

ORIGINAL



**Upper Peninsula Power Company**  
(a subsidiary of WPS Resources Corporation)  
P.O. Box 19001  
Green Bay, WI 54307-9001

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OFFICE OF THE  
SECRETARY

2007 MAY 23 P 1:11

May 22, 2007

FERC No. 1864

P-1864-076

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

Dear Secretary Salas:

**Bond Falls Hydroelectric Project –Water Quality Monitoring Plan Modification**

As per the Order Approving Settlement and Issuing New License for the Bond Falls Hydroelectric Project (FERC Project No. 1864) dated October 3, 2002, Upper Peninsula Power Company (UPPCO) is enclosing a revised Water Quality Monitoring Plan for review and approval by the Commission.

As reported to the Commission in the annual Water Quality Monitoring Summary report, dated December 28, 2006, water quality deviations from the license requirements were observed in 2006, due in part to the abnormally warm and dry conditions observed throughout the Upper Peninsula of Michigan and northern Wisconsin. Per the Water Quality Monitoring Plan, water quality monitoring is scheduled to be conducted in 2007. A conference call between UPPCO staff and members of the Bond Falls Implementation Team was held on April 10, 2007. The purpose of the call was to discuss future water quality monitoring activities at the Project sites. It was decided that an evaluation of historical water temperature data, atmospheric temperatures, and precipitation data would be beneficial to determine if water quality monitoring should continue.

Mr. Supnick of the Michigan Department of Environmental Quality (MDEQ) provided historical temperature monitoring data to UPPCO collected by the Michigan Department of Natural Resources (MDNR) and the U. S. Forest Service (USFS) at several locations, including below the Victoria powerhouse. The historical water temperature data was collected between 1994 and 2003. Atmospheric temperature and precipitation data was obtained from the National Oceanic Atmospheric Administration National Data Center. An analysis of the data collected below the Victoria powerhouse was conducted as the most deviations from water quality standards have been observed at this location. The analysis showed that deviations from the State water quality temperature standard occurred under different atmospheric temperature, precipitation and operating conditions.

**Ms. Magalie R. Salas**

**May 22, 2007**

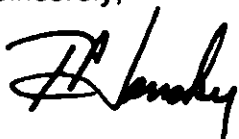
**Page 2 of 2**

A conference call was held with the Implementation Team on April 30, 2007, to discuss the historical data analysis. During the call, Ms. Jessica Mistak of MDNR recommended that water quality monitoring be ceased at this time. The recommendation was based on the amount of data already available, and that the information available shows that deviations from State water temperature standards have occurred during the summer months under several operating and atmospheric conditions. After consultation with the Bond Falls Implementation Team, it was agreed upon by the Team that water quality monitoring should be ceased at this time as there is sufficient data available to characterize water quality at the Bond Falls project facilities.

UPPCO respectfully requests to amend the approved water quality monitoring to eliminate the current requirements for water quality monitoring. Any further water quality monitoring will be conducted as necessary after consultation and agreement by the Bond Falls Implementation Team. As per section 4.1.6.3 of the Bond Falls Settlement Agreement, dated June 2000, UPPCO will review potential operating measures that may be used at Bond Falls to mitigate warm downstream temperatures and at the Victoria development to mitigate low dissolved oxygen below the powerhouse. These operational measures will be discussed with the Team to decide the next course of action. If no operational measures are feasible, lease cost structural solutions will be considered.

A copy of the amended Water Quality Monitoring Plan is attached for your review and approval. Should you have any questions or concerns about this submittal, please do not hesitate to call Mr. Mark Metcalf at (920) 433-1833. Thank you for your time and consideration.

Sincerely,



**Terry P. Jensky**

**Vice President - Energy Supply Operations**

**for Wisconsin Public Service Corporation**

**Telephone: (715) 355-2047**

**Enc.**

**cc: Mr. Shawn Puzen, Integrys Business Support - D2**  
**Bond Falls Implementation Team**  
**Mr. Pat Fulsher, UPPCO - UISC**  
**Mr. Jim Melchiori, UPPCO - UJHWS**

**Bond Falls Hydroelectric Project**  
**Water Quality Monitoring Plan**

**FERC License No. 1864**

**Article 409**

**Upper Peninsula Power Company**

**May 21, 2007**

**Revision No. 2**

## **Water Quality Monitoring Plan**

### **Bond Falls Hydroelectric Project - FERC License No. 1864**

Article 409.

