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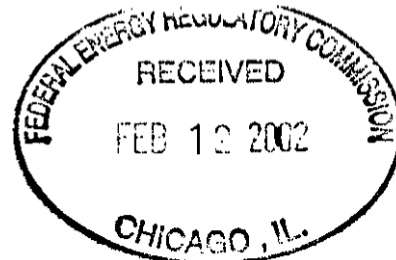
**CITY OF CRYSTAL FALLS**  
401 Superior Avenue  
Crystal Falls, MI 49920

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FEDERAL ENERGY REGULATORY COMMISSION  
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February 6, 2002



Jessica Mistak, Fisheries Biologist  
Marquette Fisheries Station  
484 Cherry Creek Rd  
Marquette, MI 49855

Subject: White Water Associates' Water Quality Monitoring Study, 2001 Final Report  
Project No. 11402-013

Dear Jessica Mistak,

Thank you for your careful review of the draft Water Quality Monitoring Study, 2001, for the City of Crystal Falls. There is one item that we would like to clarify for the record. This letter is respectfully submitted to document our claim that the DO levels were never out of compliance in 2001 despite the record temperatures recorded in our region.

After review of the White Water Associates 2001 Final Report and discussing with them their findings, we (The City of Crystal Falls) feel that never once were the DO (dissolved oxygen) levels out of compliance with those specified in Article 404. This is despite the fact that White Water had submitted an incident report to FERC dated August 22, 2001 stating that instruments had recorded levels below the 5.0 mg/L minimum level specified by Article 404. To support our claim, we submit the following information.

In White Water's 2001 water quality monitoring final report, there was but one period (from Aug 5 – Aug 12) in which low levels were recorded. The recorded DO (dissolved oxygen) level in the tailrace had fallen below the 5.0 mg/L lower limit specified by Article 404. However, the monitoring equipment during that period was shown to be out of calibration, and injecting error in the negative direction. Thus, all the recorded DO data should have had higher values. In fact, if the data was compensated by the minimum 10% figure, all the DO recorded data would have been in compliance.

The above information was discussed with and supported by the enclosed fax and letter from White Water Associates dated Feb 15, 2002. Particularly, please pay attention to the last paragraph of the letter where Kent Premo states "For the reasons stated, my professional opinion is that the water quality standard of 5.0 mg/L was not exceeded."

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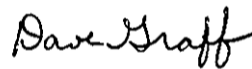
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Though we feel that the DO level was in compliance, we do realize that instrument drift can lead to faulty data. Consequently, for the year 2002, we shall follow the recommendations you laid out in your August 27, 2001 letter to White Water's Kent Premo, namely

1. Increase frequency of all visits to download data to 10 days
2. If high water temperatures ( $>25^{\circ}\text{C}$ ) are experienced, download data on at least a weekly basis.
3. Consistent post-calibration of retrieved data collection units.

Upon completion of next year's annual report and upon careful analysis of three consecutive years of data, we will want to sit down with the appropriate agencies to investigate a less intensive monitoring program - yet assure that our water quality is not jeopardized.

Sincerely,



Dave Graff  
Project Engineer

cc: Mr. Kurt Newman, MDNR  
Mr. Jim Fossum, USFWS  
✓ Ms. Patricia Grant, FERC  
Mr. Kent Premo, White Water Associates  
Mr. Charles Nordeman, City Manager