



233 E Larkin St. Suite 2 Midland, MI 48640  
(989) 941-3005  
Fourlakestaskforce.org

December 1, 2020

P-10809 Secord  
P-10810 Smallwood

Mr. John Zygaj, P.E.  
Regional Engineer, D2SI  
Federal Energy Regulatory  
Commission  
Chicago Regional Office  
230 South Dearborn Street,  
Suite 3130 Chicago, IL 60604

**Subject: USACE National Inventory of Dams Database**

Dear Mr. Zygaj:


We are working with Midland County and the US Army Corp (USACE) on a Flood Plain Managed System (FPMS) for risk mitigation down stream of our Four Lakes. Concurrently, the Four Lakes Task Force is also conducting Flood Studies for its lakes which are being coordinated with work on the FPMS. A fair amount of confusion has arisen among the stakeholders and experts conducting these studies over the classification of our lakes at Sanford, Edenville, Smallwood and Secord as flood control facilities in the USACE National Inventory of Dams Database (NID). The NID was last updated by the FERC in 2018, which is why we are writing to you.

Our understanding is that, historically, the primary purpose of the lakes was for hydropower. Over time communities developed around the lakes which gave rise to rapid growth in recreational use. The four FERC orders issuing original licenses in 1998 include provisions for 3-foot winter drawdowns at each lake. The license orders state that the winter drawdown provisions were in response comments from landowners and local entities for the purposes of preventing ice damage to shoreline recreation and erosion control structures, allowing residents to maintain and repair these structures, and reducing uncontrolled spill events that contribute to flooding.

The available information that we have tends to support the primary historic uses were hydropower and recreation. The seasonal winter drawdowns were done primarily to protect and maintain shoreline recreation and erosion control structures. Any flood control benefits were minor and seasonal in nature.

We are writing to request clarification of the NID classification of the primary purpose of our four lakes as flood control.

Sincerely yours,

A handwritten signature in black ink, appearing to read 'David Kepler', written over the typed name.

David Kepler  
President  
Four Lakes Task Force

Cc: David E. Capka, Director D2SI  
Dan DeVaun, P.E, EGLE Hydrologic Studies and Dam Safety Unit  
Lee Mueller, Boyce Hydro Power, LLC