



DATE: August 17, 2017

TO: Michael Sale, Senior Technical Advisor, Low Impact Hydropower Institute

FROM: Brandon Hoffner, Executive Director and Dr. Rob Van Kirk, Senior Scientist

RE: Island Park Project (FERC 2973) LIHI Certification

Fall River Rural Electric Cooperative (FRREC) has applied for Low Impact Hydropower Institute (LIHI) certification for its hydroelectric facility at Island Park Dam (FERC 2973). FRREC has provided us with a copy of the application, Jeff Cueto's review of that application, and your message of May 9, 2017 to FRREC communicating concerns over LIHI certification of the Island Park facility. One item of concern is the plant's ability to meet water-quality criteria. We submit this memo to formally document our satisfaction with steps FRREC has taken over the past two years to address water-quality compliance.

Founded in 1984 as a 501(c)3 nonprofit organization, the Henry's Fork Foundation (HFF) is the only organization whose sole mission is to conserve, restore, and protect the unique fishery, wildlife, and aesthetic qualities of the Henry's Fork of the Snake River watershed. HFF is supported almost exclusively by donations from its 2,500 members and from small family foundations. Since HFF first hired full-time staff in 1992, collaboration and scientific research have been our primary tools for mission accomplishment. With Fremont-Madison Irrigation District (FMID), we co-facilitate the Henry's Fork Watershed Council, which has become a nationally recognized model of collaborative management.

Our water-quality monitoring program identified low dissolved oxygen concentrations downstream of the Island Park facility in 2014, and we brought this issue to FRREC's attention in the fall of 2015. In the spring of 2016, we formally documented our concerns about repeated ramping-rate violations that occurred when the plant's automated control system failed to smoothly transfer flow from the power plant to the dam gates when unanticipated events tripped the power plant. Over the past 14 months, FRREC has worked diligently and in good faith to address these concerns. Outdated water-quality monitoring equipment has been replaced with modern equipment that is calibrated and maintained appropriately, water-quality reports have been vetted with stakeholders and submitted on time, the oxygenation system at the plant has been repaired, and the flow-control system was completely replaced. To the best of our ability to monitor the plant's operation using our instruments and publicly available flow data, the plant has been operating within the criteria of its FERC license since last summer. During time periods when water-quality criteria cannot be met, FRREC has voluntarily shut down the plant.

Therefore, we believe that the contributors to past occurrences of non-compliance with water-quality and ramping-rate criteria have been remedied and should not prevent LIHI certification of the Island Park hydroelectric project. We support FRREC's application for LIHI certification and hope that the information in this memo, as well as complementary information from Idaho Department of Fish and Game and the Henry's Fork Drought Management Planning Committee, will allow this certification to be issued.