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6 July 2018

Ms. Maryalice Fischer  
Certification Program Director  
Low Impact Hydropower Institute

**RE: Recertification Recommendation for the Gage Hydroelectric Facility, LIHI Certification #94**

Ms. Fischer:

This letter contains my recommendation for Recertification of the Gage 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

# GAGE 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 Gage Hydroelectric Project (Facility) located on the Passumpsic River, in northeastern Vermont. The Federal Energy Regulatory Commission (FERC) relicensed the Project (FERC 2397) in 1994, issuing a 40-year license for the operation and maintenance of the 0.70 MW Project. This application review for recertification was conducted using the new, 2<sup>nd</sup> Edition Handbook that was published in March 2016.

### Background:

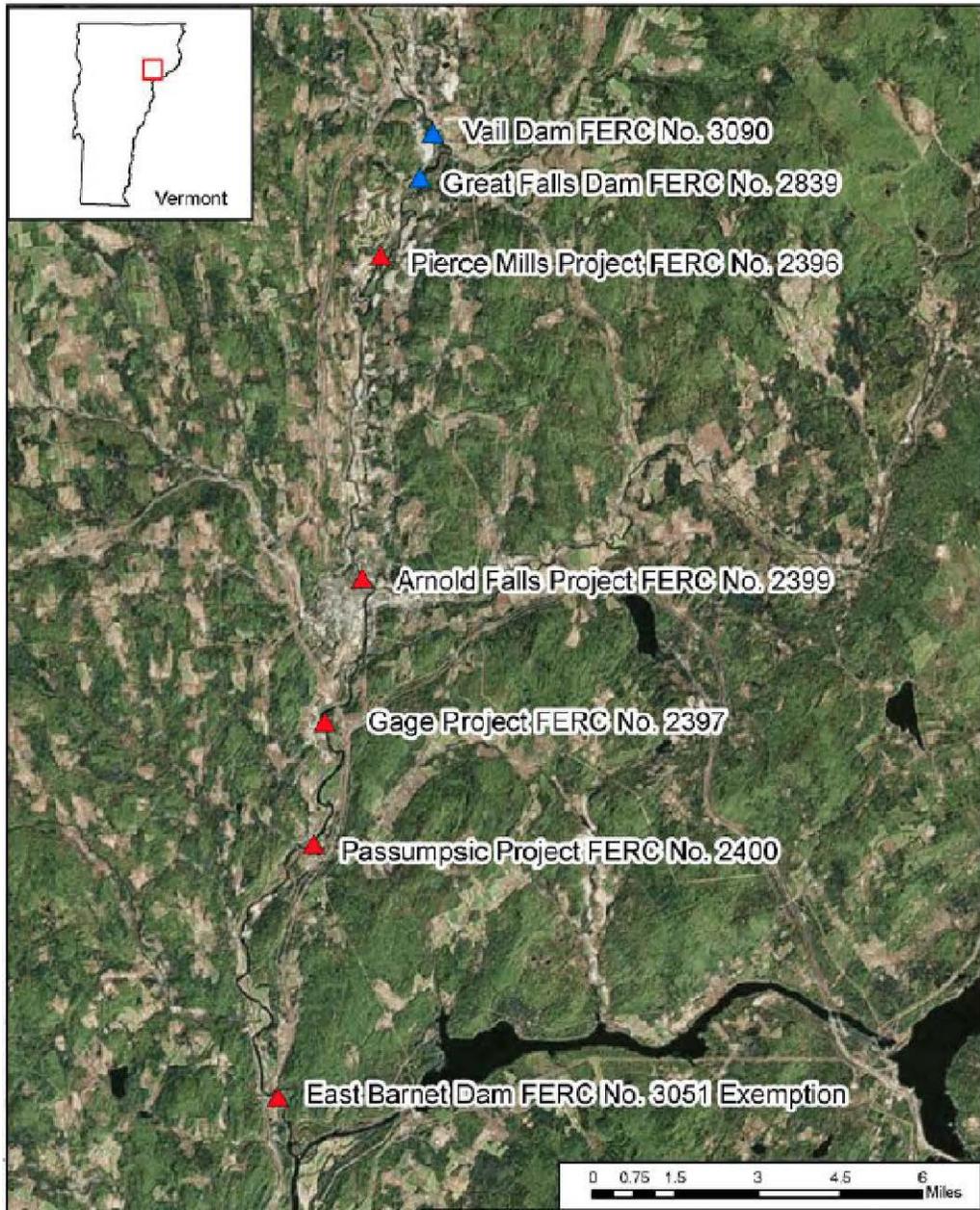
The Gage Project is located in northeastern Vermont near St Johnsbury, at river mile 7.2 (RM), on the Passumpsic River. The Passumpsic River is a major tributary to the Connecticut River. The Project's hydroelectric facilities are owned and operated by the Green Mountain Power Corporation (GMP or Licensee), formerly Central Vermont Public Service Corporation. The Gage Project is the fifth most downstream of seven dams located on the River (see Figure 1 below). The drainage area for the Gage Project is 413 square miles.