"Within six months after the issuance of a new license, the licensee shall file with the commission, for approval, a Water Quality Monitoring Plan, to document compliance with the water quality requirements of Article 408. The monitoring plan shall include a three-year monitoring period for dissolved oxygen and temperature, provisions for subsequent monitoring based on the results of the initial three-year monitoring period, and provisions for mitigation as described herein. All water quality monitoring shall be funded by the Mitigation Enhancement Fund described in Settlement Condition 7. If the fund is exhausted, the licensee shall fund the remaining activities as determined in the Water Quality Monitoring Plan."

As of May 21, 2007, all water quality monitoring activities shall be ceased. After consultation with the Bond Falls Implementation Team (Implementation Team), it was agreed upon by the Implementation Team that water quality monitoring should be ceased at this time as there is sufficient data available to characterize water quality at the Bond Falls project facilities. Any further water quality monitoring will be conducted as necessary after consultation and agreement by the Implementation Team. Documentation of Agency Consultation is attached in Appendix A. In the event that water quality monitoring is resumed in the future, the following requirements and methodologies shall be followed:

**1. Requirements - Temperature and Dissolved Oxygen**

**A. Continuous Temperature Monitoring - Requirements**

**Bond Falls Development and Victoria Powerhouse**

Upper Peninsula Power Company (UPPCO) shall not discharge water from the license projects that are in excess of the following monthly average temperatures downstream from the Victoria Powerhouse and Bond Falls Dams:

Jan	Feb	Mar	Apr	May	Jun	July	Aug	Sept	Oct	Nov	Dec
38°F	38	43	54	65	68	68	68	63	56	48	40

**Bergland Dam**

Upper Peninsula Power Company (UPPCO) shall not discharge water from the license projects that are in excess of the following monthly average temperatures into the riverine reaches of the Ontonagon River downstream of the Bergland Dam.

Jan	Feb	Mar	Apr	May	Jun	July	Aug	Sept	Oct	Nov	Dec
38°F	38	41	56	70	80	83	81	74	64	49	39

Temperature data will be collected hourly using portable, programmable recording instrumentation (see dissolved oxygen monitoring equipment).

**B. Continuous Dissolved Oxygen (D.O.) Monitoring - Requirements**

**Bond Falls Development and Victoria Powerhouse**

UPPCO shall not cause the dissolved oxygen concentration measured in the Middle Branch of the Ontonagon River and in Roselawn Creek downstream of the Bond Falls Dams and in the West Branch of the Ontonagon River downstream of the Victoria Powerhouse to be less than 7.0 mg/L.

**Bergland Development**

UPPCO shall not cause the dissolved oxygen concentrations in the West branch of the Ontonagon River downstream of the Bergland Dam to be less than 5.0 mg/L.

**C. Continuous Monitoring - Reporting Deviations**

In the event of deviations from the water quality standards, UPPCO shall notify the Water Division of the Michigan Department of Environmental Quality (MDEQ) and members of the Implementation Team within one working day of the observation of the incident, and take all

reasonable steps necessary to ensure that compliance with the water quality limits are achieved, consistent with the water quality mitigation requirements of Article 409.

A report will be filed within 30 days of the observation of the incident with the Commission in the event that the project deviates from state water quality standards. The report shall identify, to the extent possible, the cause, severity and duration of the observed incident.

## **2. Temperature and Dissolved Oxygen Monitoring Locations and Schedule**

Water quality monitoring will be conducted as necessary after consultation and agreement by the Implementation Team. Temperature and dissolved oxygen data will be collected on an hourly basis (24 measurements per day, per location) where determined to be appropriate by the Implementation Team. The following monitoring locations were selected to monitor for compliance with the requirements set forth in the project license:

- A. Downstream of Bond Falls Flowage, in Roselawn Creek, UPPCO will monitor temperature and dissolved oxygen downstream of where Bond Falls Road crosses Roselawn Creek (T46N, R39W, Sec. 11, SE ¼, GPS coordinates N46 24.662, W089 07.961).
- B. Downstream of Bond Falls Flowage, UPPCO will monitor temperature and dissolved oxygen in the Middle Branch of the Ontonagon River (T46N, R39W, Sec. 1, SW ¼) downstream of the walkway below Bond Falls (GPS coordinates N46 24.124, W089 09.788).
- C. Downstream of the Bergland Dam, UPPCO will monitor temperature and dissolved oxygen below the Bergland Dam in the West Branch of the Ontonagon River (T48N, R 42W, Sec. 3, NE ¼, GPS coordinates N46 35.143, W089 32.233).
- D. Downstream of the Victoria Powerhouse, UPPCO will monitor temperature and dissolved oxygen below the Victoria Powerhouse in the West Branch of the Ontonagon

River (T50N, R39W, Sec 29, SE ¼) near of the confluence of the discharge channel and the main river channel (GPS coordinates N46 41.869, W089 12.317).

