



Massachusetts / Rhode Island State Council of Trout Unlimited

Council Chairman: Joseph Overlock (413) 652-1638 Email: Joe.Overlock@gmail.com

Mr. Fred Ayer, Executive Director
Low Impact Hydropower Institute
34 Providence Street
Portland, ME
04103

RE: TransCanada Hydro Northeast, Inc.
FERC No. 2323

Mr. Ayers,

The Massachusetts / Rhode Island State Council of Trout Unlimited submits the following comments on the Low Impact Hydropower Institute's ("LIHI") Pending Application for TransCanada's proposed LIHI certification for Deerfield River Hydroelectric Project located in Bennington and Windham Counties, Vermont, and Berkshire and Franklin Counties, Massachusetts.

Trout Unlimited does not support TransCanada's application for LIHI Certification for the reasons outlined below.

River Flow

The Deerfield River facility is not a run of river operation. The daily water releases create an unnatural flow pattern and has decimated the native brook trout populations that once thrived in the Deerfield.

The large water releases scour the river bank and have a major impact on the benthic macro-invertebrate population, which is a major source of a trout's diet. In addition to the scheduled water releases, unscheduled water releases are a common problem to anglers on the stream. The high water flows force trout to consistently seek new habitat, disrupts their daily feeding, destroys spawning redds, and limits the available habitat and food for juvenile trout.

Fishing exists only through Mass Wildlife's stocking efforts and the Deerfield does not support wild trout.

Fish Passage & Protection

The current fish passage systems do not allow fish to naturally migrate over the entire course of the river and are there by inadequate. Even though they are currently compliant with the settlement reached during the FERC relicensing, the current administration at Trout Unlimited feels that not enough was done to protect salmon and trout habitat in the Deerfield. The daily high water flows destroy critical trout & salmon habitat, negatively impact their number one food source (benthic macro-invertebrates), and wash away spawning redds.

Recreation

While the Deerfield is a popular stream for local anglers, it is an artificial fishery. The high water releases also pose a risk to anglers wade fishing in the stream. The current warning system is inadequate and can only be heard in the immediate area of Fife Dam.

The random water releases discourage most out of state anglers from fishing it.

About the Trout Unlimited Massachusetts/Rhode Island State Council

The MA/RI State Council represents over 3,700 members and 12 local chapters in two States. Trout Unlimited is the nation's largest 501(c)(3) non-profit dedicated to cold water fisheries with over 140,000 members nationwide.

Sincerely,
Joseph Overlock
Chairman
MA/RI Trout Unlimited Council
(413) 652-1638