Friends of the Crooked River want to know. . .

Who will determine the future of Gorge Metro Park and the Cuyahoga River?

Metro Parks, Serving Summit County, tax-supported, public steward?

OR

Metro Hydroelectric Company (MHC), a private company, seeking license from the Federal Energy Regulatory Commission to operate a hydroelectric project in Gorge Metro Park over the stated objections of Metro Parks?



The Great Falls of the Cuyahoga River in Gorge Metro Park
Dam built in 1914

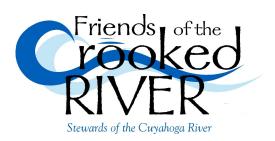


The Great Falls of the Cuyahoga River, circa 1880 Dam removed, River restored, Year 2---?

[inside front cover] Friends of the Crooked River would like to thank the following organizations for their assistance in the production of this publication: **Hydro Reform Coalition American Rivers Keel Haulers Canoe Club American Whitewater Ohio Environmental Council** Friends of Metro Parks, Serving **Summit County**

Friends of the Crooked River

The all volunteer, non-profit organization was established in 1990 to create a strong constituency for the River. We believe:



Cuyahoga River is the virtual heart of Northeast Ohio.

The River provides vast benefits for all region's citizens.

The health of our River reflects exactly the health of the region.

The benefits of the River should sustain all of the watershed inhabitants, fish and fowl and folk.

The River should meet the "fishable, swimable" goals of the Clean Water Act.

Friends of the Crooked River oppose a private company's proposal to build a hydroelectric plant in Gorge Metro Park, part of the public, tax-supported Metro Parks, Serving Summit County system.

The 57 foot dam was built in 1914 by Northern Tractor and Light, predecessor to Ohio Edison, to produce hydroelectric power and to provide cooling water for a steam plant.

The hydro operations ceased in 1958. The steam plant was mouthballed in 1992.

The proposed project threatens to degrade water quality and to perpetuate, for up to 50 years, one of the most significant impediments to water quality yet remaining on the Cuyahoga River, the dam itself.

In addition, it will diminish the experience of park visitor and river paddlers.



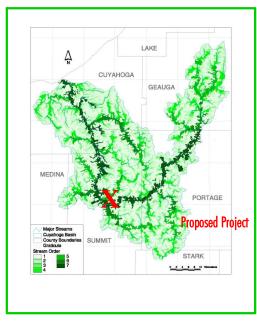
Ohio Edison Dam A Water Quality Conundrum

"..., this project seriously threatens the progress we have made on our river. It is not a small project, as the applicant has stated. It is a defining moment for our river. It challenges us to decide whether we will choose to give benefit to a favored few at the expense of a future that will profit us all. And it challenges the Federal Energy Regulatory Commission to decide whether a private company, with an unsupported proposal for an insignificant amount of electricity will have the right to override the objections of the professional experts of Metro Parks, Serving Summit County, the duly authorized political subdivision of the sovereign State of Ohio, that manages this park in the name of the people of Summit County." Elaine Marsh, Conservation Chair

In addition to Metro Parks, eleven agencies, including Summit County Council, the City of Cuyahoga Falls, Ohio EPA, Summit County Soil and Water Conservation District, the Cuyahoga RAP, NOACA, and NEFCO, have opposed the proposal.

On the wrong river

At 100.7 miles long, the Cuyahoga River, with its mere 813 square mile watershed, is a relatively tiny system.



Cuyahoga River Watershed

The Cuyahoga has low, unpredictable flow, especially in summer when electrical peak production is needed.

Ohio Edison operated a hydroelectric plant on this site. That plant had greater capacity than the MHC proposal. Despite several upgrades, Ohio Edison ceased hydroelectric operations in 1958.

In recent years, several groups, including the Ohio Edison Co., Cuyahoga Falls Hydro Associates and Akron Associates, have investigated reestablishing hydro production at the site. Nothing came of those investigations.

Universal Electric Power, UEP, a local hydro electric company, now bankrupt, operated a demonstration project on the proposed site.

"Ron Feltenberger [one of UEP's partners] acknowledged that a commercial-size power plant using the company's technology wouldn't work on smaller Midwest rivers such as the Cuyahoga." Crain's Cleveland Business 6/14/99

The Cuyahoga River does not sustain the kind of flow that can produce sufficient electrical production to justify loss of water quality benefits.

