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6 July 2018

Ms. Maryalice Fischer
Certification Program Director
Low Impact Hydropower Institute

RE: Recertification Recommendation for the Arnold Falls Hydroelectric Facility

Ms. Fischer:

This letter contains my recommendation for Recertification of the Arnold Falls Hydroelectric Facility (the Project) for a five-year term. Please find my Reviewers report to support this recommendation in the attached document.

Please contact me if you have any questions.

Sincerely,

Diane M. Barr, Principal
Camas, LLC

ARNOLD FALLS HYDROELECTRIC PROJECT

LIHI CERTIFICATION STAGE II REPORT

Introduction and Overview

This report reviews the application submitted by Green Mountain Power (Applicant) to the Low Impact Hydropower Institute (LIHI) for LIHI recertification for the Arnold Falls Hydroelectric Project (Facility) located on the Passumpsic River in northeastern Vermont. The Federal Energy Regulatory Commission (FERC) relicensed the Project (FERC 2399) in 1994, issuing a 40-year license for the operation and maintenance of the 0.350 MW Project. This application review for recertification was conducted using the new, 2nd Edition Handbook that was published in March 2016.

Background:

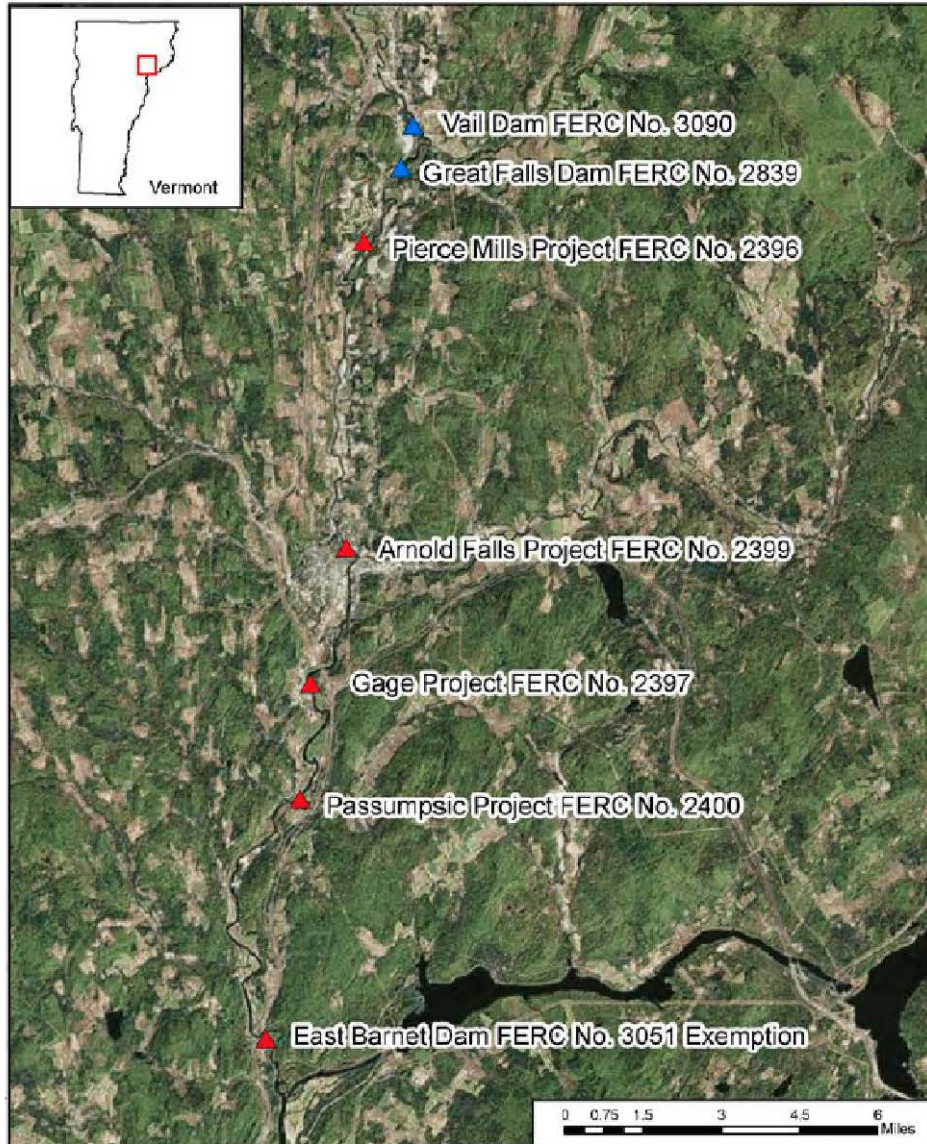
The Arnold Falls Project is located in northeastern Vermont near St Johnsbury, at river mile 9.5, on the Passumpsic River. The Passumpsic River is a major tributary to the Connecticut River. The Project's hydroelectric facilities are owned and operated by the Green Mountain Power Corporation (GMP or Licensee), formerly Central Vermont Public Service Corporation. The Arnold Falls Project is the fourth most downstream of seven dams located on the River (see Figure 1 below). The drainage area for the Arnold Falls Project is 254 square miles.

