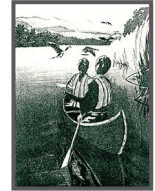


Wantastiquet Local River Subcommittee

of the Connecticut River Joint Commissions

New Hampshire - Walpole, Westmoreland, Chesterfield, Hinsdale
Vermont - Westminster, Putney, Dummerston, Brattleboro, Vernon



September 2, 2022

Kimberly D. Bose, Secretary
Federal Energy Regulatory Commission
888 First Street, N.E. Room 1-A
Washington, D.C. 20426

**RE: Great River Hydro, LLC; FERC Project Nos. 1892, 1855 and 1904
Comments on August 4, 2022 – Settlement Agreement on Fish Passage**

Dear Secretary Bose,

As you may know, the Wantastiquet local river subcommittee (LRS) of the Connecticut River Joint Commissions (CRJC) has a statutory duty, as a public entity, to comment on licenses that effect the river, and advise public agencies in their decisions regarding the River. The Wantastiquet LRS has been involved in this relicensing effort since its onset, in 2012.

The Wantastiquet LRS met on August 18, 2022, where members agreed to submit the comments contained herein. The Wantastiquet LRS would like to praise the progress made on the agreement since 2020 as they are significant. The focus of our comments pertains to the proposed timeline for fish passage improvements. The LRS agrees that we should not let the massive efforts and funding that dearly tried to revive a past icon (Atlantic salmon) be for naught, but utilize and enhance what has already been fulfilled and in place, to better the future of our more recently dominant broad stocks, American shad and American eel (threatened species). The LRS supports a reasonable effort to salvage what we have in the present and make needed improvements within this decade.

The agreement lays out a staged schedule over the course of 16 years, including a hydraulic study to take place upon the renewal of a FERC license. Given the severe deficiencies of downstream passage at Vernon dam, especially for American Shad and American Eel, the Wantastiquet LRS asks that FERC require Great River Hydro, LLC (GRH) to shorten the implementation schedule. We would like to highlight a few items in support of this recommendation. First, that the final license is likely not to be issued 10 years after the initial year it was intended to be renewed. Second, the hydraulic study could be performed before the renewal of the license. Third, the timeline would do best to reflect the shortest, realistic time needed for each improvement rather than the longest, with potential avenues to extend a stage in coordination with state Fisheries Biologists under defined conditions.

We appreciate your consideration of these comments. If you have any questions, please contact CRJC at 603-448-1680 or info@crjc.org

Sincerely,

Olivia Uyizeye, Staff

On behalf of the Wantastiquet Local River Subcommittee, Connecticut River Joint Commissions