REVIEW OF APPLICATION

OF THE FEEDER DAM HYDROELECTRIC FACILITY

FOR CERTIFICATION

BY THE LOW IMPACT HYDROPOWER INSTITUTE

Prepared by Diane Barr

31 August 2019

I. INTRODUCTION

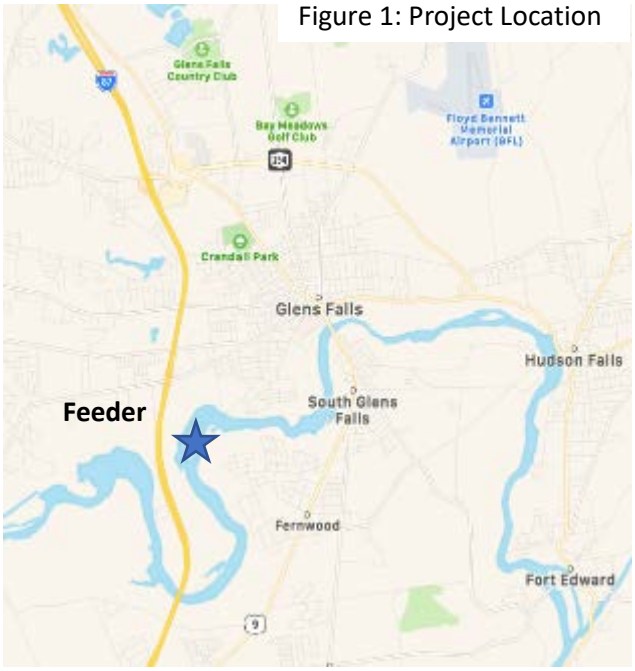
This report reviews the original application submitted by Erie Boulevard Hydropower, L.P. (Applicant), a wholly owned subsidiary of Brookfield Renewable Energy Group to the Low Impact Hydropower Institute (LIHI) for Low Impact Hydropower Certification for the Feeder Dam Hydroelectric Project (Feeder Dam or Project). A LIHI Intake Review was completed May 9, 2019. The Applicant promptly provided supplemental information for review in response to the Intake Review. The Application was posted for public review on June 12, 2019.

The Project dam was originally constructed in 1828 and hydropower was added in 1924. The Project has a nameplate generation capacity of 6.0 MW and generates an average of 25,173 MWh per year. A Federal Energy Regulatory Commission (FERC) license #2554 was issued for the Feeder Dam Hydroelectric Project on September 25, 2002, with an expiration date of August 31, 2042. New York Department of Environmental Conservation issued a Water Quality Certification (WQC) on February 5, 2002.

II. PROJECT'S GEOGRAPHIC LOCATION

The Project is located on the Hudson River at River Mile (RM) 203 in Saratoga County, New York. As shown in Figure 1, the Project is near the town of Glens Falls, NY. Access to the Project is from Interstate Route 87. The coordinates of the Project are 43.291°, -73.666°

Figure 1: Project Location



III. PROJECT AND IMMEDIATE SITE CHARACTERISTICS

The Hudson River watershed area is approximately 2,800 square miles. The Feeder Dam development is flanked by nearby hydroelectric facilities both up and downstream. Upstream of the Project between RM 209 and 218 are four FERC licensed dams. Downstream of the Project between RM 201 and 149 are ten separate dams, none of which provide upstream fish passage. There are operating agreements that influence the operations among facilities. Great Sacandaga Lake (FERC P-12252) controls 1,055 square miles of the drainage area that contributes to the hydroelectric power on the Hudson River, including the Feeder Dam Project. Discharges from that reservoir are regulated by the Hudson River Black River Regulating District (HRBRRD). In addition, 200 cfs from the Hudson

River are reserved for the Champlain Feeder Canal, which is utilized during the navigation period of May through November. Feeder Dam reregulates flows discharged from the upstream Sherman Island dam. Upstream and downstream dams are shown in Figure 2. Feeder Dam is located just upstream of Glens Falls dam and the Feeder Dam Project discharges directly into the Glens Falls impoundment.