Recertification Standards

LIHI notified the Applicant of upcoming expiration of the Low Impact Hydropower Institute certification for the Arnold Falls Hydroelectric Facility on February 6, 2017. The letter included an explanation of procedures to apply for an additional term of certification under the 2nd Edition LIHI Handbook, including the new two-phase process starting with a limited review of a completed LIHI application, focused on three questions:

- (1) Has there been a material change at the certified facility since the previous certificate term?
- (2) Has there been a change in LIHI criteria since the certificate was issued?
- (3) Is there any missing information from the application?

If the answer to any question is "Yes," the Application must proceed through a second phase, which consists of a more thorough review of the application using the LIHI criteria in effect at the time of the recertification application. The letter noted that "because the new Handbook involves new criteria and a new process, the answer to question two for all projects scheduled to renew in 2016 and beyond will be an automatic 'YES.' Therefore, all certificates applying for renewal post 2016 will be required to proceed through both phase one and phase two of the recertification application reviews." Multiple extensions of the certification term were issued, extending the current certificate to September 30, 2018 to allow time for the Applicant to supply missing information. The Stage I Review was completed in January 2017, noting minor deficiencies and areas to resolve in an updated Stage II application. The 60-day public comment period was initiated on January 3, 2017 with no comments on the application being received by LIHI. A revised application was submitted to LIHI on April 2, 2018 and this report comprises the final Stage II review.



LEGEND: Green Mountain Power

	<h2>Arnold Falls Hydro</h2>		
	<h3>FIGURE 1: SITE LOCATION MAP</h3>		
	<small>Source: ESRI</small>		<small>June 2018</small>

Figure 2: Project Features



Adequacy of the Recertification Package

On March 29, 2018, the Applicant provided supplemental information based on the deficiencies identified during the Stage I Review. This recertification review included the application package, supporting comments and documentation from LIHI obtained during compliance reviews and public records on FERC e-library since the most recent LIHI recertification dated February 2, 2012. Personal communication (email/phone) outreach was made to the following agencies:

Agency	Contact
Vermont Department of Environmental Conservation	Jeff Crocker, Streamflow Protection Coordinator
Vermont Department of Environmental Conservation	Eric Davis, River Ecologist
Vermont Division of Historic Preservation	Scott Dillon, Survey Archaeologist
US Fish and Wildlife Service	Melissa Grader, Wildlife Biologist
US Fish and Wildlife Service	Brett Towler, Hydraulic Engineer

Vermont Diversion of Fish and Wildlife	Jud Kratzer, Fish and Wildlife Specialist
Vermont Diversion of Fish and Wildlife	Scott Darling, Wildlife Management Program Mngr
Vermont Diversion of Fish and Wildlife	John Buck, Migratory Birds Biologist

Response was provided by Eric Davis, Vermont DEC, at the time of this report. Requesting agency concurrence is not a LIHI recertification requirement. Such efforts are optional, and therefore lack of response is not considered an application deficiency. See Appendix A for personal communication evidence. The application was publicly noticed and received no public comments during the comment period. The materials provided and referenced above are sufficient to make a recertification recommendation. This recommendation is based on the Applicant demonstrating the following statements are accurate:

1) Have there have been material changes in the project design or operation, in the affected environment, or in compliance with the current LIHI Certification or with LIHI conditions since the last certification?

