

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

I am writing you to comment on the Re-Certification Application Filing to LIHI by the Pawtucket Hydropower Project, FERC No. 3869. I wanted to preface my specific comments by saying that my office (the Mass. Riverways Program) supports hydroelectric power facilities that are designed, sited, constructed, operated and maintained in a manner that does not have a significant adverse impact on fish and other riverine organisms and habitats. We appreciate the incentive LIHI certification provides for encouraging existing and potential hydropower operators to reduce the adverse impact of their facilities.

As you know, Pawtucket Hydro (FERC Project # 3689) has applied to be re-certified for another five years as a low-impact facility by LIHI (see <http://www.lowimpacthydro.org/application-details.aspx?id=65>). This facility applied for and received an initial LIHI certification in 2004, which I also commented on (see file in the link above entitled "Pawtucket decisionltr72204.pdf"). The "low impact" status afforded Pawtucket Hydro by the LIHI certification has since been used by other projects to burnish their "green" credentials (see, e.g., <http://www.greenlodgingnews.com/content.aspx?id=2484>)

As you also know, Pawtucket Hydro's initial LIHI certification in 2004 was contingent on its support for the implementation of the *Blackstone River Fish Restoration Plan* (<http://www.edc.uri.edu/restoration/html/intro/Blackstone%20River%20Fisheries%20Restoration%20Plan.pdf>), a worthy effort that Riverways supports, which, among other things, includes the establishment of up- and downstream fish passage around the Main St. Dam, which diverts flow into Pawtucket Hydro's headrace.

Since 2004, many parties are cooperatively moving forward on the implementation of the Restoration Plan to establish migratory fish passage in the lower Blackstone River (see, e.g., *Finding of No Significant Environmental Impact and Environmental Assessment For the Blackstone River Fish Passage Restoration Project, Blackstone River, Rhode Island* http://www.ri.nrcs.usda.gov/news/PDF/FinalEABlackstone_complete.pdf). Providing fish passage where it has been deemed to be feasible (as it has in the case of the lower Blackstone River where Pawtucket Hydro is located) is a criterion for LIHI status. As there is currently no such fish passage facility associated with the Main Street Dam, Pawtucket Hydro does not meet this LIHI criterion.

I understand that while negotiations between Pawtucket Hydro, the RI office of the NRCS, and others to provide up- and downstream fish passage at the Main Street Dam, are currently underway, Pawtucket Hydro has yet to sign the agreement allowing this work to go forward. Until such time as the up- and downstream fish passage facilities are in place, and are substantively proven to work effectively, it seems appropriate for LIHI to withhold re-certification of the Pawtucket Hydro facility until that important criterion is met. At the very least, the LIHI re-cert should be withheld until Pawtucket Hydro has signed the aforementioned agreement.

Thanks for the opportunity to comment on this application.

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