### **3. Monitoring Equipment and Quality Assurance**

Temperature 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 dissolved oxygen prior to deployment according to the manufacturer instructions. The instruments shall be cleaned and calibrated at least once every two weeks during the monitoring period. At the time the monitoring equipment is removed from monitoring, a post deployment calibration will be performed per the manufacturer instructions to determine loss of calibration, with a goal of less than 1.0 mg/l drift or error at least 70% of the time over the monitoring season. UPPCO shall consult with the resource agencies to determine the cause and downstream extent of deviations from water quality standards and determine appropriate corrective action.

Per the equipment manufacturer, the monitoring equipment has a precision 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.

### **4. Dissolved Oxygen and Temperature Profiles**

At the Victoria and Bond Falls Developments, vertical temperature and dissolved oxygen profiles will be performed as needed after consultation with the Implementation Team. Secchi disk depth measurements will be made at the same time as the profile. At the Victoria Reservoir, the profile will be performed from a safe and easily accessible location on the top of the dam. Dissolved oxygen and temperature profiles of the Bond Falls Reservoir will be taken by boat in the deepest part of the impoundment in order to assess the approximate size of the pool of cool water that could be used to mitigate warm water temperatures in the Middle

Branch of the Ontonagon River. When secchi disk readings are taken, weather conditions will be noted on field sheets (time of day, cloud cover, wave conditions, etc.).

Profiles will be performed at 0.5 meter intervals using a hand held dissolved oxygen monitoring device (manufactured by YSI, Inc. or equivalent). Temperature and dissolved oxygen measurements will be replicated by using a second hand held device at both surface and a second monitoring depth within the hypolimnion (if present). In the event that replicate analyses differ by more than 1.0 mg/L D.O or 1.8°F (1°C), the meters will be recalibrated and the profile will be repeated. Results of the profiles and secchi disk readings will be included in the annual report.

## **5. Annual Monitoring Results - Reports**

All temperature and corrected dissolved oxygen data will be compiled and summarized in an annual report submitted to the Commission, Water Division of the MDEQ, and to members of the Implementation Team. A hard copy of the report will be filed with the Commission, and electronic copies of the data will be provided to the MDEQ and Implementation Team members in Excel format. A report will be submitted within 30 days of the completion of the annual monitoring period to the MDEQ and members of the implementation Team. A final report, including comments from the MDEQ and the Implementation Team, will be filed with the Commission by December 31<sup>st</sup> of the monitoring year. For each continuous monitoring location, the following information will be provided:

- A. A summary of all data collected with a determination of the monthly minimum, maximum, and average temperature and dissolved oxygen concentration at each monitoring location. All DO data corrected for calibration drift and raw temperature data will be presented in tabular and graphical form. All data gaps, if they occur, shall be explained.
- B. A comparison of temperature and DO data with the state water quality standard will be presented in graphical form. Any deviations from the water quality standard shall be



explained, including environmental factors and operational conditions that may have contributed or mitigated water quality conditions.

C. All quality assurance data.

D. A summary of the frequency and magnitude of any values that exceed the limits at each station.

## **6. Monitoring Schedule Amendments**

UPPCO shall consult with the Implementation Team to determine any operational measures to be implemented to improve water quality. The licensee shall bear the cost of any operational measures to improve water quality. If operational measures fail to improve water quality, least cost structural solutions shall be the next option. All water quality mitigation measures shall be developed and implemented in consultation with the members of the Implementation Team. The Mitigation Enhancement Fund shall fund any required structural mitigation until the fund is exhausted, at which point UPPCO will fund the remaining costs. Structural mitigation plans shall be developed in consultation with the Implementation Team. UPPCO shall file construction plans with the Commission for approval prior to the construction of any modifications to project facilities.

