

December 20, 2017

To: Kinnickinnic River Corridor Planning Committee

Re: FERC License Surrender

Dear Kinni Corridor Planning Committee,



River Alliance of Wisconsin has been intimately involved with the processes conducted by the City of River Falls throughout the FERC relicensing process initiated in 2013, the subsequent FERC License Amendment application submitted in 2015 which was ultimately granted in 2016 upon rehearing and for the past year working through the Kinnickinnic River Corridor Planning Process.

River Alliance of Wisconsin strongly recommends that the Kinni Corridor Planning Committee make a recommendation to the City Council for the City of River Falls as follows:

- 1) Surrender the License for the River Falls Hydroelectric Project (FERC No. 10489) "leaving the facilities in place" while gathering support & commitment from stakeholder organizations for License surrender and dam removal.
- 2) Jurisdiction for dam safety requirements transfers to the state of Wisconsin DNR
- 3) Develop and implement plans for the restoration of the Kinnickinnic River through dam removal.

We are confident that should the Kinni Corridor Planning Committee choose to pursue "License Surrender leaving the facilities in place", they would find strong support for reaching an agreement for dam removal following license surrender once FERC jurisdiction is relinquished and the dams fall under the WI DNR's authority. If instead, the Kinni Corridor Planning Committee should recommend that the City relicense their hydroelectric facility, we are confident that such a pursuit would find strong opposition from stakeholder organizations, thus driving up the cost and complexity of any anticipated relicensing process.

Your further consideration of this information, and potentially collaborative course of action moving forward is greatly appreciated!

Sincerely,

Raj Shukla

**Executive Director** 

20171228-0019 FERC PDF (Unofficial) 12/28/2017
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