Estimates for the amount of electricity that might be produced vary wildly:

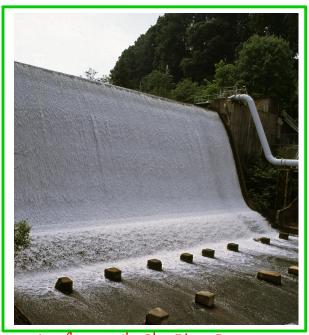
- 3 households: Ronald M. Kovach, senior engineer, First Energy, dam owner
- 2,000 households: Metro Hydroelectric Company, applicant

At 2000 households, regional air emissions of carbon dioxide would be off-set by less than 0.025 %.

Currently, the City of Cuyahoga Falls purchases electricity from a hydroelectric plant on the Ohio river. In the mid 1970's, the city investigated establishing a hydroelectric plant on the Cuyahoga River and abandoned the idea.

"We decided it wouldn't produce enough energy to light up the down town."

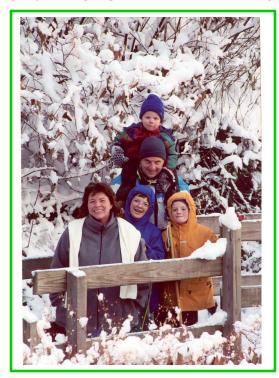
[then] Mayor Don Quirk, City of Cuyahoga Falls.



Low flow over the Ohio Edison Dam

In the wrong park

Metro Parks, Serving Summit County, the land owner of Gorge Metro Park where the project is proposed, has consistently opposed the project.



Family in Gorge Metro Park in winter

The park district has managed the park on the public's behalf since 1930 when it was deeded the land by the predecessor of Ohio Edison.

The park district concluded that the project was not in the best public interest due to impacts to habitat, visitor experience and water quality.

140,000 Summit County residents use Gorge Metro Park each year.

The public, who owns the park, consistently supports Metro Parks and opposes the project. Federal Energy Regulatory Commission (FERC) has received uncommon public response to this project:

- Nearly 400 people attended a FERC hearing
- 11 state and local agencies oppose it
- 13 national, state and local organizations oppose it
- Of the 67 agencies, organizations and individuals who expressed an opinion to FERC, only 3 individuals conveyed support

"So Cuyahoga Falls will certainly restrict our support of this until all the issues are met through the Metro Parks, the Crooked River and the other environmental concerns. And until those are met, we will oppose this project."

Don Robart, Mayor, City of Cuyahoga Falls

The project will impact unique and rare plant habitat within the densely populated urban core.

The park occupies a scant 155 acres between Akron and Cuyahoga Falls.

Preschool through graduate-level college teachers testified on the value of the site as an educational resource and requested that it not be impacted.

US Fish & Wildlife and Metro Park's plan for the site includes reintroduction of rare plants, a process incompatible with the proposed development.

"There is very little green space left in this part of the county, and this makes every acre in Metro Parks all that more important." Christine Freitag, President, Friends of Metro Parks, Serving Summit County



Gorge Metro Park - Site of proposed project

At the wrong time

At the expense of over a billion dollars of public and private funds, the Cuyahoga River has made significant progress toward the goals of the Clean Water Act.



A Cuyahoga River fire

In 1969, the "Burning River" became the poster child for the neglect and abuse of the nation's rivers.

In 1997, in part to recognize its amazing recovery, President Clinton named the Cuyahoga one of only fourteen "American Heritage Rivers".

In 2003, the Ohio EPA did a restoration study of the river. The study noted dams as a major remaining cause of water quality problems.

"Licensing the proposed project will severely inhibit or even prohibit any progress towards meeting these goals [the Clean Water Act] for the duration of the FERC license."

Steve Tuckerman, Ohio EPA

Over the last several years, millions of public and private dollars have been invested in removing and modifying dams on the Cuyahoga River for water quality reasons.