In accordance with the Recertification Standards, "material changes" mean non-compliance and/or new or renewed issues of concern that are relevant to LIHI's criteria. Based on my review of materials provided, review of FERC's public records, and consultation with the noted individuals, I found that there are no areas of noncompliance or new or renewed issues of concern. The previous LIHI certificate has no conditions for implementation.

2) Where the LIHI certification criteria satisfied in all zones?

The Applicant properly selected 3 zones: Impoundment, Bypassed Reach, and Downstream

Project Zones of Effect

Impoundment Zone of Effect

In the Impoundment Zone of Effect (ZOE), Standard 1 “Not Applicable/De Minimis Effect” was appropriately applied for Criteria A (Ecological flows), C (Upstream passage), and E (Shoreline protection). The Applicant provided sufficient evidence to support the Standard 1 as there is no active storage at the Project which functions as a run of river project, the ZOE has no bypassed reach, there are no current federal prescriptions for the upstream passage of fish and migratory fish are blocked by downstream Connecticut River dams, and the Applicant conferred with Vermont DEC verifying that the Project functions as run of river and the Project remains in compliance with the Water Quality Certificate (See Appendix C of the Application).

In the Impoundment Zone of Effect (ZOE), Standard 2, “Agency Recommendation”, was appropriately applied for B-Water Quality, D-Downstream Fish Passage, F-Threatened and Endangered Species, G-Cultural and Historic Resources, and H-Recreational Resources. The Applicant has satisfied each of these Criterion as shown below.

Criterion B: Water Quality

The Project demonstrated compliance with the Vermont DEC issued 401 Certificate (1994) by demonstrating that it operates in a run-of-river mode through the automation of inflow to outflow with a head pond controller system. Even though the WQC is not considered “current” under the LIHI Handbook, the Stage II reviewer considers the Impoundment ZOE operation to be consistent with the current Vermont DEC regulatory requirements. To verify this, the Applicant submitted Project operations data to Vermont DEC on March 29, 2018. The Vermont DEC’s review of the operations data supported the concurrence with the 1994 issued WQC, which was evidenced on July 5, 2018 and shown in Attachment A of this review. In addition, the Applicant provided a testimonial from Vermont DEC that the Project meets current 303d standards by being non-contributory. See Appendix C of the Application.

Criterion D-Downstream Fish Passage

Under FERC License Article 405 and Water Quality Certification Condition F, permanent downstream fish passage was provided via a transition box. As stated within the Project License and WQC, the downstream fish passage also benefits resident trout species. The Applicant provides a downstream fish passage via a sluiceway located in the south dam spillway adjacent to the station intake. As prescribed, the facility is operated from April 1 to June 15 and September 15 to November 15 each year. Fish enter the sluiceway and pass down a 3-foot-wide chute constructed of concrete and discharge into a 3-foot-deep plunge pool. Stoplogs control flow in the sluiceway to pass 25 cfs.

Article 406 of the 1994 FERC license requires the Licensee to file a plan for a post construction study to monitor the effectiveness of the downstream fish passage facilities after consultation with Vermont Agency of Natural Resources (VANR) and USFWS. The Licensee filed a Downstream Fish Passage Effectiveness Testing Plan on June 14, 1996. Under this plan, developed in consultation with the USFWS and Vermont Division of Fish and Wildlife (VTFW) the Licensee, USFWS, and VTFW would visually inspect the downstream Gage Project (FERC No. 2397 and Passumpsic Project (FERC No. 2400) forebays for the presence of salmon smolts during the period when smolts should be passing downstream. Observations at the Arnold Falls Project were not included within the finalized study plan as the configuration of the Project's fish passage was not expected to be problematic. The plans were approved by FERC in the September 25, 1996 Order Modifying and Approve in Plan to Monitor Effectiveness of Fish Passage Facilities. A November 1997 report on the results of the observations at the Gage Project and Passumpsic Project was issued to the VANR and USFWS. Discussions regarding Passumpsic River downstream.

On December 5, 1995, the Licensee submitted Downstream Fish Passage Facility Operation & Maintenance Plan as well as permanent downstream design drawings developed in coordination with USFWS and VANR. FERC approved of the plan in the February 7, 1996 Order Modifying and Approving Downstream Fish Passage Facilities. Final FERC authorization for extension of time to construct the fish passage was granted on November 12, 1998. The downstream fishway construction was completed on August 26, 1999 and FERC acknowledged receipt of completion information on September 27, 1999.

