



Certification Comments <comments@lowimpacthydro.org>

Deerfield River Project Comments

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To Whom It May Concern:

We do not in any way view the Deerfield River along the reaches included in the [LIHI Certificate #90 - Deerfield River Hydroelectric Project, Vermont and Massachusetts](#) as being "Low Impact." This view is justified because upstream and/or downstream native and wild eel and fish species passage facilities are nonexistent at the dams along the Deerfield River. These conditions create a highly negative adverse impact on the habitat and movement of these species. Moreover, the water temperatures immediately below the dams on the Deerfield River are extremely cold throughout the year in places and thus are also not always conducive to the natural and desirable eel and fish species habitat. To rectify these infringements of the public's rivers in receiving "Low Impact" status need to be corrected by Great River Hydro (GRH). Moreover, the fiscal benefits currently being realized by GRH with its "Low Impact" status designation on their Deerfield River project is not in any way comparable to the compensation the public receives for the significant adverse societal conservation impacts being caused at present.

In summary, we recommend denial of continued "Low Impact" designation for LIHI Certificate #90 - Deerfield River Hydroelectric Project for reasons of fish passage and water temperature extremes. Furthermore, we recommend that GRH be required to provide greater compensation than at present for their adverse impacts on waters that belong to the public for which greater conservation measures are needed.

Sincerely

David Deen & John (Jack) Widness

President & Vice President, Trout Unlimited Connecticut River Valley Chapter 450