*Any additional monitoring or other actions may be implemented by UPPCO through agency consultation and upon written approval by the Commission. The Mitigation Enhancement Fund will fund any additional monitoring until the fund is exhausted, at which point UPPCO will fund the remaining costs.*

# APPENDIX A



**Upper Peninsula Power Company**  
(a subsidiary of WPS Resources Corporation)  
P.O. Box 19001  
Green Bay, WI 54307-9001

May 3, 2007

FERC No. 1864

**To: Bond Falls Implementation Team**

Ms. Christie Deloria, U.S. Fish and Wildlife Service  
Ms. Jessica Mistak, Michigan Department of Natural Resources  
Mr. Bill Deephhouse, Michigan Hydro Relicensing Coalition  
Mr. Norman Nass, U.S. Forest Service  
Mr. Mark Fedora, U.S. Forest Service  
Mr. Bob Martini, Wisconsin Department of Natural Resources  
Mr. Gene Mensch, Keweenaw Bay Indian Community  
Mr. John Suppnick, Michigan Department of Environmental Quality  
Mr. Robert Meyers, Upper Peninsula Power Company

**Re: Bond Falls Hydroelectric Project – Cessation of Water Quality Monitoring**

Per Article 409 of the Bond Falls Hydroelectric Project license, Upper Peninsula Power Company (UPPCO) has conducted water quality monitoring during the 2005 and 2006 monitoring seasons (June through September). Deviations from the State dissolved oxygen and temperature standards were observed in 2005. The monthly average water temperature recorded at the Bond Falls, Roselawn Creek, and Victoria Powerhouse tailrace monitoring locations was in excess to the License maximum monthly average temperature limit during the months of July, August, and September 2005. Deviations from the dissolved oxygen water quality standards were observed at the Victoria Powerhouse tailrace and Cisco Branch of the Ontonagon River monitoring locations. After discussing the results with the Implementation Team at the annual meeting, it was decided that monitoring at the Cisco Dam location should be ceased since there is little flow over the dam during the summer months and there is no license minimum flow requirement. In addition, when deviations from the dissolved oxygen water quality standard are observed below the Victoria Powerhouse, UPPCO will attempt to document the downstream extent of the deviations by walking downstream with a hand held dissolved oxygen meter and measuring the DO concentration at various points in the river when monitoring equipment is

Bond Falls Implementation Team

May 3, 2007

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being calibrated and deployed prior to developing plans to mitigate water quality problems.

Water quality monitoring was conducted again in 2006 at the same monitoring locations as 2005, except for the Cisco Dam location. Deviations from the State dissolved oxygen water quality standard were observed at the Victoria Powerhouse tailrace and in Roselawn Creek. One hourly reading was below the water quality standard in Roselawn Creek on September 1<sup>st</sup>. At the Victoria Powerhouse monitoring location, 47.4% of the hourly readings were below 7.0 mg/l. As agreed upon by the team, UPPCO collected additional dissolved oxygen readings taken downstream of the monitoring location with a hand held D.O. meter. The readings showed D.O. levels were above the State water quality standard within 200 meters of the monitoring location. Mr. John Suppnick used the additional dissolved oxygen readings to calculate the amount of re-aeration occurring as water continues to flow downstream. The result of his analysis showed that dissolved oxygen levels were typically above the water quality standard within 200 meters, and additional aeration is expected downstream. Deviations from the License maximum monthly average water temperature were observed at the Bond Falls monitoring location in August, the Roselawn Creek monitoring location in July and August, and Victoria Powerhouse tailrace monitoring location during the months of June, July, and August. UPPCO believes these deviations are due in part to a lack of precipitation and warm atmospheric conditions observed in 2006.

A conference call between UPPCO staff and members of the Bond Falls Implementation Team was held on April 10, 2006 to discuss future water quality monitoring activities at Project sites. It was decided that an evaluation of historical water temperature data, atmospheric temperatures, and precipitation data would be beneficial to determine if water quality monitoring should continue. Mr. Suppnick provided UPPCO with historical temperature monitoring data collected by the Michigan Department of Natural Resources and the U. S. Forest Service at several locations, including below the Victoria powerhouse. The historical water temperature data was collected between 1994 and 2003. An analysis of the data collected below the Victoria powerhouse was conducted as the most deviations from water quality standards have been observed at this location. The analysis showed that deviations from the State water quality

Bond Falls Implementation Team

May 3, 2007

Page 3 of 3

temperature standard occurred under different atmospheric temperature, precipitation, and operating conditions. A conference call was held with the Implementation Team on April 30<sup>th</sup> to discuss the historical data analysis. During the call, Ms. Jessica Mistak of MDNR recommended that water quality monitoring be ceased at this time given the amount of data already available and that the information available shows that deviations from State water temperature standards have occurred during the summer months under several operating and atmospheric conditions.

