



**KINNICKINNIC**  
River Land Trust

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

September 18, 2015

Ms. Kimberly Bose, Secretary  
Federal Energy Regulatory Commission  
888 First Street, N.E.  
Washington, D.C.

Re: City of River Falls, Wisconsin  
River Falls Hydroelectric Project, Docket No. P-10489-013  
COMMENTS on Application for Amendment of License to Extend Date for Termination of License  
Kinnickinnic River Land Trust, Inc., September 18, 2015

Dear Secretary Bose:

The Kinnickinnic River Land Trust, Inc. (KRLT) hereby submits these comments on the application filed by the City of River Falls on July 6, 2015 to amend its license to extend the term of the license for an additional five years to August 31, 2023. Specifically, we support the City's application to allow more time during the current license to conduct a comprehensive river corridor planning process and additional studies to consider the dam removal and river restoration as an alternative to relicensing the River Falls Hydroelectric Project.

On September 27, 1988, the River Falls Project was issued a 30-year license that expires August 31, 2018. The licensee requests the Commission extend the term of the license for an additional 5 years from August 31, 2018, to August 31, 2023. The City submitted its notice of intent to relicense the project and pre-application document on November 27, 2013 and a request to use the traditional licensing process also on that date, which was granted by the Commission on January 27, 2014. Since that time, the River Falls City Council adopted resolutions that require a comprehensive river corridor planning process to determine whether to continue with the re-license or possibly surrender the project. The licensee states that it will be conducting additional studies to evaluate the potential for dam removal. The development of further study plans is expected to continue with stakeholders through 2017.

The KRLT has participated as a community stakeholder in the City's relicensing process since the initial filings in 2013. Following the initial public meeting, we filed comments on the PAD and submitted several study requests along with other community stakeholders. Following subsequent review and discussions with the City, our Board unanimously adopted the attached resolution encouraging the City to pursue a planning process that would consider dam removal and river restoration. We then supported the

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City's resolutions to seek the license extension now being considered. We have continued to participate in cooperation with the City and other stakeholders to define the river corridor planning process and preliminary studies described in the City's application for extension of its current license.

Based on the City's continued efforts to address our concerns and to formally consider the option of dam removal and river restoration, we strongly encourage you to approve the City's application for extension of the term of its current license to August 31, 2023. This additional time within the current license will allow the entire community the opportunity to make a sound and reasoned decision about the future of the hydroelectric facilities and the Kinnickinnic River.

Thank you for your consideration and the opportunity to file these comments. Please feel free to contact me at the contact information below if I can provide any additional information or if you have any questions.

Respectfully submitted,

A handwritten signature in black ink that reads "David Fodroczi". The signature is written in a cursive, flowing style.

David Fodroczi  
Executive Director  
Kinnickinnic River Land Trust, Inc.  
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**KINNICKINNIC RIVER LAND TRUST, INC.  
RESOLUTION NUMBER 20141203-1**

**TO SUPPORT A PROCESS LEADING TO THE REMOVAL OF THE RIVER FALLS DAMS**

Whereas the mission of the Kinnickinnic River Land Trust (KRLT) is to “work with the community to conserve and protect the beauty and health of the Kinnickinnic River and its watershed”; and

Whereas as part of the vision of the Kinnickinnic River Land Trust (KRLT) is that “we see a cold, clean, and free-flowing river”; and

Whereas the Kinnickinnic River Land Trust is committed to a cold water resource, and it has become clear based on scientific evidence that the dams on the Kinnickinnic River within the City of River falls are causing the river's summer temperature below the dams to increase, and

Whereas the Kinnickinnic River Land Trust is committed to a clean river resource, and it has become clear from simple observation that the dams on the Kinnickinnic River within the City of River Falls have diminished the ecological integrity of the river and are causing algae blooms in the waters of the impoundments, and this diminished water quality is noticeable both within the city and downstream in the summer, and

Whereas the Kinnickinnic River Land Trust is committed to a free-flowing river, and by definition the dams on the Kinnickinnic River impede the free flow of water and diminish the beauty of the natural falls buried below them. Recent and historic water-stage and discharge data show that the City has not been able to maintain “run-of-the-river” conditions as required by their current license, therefore

BE IT RESOLVED, that the Board of Directors of the Kinnickinnic River Land Trust, Inc. (KRLT) headquartered at 265 Mound View Road, Suite C, PO Box 87, River Falls, Wisconsin 54022 hereby concludes that the City of River Falls hydroelectric facility should pursue a process leading to the removal of the dams for the health of the river, for the benefit of the River Falls community, and to help ensure a free-flowing cold water natural resource for years to come; and

BE IT FURTHER RESOLVED that the Board of Directors of the KRLT authorizes the Conservation Committee, with support from the Executive Director and in coordination with other stakeholders, to cooperate with any and all efforts by the City of River Falls to remove the dams and restore the Kinnickinnic River.

I hereby certify that the foregoing Resolution was duly adopted by Kinnickinnic River Land Trust, Inc. on the 3rd day of December, 2014 pursuant to Kinnickinnic River Land Trust, Inc. bylaws.

Authorized signature: \_\_\_\_\_



Typed or printed name: Robert W. Chambers

Title: President

Date: \_\_\_\_\_

8 Dec 2014