KINNICKINNIC
River Land Trust

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

May 20, 2014

Ray French
City of River Falls
222 Lewis Street
River Falls, WI 54022

RE: River Falls Hydroelectric Project, FERC Project No. P-10489-013
Preliminary Application Document (PAD) Comments and Study Requests

Dear Mr. French:

On behalf of the Kinnickinnic River Land Trust (KRLT), thank you for the opportunity to participate in the relicensing process for the City of River Falls hydroelectric project, FERC Project P-10489. In response to your public notice to FERC Secretary Kimberly Bose dated March 4, 2014, several representatives of KRLT attended the project informational session on March 17th, as well as the public meeting and site visit on March 24th. We have also reviewed the Preliminary Application Document (PAD) filed with FERC by the City of River Falls on November 27, 2013. Based on our review of the PAD and our participation in the project meetings, we offer the following comments on the PAD and recommendations for studies.

The KRLT is a 501(c)(3) private, nonprofit conservation organization located in River Falls. Our mission is "to work with the community to conserve and protect the beauty and health of the Kinnickinnic River and its watershed". Therefore, we will focus our comments and recommendations on project issues related to the health and beauty of the river and watershed.

Preliminary Application Document (PAD)

Although the information in the PAD is generally accurate, the document is very brief and provides few specifics about project conditions and impacts. Information in Section 2.0 about the project location, facilities and operation is a good summary of those features, but the information in Section 3.0 about the existing environment and resource impacts is largely generalized to the entire Kinnickinnic River and watershed with few specifics about the project area and impacts of the project itself. The same is true of Section 4.0 dealing with preliminary issues and studies list. The issues identified and the studies and plans listed cover the entire City or watershed with little, if any, review of the project and project area.

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We also reached similar conclusions about the appendices included with the PAD. The project documents including maps, drawings, transmission lines and license are accurate and specific to the project. However, the appendices on water resources and environmental review are taken from regional or watershed plans that have little content specific to the project or project area. The one exception is Appendix F, the 1998 *Kinnickinnic River Priority Watershed Surface Water Resource Appraisal Report*. That report identifies project impacts on stream flow, water temperatures, sedimentation, turbidity, eutrophic conditions and related impacts on fisheries. However, the PAD does not identify any studies of these significant impacts that have been conducted by the licensee that are specific to the project area and its relationship to upstream and downstream conditions.

Study Requests

Given the general lack of information about conditions and impacts of the project on the health and beauty of the Kinnickinnic River, we respectfully request that the City of River Falls undertake a number of studies to document conditions of the project area and related impacts on the project area and affected upstream and downstream segments of the Kinnickinnic River. These studies should address conditions and impacts related to water quality, hydrology and geology, fish and aquatic species, plant communities, wildlife and aesthetics. The KRLT expects that the City of River Falls will work collaboratively with the resource agencies, participating stakeholders and other qualified professionals to develop appropriate study designs, methodologies, analyses and interpretation for the project, project area and affected stream reaches.

1. Water Resources – Previous watershed plans and studies cited in the PAD have identified a number of water resource conditions likely impacted by the dams and their impoundments, including but not limited to, water levels, stream flows, water temperatures, water chemistry, sediments, pollutants and turbidity. A thorough water resources study of the project area should be completed to benchmark data on these issues where it does not exist or compile and analyze trend data where it is available. The study should determine and document how impacts to these water quality features are affecting the Kinnickinnic River for use by humans, aquatic life and wildlife.

2. Hydrology – The dams and their impoundments have been in place for over 100 years, but there appears to be little information available about such hydrologic conditions and impacts regarding sediments, sediment transport, reservoir capacity, flow regimes and any resulting erosion. The volume, composition and mobility of sediments should be documented for long term management of the sediments and their potential impacts on downstream hydrology and water quality. Available data should also be presented and analyzed to verify the licensee's maintenance of "run-of-river" flows during the current license period and propose any operational adjustments needed to do so.

3. Aquatic Communities - Previous watershed plans and studies cited in the PAD have also identified likely and potential impacts to the excellent cold water fishery found in the Kinnickinnic River outside the project area. The rest of the river is a Class I trout stream while the impoundments have limited warm water fisheries and raise downstream water temperatures. A study should be conducted to inventory the fish, macroinvertebrates and

aquatic vegetation of the two impoundments, as well as upstream and downstream, to establish the conditions, differences and likely impacts of the project on injury or mortality, rearing and spawning habitat, fishery composition and food availability in the impoundments and the affected stream reaches.

4. Plant Communities – The project's impoundments have likely caused significant changes to the abundance and community composition of both aquatic and riparian plants. Both types of plant communities should be inventoried in the project area to identify any special status plants and to establish existing conditions and differences with upstream and downstream plant communities. Special attention should be given to identifying the extent and location of NR40 listed invasive species to develop management strategies for control to limit the spread of invasive species beyond the project area.

5. Wildlife – The impoundment of water and changes in water flows associated with the dams can have varying impacts on breeding and feeding habitats for many species of birds, amphibians and bats. Wildlife should be inventoried in the project area to identify any special status species and to establish existing conditions and differences with upstream and downstream wildlife and impacts to related habitat.

6. Aesthetics – Important elements of the Kinnickinnic River and its watershed that greatly appeal to residents and visitors alike are the sights and sounds of diverse landscapes ranging from gently rolling and wooded farmland to towering forested limestone bluffs. The Kinnickinnic River is a thread of flowing water that connects this variable landscape with sights and sounds of its own.

   The dam structures, their accessory buildings and the impoundments with wider, quiet waters represent a notable contrast of the project area to the sights and sounds of the rest of the river and watershed. Some would argue that the human structures and their resultant changes to the river have diminished the scenic integrity of the project area. However, given the longstanding presence of the dams and impoundments, nobody is alive who knows how the project area looked without them.

   We can only imagine what the view and sound would be with bedrock falls and continuous moving water through the project area. There is apparent interest throughout the community to "see" how the project area would look and feel with the original landscape absent the dams and impoundments. In our expanding virtual world, we suggest a visualization effort at some level, by sketch, photo or video means, to blend available historic photos with the view of today to help the community understand how it looked or could look.

Conclusion

Thank you again for the opportunity to review and comment on the PAD and request studies for the relicensing process. Based on the comments of City staff at the March 24th public meeting, we look forward to participating in study design, execution and implementation. If you have any questions about our comments and recommendations, please contact me at 715-425-5738 or dave@kinniriver.org.

Sincerely,

David Fodroczi
Executive Director

pc: Secretary Kimberly Bose, Federal Energy Regulatory Commission
Nicholas Utrup, U.S. Fish & Wildlife Service, Bloomington, MN
Randy Thoreson, National Park Service, St. Paul, MN
Cheryl Laatsch, Wisconsin Department of Natural Resources, Horicon, WI
Denny Caneff, Wisconsin River Alliance, Madison, WI
Gary Horvath, Kiap-TU-Wish Chapter, Trout Unlimited, River Falls, WI
Keith Rodli, Friends of the Kinni, River Falls, WI