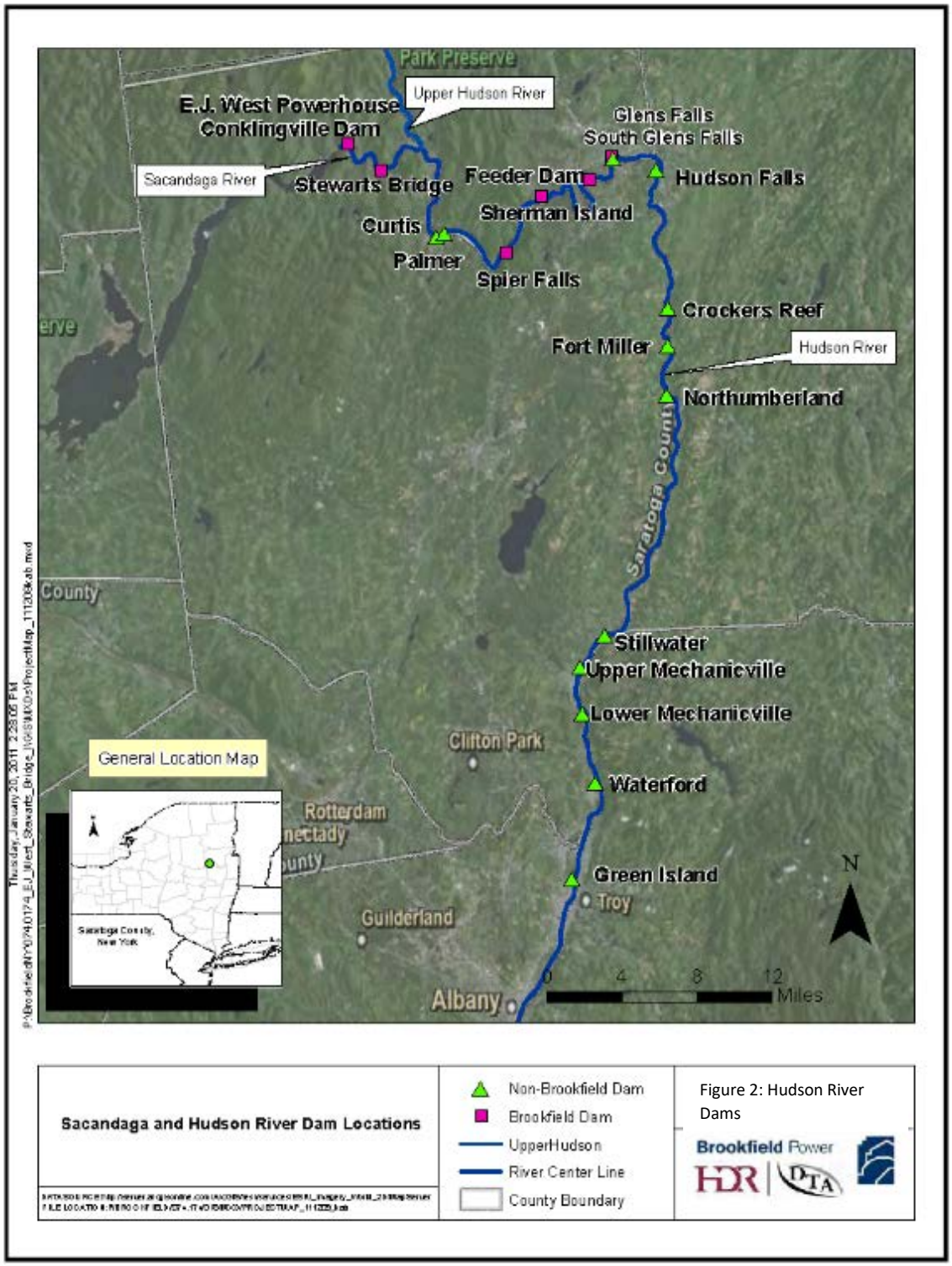


Figure 2: Hudson River Dams

The Feeder Dam impoundment extends approximately 5.5 miles with a surface area of 717 acres. The impoundment is operated by the New York State Thruway Authority to ensure water supply to the Feeder Canal which supports navigation in the Champlain Canal between Fort Edward and Lake Champlain.
The FERC Project boundary is shown in Figure 3.

