

**Subject:** FW: Fw: "Beaver River Project LIHI #7" BEAVER RIVER PROJECT COMMENTS

On Saturday, October 6, 2018 4:01 PM, Lucy Foltyniak <[lucyfoltyniak@att.net](mailto:lucyfoltyniak@att.net)> wrote:

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6

October 2018

Low Impact Hydropower Institute  
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Re: Beaver River Project

Comments

Erie Boulevard

(Brookfield) Hydropower

Beaver River Project

Recertification Issues

To Whom This May Concern:

Regarding Beaver River Project LIHII #7, I wish to make statements regarding Erie Boulevard's current application for recertification.

At this time, I do not believe Erie Boulevard Hydropower Co.(subsidiary of Brookfield) meets LIHI's criteria for recertification. Additionally, I do not believe Erie Boulevard met the criteria in 2013. Property owners on Beaver Lake and Beaver River are asking to be heard **NOW**.

Among the criteria are ecological flow regimes, including consideration of base flows, seasonal variability, high flow pulses, short term rates of change, and year to year variability; water quality; and shoreline and watershed protection.

I am a property owner of two large parcels of land on Beaver Lake, with significant lake frontage, as part of each parcel.

Our family's history and presence on Beaver Lake goes back nearly 100 years and mine personally, nearly 6 decades.

I am now the sole owner of these properties which carry our family's legacy. I take my responsibilities seriously regarding this Land and Legacy.

With this said, I know Beaver Lake and Beaver River very well.

I have experienced the variability in Beaver Lake and Beaver River water levels firsthand.

This letter is a complaint regarding this issue, for many reasons.

Due to the abnormally high water levels at times, over several years, including major flooding, our shorelines on Beaver Lake and Beaver River have eroded, beautiful trees and shrubs and vegetation of many ages and sizes have died. Loons have repeatedly had their nests flooded out and their eggs destroyed.

Regarding personal ownership, our boathouse, well over 100 years old, has been damaged year after year by high water levels. The large storage boathouse, also well over 100 years old, had water come in, flood its flooring and all contents (**first time ever in its history!**) in 2011.

The floor joists rotted in places, boathouse walls buckled, and there was structural damage to the boathouse foundation after this flooding.

Last autumn, late October 2017, shortly after completion of a 2-month huge repair-maintenance-renovation project of my boathouse, at enormous cost to me, the Beaver Lake/Beaver River water level rose to within **1 INCH** of coming into this storage boathouse once again.

This is beyond unacceptable. This is beyond upsetting.

I am very angry with Erie Boulevard for not managing water levels properly.

**This cannot be allowed to continue.**

There is historical precedent.

All actions going forward need to follow proper rules, laws, protocols.

High Flow Pulses are NOT addressed in Erie Boulevard's application to LIHI.

High flow pulses are caused by Erie's releases of water to meet power production goals that vary from day to day.

Those goals are determined by the real time power prices in the New York wholesale market. On a daily basis, electricity demand in NYS rises through the morning and peaks during the afternoon. At these peak demand hours, the price for wholesale power is highest and wholesale power suppliers, like Erie, regulate their power production by releasing water to rev up their turbines to meet peak power demand and to maximize revenue.

These peaking operations, fueled by pulses of water flowing through Erie's turbines at Moshier and its downstream power plant at Eagle

**may cause shoreline erosion, increase turbidity, destruction of loon nesting sites and disruption of Beaver Lake and Beaver River ecology. The ecological flow regimes, water quality, and shoreline and watershed protection have NEVER been studied or addressed on Beaver Lake. Erie does not disclose to LIHI any details of releases or peaking operations.**

**There needs to be full disclosure of periodic peaking releases. These would show how water volumes cresting into Beaver Lake and the Beaver River vary by the time of day.**

The impacts of Erie's peaking operations on Beaver Lake and the Beaver River need to be studied by Erie on a site-specific basis using

science-based flow ecology models. Without these studies, and lacking information on peak flows, The Low Impact Hydropower Institute SHOULD NOT RECERTIFY Erie Boulevard Hydropower Co.'s Beaver River Project #7 at this time.

Respectfully submitted,  
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4:00 PM, 6 October 2018

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