Munroe Fall Dam 2005



Kent Dam Park 2005 Clean Water Goals in 2 months



Munroe Falls Park 2006

"Your [FERC's] approval will signal that the public interest, served by transforming the Cuyahoga River into a renewed resource, takes a back seat to a very limited commercial interest. Your approval will signal that those responsible for taking on much larger efforts to clean up this river can perhaps ease up a bit." Kurt Landefeld, Citizen, Marketing Professional

By the wrong company

Metro Hydroelectric Company (MHC) consistently overlooks Metro Park's authority.



Northern Monks Hood A rare plant of the Gorge

In December 2003, the company applied to FERC for a Preliminary Permit. In March 2004, the company notified Metro Parks of their intentions to use the park.

In September 2004, over the stated objections of Metro Parks and without the park's knowledge, the company signed a lease with First Energy, exercising an ancient easement.

While stating a desire to cooperate, the company:

- Disregarded Metro Parks' management plans for the site
- Refused to conduct studies requested by Metro Parks
- Opposed Metro Parks' Motion to Intervene
- Unilaterally defined post-construction recreation

Given the clash between themselves and the park, MHC has not clarified how a peaceful future for the site and its visitors can be accomplished.

"We pay our taxes to expand and protect our Metro Parks, not to decrease and destroy them."

Robert Lewis, Citizen, Summit County

Metro Hydroelectric Company has not adequately addressed the many legitimate concerns that our local experts have expressed.

The company set aside the concerns of 11agencies, supported by public funds, who opposed the project.

Stakeholders attended five days of meetings to influence the study protocol for the project. Many considered the exercise to be a waste of time, as the company dispensed with many recommendations.

MHC has not constructed or managed a hydro electric project.

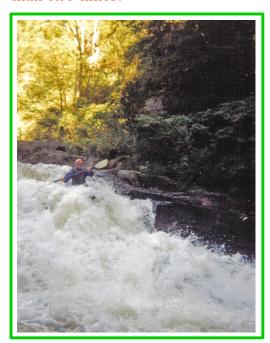
"In our view, the proposed Ohio Edison Gorge Dam Metro Hydroelectric Project is directly counter to the efforts of this agency to protect and preserve natural resources in Summit County." Attorney Gayle L. Snyder, Supervisor Summit Soil and Water Conservation District



Site of proposed turbine outfall on the Cuyahoga River

The wrong future

As it cascades through Cuyahoga Falls, the Cuyahoga River falls over 200 feet in less than two miles.



Upper Gorge Falls, Cuyahoga Falls

This stunning geography exceeds the drop at Niagara River Falls.

If the Ohio Edison dam were removed, this two mile stretch would be one of the best expert whitewater destinations in the eastern USA.

Restoring the upper gorge, the middle gorge and lower gorge would result in a spectacular attraction that would generate far more dollars in tourism than keeping the dam would generate in energy.

The Gorge, as a tourist destination, would compliment and enhance the attraction of the regions other magnets, the Cuyahoga Valley National Park, the Tow Path Trail, the Ohio and Erie Canal Corridor and the other great Metro Parks.

"This classification of whitewater is unheard of in Ohio and would draw paddlers from adjacent states to utilize this recreational opportunity and contribute to the local economy. In addition, the paddling opportunities would lend themselves to world class kayaking events."

David Hill, American Whitewater

Removing the Ohio Edison Dam would bring to light the Great Falls of the Cuyahoga River, a twenty-two foot high waterfall.

Called *Coppacaw* by the early native people, the Great Falls was a sacred place to them.

Prior to the spoiling of water quality, prior to the dam, the Great Falls and its magnificent gorge were the region's greatest tourist attractions.

"We would much rather see the gorge brought back to its original beauty, before the dam was built, for generations to enjoy." Gregory and Magdalena Veigl, Citizens of Akron



The Great Falls of the Cuyahoga River, circa 1880

Friends of the Crooked River join the throngs of citizens who say:

Stop the hydro project! Save the Cuyahoga River!

FREE THE FALLS!