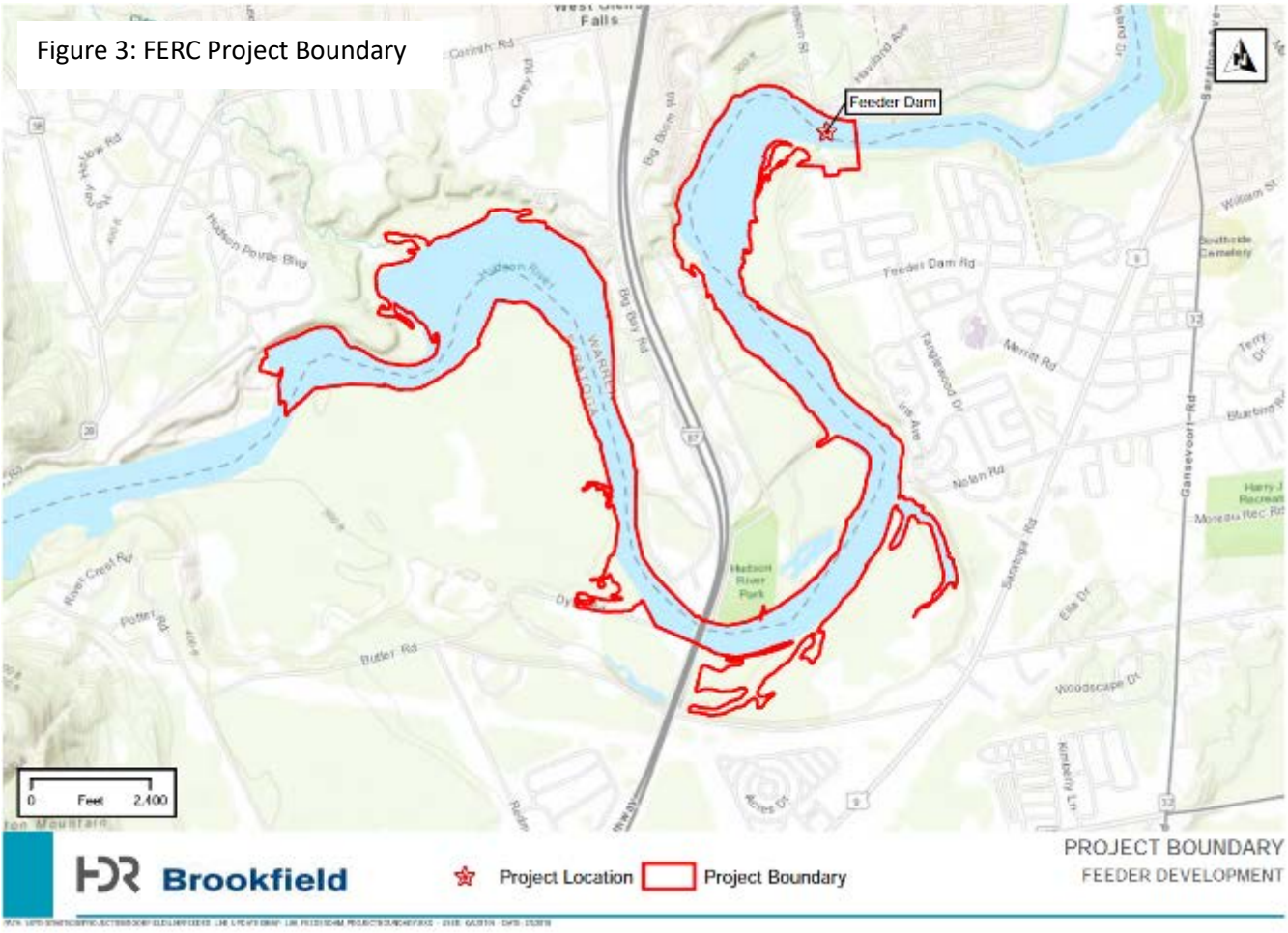


Figure 3: FERC Project Boundary

IV. Project Operation

The Feeder Dam was constructed in 1828 and modified for hydroelectric generation in 1924. The dam is 21 feet in height with three-foot flashboards. The spillway elevation is 281.1 feet above mean sea level (msl) with a hydraulic capacity of 69,100 cfs at elevation 289.5 ft msl. Tailwater elevation is 269.1 feet msl. Water is conveyed from the headwater pond through headgates and into the 250-foot-long forebay, then through a closed flume to the generating units. The average annual power production of the Project is 25,173 MWh (2013-2018) and the total rated capacity of the unit is 6 MW. The Project is operated in a pulsing mode as a reregulating project with seasonal fluctuations. There are 5 generating units with vertical propeller turbines. The Project contains a 1.0-inch spaced trash rack. The Feeder Dam Project operates with a 2.0- foot impoundment fluctuation limit while river flows are within the operating range of the turbines. The impoundment fluctuation limit is reduced to 1 foot from April 1 to June 15 to facilitate fish spawning. There is a minimum average daily flow of 1,760 cfs below Feeder Dam with an instantaneous base flow requirement of

1,500 cfs. The Project features include a dam, 250-foot long forebay, closed flume, substation, and powerhouse. These features are shown in Figure 4, Project Features.

Figure 4: Project Features

Dam and Spillway

Powerhouse and Intake

Powerhouse tailrace

V. ZONES OF EFFECT

The Project consists of two Zones of Effects (ZOEs) as shown in Figure 5. Zone 1 is the impoundment which extends from the head of the impoundment, downstream approximately 5.5 miles to the dam, RM 203.0 to 208.5. Zone 2 is the downstream reach which extends from the spillway, downstream approximately 0.2 miles to the Glens Falls Hydroelectric Project impoundment, Rm 202.8 to 203.0.