### Recertification Standards

LIHI notified the Applicant of upcoming expiration of the Low Impact Hydropower Institute certification for the Gage Hydroelectric Facility on February 6, 2017. The letter included an explanation of procedures to apply for an additional term of certification under the 2<sup>nd</sup> 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

	<h1>Gage Hydro</h1>		
	<h2>FIGURE 1: SITE LOCATION MAP</h2>		
	<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 6, 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 Division of Fish and Wildlife	Jud Kratzer, Fish and Wildlife Specialist
Vermont Division of Fish and Wildlife	Scott Darling, Wildlife Management Program Mngr
Vermont Division 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 held one condition shown below:

Condition 1. LIHI requires demonstration of effective fish passage to be certified as low impact. Downstream passage for Atlantic salmon was the focus for passage at this site; however, recent decision by the USFWS has eliminated restoration efforts for this species in this river system. Although past documentation suggests that the agencies determine that the configuration of the passage facility at the Gage facility should work satisfactorily, and final reporting on effectiveness testing could not be confirmed, recent communications with USFWS and VDF&W could not confirm this opinion, and VDF&W stated that additional issues may still exist at this site. Therefore, LIHI requires that consultation be reopened with USFWS and VDF&W to reassess, if needed, the effectiveness of the passage facilities at Gage. If no additional studies are needed, the owner shall provide LIHI documentation demonstrating agreement by USFWS and VDF&W with this decision within one month of its issuance. If any additional studies are required, documentation of the agency approved study plan, study schedule and study results shall be provided to LIHI within one month of the finalization of these documents. These documents will demonstrate compliance with this criterion.

The Applicant provided sufficient evidence that Condition 1 from the 2012 Certification was adequately met.

**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 and 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 407 and Water Quality Certification Condition I, permanent downstream fish passage is provided via the sluiceway at the right abutment of the south dam which also provides the minimum flow release. The facility provides a continuous flow of 20-25 cfs from April 1 – June 15 and from September 15 – November 15. Fish enter the sluiceway through a three-foot-wide concrete chute, which ends at a three-foot-deep plunge pool that discharges to the bypass channel. Recommendations for downstream passage were provided within the Vermont DEC letter dated December 23, 1993 and Department of Interior (DOI) recommendations for downstream fish passage are included within a December 23, 1993 letter and later incorporated into the Project license. On December 5, 1995, the Licensee submitted a Downstream Fish Passage Facility Operation & Maintenance Plan as well as permanent downstream design drawings developed in coordination with USFWS and Vermont DEC. In an Order dated February 7, 1998 FERC approved of the downstream fish passage facility designs and operations plans. FERC authorization to construct the downstream facility was granted on August 22, 1996. Included within the downstream passage design drawings and approved within the February 7 Order, Project trashracks with 1-inch clear bar spacing were approved and have been installed upstream of the canal headgates to prevent previously stocked salmon from entering into the power canal.

Under License Article 408, the Licensee conducted a study to monitor the first year of downstream fish passage operation for effectiveness in facilitating efficient and safe passage of downstream migrating Atlantic salmon stocked under the USFWS stocking program (this program has since ended in 2012). The Licensee submitted the study plan to FERC on June 14, 1996 which was approved by FERC on September 25, 1996. Under this plan, developed in consultation with the USFWS and the VTFW, the Licensee, USFWS, and the VTFW would visually inspect the Gage Project and the downstream Passumpsic Project (FERC No. 2400) forebays for the presence of salmon smolts during the period when smolts should be passing downstream. A November 1997 report on the results of the observations at the Gage Project and Passumpsic Project was issued to the Vermont Agency of Natural Resources (VANR) and USFWS. Discussions regarding Passumpsic River downstream fishways have largely concentrated on the Passumpsic Project fishway since this study.

