

February 16, 2021

Low Impact Hydro Institute
1167 Massachusetts Avenue
Office 407
Arlington, MA 02476

Attn: Shannon Ames, Executive Director

Submitted electronically to: comments@lowimpacthydro.org

RE: Lawrence Project Comments

Dear Executive Director Ames:

I am the General Manager for Pacific Mills Acquisition, LLC, owner of Unit Hydro, located along the North Canal at 300 Canal Street, Lawrence, MA. The Lower Pacific Mills site consists of a vibrant residential community, 2 commercial buildings and Unit Hydro. The residential and commercial conversion in recent years has served the City of Lawrence well in preserving these historic structures and creating a new vitality within the North Canal Historic District. Cradled within this community, Unit Hydro consists of an existing hydroelectric facility, as well as associated developable area. In connection with the property, Unit Hydro possesses 33 deeded Mill powers. As you are most likely familiar with, Mill Powers are the rights to a certain amount of flow of water through the Historic North Canal of the Lawrence Hydroelectric Project.

The Pacific Mills 33 deeded Mill Powers are currently being leased to the Lawrence Hydroelectric Project for the purpose of their operations. Upon the expiration of the lease, Pacific Mills intends to recommence hydroelectric operations at Unit Hydro.

We have concerns that Essex is failing to adequately preserve cultural and historic aspects of structures within the project facility, specifically the canals. We request that LIHI place reasonable conditions on the recertification of Essex in order to ensure that the operations at the facility meet LIHI's object that LIHI certified hydroelectric projects minimize impacts of their operations as compared to other hydropower facilities.

We are concerned that the canals, which are a part of the project and license area, are not being adequately protected as required by FERC and LIHI guidelines. We believe the low water levels are contributing to structural issues within the canals. We understand that LIHI's standard requires Essex to be in compliance with plans for "protection, enhancement, or mitigation of impacts to cultural or historic resources", such as the canals. Essex has consistently kept the water levels low, causing deterioration, and undermining the character of the area. We request that LIHI require Essex to maintain historic water and flow levels to the canals after undertaking appropriate repair of these structures, as condition to their recertification.

We understand Essex has requested that FERC approve the removal of the Canals from the project area. We do not support their removal from the project.

Thank you for your consideration of our concerns relative to Essex's recertification. We hope LIHI will place adequate conditions on the recertification in order to preserve the historic structures of the North Canal Historic District.

Sincerely,

Alida Davis
General Manager
Unit Hydro
Pacific Mills Acquisition, LLC.
300 Canal Street
Lawrence, MA 01840
Pacificmills@aol.com