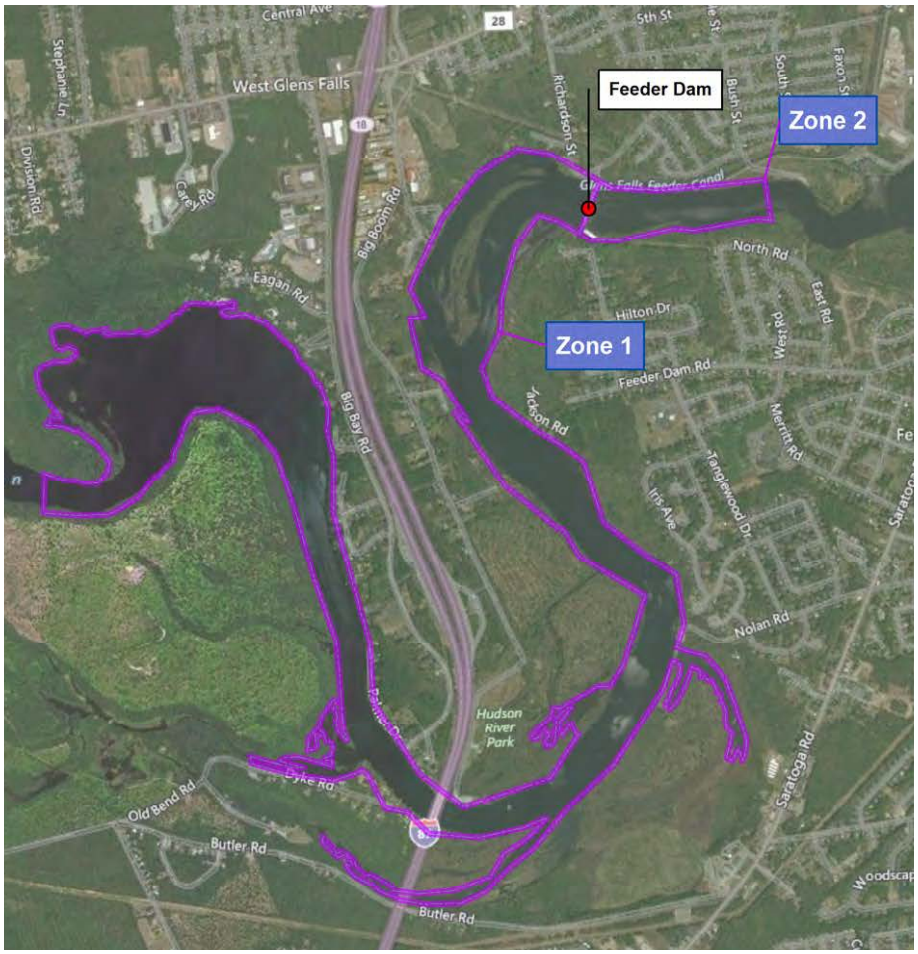


Figure 5: Zones of Effects:

Zone 1-Impoundment

Zone 2-Downstream

ZONE 1 IMPOUNDMENT STANDARDS SELECTION

	Criterion	1	2	3	4	Plus
A	Ecological Flow Standards	X				
B	Water Quality Standards		X			
C	Upstream Fish Passage Standards	X				
D	Downstream Fish Passage Standards		X			
E	Shoreline and Watershed Protection Standards	X				X
F	Threatened and Endangered Species Standards			X		
G	Cultural and Historic Resources Standards		X			
H	Recreational Resources Standards		X			

ZONE 2 DOWNSTREAM STANDARDS SELECTION

	Criterion	1	2	3	4	Plus
A	Ecological Flow Standards		X			
B	Water Quality Standards		X			
C	Upstream Fish Passage Standards		X			
D	Downstream Fish Passage Standards	X				
E	Shoreline and Watershed Protection Standards	X				X
F	Threatened and Endangered Species Standards			X		
G	Cultural and Historic Resources Standards		X			
H	Recreational Resources Standards		X			

V. REGULATORY AND COMPLIANCE STATUS

The Project was issued FERC License #2554 on September 25, 2002 which expires on August 31, 2042. The license incorporated the Feeder Dam Project Settlement Agreement, dated March 27, 2000. A Clean Water Act (CWA) Section 401 Water Quality Certificate (WQC) was issued by the New York State Department of Environmental Conservation (NYSDEC) for the Project on February 5, 2002. The FERC license is located here in the FERC elibrary and in the LIHI supporting records. The WQC is located here and documentation of NYSDEC's 2019 confirmation that the WQC is still valid is included in Appendix D of LIHI Application. As part of this review, the FERC e-library was reviewed for the past 10 years. There were no compliance issues or records that depicted the Project different from the information contained in the application. The latest FERC environmental inspection report (2013) is located here.

VI. PUBLIC COMMENTS RECEIVED OR SOLICITED BY LIHI

LIHI solicited public comments on the Application on June 12, 2019. LIHI did not receive any public comments during the 60-day comment period which ended on August 11, 2019. Based on the evidence presented by the Applicant, it was determined that direct outreach to state and federal agencies within the Project's regulatory jurisdiction was not warranted. Therefore, no comments were directly solicited for the application beyond the standard Public Comment period.