Per the VTFW email dated March 16, 2017 (Application, Appendix D), the Department reported that they worked with GMP to improve downstream fish passage at the Gage Project. The Department reported that fish passage had improved after GMP implemented recommendations and did not require further studies. The VTFW additionally commented within the March 16, 2017 email that American eel passage will not be required at the Gage, Pierce Mills, or Arnold Falls Projects within the next five years. Although the USFWS was contacted for review of fishway compliance and eel passage, no comments have been received (Application Appendix D).

No further protections are required by resource agencies for resident fish passage at the Project. The Applicant provided sufficient evidence to support these findings.

Criterion F-Threatened and Endangered Species

In December 2016, VTFW concluded that current Project operations do not negatively impact the state and federally listed northern long-eared bat or the bald eagle (Application, Appendix E). No additional species have been listed since 2016 that reside in the Project area.

The Spikemoss (*Selaginella*) and shining lady's tresses (*Spiranthes lucida*) are listed by the Vermont Natural Heritage Program as "uncommon plants" and were found in the vicinity of the Project. During re-licensing, emails dated October 19 and 21, 2016, VTFW confirmed that continued Project operations do not negatively affect the northern long-eared bat or the bald eagle (Application, Appendix F). VANR determined that State listed significant habitats found in the Project vicinity would not be impacted by continued Project operations.

Criterion G-Cultural and Historic Resources

Protection of cultural and historic resources is managed through a Cultural Resources Management Plan. The Applicant provided sufficient evidence that all necessary resources have and will continue to be protected. The FERC 2013 Environmental Inspection (5-year interval) concluded that inspection frequency can be reduced due to the lack of impact to the resources, and the Project is in compliance with its License conditions.

Criterion H-Recreational Resources

In accordance with License Article 411 and WQC Conditions K and L, the Applicant developed and maintains recreation facilities including a canoe/kayak take-out and portage trail with associated directional signage in the Impoundment ZOE. A Recreation Management Plan (RMP) was approved by FERC in 1995, and all prescribed improvements have been implemented. FERC Environmental Inspection (2013) confirmed compliance with the RMP.

Under Article 413 of the upstream Pierce Mills Hydroelectric Project License (FERC No. 2396), the Licensee is required to evaluate the recreational uses of **all GMP hydropower projects** located on the Passumpsic River within six months of the 10th and 20th year anniversaries of license issuance. On September 7, 2010, the Licensee filed the 10-year study of recreational uses at GMP's licensed hydropower projects located on the Passumpsic River. FERC approved of this Recreational Use Study on November 23, 2010. No improvements for recreation areas within the ZOE were included within FERC's November 23 approval. GMP's 20-year study of recreational uses was submitted to FERC on August 27, 2015 and approved by FERC Order issued on November 30, 2015. Within the November 30, 2015 order, it was identified that GMP installed an interpretative/informational sign near the Project powerhouse, installed new directional signage along the portage route, as well as a new picnic bench at the neighboring LeClair site. Condition B of the November 30, 2015 order required that GMP file photographic evidence of these installations as well as an updated recreation plan map. GMP filed a letter with FERC on November 30, 2016 that includes photographic evidence as well as an updated recreation plan map to depict sign installations as well as the picnic bench installation. Order dated March 30, 2017 approved of GMP's recreation improvements at the Project. An email dated January 19, 2018, the Vermont DEC confirmed Project compliance with the amended RMP (Application, Appendix G).

Criterion H-Recreational Resources-PLUS

The Applicant has voluntarily committed to updating the Passumpsic River Canoeing and Recreation Guide in consultation with the VANR and other area stakeholders. The Applicant's evidence of this voluntary commitment supports the Pierce Mills FERC License Article 412, not the Arnold Falls Project per the information in the application.

The **LIHI PLUS Standard** states that to meet an Applicant must demonstrate "new public recreational opportunities that **have been created on facility lands or waters beyond those required by agencies** (e.g., campgrounds, whitewater parks, boating access facilities and trails)". Based on the evidence provided in the application, the Applicant has not demonstrated that adherence to the Pierce Mills FERC License and extra efforts related to the Canoeing and Recreation Guide has also supported the Arnold Falls impoundment ZOE, thus my review determines that the PLUS standard is inappropriate for this Project.

