

Federal Energy Regulatory Commission
888 First Street, NE
Washington, D.C. 20426

The Big Eau Pleine Citizens Organization (BEPCO) is requesting:

1 - That the minimum water level be set no lower than 1,131.0 feet on the Big Eau Pleine Reservoir; this was the initial recommendation of the Wisconsin Dept. of Natural Resources (WDNR) and the U. S. Dept. of Interior (DOI), in the 1996 Final Environmental Impact Statement, FERC/EIS-0089F (FEIS). BEPCO's minimum recommendation at that time was at a level of 1,133.43. The current operating plan allows for a drawdown to 1,118.00 feet.

We are requesting that this adjustment be permanent through the upcoming 2011, five year "look in", review, of the Wisconsin Valley Improvement Company's (WVIC) operations for Project No. 2113-022.

2 - That FERC review the operation of the aerator system used on the reservoir. The FEIS appears to charge WVIC with its continuing operational responsibility. We are requesting FERC to direct WVIC to ensure that the aerator is effective and properly positioned in the reservoir.

3 - That FERC request that WVIC, in cooperation with the WDNR, resurvey the Big Eau Pleine to produce an updated lake map, reestablishing the "usable storage capacity" of the reservoir. Based on available information, the 1969 WDNR lake mapping survey was used during the relicensing process, and was already "out of date" at that time, and with the continued silting and shifting of the shoreline and islands over the years, we believe that a reduction of upwards of 15% of usable storage has occurred. This will also address possible pothole fish strandings and the potential need for excavating escape channels in all significant potholes.

We believe that these actions done now, can begin to address the long term problems confronting the Big Eau Pleine. With more water, comes more dilution of the pollution and the reduction of fish strandings in potholes.

BEPCO and the residents of central Wisconsin are requesting your action. This spring has produced a massive fish kill in the Big Eau Pleine reservoir, estimated by the WDNR to be upwards of 70% to 80% of the population. This is now the reservoir's third fish kill in the last year, despite WVIC's operating plan, dissolved oxygen monitoring and winter operation of the aerator.

These fish kills are a symptom of the continuing problems being experienced by the Big Eau Pleine Reservoir. The combination of low water levels and high nutrient loads, from the watershed's runoff, is leading to very low levels of dissolved oxygen (< 1 PPM this winter) in the reservoir.

The Big Eau Pleine Reservoir is unique, and should be treated as such, within WVIC's operation of the Wisconsin River system, as its watershed is upwards of 77% agricultural land.

The Wisconsin Valley Improvement Company (WVIC) is licensed by the Federal Energy Regulatory Commission (FERC) to manage the water level and flow of the Wisconsin River, under The Wisconsin Headwaters Reservoir System, Project No. 2113-022.

As stated in the operating license and/or the FEIS, the Commission (FERC), “retained the authority” to order adjustments in the operating scenario and reserved the “right to modify the minimum allowable water elevation”.

As contained in the operating license, FERC stated: “Our approach does not preclude the agencies or citizen groups from recommending adjustments to the adopted operating scenario in the future;but also allow the needed flexibility to adapt to unforeseen circumstances or changing conditions”.

We request that FERC act now on our “citizen’s group” recommendations.

Thank you,
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