

## LIHI Comment

Re: Recertification of LIHI Certificate #20 - Salmon River Hydro Project, Salmon River, New York (FERC # 11408)

As a property owner on Salmon River Reservoir at 592 Waterbury Rd., Redfield, NY, I commend the certification efforts by LIHI to reduce the environmental impacts of hydropower generation on the many reservoirs around the country. With respect to the recertification of the Salmon River, NY Hydro Project, I would like to offer a few comments. They address your criteria of flows, water quality, and overall environmental impact. (Note that the fish passage criterion is not an issue because the waterfall on the river would impede any passage.)

The large fluctuations in water level consistently experienced on the Salmon River Reservoir in the past decade have many adverse impacts both on the environment and the economy of the local community.

First of all, the low water levels severely stress the fish population in the reservoir. After a sudden drop in level, one can observe egg sacks hanging in exposed brush drying out in the sun and schools of small fry stranded in isolated pools of water. The water level fluctuations also impact other wildlife habitats, such as the loon nests. The loon family that has consistently nested directly across from our property did not return this year after the severe drop in water level in 2012. The long periods during which much of the reservoir bottom is exposed to sunlight and eventually becomes bare land has hastened the spread of non-native invasive weeds, particularly Eurasian milfoil. Our waterfront, which was weed-free until several years ago, is now choked with milfoil.

Recreational use of the reservoir decreases significantly during the low water levels, not only for fishing but also recreational boating, canoeing, and flatwater kayaking. This obviously reduces tourism and has a detrimental impact on the economy of the communities around the reservoir. Finally, it destroys the aesthetics of the area. The NY Department of Environmental Conservation is proposing a new Unit Management Plan that includes the creation of 300 ft. buffer strip areas along their land on the reservoir to preserve the 'viewshed'. However, the question is: what viewshed are they protecting, a full reservoir or bare ground?

In addition to minimum base flows, the 1996 reservoir license also establishes target water levels to prevent rapid drawdowns. However, in the decade and a half after that license was approved, the reservoir water level has consistently fallen far below these target levels during the summer months. Most notably, in 2002, 2007, and 2012, the water level fell more than 20 feet below specified levels exposing over one half of the reservoir surface area to bare land. Even this year (2013) with above average rainfall, the reservoir water level was drawn down well below the target levels.

One of the causes of the low water levels is the needless whitewater releases during the summer months. These occur during periods of normally lower rainfall and the level is

never restored after them. (Each release reduces the water level by about one foot.) Experience has shown that the reservoir does not have the capacity and watershed area to support these releases. The minimal (if any) economic benefit of such releases is overshadowed by the adverse economic impact on the area around the reservoir.

At other times during the warmer periods of summer, the drop in reservoir water level is greater than can be attributed to the required minimum base flows. This suggests that the power company continues to use the reservoir for peaking operations during periods of high energy demand and simply ignores the target levels specified in the license. With reasonable minimum base flows, a run-of-river release policy would maintain the target levels in all but rare periods of extreme drought.

Erie Boulevard Hydropower's response to petitions regarding better maintenance of the Bennett's Bridge reservoir elevation claims that they are fully compliant with the terms of the FERC operating license. However, this agreement is subject to interpretation of such terms as "extreme drought conditions or emergency conditions". I feel that most people will agree that they have not abided by the spirit of the agreement.

I propose the following:

1. that the power company monitor the reservoir water level daily and post the data on-line accessible to the public,
2. that the scheduled summertime whitewater releases be eliminated,
3. that LIHI withhold recertification of the reservoir (FERC # 11408) until the power company (Brookfield Power Corporation) provides credible assurances that they will honor the reservoir target water levels as currently specified in the FERC licensing agreement or any future modifications thereof.

Sincerely,

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