Bypass Reach Zone of Effect

In the Bypass Zone of Effect (ZOE), Standard 1 “Not Applicable/De Minimis Effect” was appropriately applied for Criteria C (Upstream passage), and E (shoreline protection). The Applicant provided sufficient evidence to support the Standard 1 as there is no active storage at the Project which functions as a run of river project, there are no current federal prescriptions for the upstream passage of fish and migratory fish are blocked by downstream Connecticut River dams, and the Applicant conferred with Vermont DEC verifying that the Project functions as run of river and remains in compliance with the Water Quality Certificate (See Appendix C of the Application).

In the Bypass Zone of Effect (ZOE), Standard 2, “Agency Recommendation”, was appropriately applied for A-Ecological Flows, B-Water Quality, D-Downstream Fish Passage, F-Threatened and Endangered Species, G-Cultural and Historic Resources, and H-Recreational Resources. The Applicant has satisfied each of these Criterion as shown below.

Criterion A-Ecological Flows

In 1994 WQC Condition B, the Vermont DEC required that the Arnold Falls Project be operated in a run-of-river mode. Article 402 of the December 8, 1994 FERC license incorporated Vermont DEC’s Water Quality Certification requirements to operate the Arnold Falls as a run-of-river facility. Article 402 and WQC Condition D also require that the Licensee, following the reinstallation of flashboards or an approved special maintenance operation necessitating a drawdown, refill the impoundment by reducing downstream flows, but to no less than 127 cfs from June 1 to September 30 and 254 cfs from October 1 to May 31. During the period of April 1 to May 31 or under circumstances during the other periods when the natural inflow to the Project is insufficient to permit both passage of these minimum flows and refilling the impoundment, the impoundment is to be filled while releasing 90% of instantaneous inflow downstream at all times. Flows in the Downstream ZOE are essentially unregulated unless there is impoundment refill. Per WQC Condition E and License Article 404, a flow management plan was developed in consultation with Vermont DEC and USFWS, to ensure compliance with run-of-river operations. FERC approved the plan in 1997.

Run of river is managed with a headpond controller system automatically adjusting the turbine output to maintain impoundment levels within 1 inch of the top of, or spilling over the top of the flashboards. The system reads turbine output and headpond level every five minutes and raises or lowers the turbine load to maintain the headpond level in the range of 574.25 to 574.35 feet. If the turbine load is 25 kW or lower and the headpond level drops to 574.22 feet, the system shuts down automatically, causing all flow to spill over the dam. When the station is shut down, the operator opens the downstream fish passage to provide 33 cfs to the south channel prior to shutting down the station.

Project operations data was provided to Vermont DEC on March 29, 2018 for verification of Project run-of-river and Water Quality Certificate compliance (see Appendix C for email exchange). Project operations data was provided to Vermont DEC on March 29, 2018 for verification of Project operations and Water Quality Certificate compliance (Application, Appendix C). The Vermont DEC’s review of the operations data supported the concurrence with the 1994 issued WQC, which was evidenced on July 5, 2018 and shown in Attachment A of this review.

Criterion B: Water Quality

The Project demonstrated compliance with the Vermont DEC issued 401 Certificate (1994) as well as by providing a current testimonial from Vermont DEC that the Project meets current 303d standards by being non-contributory. See Appendix C of the Application.

Criterion D-Downstream Fish Passage

In accordance with 1994 FERC License Article 405 and WQC Condition F, the Licensee developed, in consultation with VANR and USFWS, a downstream fish passage facility. The fishway is a sluiceway located in the south dam spillway adjacent to the station intake. As prescribed, the facility is operated from April 1 to June 15 and September 15 to November 15 each year. Fish enter the sluiceway and pass down a 3-foot-wide chute constructed of concrete and discharge into a 3-foot-deep plunge pool. Stoplogs control flow in the sluiceway to pass 25 cfs. On December 5, 1995, the Licensee submitted Downstream Fish Passage Facility Operation & Maintenance Plan as well as permanent downstream design drawings developed in coordination with USFWS and VANR. FERC approved of the plan in the February 7, 1996 Order Modifying and Approving Downstream Fish Passage Facilities. Final FERC authorization for extension of time to construct the fish passage was granted on November 12, 1998. The downstream fishway construction was completed on August 26, 1999 and FERC acknowledged receipt of completion information on September 27, 1999.

