



May 28, 2019

MEMORANDUM FOR:

Ms. Shannon Ames, LIHI Executive Director
Low Impact Hydro Institute
329 Massachusetts Avenue, Suite 6
Lexington, MA 02420

SUBJECT: National Marine Fisheries Service comments on Low Impact Hydropower Institute Proposal to Expand Certification Eligibility for New Construction

Dear Ms. Ames:

The National Marine Fisheries Service (NMFS) would like to thank the Low Impact Hydropower Institute (LIHI) for the opportunity to provide comments on proposed handbook changes regarding LIHI Certification eligibility for new construction. NMFS recognizes the critical importance of our national energy infrastructure and has a strong interest in supporting 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. NMFS offers the following general comments for LIHI's consideration.

NMFS appreciates the inclusion of a criterion demonstrating a "net benefit to resource values" in LIHI's Certification process and recognizes the many challenges associated with measuring and demonstrating a "net benefit." We understand that in the current LIHI Certification process, the LIHI Board or the LIHI Technical Committee determines whether a project will receive Certification based on the application. Realizing that it is a complex aspect of the application, NMFS would like to offer our technical assistance to LIHI in assessing whether candidate dams or diversions result in a "net benefit to the resource values" during the LIHI Certification process. NMFS recommends LIHI consider environmental aspects on a project-by-project basis within the context of a candidate project's watershed such as: in-stream flows, water temperatures, habitat quality, habitat quantity/accessibility, sediment, channel and side channel habitats, and presence of threatened or endangered species.



NMFS is also interested in learning more about how the rolling five-year timeframe was identified. We note that Green-e, EPA's Green Power Partnerships, and many state Renewable Portfolio Standards programs require LIHI Certification as part of their eligibility. Therefore, this important change could have broad implications to the number of projects that are eligible for these programs. We recommend LIHI include in its revised or final eligibility criteria document a discussion of data or case studies that were used in identifying and selecting the proposed five-year timeframe.

We appreciate the opportunity to provide input on LIHI's proposal to expand eligibility for new construction. We view this comment letter as a starting point for a dialogue between NMFS and LIHI and welcome further conversations on this topic. Please contact Ms. Melanie Harris, National Hydropower Program Coordinator, Office of Habitat Conservation at melanie.harris@noaa.gov or by phone at 301-427-8636.

Sincerely,



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Patricia A. Montanio
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