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FEDERAL ENERGY
REGULATORY COMMISSION

July 29, 2003

FERC Project No. 1981 - 014

Ms. Magalie Roman Salas, Secretary
Federal Energy Regulatory Commission
Mail Code: DTCA, HL 21.3
888 First Street, N.E.
Washington, DC 20426

Dear Secretary Salas:

Stiles Hydroelectric Project Water Quality Monitoring Plan

As per the Order Issuing New License for the Stiles Hydroelectric Project (FERC Project No. 1981) dated February 26, 2003, Oconto Electric Cooperative (OEC) is enclosing a proposed Water Quality Monitoring Plan for approval, as described in Article 404 of the Order.

The Water Quality Monitoring Plan addresses the following requirements listed in the Order: locations to monitor water temperature and dissolved oxygen (DO) at five year intervals, monitoring periods and frequency of measurements, instrumentation, and a schedule for monitoring and reporting of the data generated. A copy of the Water Quality Monitoring Plan is attached.

OEC has consulted with the Wisconsin Department of Natural Resources (WDNR) and the United States Fish and Wildlife Service (FWS) during the development of this plan. WDNR returned comments supporting the plan as proposed. FWS did not respond with comments within the required comment period. Documentation of Agency Consultation is included in Appendix A. A written response to agency comments and recommendations is also included in Appendix A.

Should you have any questions regarding this material, please feel free to contact Shawn Puzen at (920) 433-1094 or Mark Metcalf at (920) 433-1833. Thank you.

Sincerely,

Jan M. Stranz
Member Services Director
Telephone: (920) 846-2816

Enc.

cc: Mr. Greg Egtvedt, WPSC - A2 (w/o attach)
Mr. Shawn Puzen, WPSC - A2 (w/o attach)
Mr. Mark Metcalf, WPSC - A1 (File)

Mr. Tom Meronek, WDNR
Ms. Janet Smith, FWS

Water Quality Monitoring Plan

Stiles Hydroelectric Project

FERC License No. 1981

Oconto Electric Cooperative

June 2003

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Water Quality Monitoring Plan

Stiles Hydroelectric Project - FERC License No. 1981

Article 404 Within 6 months of the effective date of the license, the licensee shall file for Commission approval a plan to monitor water quality (i.e., temperature and dissolved oxygen [DO]) at five-year intervals.

1. Water Quality Requirements

The Wisconsin Department of Natural Resources (WDNR) has classified the Oconto River immediately below the Stiles Project as a warm water sport fish community. Oconto Electric Cooperative (OEC) shall meet the criteria listed in NR 102.04, Wisconsin Administrative Code and the 401 Certification:

A. Temperature - Requirements

The temperature shall not exceed 89°F for warm water fish.

B. Dissolved Oxygen - Requirements

OEC shall not cause the dissolved oxygen (DO) concentration to be less than 5.0 mg/L at any time in the Oconto River below the Stiles Project.

C. pH - Requirements

The pH requirement is criteria listed in NR 102.04, Wisconsin Administrative Code:

The pH shall be within the range of 6.0 to 9.0, with no change greater than 0.5 units outside the estimated natural seasonal maximum and minimum.

2. Water Quality Monitoring

Temperature, DO, and pH data will be collected on an hourly basis (24 measurements per day, per location) from June 1 through August 31 each year using portable, programmable recording instrumentation (see dissolved oxygen monitoring equipment).

3. Water Quality Monitoring: Locations and Schedule

Temperature, pH, and dissolved oxygen data will be collected at two sites along the Oconto River. OEC proposes the following monitoring locations for compliance with the requirements set forth in the project license:

- A. Below the Stiles Hydroelectric Project, OEC will monitor temperature and dissolved oxygen approximately 300 yards downstream of the dam at the

railroad trestle, SE ¼ of NE ¼, section 34, T28N, R20E (Township of Stiles) in the middle of the river.

- B. Above the dam at the Stiles Hydroelectric Project, near the intake to the Powerhouse. Monitoring at this location is to determine the water quality prior to discharge through the Powerhouse, as the City of Oconto Falls still operates a municipal wastewater plant that discharges into the Oconto River above the Stiles Project. Monitoring at this location will be conducted at mid-depth (approximately 9 feet below surface water level)

OEC is required to operate the Stiles Project in limited peaking mode for a period of 3 years from the effective date of the license (2003). At the conclusion of this 3-year period, OEC shall operate the project in a run-of-river mode for the protection of water quality and aquatic resources. Water quality monitoring will begin in the first year of run-of-river operation (2006) and every 5 years thereafter for the duration of the license (2011, 2016, etc.).

4. Monitoring Equipment and Quality Assurance

Temperature, pH, and dissolved oxygen data will be collected using portable water quality monitoring equipment manufactured by Hydrolab, Inc., or equivalent. All monitoring equipment will be calibrated for pH and dissolved oxygen prior to deployment according to the manufacturer instructions. The instruments shall be cleaned and calibrated at least once every ten days during the annual monitoring period. At the time the monitoring equipment is removed from monitoring, a post-calibration will be performed per the manufacturer instructions to determine loss of dissolved oxygen calibration. The post-calibration will be performed on the dissolved oxygen monitoring equipment before any maintenance or cleaning of the probe occurs.

