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ORIGINAL

FEDERAL ENERGY
REGULATORY COMMISSION

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

SUBJECT: Comments RE: Symphony Hydro Project No. 14627-000, Minneapolis, MN:

References:

1. Oct. 22, 2014 "Notice of Preliminary Permit Application Accepted for Filing and Soliciting Comments, Motions to Intervene, and Competing Applications" issued by FERC to Symphony Hydro LLC
2. June 25, 2014 "Application for Preliminary Permit for Symphony Hydro Project at Upper St. Anthony Lock & Dam" submitted to FERC by Schulte Associates on behalf of Symphony Hydro LLC

The project proposed by Symphony Hydro should not be approved and no license should be issued.

In Paragraph 2 of the "Notice" the scope of the proposed project is briefly described by FERC. What it does NOT state is that the concrete bulkheads and turbine generators will be constructed **INSIDE** the current St. Anthony Falls Lock. This information was included in Symphony Hydro's original June 25, 2014 application to FERC for the permit that has now been issued. The plan to construct a hydro plant inside the Lock is predicated on the future closing of the Lock for navigation, required not later than June 10, 2015 by Public Law 113-121, dated June 10, 2014. This section of the Law was intended mainly to prevent migration of invasive carp up the Mississippi River.

The law provides: "Emergency Operations -- Nothing in this section prevents the Secretary from carrying out emergency Lock operations necessary to mitigate flood damage." The Lock was used for this purpose for a couple of weeks this past summer when Lock doors at both ends were open.

Construction of concrete bulkheads and turbine generators inside the Lock would certainly have some impact on the ability of the Corps of Engineers to regulate flow for flood control. But more importantly, such construction would be a significant obstacle to any future navigation through the Locks if it were necessary for an emergency or even for certain maintenance operations up river from the Lock. The current repair project on the base of the 3d Avenue Bridge (above the Lock) requires the use of several barges loaded with heavy equipment, including a large crane, for example. These barges all came through the Lock to get to their current position at the bridge. Construction of any kind inside the Lock would impede such passage.

The notion of constructing a hydro plant inside the Lock, regardless of whether it is to be

closed for navigation, is a bad idea. It is inconceivable that the Lock would never again be needed for navigation. It is critical that the Lock remain functional, controlled by the Corps of Engineers, and unencumbered by any sort of construction so that it is available immediately when needed in the future.

This project would permanently damage the Lock and prevent future use for navigation in case of emergency and may, in fact, interfere with its use for flood control. I strongly encourage FERC to reject this proposal and not issue a license to Symphony Hydro LLC.

Best regards,



Douglas Verdier