



UNITED STATES DEPARTMENT OF COMMERCE
National Oceanic and Atmospheric Administration
NATIONAL MARINE FISHERIES SERVICE
Southeast Regional Office
263 13th Avenue South
St. Petersburg, Florida 33701-5505
<https://www.fisheries.noaa.gov/region/southeast>

February 25, 2025

F/SER47:KM/pw

Ms. Debbie-Anne A. Reese, Secretary
Federal Energy Regulatory Commission
888 First Street, N.E.
Washington, D.C. 20426

Re: Comments on the Environmental Assessment for surrender of hydropower exemption and removal of project facilities for the High Falls Hydroelectric Project (P-7987-016)

Dear Secretary Reese:

NOAA's National Marine Fishery Service (NMFS) reviewed the Environmental Assessment (EA) for surrendering the hydropower authorization for the High Falls Hydroelectric Project (Project) and removing its facilities down to the riverbed. The Federal Energy Regulatory Commission (Commission) noticed the availability of the EA on January 31, 2025. UP Property 2, LLC, is the owner of the project, which is located on the Deep River in Moore County, North Carolina. NMFS provides the following comments pursuant to its authorities under the Fish and Wildlife Coordination Act, National Environmental Policy Act, and the Federal Power Act.

NMFS previously provided a letter supporting the surrender because removing the dam will benefit the riverine ecosystem and improve habitat conditions downstream for migratory fish. Historically, anadromous fish like American shad and river herring would have migrated up the Cape Fear and Deep rivers in order to spawn. At present, dams and other impoundments downstream prevent these species from reaching the Project. Removing the Project dam would restore habitat connectivity and, should fish passage be provided at downstream impoundments, restore access to suitable spawning habitat for migratory fish important for our nation's fisheries.

NMFS agrees with the Commission's environmental analysis of effects to water quality/quantity and aquatic resources. Temporary adverse impacts to water quality would occur as sediments impounded by the dam are flushed downstream. However, long-term benefits would result from reconnecting habitat, restoring natural sediment transport, and converting habitat from lentic to free flowing lotic. Conducting in-river work outside the spawning season for anadromous fish would avoid impacts to spawning habitat downstream. Temporary adverse impacts to invertebrate communities are possible, but mussels in the affected area would be relocated prior to removal. Long-term beneficial effects would occur post-removal.

NMFS concurs with the Commission's conclusion that the proposed surrender and decommissioning would not result in long-term adverse environmental effects and would have a permanent, positive environmental effect for resident and migratory fish species. NMFS supports the Commission's finding of no significant impact.



NMFS appreciates the opportunity to review and comment on the EA. Please direct related questions or comments to the attention of Mr. Kevin Mack at our Charleston Field Office, 331 Ft Johnson Road, Charleston, SC 29412, or at Kevin.Mack@noaa.gov.

Sincerely,

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/ for

Kelly Shotts
Assistant Regional Administrator
Habitat Conservation Division

cc: F/SER47, Kevin.Mack@noaa.gov

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