

FISHER FORESTRY, LLC

72 Nashua Rd.
Windham, NH 03087

July 14, 2018

Shannon Ames, Executive Director
Low Impact Hydropower Institute
329 Massachusetts Ave, Suite 2
Lexington, MA 02420

Re: Flooding and Ecological Damage of Beaver Lake

Dear Ms. Ames,

I am writing concerning the Low Impact Hydropower Institute's recertification of Brookfield Renewable Power, Inc. Beaver River Project, FERC No. 2645. Beaver Lake is within the Beaver River Project. It is a natural lake that is not approved as a reservoir for hydro-power operations. Yet, Beaver Lake has been plagued by excessive flooding due to mismanagement of water levels by Brookfield Renewable Power, Inc. and the Hudson River-Black River Regulating District, which operates water releases from Stillwater Reservoir upriver from Beaver Lake. This has been a problem going back at least thirty years and was discussed in some detail by residents, environmental organizations, and the NY State Department of Conservation during FERC re-licensing of the Beaver River Project in 1995. The license was not renewed until these issues were addressed by Niagara Mohawk, the licensee at the time. A settlement agreement was eventually reached by all parties. However, the flooding has continued unabated causing extensive shoreline erosion, impact to wildlife nesting, and damage to personal property. In addition, silt and sludge has been deposited throughout the lake.

Brookfield Power holds water in Beaver Lake due to their inability to manage the outflow from the Eagle Development. By their own admission, they have never removed the flashboards and will not open the sluiceway or spillway to release excess water. When asked why they don't remove the flashboards, they responded, "...it's not in our license...". Please note that LIHI Certification Handbook Questionnaire for the Beaver River Project clearly states for the Eagle Development:

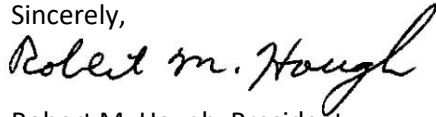
- Flashboard installation: To be installed by May 1 of each year (on/or after July 1) and removed in the fall, as determined by Erie.

On many occasions Loon nests have been flooded and eggs lost due to the high water. Water is typically flowing over the flashboards and on many occasions has been as high as two feet over the flashboards. The maximum headwater elevation allowed is 1426.2 feet with flashboards and 1425.2 without flashboards. Beaver Lake residents regularly see levels in excess of this far up-river from the allowed containment area into the lake proper itself.

The flooding is compounded by the Hudson River-Black River Regulating District releasing large flows of water during Stillwater Reservoir drawdowns. The drawdowns go as high as 950CFS, which far exceeds the Eagle Developments ability to release water. It all simply floods Beaver Lake. Complaints to the regulating district go unheeded. There are occasions where Beaver Lake has been flooded with as much as three feet of water, while the next reservoir down river is merely an inch or two high. The flooding is having a serious impact on the Beaver Lake environment, ecology, and wildlife habitats. In the winter after the ice forms, the flooding causes extensive damage to wetlands. The ice takes hold of bogs, the subsequent high water then uproots them, and they float away.

Both Brookfield Power and the Hudson River-Black River Regulating District show little regard for the major destructive impact their operations are having on Beaver Lake. I request that the LIHI deny recertification of the Beaver River Project until Brookfield Power develops a plan that eliminates their operation's impact to Beaver Lake. That plan must include input from, and be satisfactory to, Beaver Lake property owners.

Sincerely,

A handwritten signature in black ink that reads "Robert M. Hough". The signature is written in a cursive, flowing style.

Robert M. Hough, President
rmhough44@yahoo.com
603-490-8215