Fred Ayer, Executive Director  
Low Impact Hydropower Institute  
34 Providence Street  
Portland, ME 04103  
FAX: 206-984-3086

Re: Certification for Brascan Power for West Branch  
St. Regis hydroplants

We have reviewed your criteria for certification  
and believe that all factors of evaluation have been  
met for Brascan's two hydroplants (Parishville and  
Allens Falls) on the West Branch of the St. Regis  
river.

The Adirondack Mountain Club (ADK) was a settle-  
ment participant and signator for these two plants,  
which had existed for many years but never had had a  
FERC license until September 2002. The provision  
of bypass flows is probably the most important envi-  
ronmental feature compared to previous nearly dry  
conditions for 38 miles of downstream river often  
seen in the summer. While these flows originate  
near the two dams, the Parishville bypass flow goes  
into the Allens Falls impoundment, but the bypass  
flow for Allens Falls continues past the powerhouse  
on down to the confluence with the main St. Regis  
river at Winthrop. Obviously the two bypass reaches  
benefit from having continuous significant water flow  
as well.

The location of these two plants, just outside  
the Adirondack Blue Line (park boundary) means that  
the watershed is quite protected and the incoming water  
looks like an Adirondack stream, clear with maybe a  
slight brownish tint from vegetation. Most of the  
drainage area is thus classed as Resource Management,  
basically forest land with only one principal building  
per 42.7 acres allowed. The last 5.5 miles to the  
Blue Line are Rural Use allowing one principal build-  
ing per 8.5 acres. Shoreline use for 1/4 mile to  
the river is controlled by the NY State Wild Scenic  
and Recreational Rivers Act. This river is classed  
as Scenic in most of its length and Recreational in  
the last 5.5 miles to the Blue Line which further  
restricts buildings and prohibits logging along the  
banks. Note that the Adirondack Blue Line crosses  
the West Branch of the St. Regis River about a mere
0.6 mile from the upper end of the Parishville impoundment. There are a few homes on the Parishville impoundment located in the Hamlet of Parishville, but these are the first in many miles. Also, there are houses on the Allens Falls impoundment, mainly on the southwest side. All this bodes well for the water quality at the two hydro plants which themselves are inherently benign to water quality.

Fish migration is not to be encouraged here. Historically natural falls (now the site of the hydroplants) acted to separate upstream cold water fish from downstream warm water fish. However, smaller trash rack spacing is required to minimize the killing of any fish headed downstream.

Historically, the hamlet of Parishville was apparently larger than today. We had a map of the supposed layout in the 1800's when mills were present to use water power to operate mechanically driven equipment. Today most vestiges of the past are mere remnants covered by opportunistic vegetation.

ADK concludes that the Parishville/Allens Falls hydroplants are suitable for low impact certification.

Betty Lou Bailey
Betty Lou Bailey, ChaM.
Canoes Route Subcommittee
Conservation Committee

cc: T. McGuire ADK
    J. Omohundro "
    R. Ringlee "
    J. Sabattis Brascan