

Rachel McCall

7517 Pinnacle Pl. SE, Snoqualmie, WA 98065 | 206-226-6452 | rachelmccall@msn.com

October 6, 2018

Ms. Ames
Executive Director
Low Impact Hydropower Institute
329 Massachusetts Ave., Suite 2
Lexington, MA 02420
comments@lowimpacthydro.org

Re: Beaver River Project – LIHI #7

Dear Ms. Ames:

This letter provides comments on the Low Impact Hydropower Institute's (LIHI) Recertification review of Erie Boulevard's Hydropower (Erie) Beaver River Project for the five-year period beginning July 16, 2018. My family has owned a cabin on Beaver Lake, a lake within the Beaver River Project, for over 60 years. Years of mismanagement of water levels impacting the lake has led to significant adverse impacts on the wildlife and ecology in and around the lake. Loon nests have been flooded and eggs lost due to high water. The wetlands have experienced extensive damage, especially in the winters when the ice takes hold of bogs and the high water uproots them. This damage has been caused by Erie's failure to meet and abide by the LIHI's certification requirements and Erie's current application for recertification does nothing to address these issues. Rather, it further demonstrates that Erie's plans will continue to erode the wildlife and habitat in and around Beaver Lake.

Erie's application for recertification has not met the appropriate criteria to demonstrate compliance with at least one of LIHI's standards described in A-1 through A-4 of LIHI's handbook. Erie's failure to meet these standards are outlined in more detail in a letter to you from Edward D. Earl, to which I sign on to and thus will not reiterate those reasons here. Please review that letter in detail, especially the graph on page 4 that shows the significant fluctuation of water flows in the Beaver River over a one-month period. This alone demonstrates that Erie is not maintaining the Beaver River "in a true run of river operational mode" as required by LIHI. Erie has completely ignored the environmental effects of the Moshier peaking operation on Beaver Lake, which contains important shoreline wetlands and wildlife habitats, all of which will soon be destroyed if Erie is left to continue its mismanagement of its hydropower project.

For these reasons, as well as for the reasons cited in other public comments, and in keeping with LIHI's mission to "reduce the impacts of hydropower generation through the certification of hydropower projects that have committed to environmental, cultural and recreational stewardship," I urge you to deny recertification of the Beaver River Project unless and until Erie can demonstrate a plan to eliminate these significant detrimental impacts on the wildlife and ecological habitat of Beaver Lake.

Respectfully submitted,



Rachel McCall