

Michigan Hydro Relicensing Coalition

1620 High Street
Traverse City, MI 49684

Telephone (231) 775-4321

July 10, 2020

Mr. Jason Kreuzscher
Renewable World Energies, LLC
100 State Street
PO Box 264
Neshkoro, Wisconsin 54960

Re: AU TRAIN HYDROELECTRIC PROJECT – DRAFT LICENSE SURRENDER APPLICATION
(P-10856)

Dear Mr. Kreuzscher:

The Michigan Hydro Relicensing Coalition (MHRC) is a coalition of four statewide, nonprofit conservation groups with an interest in the protection and enhancement of aquatic resources: Michigan United Conservation Clubs, Michigan Council of Trout Unlimited, Great Lakes Council of Flyfishers International, and Anglers of the Au Sable. All members are 501(c)(3) non-profit organizations. The MHRC mission is to ensure that conservation, environmental and recreational concerns are adequately addressed by the FERC.

Given our interest in Michigan hydro projects, the MHRC has reviewed the draft Application for License Surrender that Renewable World Energies (RWE) has prepared for submission to FERC for the Au Train hydropower project (P-10856). The MHRC respectfully submits the following comments on the draft application.

The MHRC fully agrees with and supports the comments provided to you by the Michigan Department of Natural Resources and Michigan Department of Environment, Great Lakes and Energy. Related to the Au Train Project, it is the goal of the MHRC to ensure that any safety deficiencies of this project are not passed to the State or another entity at the conclusion of the surrender process. Therefore, the MHRC recommends removal of the dam and all associated infrastructure related to power generation (e.g., penstocks, powerhouse) as the preferred endpoint of the license surrender and subsequent decommissioning process.

The MHRC urges RWE to work closely with FERC's Division of Hydropower Administration and Compliance (DHAC) staff to ensure that the surrender process is done in accordance with the procedures outlined in their 2015 Compliance Handbook (copy included as a separate attachment to this letter). Section 2.9.1. specifically pertains to license surrender.

The MHRC has the following specific comments about the draft surrender application:

- Flood control - the licensee proposes to modify the spillway and leave the dam in place for future "flood control". However, there is no supporting documentation of storage capacity of the impoundment that contributes to flood control. In fact, the project's

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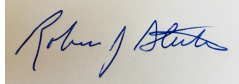
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operation is described as run-of-river, which usually means project inflow = project outflow. Such run-of-river projects typically have stable reservoir levels which do not contribute significantly to flood flow storage capacity. In addition, it is unclear how the proposed cutting down of the north dam will significantly increase flow capacity for a given reservoir elevation as described in the draft application.

- Long-term maintenance needs - the MHRC feels that the proposed measures for decommissioning of project infrastructure are inadequate for long-term maintenance. In fact, the proposed measures could lead to abandoned infrastructure on the landscape becoming an "attractive nuisance" should the project owner dispose of its project lands. RWE needs to provide measures that will ensure that the project infrastructure does not become some other entity's problem at the conclusion of the surrender and decommissioning process. The MHRC supports the concept of project owner "bonding" so that financial resources are available to provide for future maintenance needs should the owner choose to leave any infrastructure in place on the landscape. Such financial bonding should transfer with any property sale or transfer.

Thank you for the opportunity to provide comments. Please contact me if you have any questions.

Sincerely,



Robert J. Stuber, Executive Director
Michigan Hydro Relicensing Coalition

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Enclosure