VII. DETAILED CRITERIA REVIEW

A. Ecological Flow Regimes

Goal: The flow regimes in riverine reaches that are affected by the facility support habitat and other conditions suitable for healthy fish and wildlife resources.

The Applicant selected Standard 1 for the Impoundment ZOE and Standard 2 for the Downstream ZOE.

> ***STANDARD A-1. Not Applicable/De Minimis Effect:*** The facility operates in a true run-of-river operational mode and there are no bypassed reaches or water diversions associated with the facility; or the facility is located within an existing water conduit that does not discharge into natural waterways.
>
> ***STANDARD A-2. Agency Recommendation:*** The flow regime at the facility was developed in accordance with a, science-based agency recommendation.

The Applicant provided the following evidence to support the selection of Standard A-1 for the Impoundment ZOE:

(i) There is no bypass reach.

(ii) License Article 403 requires that Feeder Dam operates to minimize the impacts on fish and wildlife with an impoundment fluctuation restriction of one foot daily from April 1 to June 15 to facilitate walleye spawning, and two feet the rest of the year.

(iii) FERC License Article 401, Stream Flow and Water Level Monitoring Plan (SFWLMP) directs operations related to impoundment fluctuations and releases.

The Applicant provided the following evidence to support the selection of Standard A-2 for the Downstream ZOE:

(i) License Article 405 and Settlement Agreement requires a minimum average daily flow of 1,760 cubic feet per second (cfs) below Feeder Dam. An instantaneous base flow of 1,500 cfs is also provided below Feeder Dam. The flow release may be adjusted for flow augmentation purposes if low lake elevation conditions occur on Great Sacandaga Lake (FERC P-12252). The Champlain Feeder Canal flow reserve is approximately 200 cfs, which is utilized during the navigation period of May to November.

(ii) To ensure there is visual confirmation of this compliance the Applicant installed a "generation on" light for each of the Feeder Dam generating units to verify that the 1,500 cfs flow is being provided.

(iii) Article 401 of the FERC license requires the SFWLMP be developed to ensure compliance with impoundment fluctuations, and fish movement/bypass flows.

(iv) The Applicant established compliance for these requirements with the installation of hydro-acoustic sensors to monitor the tailwater elevation for monitoring and maintaining tailwater flows to FERC and NYSDEC agency requirements for ecological flows.

Based on the review of the application and supporting documentation, the Project satisfies the Ecological Flow Regimes criterion.

B. Water Quality

Goal: Water quality is protected in waterbodies directly affected by the facility, including downstream reaches, bypassed reaches, and impoundments above dams and diversions.

The Applicant selected Standard 2 for both ZOEs:

> ***STANDARD B-2.*** **Agency Recommendation:** The facility is in compliance with all water quality conditions contained in a recent Water Quality Certification or science-based resource agency recommendation providing reasonable assurance that water quality standards will be met for all waterbodies that are directly affected by the facility. Such recommendations, whether based on a generally applicable water quality standard or one that was developed on a site-specific basis, must include consideration of all water quality components necessary to preserve healthy fish and wildlife populations, human uses and recreation.

The Applicant provided the following evidence to support the selection of Standard B-2:

(i) The portion of the Hudson River in the Project area is listed as "impaired" per the November 2016 Section 303(d) List of Impaired Waters Requiring a TMDL/Other Strategy for PCB contaminated sediments. Since the listing is for PCB's it is not related to the Feeder Dam Project. A copy of the November 2016 Section 303(d) list for New York State can be viewed here.

(ii) The Hudson River is classified by NYSDEC as Class B in the Project reach. The best usage of Class B waters is primary contact recreation and secondary fishing, and such waters are also suitable for fish propagation and survival. The Project does not impede these uses.

(iii) The Feeder Dam Project is in compliance with all conditions issued pursuant to the Clean Water Act – Section 401 WQC per materials provided in the application. On-going water quality monitoring at the Project is not required as part of the WQC or FERC license, therefore the Applicant is self-regulated for compliance. To demonstrate adherence the Applicant contacted the NYSDEC for concurrence with the WQC. The Applicant provided a letter dated January 9, 2019, from NYSDEC stating that the WQC is still valid. This letter was provided in Appendix D of the Application.

Based on the review of the application and supporting documentation the Project satisfies the Water Quality criterion.

C. Upstream Fish Passage

Goal: The facility allows for the safe, timely, and effective upstream passage of migratory fish. This criterion is intended to ensure that migratory species can successfully complete their life cycles and maintain healthy, sustainable fish and wildlife resources in areas affected by the facility.

The Applicant selected Standard 1 for the Impoundment ZOE and Standard 2 for the Downstream ZOE.

