



January 23, 2018

John L. Ragonese
FERC License Manager
Great River Hydro, LLC
One Harbour Place, Suite 330
Portsmouth, NH 03801
Via email: jragonese@greatriverhydro.com

RE: Request for Additional Three Years of Certification Term in Accordance with Condition 3 of the Fifteen Mile Falls' (LIHI Cert #39) Recertification

Dear Mr. Ragonese,

On December 20, 2017 LIHI received Great River Hydro LLC's 2017 Compliance package for Fifteen Mile Falls ("Project") along with a request for three (3) additional years of Certification as offered in Condition 3 of the recertification that was issued in 2015 (Certification term 2013-2018) if the project met certain provisions.

Condition 3 stated:

The facility owner shall provide LIHI with a description of the current status and use of funds from the Mitigation and Enhancement Fund that was part of the Settlement Agreement for the most recent FERC licensing. In particular, this description shall identify the lands and waters that are benefiting from the funds, the current fund balance, and continuing payment schedule, and be sufficient to determine if these funds are achieving the ecological and recreational equivalent of land protection of the buffer zone referred to in Question D.1. This information will be used by LIHI staff to determine if the Fifteen Mile Falls certification qualifies for three additional years in its term. The facility owner may or may not take advantage of this opportunity to request an extended term of their new certificate; if they do not provide this additional information, it will not affect the new five-year term.

Question D.1 of the April 2014 Handbook, referred to above, is as follows:

Is there a buffer zone dedicated for conservation purposes (to protect fish and wildlife habitat, water quality, aesthetics and/or low-impact recreation) extending 200 feet from the average annual high water line for at least 50% of the shoreline, including all of the undeveloped shoreline? (page 41, LIHI Certification Handbook, April 2014 Edition)

Since the beginning of the Mitigation and Enhancement Fund ("Fund") in 2002, a total of \$11,534,404 in grants and \$2,131,653 in payments to towns for a total of \$13,666,057 has been dispersed by the Fund. The current balance of the Fund is \$8,157,121. Over the life of the Fund, Great River has contributed \$21,005,350 and interest has provided another \$1,708,611 to the asset total.

Approximately 2% of the total assets have been spent on fees, program expenses and easement expenses.

Since 2012 the grants have provided for the protection of 3,122 acres of upland forest, farmland, wetland, riparian buffer, and river lands. The acreage associated with the Project's FERC boundary is approximately 3,400 acres. The Fund protected lands, therefore, represent well over 50% of the project's developed and undeveloped shorelines. These lands protect fish and wildlife habitat and water quality, and are "the ecological and recreational equivalent of land protection of the buffer zone referred to in Question D.1".

Therefore, the Project has satisfied Condition 3 and qualifies for an additional three years of Certification term.

In addition to the lands protected and enhanced through the Fund, the Owner has protected through permanent easements, 6,918 acres. These easements were conveyed to New England Forestry Foundation, Inc. in 2008.

By this letter, I hereby amend the Certification term for the Fifteen Mile Falls project (LIHI Cert #39) to December 15, 2013 expiring December 14, 2021.

Sincerely,

A handwritten signature in blue ink, appearing to read "Shannon Ames".

Shannon Ames
Executive Director

Cc: Jennifer Griffin via email jgriffin@greatriverhydro.com