UPPCO herby requests that all water quality monitoring activities cease at this time unless a structural or significant operational change occurs at a Bond Falls Hydroelectric Project facility. Any further water quality monitoring will be conducted as necessary after consultation and agreement by the Bond Falls Implementation Team.

Please provide any comments you may have by June 1, 2007. Should you have any questions or concerns, please do not hesitate to call me at (920) 433-1833. Thank you for your time and consideration.

Sincerely,



Mark W. Metcalf  
Environmental Consultant – Air & Water  
Integrays Business Support  
Telephone: (920) 433-1833  
*Providing Support for Upper Peninsula Power Co.*

cc: Mr. Shawn Puzen, Integrays Business Support

**Metcalf, Mark W**

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**From:** Jessica Mistak [mistakjl@michigan.gov]  
**Sent:** Thursday, May 10, 2007 9:12 AM  
**To:** Bob Martini; Mark Fedora; Norman Nass; Christie Deloria; Metcalf, Mark W; Gene Mensch; John Suppnick; Bill Deephouse; Meyers, Robert J  
**Cc:** Puzen, Shawn C; Melchiori, James R; Poissant, Kevin G; Fulsher, Patrick F  
**Subject:** Re: Bond Falls water quality monitoring - Planned changes

Hi Mark,  
The DNR concurs that we have sufficient data to characterize water quality at the Bond Falls projects under various flow and temperature conditions. Your letter does a good job of summarizing the water quality issues at Bond Falls and we have only a few minor comments:

- Rather than tie future water quality monitoring to structural or operational changes, monitoring should simply be decided at the discretion of the team. Modify the next to last paragraph to read "UPPCO hereby requests that all water quality monitoring activities cease at this time. Any further water quality monitoring will be conducted as necessary after consultation and agreement by the Bond Falls Implementation Team."

- To provide a more complete record of our discussion, please include a statement regarding the next step- a review of mitigative solutions. For example, "UPPCO will review potential operational measures that may be used at Bond Falls to mitigate warm downstream temperatures and at Victoria to mitigate low DO below the powerhouse. These operational measures will be discussed by the Team to decide the next course of action. If no operational measures are feasible, least cost structural solutions will be considered."

Thanks,  
Jessica

>>> "Metcalf, Mark W" <MWMetcalf@integrysgroup.com> 05/03/2007 2:17 PM  
>>>  
Good Afternoon,

As discussed during the conference call on Monday, April 30th, UPPCO is requesting that all water quality monitoring activities under Article 409 of the Bond Falls Hydroelectric Project be ceased at this time. Attached is a letter to the Implementation Team regarding cessation of monitoring activities. Please let me know if you have any questions.

Thanks,  
Mark

## **Response to Comments from the Michigan Department of Natural Resources**

**Comment:**

Rather than tie future water quality monitoring to structural or operational changes, monitoring should simply be decided at the discretion of the team. Modify the next to last paragraph to read "UPPCO hereby requests that all water quality monitoring activities cease at this time. Any further water quality monitoring will be conducted as necessary after consultation and agreement by the Bond Falls Implementation Team."

**Response:** The plan has been amended accordingly.

**Comment:**

To provide a more complete record of our discussion, please include a statement regarding the next step—a review of mitigative solutions. For example, "UPPCO will review potential operational measures that may be used at Bond Falls to mitigate warm downstream temperatures and at Victoria to mitigate low DO below the powerhouse. These operational measures will be discussed by the Team to decide the next course of action. If no operational measures are feasible, least cost structural solutions will be considered."