> ***STANDARD C-1.*** **Not Applicable / De Minimis Effect:** The facility does not create a barrier to upstream passage, or there are no migratory fish in the vicinity of the facility and the facility is not the cause of extirpation of species that were present historically.
>
> ***STANDARD C-2. Agency Recommendation:*** The facility is in compliance with science-based fish passage recommendations issued by appropriate resource agency(ies) for the facility and which may include provisions for appropriate monitoring and effectiveness determinations.

The Applicant provided the following evidence to support the selection of Standard C-1 for the Impoundment ZOE:

(i) There are no upstream fish passage barriers or migratory fish management in the impoundment.

The Applicant provided the following evidence to support the selection of Standard C-2 for the Downstream ZOE:

(i) No downstream dams provide upstream fish passage.

(ii) There are no mandatory Federal Section 18 prescriptions for passage at the Project. In Article 408 of the license and in the Settlement Agreement, the Department of Interior retained its reservation of its authority to prescribe upstream and downstream fish passage devices in the future.

(iii) There are no anadromous species present, although there is information that some American eels can ascend downstream dams to reach Feeder Dam. Two eels were captured in the impoundment in a 1984 study.

Based on the review of the application and supporting documentation the Project satisfies the Upstream Passage criterion.

D. Downstream Fish Passage

Goal: The facility allows for the safe, timely, and effective downstream passage of migratory fish. For riverine (resident) fish, the facility minimizes loss of fish from reservoirs and upstream river reaches affected by facility operations. All migratory species can successfully complete their life cycles and to maintain healthy, sustainable fish and wildlife resources in the areas affected by the facility.

The Applicant chose Standard D-2 for the Impoundment ZOE and Standard D-1 for the Downstream ZOE.

> ***STANDARD D-1. Not Applicable/De Minimis Effect*:** The facility does not create a barrier to downstream passage, or there are no migratory fish in the vicinity of the facility; if migratory fish were present historically, the facility did not contribute to the extirpation of such species; the facility does not contribute adversely to the sustainability of riverine fish populations or to their access to habitat necessary for the completion of their life cycles.
>
> ***STANDARD D-2. Agency Recommendation:*** The facility is in compliance with a science-based resource agency recommendation for downstream fish passage or fish protection, which may include provisions for appropriate monitoring and effectiveness determinations.

The Applicant provided the following evidence to support the selection of Standard D-2 for the Impoundment ZOE.

(i) No upstream dams provide downstream passage and there are no anadromous species present, although American eel is or may be present.

(ii) There are no mandatory Federal Section 18 prescriptions for passage at the Project. In Article 408 and in the Settlement Agreement, the Department of the Interior retained its reservation of its authority to prescribe upstream and downstream fish passage devices in the future. There are no requirements to monitor downstream fish passage.

(iii) The Applicant provided information indicating fish populations are dominated by smallmouth bass, yellow perch, pumpkinseed, rock bass, fallfish, killfish, sunfish, tessellated darters, chain pickerel, and black bullhead. Downstream, the Glens Falls impoundment shows a diverse mix of warm-, cool-, and coldwater species and the fish community in the Glens Falls impoundment appears to be balanced and stable according to that project's relicensing information.

(iv) An entrainment study was conducted in 1993-1994 which showed varying rates of entrainment from 1-50% with the most common fish entrained being sunfish, rock bass, and pumpkinseed. The combined FERC Environmental Impact Statement (EIS) found here for Feeder Dam and other projects indicated that trash rack overlays would sufficiently reduce entrainment of large fish given the low approach velocity of about 2 ft/sec.

(v) Article 404 of the FERC license required the Applicant to install full trash rack overlays with 1-inch spacing. Overlays were installed in 2005 and a continuous 25-cfs discharge through the trash sluice is provided. Other fish protection enhancements included construction of plunge pools at the spillway toes and reduction of the roughness of the spillway faces.

The Applicant provided the following evidence to support the selection of Standard D-1 for the Downstream ZOE:

(i) There are no downstream fish passage barriers or migratory fish management in the downstream reach.

Based on the review of the application and supporting documentation the Project satisfies the Downstream Passage criterion.

E. Shoreline and Watershed Protection

Goal: The facility has demonstrated that sufficient action has been taken to protect, mitigate or enhance the condition of soils, vegetation and ecosystem functions on shoreline and watershed lands associated with the facility.

The Applicant selected Standard E-1 -Not Applicable/De Minimis Effect for both ZOE's. In addition, the Applicant selected Standard PLUS.

> ***STANDARD E-1. Not Applicable/De Minimis Effect:*** There are no lands associated with the facility where the facility owner has direct or indirect ownership or control over lands surrounding the facility and its riverine zones that have significant ecological value for protecting water quality, aesthetics, or low-impact recreation, and the facility is not subject to any Shoreline Management Plan (SMP) or similar protection plan.

The Applicant provided the following evidence to support the selection of Standard E-1.

