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GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF NATURAL RESOURCES
LANSING



DANIEL EICHINGER
DIRECTOR

June 18, 2020

Melissa Rondou
Regulatory Compliance Manager
Eagle Creek Renewable Energy
116 North State Street, PO Box 167
Neshkoro, WI 54960

RE: Morrow Dam (FERC No 9000) Drawdown and Gate Repair Schedule

Dear Ms. Rondou:

The Michigan Department of Natural Resources (Department) reviewed the letter from STS Hydropower (STS) to the resource agencies dated May 14, 2020 updating their proposed planning for the gate repairs at the Morrow Project. STS states to the Federal Energy Regulatory Commission (Commission) that they request an extension of time to complete the engineering plans for the repairs due to selecting an alternative plan to dewater the gate areas during the repairs with an anticipated completion date of December 31, 2020.

The Department was not provided a construction schedule and not aware of the anticipated completion date until STS filed their request with the Commission for the extension. We do not oppose the adjustment in the design phase as it does not appear to change the completion date; we are concerned that the construction may not be completed until the end of December 2020. The initial correspondence to the agencies indicated the duration of the drawdown would be at least 4 months in duration, but no end date was provided. Now that we know that the impoundment will remain significantly drawn down for much of 2020, we have several concerns related to natural resource protection.

The Department continues to receive complaints about sedimentation in the river downstream of the impoundment. Given the bottomlands will remain exposed for many more months, STS should provide protections against additional sediment movement downstream out of the impoundment area. We request that STS immediately take measures to monitor and reduce sediment and turbidity during the period the impoundment is drawn down. For monitoring, the Department requests that STS install a turbidity meter at the Consumers Power Drive bridge just downstream of the project. STS should work with the Department on establishing a monitoring plan that includes long-term (seven-day average) and momentary thresholds for action. The plan should include notifying Department of Environment, Great Lakes, and Energy (EGLE) and the Department immediately if these thresholds are exceeded to identify additional strategies for reducing turbidity.

To prevent further erosion of the exposed bottomlands we request that STS use a native seed mix and mulch the exposed areas to establish a vegetative cover for the duration of the drawdown.

The estimated completion date of December 31, 2020 is beyond the window for refill typically recommended by the Department. If the impoundment refill cannot be completed prior to October 2020, we recommend postponing refill until after April 1, 2021 to provide protection for aquatic resources, hibernating herpetofauna, and to avoid unsafe ice conditions that may occur during a winter refill.

The Kalamazoo River is a frequent destination for recreation in the vicinity of the Morrow Project. Given the nature of the drawdown and concerns with the public the affected area, we request that STS make sure public notice goes out to inform the public of the reduced impoundment and post public information signage at access areas in the vicinity of the project to inform the public of possible safety and navigation issues along the river.

If you have any questions or need clarification, please contact me at thiamkeelakulk@michigan.gov or 517-388-4536.

Sincerely,



Kesiree Thiamkeelakul
Resource Analyst
Habitat Management Unit
Fisheries Division

cc: Kimberly Bose, FERC
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