Per the equipment manufacturer, the monitoring equipment has an accuracy of 0.20 mg/L, excluding any bio-fouling or water quality problems. The data collected will be corrected for any loss of calibration greater than 0.20 mg/L. Raw data will be adjusted assuming a linear degradation of calibration based upon a post-calibration of the equipment.

5. Annual Monitoring Results - Reports

All temperature, pH and DO data collected will be compiled and summarized in an annual report submitted to the WDNR and U.S. Fish and Wildlife Service (FWS). The report will be submitted within 60 days of the completion of the annual monitoring period. The following information will be provided:

- A. Data will be presented in graphical and tabular format. Graphical data will be provided to show the daily DO levels at each monitoring location.
- B. All copies of instrument pre-deployment and post-deployment calibration sheets will be provided.
- C. A summary of any water quality deviations observed during the monitoring period. An evaluation of the relationship between any observed temperature or DO deviations and other environmental factors, including project operations data, that may affect the water quality of the discharge.
- D. In the event that deviations are observed and are due to project related activities, OEC will consult with WDNR and FWS to pursue appropriate actions.

Appendix A

Documentation of Agency Consultation



Oconto Electric Cooperative

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June 24, 2003

FERC Project No. 1981

Mr. Tom Meronek
Wisconsin Department of Natural Resources
101 N. Ogden Road
Peshtigo, WI 54157

Dear Mr. Meronek:

Draft Water Quality Monitoring Plan for the Stiles Hydroelectric Project (FERC Project No. 1981)

Oconto Electric Cooperative (OEC) is pleased to submit a Draft Water Quality Monitoring Plan for your review and comment.

The Water Quality Monitoring Plan addresses the requirements listed in Article 404 of the Order Issuing New License dated February 26, 2003. The plan includes provisions for monitoring water temperature, dissolved oxygen (DO), and pH in the Oconto River at the Stiles Hydroelectric Project. A copy of the Draft Water Quality Monitoring Plan is enclosed for your review and comment.

Please review the enclosed plan and provide comments or suggestions as soon as possible, but no later than 30 days from the date of this letter. Should you have any questions or concerns, please do not hesitate to call Shawn Puzen at (920) 433-1094 or Mark Metcalf at (920) 433-1833. Thank you for your time and consideration.

Sincerely,

Jan M. Stranz
Member Services Director
Telephone: (920) 846-2816

vav

Enc.



State of Wisconsin \ DEPARTMENT OF NATURAL RESOURCES

Jim Doyle, Governor
Scott Hassett, Secretary
Ronald W. Kazmierczak, Regional Director

P.O. Box 208
Peshtigo, Wisconsin 54157
Telephone 715-582-5052
FAX 715-582-5005
TTY 715-582-5000

July 1, 2003

Ms. Jan Stanz
Oconto Electric Cooperative
P.O. Box 168
Oconto, WI 54154-0168

Subject: Draft Water Quality Monitoring Plan for Stiles Dam (FERC # 1981)

Dear Jan:

I have read the Water Quality Monitoring Plan you prepared and am pleased with it. Thanks you for submitting the plan for my review.

Sincerely,

A handwritten signature in black ink, appearing to read 'Thomas G. Meronek', is written over a light blue horizontal line.

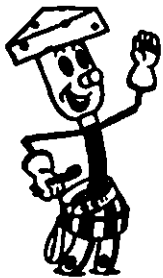
Thomas G. Meronek
Fisheries Biologist

Stiles Hydroelectric Project
Water Quality Management Plan - Article 404
Response to WDNR Comments

Water Quality Management Plan

WDNR has no additional comments and concurs with the plan as written.

Response: Comment noted.



Oconto Electric Cooperative

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June 24, 2003

FERC Project No. 1981

Ms. Janet Smith
U.S Fish and Wildlife Services
2661 Scott Tower Drive
New Franken, WI 54229

Dear Ms. Smith:

Draft Water Quality Monitoring Plan for the Stiles Hydroelectric Project (FERC Project No. 1981)

Oconto Electric Cooperative (OEC) is pleased to submit a Draft Water Quality Monitoring Plan for your review and comment.

The Water Quality Monitoring Plan addresses the requirements listed in Article 404 of the Order Issuing New License dated February 26, 2003. The plan includes provisions for monitoring water temperature, dissolved oxygen (DO), and pH in the Oconto River at the Stiles Hydroelectric Project. A copy of the Draft Water Quality Monitoring Plan is enclosed for your review and comment.

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Sincerely,

Jan M. Stranz
Member Services Director
Telephone: (920) 846-2816

vav

Enc.

Stiles Hydroelectric Project

Water Quality Management Plan - Article 404

Response to FWS Comments

The United States Fish and Wildlife Service did not respond with comments within the 30-day comment period.