10 Reasons Why Inactive Dams Are Bad for Fish



Steel head trout caught downstream of Rt. 82 Dam Cuyahoga River

- 1. Dams are barriers to fish passage.
- 2. They alter dissolved oxygen, causing wide fluctuations.
- 3. They greatly reduce the riverine biodiversity.
- 4. They trap toxins.
- 5. They alter temperatures, causing extensive vacillation.
- 6. They alter flow patterns, especially problematic in low flow.
- 7. They modify habitat, eliminating needed stream features.
- 8. They increase algal growth in dam pool.
- 9. They encourage pollution tolerant species to dominate.
- Dams are associated with an overall lowering of biological, chemical and physical integrity of extended sections of rivers where they occur.

10 Reasons Why Inactive Dams are Bad for People

- 1. Dams are a life-threatening safety hazards to paddlers.
- They increase bacteria growth in dam pools, causing health hazards.
- 3. They increase water treatment costs.
- 4. They are safety hazards for swimmers and waders.
- 5. They limit river access.
- 6. They inhibit watershed restoration.
- 7. They limit a river's ability to assimilate pollutants.
- 8. They limit fishing opportunities.
- 9. They obscure the river's natural beauty.
- 10. They are a destructive downstream force if not properly maintained.



White water paddling in Upper Gorge Cuyahoga Falls, Cuyahoga River

"But if you issue the license, that will prohibit the removal of the dam for 50 years. Okay. So...you guys hold our future of this situation in your palms. That's why we're all imploring you today to do the right thing to prevent this from happening." Unidentified Citizen, FERC Public Hearing

Please help us to stop the hydro project, to save our River and our Park.

Please oppose this project to FERC.

Quotes from Public Comment to FERC

"It would seem inconceivable that this kind of public expenditure [over 2 billion for cleaning up CSO's] could be negated by the continued presence of the Edison Dam for the purpose of generating such a minor amount of electricity."

Jim White, Executive Director, Cuyahoga River Remedial Action Plan

"We oppose this hydroelectric project on the grounds that, A, it will destroy scenic beauty in a public park cherished by the Akron community; B, it will destroy a rare ecosystem which, among other things, will prevent the restoration of an endangered plant; and, C, the only benefit of this project on public land will be reaped by a private company."

Jean Foust, Akron Garden Club

"Our parks are one of Summit County's strongest economic assets. Our citizens love, use and support their parks. It is our responsibility to fight to save and protect them from abusive projects like this proposed hydro plant."

Christine Freitag, President, Friends of Metro Parks, Serving Summit County

"And by supporting this hydropower station, we understand that FirstEnergy can avoid, for up to 50 years, any costs it may have had to bear associated with the removal and disposal of contaminated sediments held behind the Edison Dam, even while communities and sewer districts and sewer utilities have spent multibillions to restore the river. This is an unacceptable undermining of community restoration investments."

Jim White, River Navigator, American Heritage River Initiative

"I'm the deputy director at the Ohio Environmental Council, and I'm here to speak in support of the Friends of the Crooked River and Friends of Metro Parks Serving Summit County to oppose this license, and really to make a statement in favor of the commonsense notion that now is not the time to lock up this dam for the next 50 years."

Keith Dimoff, Deputy Director, Ohio Environmental Council

"So what does it [the proposed hydro project] offer? Not much in the way of power. Well, it offers a federal license that will essentially preempt any possibility of removing the dam and restoring the river for at least 50 years, giving the dam's owner a free pass to postpone dealing with that obsolete hunk of concrete."

John Seebach, Hydro Reform Coaltion

"This ill-considered project would detract from existing park lands and would delay future improvements for 50 years. Let's deny this application, and increase rather than decrease our efforts to preserve our water and parks."

Susan Yovichin, Summit County Resident

"While we must recognize that some dams do have value and provide us substantial benefits, we must equally realize the age of indiscriminately building and maintaining our nation's dams must come to an end. The benefits of maintaining a dam must be weighed against the impairments that they create. On behalf of the many interests of the City of Kent, it is respectfully requested that the Federal Energy Regulatory Commission does not issue this permit due to the fact that it would circumvent the trend to restore this river back to its natural free-flowing state."

Bob Brown, Water Reclamation Plant Manager, City of Kent

"I came here tonight with an open mind because I'm a firm believer in green power, but I'm also a firm believer in rescuing our environment. And after everything that I've heard so far this evening, I'm very much opposed to this project."

