Ashuelot River Hydro, Inc.

42 Hurricane Rd. Keene, NH 03431 (603) 352-3444

August 22, 2019

Ms. Maryalice Fischer Low Impact Hydropower Institute 329 Massachusetts Ave., Suite 6 Lexington, MA 02420

RE: Re-certification of Ashuelot and Lower Robertson Hydro Projects Response to letter from ARLAC

Dear Ms. Fischer:

We are in receipt of the August 9 letter from the Ashuelot River Local Advisory Committee (ARLAC) regarding re-certification of our hydro projects on the lower Ashuelot River. We appreciate the efforts of ARLAC in caring for the health of the Ashuelot River ecosystem and in taking the time to comment on our re-certification.

Regarding eel passage, which is also mentioned in the comment letter from the Connecticut River Conservancy (CRC), we understand this is not currently a requirement of the resource agencies but that ARLAC and CRC would like us to plan ahead. We continue to educate ourselves on fish passage, including eel passage, so that we will be well prepared when the time comes. We recently toured the Silvio Conte Anadromous Fish Lab (thanks to the CRC) and discussed the latest designs for fish passage as well as who the experts are with whom we should consult. We have experience running upstream eel passage at our hydro plant in West Springfield, MA. Eel passage has been a challenge at this site for numerous reasons. We are now in search of consultants who can help us improve our eel passage. We are doing this in coordination with the Massachusetts Dept. of Fish & Game. Lessons learned in West Springfield will be helpful at these and other projects.

The ARLAC letter mentions that our company last donated to land conservation in the Ashuelot basin in 2014. To be clear, we are not aware that ongoing participation in local environmental conservation efforts is a requirement for re-certification. That said, Ashuelot River Hydro has made significant charitable donations every year since that time. These donations have all been in support of increased energy efficiency at various public and non-profit buildings in the Ashuelot basin. Our belief is that climate change is the greatest threat to the planet and that reduced use of energy is part of the solution. With a spate of public building projects in recent years we felt compelled to apply whatever leverage we could to move those buildings in a green direction.

Another part of the solution to climate change remains land conservation, particularly conservation of wild lands, which are shown to be the most effective carbon sinks. That is one reason why the principals of our company have donated to land conservation organizations in the Ashuelot basin in most years since 2014. Recently, we have made leadership gifts or pledges to projects in the California Brook focus area (Monadnock Conservancy) and now the Surry Mountain Project (The Nature Conservancy). Please rest assured, our company and its principals are not asleep at the wheel, though we do adjust the sources for and recipients of charitable donations based on personal tax and income situations as well as the conservation opportunities that present themselves.

Again, thank you for the opportunity to respond to comments. We are happy to answer any follow up questions. Please contact Sam Payne at (603) 903 7693.

Sincerely,

Robert E. King, President

cc: Barbara Skuly, ARLAC Kathy Urffer, CRC