**Response:** The plan has been amended accordingly.

**Metcalf, Mark W**

---

**From:** John Suppnick [SUPPNICJ@michigan.gov]  
**Sent:** Thursday, May 10, 2007 10:32 AM  
**To:** Metcalf, Mark W  
**Cc:** Bob Martini; Mark Fedora; Norman Nass; Christie Deloria; Puzen, Shawn C; Gene Mensch; Jessica Mistak; Bill Deephouse; Melchiori, James R; Poissant, Kevin G; Fulsher, Patrick F; Meyers, Robert J  
**Subject:** Re: Bond Falls water quality monitoring - Planned changes

Mark,

We agree that the existing data characterize the water quality problems at the Bond Falls Hydro project adequately. Further monitoring should be designed to evaluate the effectiveness of or test potential solutions to the problems or to evaluate other changed conditions as necessary.

John

John Suppnick  
Michigan Department of Environmental Quality  
Water Bureau  
517-335-4192  
[suppnicj@michigan.gov](mailto:suppnicj@michigan.gov)

>>> "Metcalf, Mark W" <MWMetcalf@integrysgroup.com> 5/3/2007 2:17 PM >>>  
Good Afternoon,

As discussed during the conference call on Monday, April 30th, UPPCO is requesting that all water quality monitoring activities under Article 409 of the Bond Falls Hydroelectric Project be ceased at this time. Attached is a letter to the Implementation Team regarding cessation of monitoring activities. Please let me know if you have any questions.

Thanks,

Mark

5/21/2007



**Response to Comments from the  
Michigan Department of Environmental Quality**

**Comment:** We agree that the existing data characterize the water quality problems at the Bond Falls Hydro project adequately. Further monitoring should be designed to evaluate the effectiveness of or test potential solutions to the problems or to evaluate other changed conditions as necessary.

**Response:** Comment noted.

**Metcalf, Mark W**

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**From:** Bill Deepphouse [troutkpr@up.net]  
**Sent:** Thursday, May 10, 2007 12:45 PM  
**To:** Metcalf, Mark W; Meyers, Robert J; Mistak, Jessica ; Suppnick, John; Mensch, Gene ; Deloria, Christie; Norman Nass ; Fedora, Mark; Martini, Bob  
**Cc:** Metcalf, Mark W; Puzen, Shawn C; Melchiori, James R; Fulsher, Patrick F; Poissant, Kevin G  
**Subject:** Re: Bond Falls water quality monitoring - Planned changes

Hi Mark - Thanks for the information. I agree with the decision to cease water quality monitoring activities at this time. I would like to suggest one change or addition to your letter regarding this matter.

You note at the end of the first paragraph on page 4 of the letter that "UPPCO believes these deviations are due in part to a lack of precipitation and warm atmospheric conditions observed in 2006". I think it would be appropriate to also include that the addition of up to 50% of the flow release to the M.Br. Ontonagon River is derived from the surface (or at least the epilimnetic portion) of Bond Falls Reservoir and that this is most likely also a part of the reason for the deviation in water temperature downstream.

Thanks for the opportunity to give some input on this matter. Bill Deepphouse

----- Original Message -----

**From:** Metcalf, Mark W  
**To:** Meyers, Robert J ; Mistak, Jessica ; Suppnick, John ; Mensch, Gene ; Deloria, Christie ; Deepphouse, Bill ; Norman Nass ; Fedora, Mark ; Martini, Bob  
**Cc:** Metcalf, Mark W ; Puzen, Shawn C ; Melchiori, James R ; Fulsher, Patrick F ; Poissant, Kevin G  
**Sent:** Thursday, May 03, 2007 2:17 PM  
**Subject:** Bond Falls water quality monitoring - Planned changes

Good Afternoon,

As discussed during the conference call on Monday, April 30th, UPPCO is requesting that all water quality monitoring activities under Article 409 of the Bond Falls Hydroelectric Project be ceased at this time. Attached is a letter to the Implementation Team regarding cessation of monitoring activities. Please let me know if you have any questions.

Thanks,

Mark

## **Response to Comments from the Michigan Hydro Relicensing Coalition**

**Comment:**

I agree with the decision to cease water quality monitoring activities at this time. I would like to suggest one change or addition to your letter regarding this matter.

You note at the end of the first paragraph on page 4 of the letter that "UPPCO believes these deviations are due in part to a lack of precipitation and warm atmospheric conditions observed in 2006". I think it would be appropriate to also include that the addition of up to 50% of the flow release to the M.Br. Ontonagon River is derived from the surface (or at least the epilimnetic portion) of Bond Falls Reservoir and that this is most likely also a part of the reason for the deviation in water temperature downstream.

**Response:** Comment noted.