



**Connecticut River Valley Chapter
5607 Westminster West Road
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*dedicated to conserving, protecting, and restoring
North America's coldwater fisheries*

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To Whom It May Concern:

We do not view the Deerfield River along all of the reaches included in the [LIHI Certificate #90 - Deerfield River Hydroelectric Project, Vermont and Massachusetts](#) as being fully “Low Impact” due to the lack of upstream and/or downstream eel and fish species passage facilities at the dams along the Deerfield River creating an adverse impact on the habitat and movement of these species.

Moreover, the water temperatures immediately below some of the dams are either extremely cold throughout the year or at other facilities hot during summer high temperature times and thus are also not always conducive to the natural and desirable eel and fish species habitat.

In order to retain its “Low Impact” status Great River Hydro (GRH) should make some effort to address these impacts including consideration of using some of the fiscal benefits currently being realized by GRH with its “Low Impact” status designation that would enable increases in conservation efforts in the watershed for the benefit of fish, wildlife, and the public.

We also point out that by their nature some current GRH dam operations do offer benefits for cold-water fish species. Those cases are where the reservoir release keeps the water cool throughout the year, even during those stressful times of high, hot summer. Some of their releases create a stable flow level even during the summer and winter low flow times. Furthermore, GRH has cooperated with our TU chapter on a stream assessment project which we look forward to continuing with them.

We recommend that if Great River Hydro is to keep their “Low Impact” designation for LIHI Certificate #90 - Deerfield River Hydroelectric Project that they begin to plan during this certification period for how they might improve fish passage and reduce or remove water temperature extremes that are damaging to the fishery. We suggest that GRH increase its contribution to the Deerfield River Environmental Fund (DREF) or increase their engagement with projects initiated by the DREF so that this can provide greater opportunity to address the remaining adverse impacts in those locations in the watershed in need of conservation measures.

Sincerely

David Deen & John (Jack) Widness
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