(i) The review of the FERC license supported the Applicant's statement that that no shoreline management plan is required for the Project.

(ii) Land use along the impoundment shoreline is generally undeveloped with some areas of residential development. The impoundment includes some areas of forested and emergent wetlands.

(iii) Applicant-owned properties are maintained as undeveloped buffer zones.

(iv) There is no evidence, according to the EIS, that Project operations have contributed to shoreline erosion, and limiting impoundment fluctuations helps to reduce the potential for erosion as well as enhance wetland areas and improve wildlife habitat especially for shore nesting birds and other riparian species.

Based on the review of the application and supporting documentation, the Project satisfies the Shoreline and Watershed Protection criterion.

The Applicant also selected the PLUS Standard for both Zones.

> ***STANDARD E-PLUS. Bonus Activities:*** To the extent the facility owner has direct or indirect ownership or control over lands surrounding the facility and its riverine zones, the facility has an approved and legally enforceable shoreline buffer or equivalent watershed land protection plan for ecological land protection of water quality, aesthetics, and low-impact recreation values. The buffer zone must be dedicated for conservation purposes and must also be vegetated similarly to adjacent natural lands. In addition, the buffer zone must include at least 50% of the undeveloped shoreline around the reservoir, or a reservoir shoreline equivalent along its riverine zones. Alternatively, the facility has established a watershed enhancement fund for land management within the facility's watershed that is designed to achieve the ecological and recreational equivalent of land protection that would have been achieved by dedicating an ecologically effective buffer zone around more than 50% the reservoir.

The Applicant provided the following evidence to support the selection of Standard E-PLUS based on requirements in the comprehensive Settlement Agreement for the Feeder Dam Project and the three upstream projects on the Sacandaga and Hudson River owned by the Applicant (see Figure 2). Fund amounts are for all four projects collectively. The funds are administered by advisory councils created for each fund. The Applicant:

(i) Annually contributes $10,000 (escalated for inflation annually) to the Hudson/Sacandaga River Enhancement Fund. This fund may be used within the Hudson River as defined from the confluence of the Sacandaga River downstream to Feeder Dam for purposes including but not limited to ecosystem restoration or protection, fish stocking, natural resource stewardship, and new recreation resources.

(ii) Has pre-funded the fund for years 2015-2020 ($71,098) to serve as partial matching funds for a grant received under Warren County's First Wilderness Heritage Corridor economic development initiative to create the "Whitewater Rodeo Hole", including a whitewater park with an engineered set of rapids on the Sacandaga River just upstream of the confluence with the Hudson River.

The 2017 Annual funding Report, provided here includes a listing of funded projects such as: A historical film documentary, *Harnessing Nature,* about the creation of Great Sacandaga Lake which was built to alleviate flooding in the Sacandaga and Hudson rivers; funding for boat launch stewards from the Adirondack Watershed Institute at Paul Smith's College; and funding for a trout hatchery and for classroom teaching materials related to trout.

The Applicant also annually contributes $30,000 ($41,882 in 2018) to the Great Sacandaga Lake Enhancement Fund (GSL Fund). The funds may also be used within the Sacandaga River Basin for ecosystem restoration, fish stocking, stewardship, or recreational resources in the basin upstream of Conklingville Dam at Great Sacandaga Lake. Lastly, the Applicant annually contributes $5,000 ($7,000 in 2018) to a Fisheries Enhancement Fund for projects located throughout New York including stream habitat improvement, handicap fishing access, native brook trout restoration, and public fishing rights acquisition.

Based on the review of the application and supporting documentation, the Project satisfies the Shoreline and Watershed Protection PLUS criterion as the watershed enhancement funds are used for ecological land and recreation management that will achieve the equivalent land protection value of 50% or more around the undeveloped shoreline at the Project. The Feeder Dam Project has only 55 acres of land above water, including non-project lands (see Figure 3). While some of the funding is for educational programs and recreation, those would also be eligible for the PLUS standard under the cultural and historic and/or recreation criteria but given the multiple purposes of the enhancement fund, it is appropriate to award the PLUS for shoreline and watershed protection.

F. Threatened and Endangered Species Protection

Goal: The facility does not negatively impact federal or state listed species.

The Applicant selected Standard F-3, Recovery Planning and Action for both ZOE's.

> ***STANDARD F-3. Recovery Planning and Action.*** The facility is in compliance with relevant conditions in a species recovery plan, with relevant conditions in an incidental take permit or statement, biological opinion, habitat conservation plan, or similar government document and the incidental take document and/or biological opinion issued relevant to the facility was designed to be a long-term solution for protection of the listed species.

The Applicant provided the following evidence to support the selection of Standard F-3.

