment levels and changes in gate openings shall be submitted to the MDNR. All recorded Sturgeon Falls Impoundment level data and gate opening change data shall be submitted promptly to the MDNR upon request.

1.4 The City shall fund a USGS gage on the Sturgeon River near the mouth. This gage will be used along with data from USGS gage number 04065106 to determine daily average upstream flows to the Sturgeon Falls Project.

1.5 Compliance with Section 1.2 of this Certification shall be determined at United States Geological Survey (USGS) gage number 04065722 on the Menominee River near Vulcan when this gage is in operation. If USGS gage number 04065722 is not in operation, then compliance shall be determined using operations data and data from gage number 04065106 and a gage on the Sturgeon River to be funded by the City as described in Section 1.4 of this Certification. An annual report describing the results from flow monitoring and the results from consultations with the WE shall be submitted to the MDNR.

1.6 A three-year test period shall be used to determine the City's ability to comply with the requirements listed in Sections 1.1 and 1.2 of this Certification. The test period shall begin after

operations at the upstream Wisconsin Electric Hydroelectric Projects are operated in a manner consistent with their FERC license issued on January 12, 2001, and after the structural modifications necessary for reregulation at the Sturgeon Falls Project have been completed. During the three-year test period, the City shall consult with the WE regarding how best to predict daily average upstream flows. Within 90 days after the end of the three-year test period, a report shall be prepared by the City, in cooperation with the MDNR and the MDEQ, and submitted to the MDEQ which documents their ability to comply with requirements in Sections 1.1 and 1.2. If the report indicates that the City is not able to comply with all of the requirements in Sections 1.1 and 1.2, then the report shall also contain a revised operations plan to meet the requirements.

1.7 During adverse conditions when the requirements in Sections 1.1 or 1.2 cannot be met, the City shall, within one business day, consult with the MDNR and the Marquette District Supervisor of the MDEQ, SWQD, regarding emergency actions taken or planned. Consultation during the adverse conditions shall continue following a mutually agreed upon schedule. Upon cessation of the adverse conditions, the City shall resume the normal operations.

2.0 Sturgeon Falls Project - Water Quality Limitations:

2.1 The City shall not warm the Menominee River downstream from the Sturgeon Falls Project, by operation of the project, to temperatures in degrees Fahrenheit higher than the following monthly average temperatures:

JAN	FEB	MAR	APR	MAY	JUN	JUL	AUG	SEPT	OCT	NOV	DEC
38	38	41	56	70	80	83	81	74	64	49	39

This Section (2.1) shall not apply when the natural temperatures of the Menominee River measured upstream of the Sturgeon Falls Impoundment exceed the above monthly average temperature values.

2.2 The City shall not cause the dissolved oxygen (DO) concentration measured in the Menominee River downstream of the Sturgeon Falls Project, by operation of the Project, to be less than 5.0 milligrams per liter at any time.

3.0 Sturgeon Falls Project - Water Quality Monitoring and Reporting:

3.1 The City shall monitor the temperature and DO of the Menominee River from May 1 through September 30, at representative locations upstream and downstream of the Sturgeon Falls Project, beginning five years after license issuance and every five years thereafter.

3.2 Ten years after the issuance of the FERC license, and every ten years thereafter, the City shall analyze the sediments in the Sturgeon Falls Impoundment for the following parameters:

- Oil and Grease
- Total Arsenic
- Total Cadmium
- Total Chromium

**Total Copper
Total Mercury
Total Selenium
Total Zinc
Total PCB**

**Total Lead
Total Nickel
Total Phosphorus
Total Silver**

3.3 Beginning one year after the issuance of the FERC license and every ten years thereafter, the City shall monitor the edible portion of fish from the Sturgeon Falls impoundment for total mercury and polychlorinated biphenyls. The sample shall consist of ten legal size resident predator fish of one species and ten bottom feeder fish of one species that are representative of the sizes normally consumed by anglers. If ten legal size resident predator fish of one species cannot be collected after a reasonable effort, then smaller fish may be substituted. Data less than three years old from nearby impoundments on the Manominee River may be substituted on a case-by-case basis.

3.4 All sampling locations, sampling methods, and reporting formats shall be determined in consultation with the MDEQ. All analytical methods used shall be those approved by the United States Environmental Protection Agency pursuant to Title 40 of the Code of Federal Regulations, Part 136, or methods approved by the MDEQ. An annual report of the data generated to comply with Sections 3.1-3.3, shall be submitted to the MDEQ and the MDNR within three months of completing the sampling. The report shall include a summary of quality assurance data.

