



## Connecticut River Conservancy

*Clean water. Healthy habitat. Thriving communities.*

15 Bank Row, Greenfield, MA 01301  
413.772.2020 · [www.ctriver.org](http://www.ctriver.org)

August 10, 2017

Low Impact Hydropower Institute  
PO Box 194  
Harrington Park, NJ 07640

Re: LIHI Project #8 – Gardner Falls Hydroelectric Project FERC P-2334

Dear LIHI,

The Connecticut River Conservancy (CRC) submits the following comments on the evaluation of the Gardner Falls Hydroelectric Project's (Gardner Falls) adherence to LIHI's certification criteria. CRC is the principal nonprofit environmental advocate for protection, restoration, and sustainable use of the Connecticut River watershed. Until April of 2017, our organization's name was the Connecticut River Watershed Council (CRWC). We are now doing business as the Connecticut River Conservancy. The Deerfield River is a major tributary of the Connecticut River, and we therefore take interest in this re-certification. In 2011, during the original certification, CRWC submitted a letter opposing LIHI certification.

### Operations

As the cover letter to the renewal application states, over the last six years (in fact, since the original LIHI certification) the Gardner Falls facility has operated at reduced output or ceased operations altogether due to seepage issues.

### Fish passage

The Atlantic salmon restoration program has ceased within the Massachusetts part of the Connecticut River watershed. Unfortunately, the current license for the Deerfield River projects has no other requirements for upstream fish passage. The MA Division of Fisheries and Wildlife conducted a fish survey in 2016, and I have not seen the data for this section of river. If a FERC license were issued today, it would like have upstream fish passage requirements for American eel and possibly sea lamprey. No upstream fish passage facilities, combined with peaking flows on the Deerfield, continue to frame our position that any dam on the Deerfield River system does not merit being considered a low impact hydropower facility.

### Recreation

I attempted to visit the recreational facilities at Gardner Falls in preparation for this letter. At Wilcox Hollow, things looked good other than the access road being very difficult to do without damage to a car. As explained in the last LIHI certification round, access road maintenance is the responsibility of the state, and apparently it is not being adequately done.

On the Buckland side, I was met with a gate and signs barring access. There was no explanation in the

signs about construction or when access might again be granted. The picnic tables that were accessible were in a bad state of disrepair, and there was no information on the sign. One of the filings indicated that signs had not been posted because they had been taken down in the past. That doesn't seem to be an adequate reason not to have any signage.



Photos above: Gardner Falls Road in Buckland. Lack of signage, a picnic table that is falling apart, and a gate barring access to the remaining recreational amenities on the site.

CRC recommendation: Though the LIHI 2<sup>nd</sup> addition handbook does not seem to address the issue of a facility that has not been operational since the last certification, CRC recommends that LIHI suspend certification and review of re-certification until the project becomes operational. The facility is not able to balance power generation with impacts to natural resources, historical resources, and recreation on the Deerfield River when it is not even generating power. Certainly, the facility should not garner renewable energy credits when it is also not generating renewable energy.

CRC appreciates the opportunity to provide comments. I can be reached at [adonlon@ctriver.org](mailto:adonlon@ctriver.org) or (413) 772-2020 x.205.

Sincerely,

A handwritten signature in dark ink, appearing to read "Andrea F. Donlon". The signature is fluid and cursive, with the first name "Andrea" and last name "Donlon" clearly legible.

Andrea F. Donlon  
River Steward

Cc: Jim Perry, Deerfield River Watershed Association  
Kristen Sykes, AMC  
Kevin Mendik, NPS  
Bob Kubit, MassDEP  
Caleb Slater, MA DFW  
Melissa Grader, USFWS