Article 406 of the 1994 FERC license requires the Licensee to file a plan for a post construction study to monitor the effectiveness of the downstream fish passage facilities after consultation with VANR and USFWS. Observations at the Arnold Falls Project were not included within the finalized study plan as the configuration of the Project's fish passage was not expected to be problematic. The plans were approved by FERC in the September 25, 1996 Order Modifying and Approving Plan to Monitor Effectiveness of Fish Passage Facilities.

Salmon fry were noted by VTFW within the downstream Gage Project forebay approximately 20 years ago. GMP installed a steel cover over a gap discovered in the concrete between the trashracks and forebay so to prevent entrance of fish into the forebay. GMP is additionally pursuing intake maintenance and repair work at the Gage Project in 2018 by resurfacing the concrete to seal it and further enhance downstream passage conditions at Gage. VTFW did not express any comments or suggest enhancements for the Pierce Mills Project or the Arnold Falls Project. Per the VTFW email dated March 16, 2017 (Application, Appendix D), the Department reported that they worked with GMP to improve downstream fish passage at the Gage Project. The Department reported that fish passage had improved after GMP implemented recommendations and did not require further studies. The VTFW additionally commented within the March 16, 2017 email that American eel passage will not be required at the Gage, Pierce Mills, or Arnold Falls Projects within the next five years. Although the USFWS was contacted for review of fishway compliance and eel passage, no comments have been received (Application, Appendix D). As part of the LIHI Application review, USFWS was requested to provide concurrence with the Applicants finding. USFWS did not respond to the request.

The USFWS Atlantic salmon stocking program occurred during Project relicensing (program was decommissioned in 2012), and stocked Atlantic salmon needed a way to make an outmigration past the Project. In addition to aiding the Atlantic salmon smolt passage, it was concluded that downstream passage would also benefit resident trout species. No further protections are required by resource agencies for resident fish passage at the Project. A 2013 FERC Environmental Inspection indicated that "The licensee maintains downstream fish passage via the sluiceway in the Project forebay which transports fish along a concrete chute into a three-foot plunge pool. The fish passage facility appeared to be in good condition. The licensee files annual reports certifying compliance with its minimum flow requirements; the licensee's 2012 annual minimum flow certification was filed on January 23, 2013. The licensee appears to be in compliance with its requirements with regard to fish and wildlife resources.

Criterion F-Threatened and Endangered Species- See Impoundment Section

Criterion G-Cultural and Historic Resources- See Impoundment Section

Criterion H-Recreational Resources- See Impoundment Section

Downstream Reach Zone of Effect

In the Downstream Zone of Effect (ZOE), Standard 1 “Not Applicable/De Minimis Effect” was appropriately applied for Criteria A-Ecological Flows, C-Upstream passage, D-Downstream Fish Passage, and E-Shoreline protection. The Applicant provided sufficient evidence to support the Standard 1, as there is no active storage at the Project which functions as a run of river project, the ZOE has no bypassed reach, there are no current federal prescriptions for the upstream passage of fish and migratory fish are blocked by downstream Connecticut River dams, and the Applicant conferred with Vermont DEC verifying that the Project functions as run of river (See Appendix C of the Application).

In the Downstream Zone of Effect (ZOE), Standard 2, “Agency Recommendation”, was appropriately applied for B-Water Quality, F-Threatened and Endangered Species, G-Cultural and Historic Resources, and H-Recreational Resources. The Applicant has satisfied each of these Criterion as shown below.

Criterion B: Water Quality

The Project demonstrated compliance with the Vermont DEC issued 401 Certificate (1994) with the Vermont DEC review of the operations data. Vermont DEC supported the concurrence with the 1994 issued WQC, which was evidenced on July 5, 2018 and shown in Attachment A of this review. The Applicant also demonstrated the Project concurrence with the current 303d standards by being non-contributory with a Vermont DEC testimonial. See Appendix C of the Application.

