

**Subject:** FW: Occum Comments

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

From: **Gephard, Steve** <[Steve.Gephard@ct.gov](mailto:Steve.Gephard@ct.gov)>

Date: Thu, Mar 8, 2018 at 1:55 PM

Subject: Occum Comments

To: "[comments@lowimpacthydro.org](mailto:comments@lowimpacthydro.org)" <[comments@lowimpacthydro.org](mailto:comments@lowimpacthydro.org)>

To LIHI,

I am a fisheries biologist with the State of Connecticut's DEEP-Fisheries Division. I take the lead for our Division in regard to fish passage issues and FERC relicensing as well as assisting with the drafting of the DEEP's Section 401 Water Quality Certificate for hydro projects. I have communicated with LIHI on other hydro projects in Connecticut in the past. I have the following comments in regards to the Occum Hydroelectric Project FERC #P-11574 operated by the Norwich Public Utilities (NPU).

1. As part of its relicensing, NPU was required to install upstream and downstream fish passage facilities to support anadromous fish restoration. It was also required to install upstream passage facilities for American Eel. It worked with us and the U.S. Fish & Wildlife Service on approved designs and installed both per license requirement.
2. Evaluation tests were conducted and the downstream fish passage facilities were deemed effective.
3. The results of the tests of the upstream fish passage facilities were highly encouraging but inconclusive due to passage difficulties at the non-jurisdictional project just downstream of it. Studies were suspended. Those studies resumed last year. Again, preliminary results are highly encouraging but we withhold final conclusions until the completion of the tests.
4. The eel pass was successful but had operational challenges. NPU replaced the eel pass with a more effective eel lift similar to one at another one of its projects and that is undergoing testing but it looks good. This improvement was initiated by NPU but done in consultation with us.
5. The project operates as run-of-the-river and we have no concerns with plant operation.
6. We have interacted with NPU at its Greenville and Occum projects and find it to be highly cooperative and responsive. I suspect that it is one of the most cooperative hydro operators in New England, in terms of compliance with fisheries and flow issues.

I support LIHI certification of the Occum project notwithstanding the fact that the evaluation study for the Denil fishway is not completed. I believe the study will show effective passage and if it does not, I trust NPU to make any necessary modifications. If this should not happen, I can always contact LIHI and recommend that certification be withdrawn.

Thank you for the opportunity to comment.

Steve Gephard

Stephen Gephard

Supervising Fisheries Biologist

Diadromous Fisheries *and* Habitat Conservation and Enhancement programs

Fisheries Division

Connecticut Department of Energy and Environmental Protection  
P.O. Box 719, Old Lyme, CT 06371

P: [860.447.4316](tel:860.447.4316) | F: [860.434.6150](tel:860.434.6150): [steve.gephard@ct.gov](mailto:steve.gephard@ct.gov)



[www.ct.gov/deep](http://www.ct.gov/deep)