3.5 Alternatives to the monitoring required in Section 3.0 may be implemented upon written approval from the MDEQ.

4.0 Sturgeon Falls Project Bank Erosion Control:

4.1 The City shall, within three years of the issuance of the FERC license, develop and implement a plan to remediate stream and reservoir bank erosion sites that are caused by the Sturgeon Falls Project. Prior to implementation, the plan shall be approved by the MDEQ, in consultation with the MDNR. This plan shall include a determination of the area of influence by the Sturgeon Falls Project, an erosion site inventory, an assessment of reasonable erosion control alternatives available for each site, and implementation dates for the erosion control option(s) selected for each site. The plan shall include a mechanism for the City to identify and control future erosion problems caused by the Sturgeon Falls Project.

5.0 Sturgeon Falls Project - Natural Organic Debris Maintenance:

5.1 The City shall pass natural vegetative debris (logs, stumps, sticks, limbs, leaves, and aquatic vegetation) collected on the trash racks and other structures over the Sturgeon Falls Dam, according to the plan in Appendix 25 of the FERC application.

6.0 Sturgeon Falls Project - Schedule Modification:

6.1 The MDEQ may extend or modify the specified implementation schedules within this Certification upon written request from the City, in the event the City, despite their good faith effort, is unable to meet the schedules specified within this Certification because of events beyond their control.

7.0 Sturgeon Falls Project - Temporary Modification of Operational Requirements:

7.1 Operational requirements of this Certification may be temporarily suspended for completion of necessary inspections, maintenance activities, dam safety activities, or in response to emergency requests from government agencies provided that prior notice is given to the MDNR.

8.0 Sturgeon Falls Project - Natural Resources Damages and Penalties:

8.1 The state reserves the right to seek civil or criminal penalties and liabilities under applicable law for natural resource damages that may occur.

9.0 Sturgeon Falls Project - Permits and Approvals:

9.1 Nothing herein shall relieve the City from the requirement to obtain any other necessary permits, licenses, or approvals from other federal or state departments or agencies. For all proposed drawdowns (and refills), for dam maintenance purposes, the City shall obtain any necessary state of Michigan permits and consult with the MDNR concerning the need for any remedial actions, mitigation, or restitution.

10.0 Sturgeon Falls Project - Right of Entry:

10.1 The City shall allow the MDEQ, or any agent appointed by the MDEQ, upon the presentation of credentials, to enter upon the City premises at reasonable times, to have access to and copy any records required to be kept under the conditions of this Certification, and to inspect the facilities or to conduct any environmental sampling.

11.0 Sturgeon Falls Project - Changes:

11.1 The City shall notify the MDEQ and the MDNR within ten days of any change that has or may occur in the structures or operation of the Sturgeon Falls Project, which may affect compliance with the MWQS.

12.0 Sturgeon Falls Project - Revocation:

12.1 If the MDEQ determines that the Sturgeon Falls Project can no longer comply with Section 401 (a) of the federal Clean Water Act and the MWQS, then this Certification may be revoked or modified after appropriate public notice.

Appendix C. Documentation of Agency Consultation

Summary of Resource Agency Consultation

The following text presents resource agency comments of the licensee's *Draft Water Quality Monitoring and Fish Tissue Plan*, and the licensee's response. Copies of licensee and resource agency correspondence are included following this summary.

Michigan Department of Natural Resources Comment (Telephone Discussion June 13, 2005)

Section 4.A, Page 6 – It should be clarified that MDEQ will approve substitutions for fish tissue analysis on a case-by-case basis.

Licensee's Response

The licensee's plan states that "data less than 3 years old collected from nearby impoundments on the Menominee River may be substituted for data collected on the Sturgeon Falls impoundment on a case-by case basis." This language reflects Section 3.2 of the Water Quality Certification prepared by the MDEQ, which states: "data less than 3 years old from nearby impoundments on the Menominee River may be substituted on a case-by-case basis." The MDEQ did not request that the language included in the plan be revised, and the licensee believes that the language as presented correctly reflects the MDEQ's intent. For this reason, the licensee believes that modifications are not required.

Michigan Department of Natural Resources Comment (Letter dated June 13, 2005)

Section 4.B, Page 6 – "The phrase "by MDEQ" should be added to the end of the last sentence of the first paragraph.

Licensee's Response

The requested change will be has been made, such that the sentence reads" Tissue data that meets the geographic and temporal criteria may be substituted for tissue data obtained from sampling of the Sturgeon Falls impoundment predator fish species, bottom-dwelling fish species, or both predator and bottom-dwelling species as deemed appropriate by the MDEQ."