Criterion D-Downstream Fish Passage

There are no barriers to downstream fish passage in the Downstream ZOE. Once fish cross past the Impoundment and Bypassed Reach ZOEs with the use of the sluiceway, the fish do not have any further impediments to passage through the Downstream ZOE. Once fish approach the downstream Gage Dam, they are then allowed once again to pass over the dam via the use of another downstream fish passage facility. The Applicant provided recent data for all monitored upstream migrating species in the downstream Connecticut River which is included in two reports in the application. Based on these reports, there are presently no upstream fish ladders above the above Wilder Dam (FERC No. 1892) located at RM 264 and this is where migratory assessments stop. Opening of the Wilder Dam fish ladder only occurs if triggers are met for returns at downstream dams. Therefore, anadromous fish passage is unlikely to be an issue on the Passumpsic River. The Applicant provided sufficient evidence of the passage conditions in the application under all three ZOEs.

Criterion F-Threatened and Endangered Species- See Impoundment Section

Criterion G-Cultural and Historic Resources- See Impoundment Section

Criterion H-Recreational Resources- See Impoundment Section

(3) Is there any missing information from the application?

The application information is complete. There are no outstanding record requirements.

Conclusion

It is recommended that the Arnold Falls Hydroelectric be LIHI Certified without the PLUS standard, for a term of five years.

Please contact me if you have any questions.

Sincerely,

A handwritten signature in blue ink that reads "Diane M. Barr". The signature is written in a cursive style.

Diane M. Barr, Principal
Camas, LLC

Attachment A

State and Federal Agency Communication for LIHI Concurrence for Certification

Wednesday, May 30, 2018 at 7:20:43 PM Pacific Daylight Time

Subject: LIHI Certification Arnold Falls, Gage and Pierce Mills
Date: Wednesday, May 30, 2018 at 12:49:13 PM Pacific Daylight Time
From: Diane Barr
BCC: jeff.crocker@vermont.gov, eric.davis@vermont.gov, scott.dillon@vermont.gov, Melissa_Grader@fws.gov, brett_towler@fws.gov, jud.kratzer@vermont.gov, scott.darling@vermont.gov, john.buck@vermont.gov
Priority: High
Attachments: image001.png

I am conducting the independent review of the Green Mountain Power Low Impact Hydro Institute (LIHI) certification for the Arnold Falls, Gage and Pierce Mills hydroelectric project. These three projects have been previously LIHI certified for a 5-year term. As required by the LIHI re-certification process, I am soliciting any comments or concerns your agency may have with this re-certification. The application does not present any concerns upon review of the information provided from a LIHI certification perspective.

Our due diligence would like to establish that to the best of your knowledge these facilities are not jeopardizing any known protected species or water quality standard.

Please do not hesitate to respond with questions, concerns, or support to this request.

Thank you for your time in considering this matter.

Diane M. Barr | Principal Regulatory Specialist



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Page 1 of 1

Thursday, July 5, 2018 at 10:21:22 AM Pacific Daylight Time

Subject: RE: LIHI Cer+fica+on Arnold Falls, Gage and Pierce Mills
Date: Thursday, July 5, 2018 at 10:16:08 AM Pacific Daylight Time
From: Davis, Eric
To: Diane Barr
CC: Crocker, Jeff, McHugh, Peter
Attachments: image004.jpg, image005.png, image006.jpg, image007.png

Hello Diane,

The applicant ac+vely engaged the Agency in developing the LIHI applica+on for the Arnold Falls, Gage and Pierce Mills projects. This included consulta+on and providing opera+ons data. The Agency reviewed this informa+on and determined the project consistently operates in compliance with the condi+ons of its cer+fica+on. As such, the Agency supports the LIHI cer+fica+on of these projects.

Thanks,
Eric

Eric Davis, *River Ecologist*

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<http://www.watershedmanagement.vt.gov/rivers>



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From: Diane Barr <diane@camasllc.com>
Sent: Friday, June 01, 2018 10:35 AM
To: Davis, Eric <Eric.Davis@vermont.gov>
Cc: Crocker, Jeff <Jeff.Crocker@vermont.gov>
Subject: Re: LIHI Cer+fica+on Arnold Falls, Gage and Pierce Mills

Hi Eric, thanks for the email.

We have completed our review and are just awai+ng VDEC's response to the GMP data submi] al. Since the current WQC is over 10 years old, LIHI requires concurrence from the 401 issuing agency that the project conforms to current water quality standards, or that the issuing agency supports the LIHI cer+fica+on. Is the data review a necessary step to make such a concurrence statement from VDEC?

Diane M. Barr | Principal Regulatory Specialist



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