

To: Fred Ayer, Executive Director, Low Impact Hydropower Institute (LIHI):

I am writing you as an individual involved in organizations and projects aimed at improving the Blackstone River from Worcester MA to Providence RI. I am a member of the Blackstone River Watershed Council/Friends of the Blackstone (BRWC/FOB) and I also serve as a liaison for the BRWC/FOB to the Blackstone River Coalition (BRC). I am routinely for and support low impact and environmentally friendly projects. My comments herein are my own.

I wish to express my concern and disappointment over my belief that most local organizations involved in improving the Blackstone River, especially on the lower Rhode Island segment, were not contacted or were not made aware of the public comment period for this particular application. On June 11, 2009 I received an email from Russ Cohen of the MA Riverways Program identifying the re-certification application and public comment opportunity. This was the first I had heard of the application and in communicating with others it appears that others are feeling the same way. I quickly alerted Council members about this application. I was deeply disappointed to learn that the public comment period was closing on June 13; too quick to organize those concerned to provide pertinent comment on the application. Could you please inform me if the LIHI was aware of the BRWC/FOB, and its flagship project to bring anadromous fish back to the Blackstone? Have you heard of the BRC? Was any other organization or state or local Agency contacted (such as: the Blackstone River Valley National Heritage Corridor (and its Commission), the Rhode Island Rivers Council, Save the Bay, The Rhode Island Natural Resources Conservation Service (NRCS), Rhode Island Coastal Resource Management Council (CRMC), Rhode Island Audubon, or Rhode Island Rivers Council? Usually our partners in Rhode Island are astute at identifying the issues and active in communicating with each other on important subject matter which impacts our river. So you can understand that I am a bit taken back by not hearing, in a more formal way, of this particular and rather important application process until such time that it is apparently too late to provide formal comment. I also firmly believe that Mr. Rosenfield knows of these organizations and the projects that each support. I am aware that Mr. Rosenfield has met several times with many people associated with these partnered organizations. He is certainly aware of one project in particular which clearly affects his Pawtucket Hydroelectric Project; namely the Blackstone River Fish Passage Project. So I may find myself somewhat concerned that this information may not have been supplied to LIHI as part of the application. (see:

http://www.blackstoneriver.org/programs/Blackstone_River_Fish_Passage_Project.php and http://www.blackstoneriver.org/programs/program_fish_ladders.php. Additional information concerning this project can be obtained from the BRWC/FOB by contacting us at www.blackstoneriver.org or otherwise viewed at http://www.ri.nrcs.usda.gov/news/PDF/FinalEABlackstone_complete.pdf

The Re-Certification Application Filing to LIHI by the Pawtucket Hydropower Project, FERC No. 3869 is clearly an important step for affordable power with acknowledgement of low impact to the environment. I too appreciate the incentive LIHI certification provides for encouraging existing and potential hydropower operators to reduce the adverse impact of their facilities. However, I would ask that LIHI consider withholding its re-certification unless or until Pawtucket Hydropower, LLC commit (in writing) to make all concerted efforts to work in partnership with the established organizations supporting fish passage at the Main Street Dam (first, and the most important, dam needing restoration since it is located at the fresh and salt water interface of the river). Moreover LIHI should require Pawtucket Hydropower, LLC to commit to the design and construction of this project, which is also supported by FIRC, within the year. It is just as important that as we move forward to meet our power needs, we also demand that "low impact" means that hydroelectric power facilities are certified, sited, retrofitted or designed and constructed, to allow for eco-friendly operation in a manner that does not have a significant adverse impact on fish and otherwise restores and supports aquatic life and riverine systems and habitats.

Recognizing that the formal comment period has closed, it is my hope that you will respond to the questions I raise above. I also hope that your organization will take note that public funds are being expended, that in-kind services and volunteerism along the first four dams are mounting, and community and government support of the Fish Restoration Project is crystal clear and on record. Lastly, I hope you may consider, formally or informally, that restoration of many rivers, including the Blackstone, are well underway, and by instilling a sense of environmental integrity and empowering these facilities to comply with the Clean Water Act, a greater quality of low impact hydropower development may be realized.

Sincerely,

David Newton
Member BRWC/FOB
Resident of Cumberland RI