Michigan Department of Environmental Quality Comment (Letter dated June 3, 2005)

Our only comment is that the maintenance frequency for the dissolved oxygen monitors should be such that errors in calibration due to drift or probe fouling as measured by the recalibration data are less than 1 mg/l at least 70 percent of the time.

Licensee's Response

Section 2.C of the licensee's plan has been revised to reflect the MDEQ's request.

U.S. Fish and Wildlife Service

No comments were received.

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May 18, 2005

Ms. Jessica Mistak
Habitat Management Unit
Fisheries Division
Michigan Department of Natural Resources
Marquette Fisheries Station
484 Cherry Creek Road
Marquette, MI 49855-8999

Ms. Janet Smith
Field Supervisor
U.S. Department of the Interior
Fish & Wildlife Service
Green Bay Field Office
2661 Scott Tower Drive
New Franken, WI 54229-9565

John Suppnick
Michigan Department of Environmental Quality
Surface Water Quality Division
P.O. Box 30273
Lansing, MI 48909

Subject: Article 404 – *Water Quality Monitoring and Fish Tissue Plan*
Order Issuing New License – Major Project (issued January 6, 2005)
Sturgeon Falls Hydroelectric Project
FERC Project No. 2720
Norway, Michigan

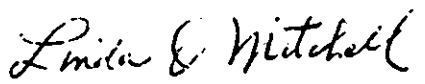
On behalf of the City of Norway, I am hereby submitting a copy of the *Draft Water Quality Monitoring and Fish Tissue Plan* to each of you for your review and comment. The plan has been prepared in accordance with Article 404 of the above-referenced new license for a major water power project.

Please submit any review comments you may have by June 18, 2005. Upon receipt of any review comments, the *Draft Water Quality Monitoring and Fish Tissue Plan* will be finalized and submitted to the Federal Energy Regulatory Commission for approval.

Thank you for your time and consideration in this matter. If you have any questions, please contact me.

Sincerely,

MEAD & HUNT, Inc.



Linda D. Mitchell
Project Manager

Enclosure

cc: Mr. Joe Pickart, City of Norway



JENNIFER M. GRANHOLM
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF ENVIRONMENTAL QUALITY
LANSING



STEVEN E. CHESTER
DIRECTOR

June 3, 2005

Ms. Linda Mitchell
Mead and Hunt
6501 Watts Road
Madison, Wisconsin 53719-2700

Dear Ms. Mitchell:

We have reviewed the May 18, 2005 Water Quality Study Plan for the Sturgeon Falls Hydroelectric Project that you submitted to us on behalf of the city of Norway. Our only comment is that the maintenance frequency for the dissolved oxygen monitors should be such that errors in calibration due to drift or probe fouling as measured by the recalibration data are less than 1 mg/l at least 70 percent of the time.

If you have any questions regarding this matter, please contact me.

Sincerely,

John Suppnick
Surface Water Assessment Section
Water Bureau
517-335-4192

cc: Ms. Jessica Mistak, Fisheries Division, DNR
Mr. Gerald Saalfeld/Section 401 File, WB, DEQ



STATE OF MICHIGAN

JENNIFER M. GRANHOLM
GOVERNOR

DEPARTMENT OF NATURAL RESOURCES
LANSING

REBECCA A. HUMPHRIES
DIRECTOR

Refer to: 4202.2.33

June 13, 2005

Ms. Linda Mitchell
Mead & Hunt
6501 Watts Rd.
Madison, WI 53719

Dear Ms. Hunt,

Subject: Article 404 Water Quality Monitoring and Fish Tissue Plan
Sturgeon Falls Hydroelectric Project (FERC No. 2720)

The Michigan Department of Natural Resources (MDNR) has received your May 18, 2005 Sturgeon Falls Hydroelectric Project Water Quality Monitoring and Fish Tissue Plan. After reviewing the plan, we have the following comments:

- 4. A. page 6- It should be clarified that MDEQ will approve substitutions for fish tissue analysis on a case-by-case basis.
- 4. B. page 6- The phrase "by MDEQ" should be added to the end of the last sentence of the first paragraph.

If you have any questions about this matter, please contact Jessica Mistak, Senior Fisheries Biologist, 906-249-1611 ext 308 or mistakjl@michigan.gov. If you wish to contact Jessica Mistak in writing, her address is:

MARQUETTE FISHERIES STATION
MICHIGAN DEPARTMENT OF NATURAL RESOURCES
484 CHERRY CREEK RD
MARQUETTE, MI 49855

Sincerely,

Jessica Mistak, Senior Fisheries Biologist

cc: Ms. Janet Smith, FWS
Mr. John Suppnick, MDEQ
Mr. Chris Freiburger, MDNR
Mr. Mike Herman, MDNR