

Subject: FW: Willow Island Project Comments
Date: Friday, September 1, 2017 at 10:36:43 AM Eastern Daylight Time
From: Shannon Ames <sames@lowimpacthydro.org>
Attachments: 20170602-5024(32196011)USFWS_PAFO_comments.pdf

----- Forwarded message -----

From: **McCorkle, Richard** <richard_mccorkle@fws.gov>
Date: Fri, Sep 1, 2017 at 10:12 AM
Subject: Fwd: Willow Island Project Comments
To: lzai@lowimpacthydro.org

Please see comments regarding the proposed LIHI certification for the Willow Island Project, below:

----- Forwarded message -----

From: **McCorkle, Richard** <richard_mccorkle@fws.gov>
Date: Fri, Sep 1, 2017 at 9:59 AM
Subject: Willow Island Project Comments
To: dhall@lowimpacthydro.org

To Whom it may concern,

I am writing to provide input regarding the proposed LIHI certification for the Willow Island Locks and Dam Hydroelectric Project which is located at River Mile 162 on the Ohio River.

I believe this certification is premature. The project was only recently constructed, and post-construction monitoring of downstream mussel communities, which include federally listed endangered species, is still ongoing in order to determine whether or not project operation is affecting the mussels. The results of the first post-construction survey have not been provided yet, and 2 additional post-construction surveys are planned for 2018 and 2020. Therefore, it would be premature to certify that the project has a low environmental impact with regards to federally listed endangered mussels which occur a short distance downstream of the project.

In addition, the licensee has submitted a license amendment application to the Federal Energy Regulatory Commission (FERC), requesting that license article 404 be deleted. This license article requires fish mortality monitoring, development of a plan to reduce mortality, and compensation for estimated mortality to be paid to the West Virginia Division of Natural Resources and Ohio Department of Natural Resources. The U.S. Fish and Wildlife Service (Service) has filed comments to the FERC docket for this project (attached), opposing this license amendment.

Please read the attached comment letter responding to the licensee's request. We believe LIHI certification for this project is premature, and a decision should be postponed until it can be determined that the project is, indeed, a low-impact project.

Richard C. McCorkle
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814-206-7470

*The law locks up both man and woman
Who steals the goose from off the common,
But lets the greater felon loose
Who steals the common from the goose.*