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July 8, 2011

Hon. Kimberly D. Bose, Secretary  
Federal Energy Regulatory Commission  
888 First Street, NE  
Washington, DC 20426

Subject: Comments on proposed Hydroelectric Projects for Lock and Dam 3 P-13334; Lock and Dam 4 P-13335; Lock and Dam 5 P-12987; Lock and Dam 5A P-13391; Lock and Dam 6 P-13336; Lock and Dam 7 P-13337; Lock and Dam 8 P-13338; Lock and Dam 9 P-13392, P-14148; Lock and Dam 10 P-13567; Lock and Dam 11 P-14111, P14112, P-14113

Secretary Bose:

The Wisconsin Conservation Congress (WCC) has questions and concerns regarding proposals to place hydroelectric generation facilities in a series of Federal Locks and Dams in or directly adjacent to Wisconsin on the Upper Mississippi River (UMR). The WCC has elected representatives from all 72 Counties and is authorized by Wisconsin State Statute to advise the Wisconsin Natural Resources Board on matters pertaining to natural resources.

Representatives of the WCC have attended scoping meetings on certain aspects of the hydropower proposals and consulted with the federal and state agencies responsible, in accordance with their individual agency public trust responsibilities, for managing the UMR. We are in accord with the questions and concerns put forth at this time by the Wisconsin Department of Natural Resources and the US Fish and Wildlife Service Refuge staff. We understand from the meetings we attended that the plans for the proposed projects are preliminary. We observed at the scoping meetings that the impacts of the proposed hydropower facilities are not well understood and require significant examination and study.

Of great concern are the cumulative impacts of a series of hydropower facilities on the fish and wildlife that depend on the Upper Mississippi for habitat. This impact should be determined, in particular for the many migratory species of fish and wildlife that are indigenous to the UMR. Direct impacts from the proposed projects on water levels and flow, including sedimentation patterns, need to be determined and quantified. The tailwater of the locks and dams are high quality recreational fishing areas with facilities

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As established by Wisconsin State Statutes, the Wisconsin Conservation Congress is officially recognized as the only natural resources advisory body in the state where citizens elect delegates to represent their interests on natural resources issues on a local and statewide level to the Natural Resources Board and the Department of Natural Resources. Their mission is to represent the citizens of Wisconsin by working with the Natural Resources Board and the Department of Natural Resources to effectively manage Wisconsin's greatest asset, our abundant natural resources, for present and future generations to enjoy.

such as fishing floats that are uniquely located. The fishing floats are highly utilized by the public- particularly low and moderate income individuals and families. At L&D 8 people from the local Amish community utilize shore fishing areas and the adjacent fishing float to catch fish to eat. Of particular concern are the vast amounts of aquatic vegetation produced on the large shallow pools behind each of the dams and, at times, the overwhelming impact that free floating aquatic vegetation has had and will have on the operation and function of structures such as water intakes, culverts, spillways and gates.

The UMR management agencies (FWS, COE and the 5 states) and the public collaborate to manipulate water levels to improve fish and wildlife habitat conditions. Any license issued should provide that fish and wildlife conservation should have priority over power production. This is vital because of the important role that the UMR plays in the ecological health of so many migratory species of fish and wildlife such as waterfowl as well as threatened and endangered fish and mussels. The public should not have to reimburse private power companies for unrealized power production from water that is currently public and managed for fish and wildlife purposes.

There are several other concerns such as maintaining commercial and recreational navigation channels, exotic species, flood flows, low flows, endangered and threatened species, transmission lines, water quality, surface water use conflicts plus economic and social impacts. We suggest each of these issues need to be thoroughly scrutinized and evaluated before a license is to be considered for issuance.

Because the US Congress has established the UMR for the public purposes of commercial navigation and as a fish and wildlife refuge, the installation of hydropower should not be approved unless no significant environmental, economic and social impact can be established from the proposed multiple hydropower projects. We suggest that run-of-the-river hydro technology is unproven and, in the case of the UMR with the unique management challenges it presents, should be clearly proven before it can be applied.

Sincerely



Robert Bohmann  
Chair, Wisconsin Conservation Congress

Cc: Senator Herb Kohl  
Senator Ron Johnson  
Representative Ron Kind  
Representative Sean Duffy  
Kevin Foerster, Upper Mississippi River Refuge Complex Manager  
Nanette Bischoff, Project Manager, US Army Corp of Engineers  
Dave Clausen, Chair, Natural Resources Board  
Cathy Stepp, Secretary, Department of Natural Resources

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