(i) FWS New York Field Office provided on January 31, 2019, information on rare, threatened or endangered (RTE) species. This included the northern long-eared bat (*Myotis septentrionalis*), Indiana Bat (*Myotis sodalis*), and Karner blue butterfly (*Lycaeides melissa samuelis*) may potentially occur within the Project area, but there are no critical habitats located within the Feeder Dam Project area.

(ii) The Applicant consulted with NYSDEC's Natural Heritage Program for an updated list of threatened and endangered species. The NYSDEC indicated that the Karner blue butterfly, state-listed as endangered, and frosted elfin butterfly (*Callophrys irus*), which is state-listed as threatened, have been documented within 0.5 miles of the Feeder Dam Project.

(iii) The FWS 2007 Indiana Bat Draft Recovery Plan identified that no Indiana bat hibernacula, which typically include caves and mines, are known to exist in the immediate vicinity of the Project. Transient individuals, presumably in association with summer habitat, may however exist in the Project area. Operations of the Project, especially with regard to preservation of woodland buffer areas, are consistent with this draft recovery plan.

(iv) The FWS has not adopted a formal recovery plan for the northern long-eared bat. On January 14, 2016, the FWS published the final 4(d) rule identifying prohibitions for the protection of northern long-eared bats. Operations of the Project, especially with regard to tree clearing from June 1 through July 31, adhere to the prohibitions outlined in the final 4(d) rule.

(v) The NYSDEC has not adopted a formal recovery plan for the Karner blue butterfly or the frosted elfin.
(vi) There are no specific additional requirements for threatened or endangered species protection in the FERC license or WQC for the Feeder Dam Project although as part of recreation planning, a survey for Karner blue butterfly and blue lupine was conducted. Neither species was observed.
(vii) Agency consultation was provided in Appendix E of the LIHI Application.

Based on the review of the application and supporting documentation, the Project satisfies the Threatened and Endangered Species Protection criterion.

G. Cultural and Historic Resource Protection

Goal: The facility does not unnecessarily impact cultural or historic resources that are associated with the facility's lands and waters, including resources important to local indigenous populations, such as Native Americans.

The Applicant selected Criterion G2 – Approved Plan for both ZOEs.

> ***STANDARD G-2. Approved Plan:*** The facility is in compliance with approved state, federal, and recognized tribal plans for protection, enhancement, or mitigation of impacts to cultural or historic resources affected by the facility.

The Applicant provided the following evidence to support the selection of Standard G-2.

(i) A Programmatic Agreement (executed July 19, 1996), included a Cultural Resources Management Plan (CRMP) for the Project. The Feeder Canal is located within the Project boundary, which provides water from the Hudson River to the Champlain Canal (a division of the New York State Barge Canal System).
(ii) FERC Approved the CRMP on June 3, 2005.
(iii) The Applicant implements its Programmatic Agreement and CRMP to mitigate the effects of operations within the Project's area of potential effect (APE), and historic structures including the dam, powerhouse and Feeder Canal, pursuant to license Article 409.
(iv) The most recent annual monitoring report on activities undertaken that may be subject to the CRMP was filed on September 18, 2018.

Based on the review of the application and supporting documentation and given run-of-river operations that minimize erosion, the Project satisfies the Cultural and Historic Resource Protection criterion.

H. Recreational Resources

Goal: The facility accommodates recreation activities on lands and waters controlled by the facility and provides recreational access to its associated lands and waters without fee or charge.

The Applicant selected Criterion H2 – Agency Recommendation for both ZOE's.

> ***STANDARD H-2. Agency Recommendation:***
> The facility demonstrates compliance with resource agency recommendations for recreational access or accommodation (including recreational flow releases), or any enforceable recreation plan in place for the facility.

The Applicant provided the following evidence to support the selection of Standard H-2.

(i) Article 406 required the licensee to permit public access across Project lands to the shoreline of the Feeder Dam impoundment and to file a Recreation Management Plan and schedule for constructing recreational enhancements.
(ii) The Applicant constructed the following facilities: Tailrace fishing access parking (1 space), canoe put in at Hudson River below Feeder Dam, 16 parking spaces for access to the Feeder Canal, two picnic tables at Overlook Park, car-top boat launch at Richardson Street, canoe portage, and take-out at the Richardson Street boat launch.
(iii) The Applicant constructed recreational facilities at Feeder Canal which were turned over to the NY State Conservation Council.
(iv) The Feeder Dam Project is in compliance with recreational access, accommodation, and facilities conditions in the FERC license.

Based on the review of the application and supporting documentation, and given the limited recreational opportunities at the development, the Project satisfies the Recreational Resources criterion.

VIII. GENERAL CONCLUSIONS AND REVIEWER RECOMMENDATION

Based on this review, the Feeder Dam Project meets the LIHI criteria for certification as a Low Impact Hydropower facility and the PLUS Standard for shoreline protection, thus an eight (8)-year term is appropriate. No conditions are recommended.