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**Fwd: Penacook Upper Falls Project (FERC No. 6689; LIHI No. 52) Comments**

1 message

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**Certification Comments** <[comments@lowimpacthydro.org](mailto:comments@lowimpacthydro.org)>  
To: [wconstantineau@lowimpacthydro.org](mailto:wconstantineau@lowimpacthydro.org)

Fri, Jan 10, 2020 at 9:09 AM

----- Forwarded message -----

From: **Rosset, Julianne** <[julianne\\_rosset@fws.gov](mailto:julianne_rosset@fws.gov)>  
Date: Thu, Jan 9, 2020 at 4:08 PM  
Subject: Penacook Upper Falls Project (FERC No. 6689; LIHI No. 52) Comments  
To: <[nicholas.funk@wsp.com](mailto:nicholas.funk@wsp.com)>, <[comments@lowimpacthydro.org](mailto:comments@lowimpacthydro.org)>

Greetings -

The United States Fish and Wildlife Service (Service) has reviewed Essex's Power Services (EPS) LIHI recertification application for the Penacook Upper Falls Hydroelectric Project (FERC No. 6689; LIHI No. 52) and has the following comments.

Upstream Fish Passage

The recertification document does not provide information regarding upstream or downstream American eel passage and protection measures. As indicated in EPS's Pre-Application Document (FERC eLibrary Accession No. 20191129-5029), American eel are present upstream and downstream of Penacook Upper Falls. Currently, the Project has an experimental eel ladder, which was installed by the Service in 2017. Eels have passed the Project in the thousands (Service biologists estimate 3000-4000 per year) since ladder install. Therefore, the Service recommends that any LIHI recertification issued for the Penacook Upper Falls Project require EPS to implement upstream and downstream eel passage within two years after receiving LIHI recertification (though interim measures should be in place as soon as possible after recertification). Implementation of effective upstream and downstream eel passage will require consultation with, and approval of, Service personnel.

The Service appreciates the opportunity to provide information relative to fish and wildlife resource issues in the LIHI recertification process and thank you for your interest in these resources. If you have any questions, please feel free to call or email me.

Kind regards,  
Julianne

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