Lisa Brusso, Local Business Owner

"For all of these reasons, I oppose the construction of a hydroelectric facility by Metro Hydroelectric Company, LLC in the Gorge Metro Park on the Cuyahoga River on the basis that it will seriously impair efforts to restore the environmental integrity of the Cuyahoga River."

Howard Maier, Executive Director, Northeast Ohio Areawide Coordinating Agency

More Quotes from Public Comment to FERC

"I'd like the Committee to consider the Gorge Metro Park, in addition to being an aesthetic and a recreational resource; it's also an educational resource. It is one of the few areas in northeast Ohio where we have bedrock exposed. And it's frequently used by local universities and local schools for field trips in both geology and environmental studies, and also I've directed a number of field investigations in the park. So it's an educational resource which we would not want to have impacted."

Annabelle Foos, Professor of Geology, University of Akron

"I'm sure most people in this room are from Summit County. We pay our taxes to expand and protect our Metro Parks, not to decrease and destroy them."

Robert Lewis, Taxpayer, Summit County

"The only reason that we bought our house in Akron is because of the Metro Parks, and now you want to spoil them with this. Please, do not do this."

Chris Green, Resident, Akron

"I'm a biologist and I've studied the Cuyahoga River from the mouth, since 1987, to the headwaters, and I've seen great improvements over these 20 years. And the biggest impairment, right now...is the dam itself. And I hope to see the dam removed and further improvements in water quality and fish and invertebrate species come back before I die, or before I retire."

Bill Mack, Biologist

"I just want to make sure that FERC doesn't go away from this meeting with the impression that we are a confused public, that we don't know why we're here, that we have some general environmental concerns but we're not focused... That should be unequivocally understood that we do know what we want and we don't want this project."

Susan Yovichin, Resident, Clinton Township

"On the one hand, while agencies such as the one I work at fund taking down unnecessary dams on this Cuyahoga river to improve the aeration, biodiversity and protect water quality, I see that other entities are busy taking away more than they promise to give back."

Dainel Bunn, engineer, graduate of Cuyahoga Falls High School

"The removal of these dams (Kent and Munroe Falls) resulted almost immediately in water quality improvement and the addition of public use facilities. The Gorge Project would work in the opposite direction by destroying long established and rare vegetation, removal of public facilities and no improvement to the water quality."

Rich Altfather, Boater

"The small amount of electricity which may be generated, is not worth the loss of the scenic value of the area to park users; is not worth the loss of rare plant species; and is not worth the loss of protection of water quality. As an avid Metropark user, I ask you not to approve this application."

Phyllis Devlin, Park User

"I am an electrical engineer and am interested in the overall value of a hydroelectric site at the Cuyahoga Falls dam. I came away from this meeting feeling such a generating site could not possibly create enough power to cover the expenses of its construction, and that the environmental issues FAR outweigh any benefits that could be gained by licensing this facility."

Eric Thorson, Electrical Engineer

"At a time when projects upstream on the Cuyahoga River at Kent and at Munroe Falls OH seek to enhance the health of this historically stressed river by lowering or eliminating dams between its source and the City of Cleveland, this hydroelectric project would ensure for many years the presence of the dam at Cuyahoga Falls, OH."

John A. McDonald, Ph.D., Professor Emeritus, The University of Akron

Still More Quotes from Public Comment to FERC

"The damage that would be done to the park's ecosystem and recreation value far exceeds any benefits obtained by the limited amount of electricity produced by the hydroelectric project."

John De Vries, Citizen

"I am a long-time student of Ohio's natural history and have worked professionally as an educator, biologist, naturalist and museum curator for 38 years. Since 1989, I have been appointed four times by three different Ohio governors to serve on Ohio's Natural Areas Council. I fully understand the importance, needs, and values of electricity — but this is one case where ecological, psychological and aesthetic values must take precedence over very limited electrical value. Please reject this application."

Robert C. Glotzhober, Educator, Biologist, Naturalist, Museum Curator

"WHEREAS, issuance of the project's license will inhibit efforts to assist the dam's owner, First Energy, in securing funding to treat sediments behind the dam as well as remove the dam itself... NOW, THEREFORE, BE IT RESOLVED that NEFCO [Northeast Ohio Four County Regional Planning and Development Organization] General Policy Board opposes the construction of an hydroelectic facility..."

