



Friends of the Boyne River

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December 16, 2019

Randall Sutton, Area Manager
Boyne Mountain Resort, Boyne USA
P.O. Box 19
Boyne Falls, MI 49713

2019-2020

Board of Directors

RE: Federal Energy Regulatory Commission Project No. 3409
Boyne USA, Inc. – Boyne River Hydroelectric Project

Adam Kennedy
President

Jo Bowman
Vice President

As a non-governmental agency stakeholder, Friends of the Boyne River (FoBR) was invited to comment on the draft application for the Subsequent License of a Boyne River hydroelectric dam. Our written comments follow.

Nancy Cunningham
Secretary

FoBR's mission is to improve and conserve the environmental health and recreational quality of the Boyne River and its watershed. In keeping with this standard, we believe non-critical dams should be removed not renewed.

Bob Greene
Treasurer

River dams were generally constructed 100 years ago as a way to produce energy. In 2016, the 114 year old Boyne River Hydro Dam malfunctioned to cause multiple erosion issues along with concerns about the impact on fish populations. Modern energy production looks to wind mills and solar power as more efficient means to harness clean energy. Dams are no longer being built, but instead are being removed. Michigan dam removal operations near us include the Boardman River in Traverse City and the Maple River near Pellston.

Candy Greene

Gow Litzenburger

Sheri Rhoads

Michael Ryan

Marie Sheets

As we know, a river dam is a barrier that stops the flow of fish, aquatic species and microscopic organisms while creating a collection pond/reservoir of mucky silt. In April 2019, the Boyne Falls grist mill dam breach left a trail of silt for approximately seven miles. This silt contamination passed through the M-75 dam in the Village of Boyne Falls, on through the Boyne USA dam and finally out into Lake Charlevoix. The Boyne River, a Michigan Public Trust Waterway, was visibly cloudy for about two weeks. This kind of silt can cause serious damage to fish and aquatic insect habitat as well as future fish populations. Furthermore, the grist mill dam was a relatively small breach. When compared to what could happen in a larger impoundment breach, such as the M-75 dam or the Boyne USA dam, river damage might last for years.

Facts show that dams warm up the water. The temperature in the Boyne River is warmer below the Boyne USA dam than above it. With climate change already affecting river biology, any additional temperature increase adds a further threat to the river's ecological health.

In addition to operating the dam to stringent environmental regulations, Boyne USA invests a significant amount of time and money into license renewal. The end result maintains the dam's status quo of producing approximately 660 MWh of electricity annually. This amount of power generation appears small compared to the risk it places on a Public Trust Waterway.

FoBR's bottom line is the expectation for a Boyne River that is clean, thriving and dam free with open access to the public for future generations.

Respectfully,
Adam Kennedy, President

XC: Secretary Kimberly D. Bose, Federal Energy Regulatory Commission