In the mid-1990’s, the Applicant addressed a VTFW concern about salmon fry within the Gage Forebay. It was determined that the salmon were entering into the forebay because of a gap that emerged due to deteriorated concrete between the trashracks and forebay. To remedy the situation, GMP installed a steel cover over the concrete gap so to prevent entrance of fish into the forebay. GMP is additionally pursuing intake maintenance and repair work at the Gage Project in 2018. This work will involve concrete resurfacing which will include concrete repairs to the deteriorated concrete gap between the trashracks and the forebay. This long-term seal will further enhance conditions at Gage.

Per 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 Project or the Arnold Falls or Pierce Mills 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). Per the evidence in the application, Atlantic salmon smolt passage and resident trout species were benefited by the downstream passage improvements. The Atlantic salmon smolts are remnants of the USFWS stocking program that was ceased in 2012.

#### **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. During re-licensing, Per 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. 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 413 and WQC Conditions N, the Applicant developed and maintains recreation facilities including a public picnic area, interpretive signage, and directional and warning signage, as well as a canoe/kayak take-out portage route with a corresponding take-out in the Impoundment ZOE. The 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** [emphasis added] 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).

On March 29, 2018 GMP filed a revised Recreation Management Plan (RMP) with FERC. The revised RMP was developed in consultation with Vermont DEC and the Town of St. Johnsbury. The Reviewer's FERC eLibrary search determined that FERC had approved the RMP on May 18, 2018. The FERC Order is located here: <https://elibrary.ferc.gov/idmws/search/results.asp>

#### **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 Gage 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 Gage 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 accordance with WQC Condition C (Article 405 of 1994 License), GMP provides, when flows are available, a minimum instantaneous flow of 142 cfs from Oct 1 to May 31 and 82 cfs from June 1 through September 30 in the bypassed reach. Flows are released in part through the downstream fish passage facility and controlled with the use of stop logs. If instantaneous inflow falls below the minimum hydraulic capacity of the turbine unit plus this spillage requirement, all flows are spilled at the dam.

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). On July 5, 2018 Vermont DEC responded to the March 29 data submittal stating that the “project consistently operates in compliance with conditions of the certification”. Evidence of this concurrence is provided in Attachment A of this review.

#### **Criterion B: Water Quality**

The Applicant 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 407 and WQC Condition I, GMP provides permanent downstream fish passage via the sluiceway at the right abutment of the south dam which also provides the minimum flow release. The facility provides a continuous flow of 20-25 cfs from April 1 – June 15 and from September 15 – November 15. Fish enter the sluiceway through a three-foot-wide concrete chute, which ends at a three-foot-deep plunge pool that discharges to the bypass channel. Recommendations for downstream passage were provided within the Vermont DEC letter dated December 23, 1993 and Department of Interior (DOI) recommendations for downstream fish passage are included within a December 23, 1993 letter and later incorporated into the Project license.

Under License Article 408, the Licensee conducted a study to monitor the first year of downstream fish

passage operation for effectiveness in facilitating efficient and safe passage of downstream migrating Atlantic salmon stocked under the USFWS stocking program (this program has since ended in 2012). The Licensee submitted the study plan to FERC on June 14, 1996 which was approved by FERC on September 25, 1996. Under this plan, developed in consultation with the USFWS and the VTFW, the Licensee, USFWS, and the VTFW would visually inspect the Gage Project and the downstream Passumpsic Project (FERC No. 2400) forebays for the presence of salmon smolts during the period when smolts should be passing downstream. 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 fishways have largely concentrated on the Passumpsic Project fishway since this study.

Salmon fry were noted by VTFW within the 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 Project in 2018 by resurfacing the concrete to seal it and further enhance downstream passage conditions. VTFW did not express any comments or suggest enhancements for the 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 encounter the downstream Passumpsic 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 Gage Hydroelectric be LIHI Certified without the PLUS standard, for a term of five years.

Please contact me if you have any questions.

Sincerely,



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

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**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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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*

1 National Life Drive, Main 2  
Montpelier, VT 05620-3522  
802-490-6180 / [eric.davis@vermont.gov](mailto:eric.davis@vermont.gov)  
<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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