Richard Regula, Secretary, NEFCO General Policy Board

"As an electrical engineer, business owner and active Boy Scout volunteer, I would like to voice my opposition to the above electrical generation project... In 2005, a Summit County project less than two miles upriver, involved removal of a small dam in order to improve stream quality and habitat. This project was funded with public money. This proposed project is in direct conflict with this recent dam removal."

David P. Tschantz, Ohio Professional Engineer #E46485

"I was completely captured by the beauty of the geologic features...I attended the University of Akron, where I graduated Magna Cum Laude with a Bachelor's of Science in Geology. The MetroParks have been a cornerstone of my life, and they are priceless to me. And it all stated that one morning at my treasured Gorge. Please preserve this masterpiece for the generations to come, and please preserve it for me."

Rebecca S. Bralek, Geologist

"I am the energy reporter for the Houston Business Journal. My family lives up in Cuyahoga Falls Estates, along the Cuyahoga River...FirstEnergy and Metro Hydroelectric have touted their project as a way to produce 'green, environmentally-friendly power.' That argument is patently absurd. Even if the project is able to produce power — which is questionable — and even if that power is produced without harmful emissions, the huge detrimental impact it would have on the quality and flow of water in the Cuyahoga River and the destruction of the habitat and plant and animal species both in the river and in the surrounding Gorge Metro Park area obviously cancel out any possible environmental benefits that the project might, in theory, have."

Monica Wilch Perin, Journalist

"We echo the concerns of the Ohio Environmental Protection Agency that this project conflicts with the Lower Cuyahoga Total Maximum Daily Load (TMDL) Watershed Restoration Report approved by US EPA on September 26, 2003...The lower Cuyahoga TMDL recommends that all dams remaining on the lower Cuyahoga River be evaluated for removal."

Chris Vild, Chair, Northeast Ohio Watershed Council

"Even worse, to take the management of this old dam out of the hands of the people who live in northeast Ohio effectively disempowers them and their children for more than a generation."

Eugene Wenninger, Chair, Kent Environmental Council

"The Cuyahoga River is a critically important resource that affects millions of people in Northeast Ohio. The proposed project would be a major setback to the huge public investment that already has been made and continues to be made to restore river quality and protect natural habitat." Christine Craycroft, Executive Director, Portage Park District

[inside back cover]

Who opposes this project . . .

Agencies

Metro Parks, Serving Summit County

Summit County Council

Ohio EPA

Summit County Soil & Water Conservation District

City of Kent

City of Cuyahoga Falls
Portage County Park District

Geauga Park District

Northeast Ohio Four County Regional Planning and

Development Organization

Northeast Ohio Areawide Coordinating Agency

Individuals: 54

Organizations

Friends of the Crooked River

Friends of Metro Parks, Serving Summit County

American Rivers

Ohio Environmental Council American Heritage River Initiative Northeast Ohio Watershed Council

Akron Garden Club

Kent Environmental Council Friends of Whiskey Island Friends of Wetlands

Medina/Summit Land Conservancy
Portage Trail Group of the Sierra Club

Buckeye Forest Council American Whitewater Keel Haulers Canoe Club

Who is concerned about this project . . .

Agencies

Ohio EPA

Cuyahoga River Remedial Action Plan

National Park Service

Ohio Department of Natural Resources

Organizations

Rivers Unlimited

Individuals: 10

Who supports this project . . .

Individuals: 3

Organizations

Metro Hydroelectric Company

^{**} Agencies, organizations and individuals noted here have expressed sited opinions to the Federal Energy Regulatory Commission (FERC)

"I'm 80 years old. I hope that, in my remaining years, I see that dam come down." Dick Benton, Resident, Stow



Kayak in Upper Gorge, Cuyahoga Falls

Rapids entering Ohio Edison Dam pool.

For more information

Elaine Marsh, Conservation Chair, (330) 657-2055 days (330) 666-4026 evening ohgreenway@aol.com

John Kaminski, President , (440) 356-8974 evening, riverkeeper@wideopenwest.com

Also see: www.cuyahogariver.net www.summitmetroparks.org

