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River Land Trust

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We work with the community to conserve and protect the beauty and health of the Kinnickinnic River and its watershed.

January 6, 2016

Mayor Toland and City Council  
City of River Falls  
222 Lewis Street  
River Falls, WI 54022

RE: River Falls Hydroelectric Facilities, FERC Project No. P-10489

Dear Mayor Toland and City Council Members:

I am writing on behalf of the Kinnickinnic River Land Trust to comment on the recent action of the Federal Energy Regulatory Commission (FERC). We have reviewed the Order Denying Extension of License Term issued by FERC on December 9, 2015 in response to the City's application to extend the current license for five years. We are very concerned that the extension denial imposes serious time constraints on the ongoing process by maintaining the August 31, 2016 deadline for a City decision to relicense or decommission the facilities.

Given this deadline only seven months away, we strongly encourage the City Council to initiate an alternatives analysis for relicensing or decommissioning the hydroelectric facilities as soon as possible. Such an analysis should consider the complete costs, benefits and technical requirements of both options through the 30-year operating period of a new license. The analysis should be conducted by a consulting firm experienced in such studies, hydroelectric facilities, dam removal and river restoration. This alternatives analysis will benefit greatly from the sediment analysis about to be completed by the City's consultant.

As always, our comments and recommendation are driven by our mission "to work with the community to conserve and protect the beauty and health of the Kinnickinnic River and its watershed." It was also the basis for our previous comments and study recommendations and our continuing interest and offers to participate in the City's river corridor planning strategy. Although we realize there is not enough time to complete all recommended studies and the corridor planning process before August, the river corridor planning and implementation process can continue beyond that time. For now, the suggested alternatives analysis can best inform the City Council and the community about the best course of action in the time available.

Thank you for your consideration of our comments and recommendation. We stand ready to help in any way we can and look forward to our continued partnership to conserve and protect the Kinni.

Sincerely,

A handwritten signature in cursive script that reads "Dave Fodroczi". The signature is written in black ink and is positioned above the printed name and title.

Dave Fodroczi  
Executive Director

pc: Scot Simpson, City Administrator  
Kevin Westhuis, Utility Director  
Ray French, Management Analyst  
Michael Page, Friends of the Kinni  
Tom Schnadt, Kiap-TU-Wish Chapter of Trout Unlimited  
Denny Caneff, River Alliance of Wisconsin  
Kimberly Bose, Federal Energy Regulatory Commission  
Randy Thoreson, National Park Service  
Nick Utrup, U.S. Fish & Wildlife Service  
Cheryl Laatsch, Wisconsin Department of Natural Resources