



# New Hampshire Fish and Game Department

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July 14, 2016

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

**RE: Review of Updated Study Reports filed on May 15, 2016, for FERC project numbers P-1904 (Vernon), P-1855 (Bellows Falls), and P-1892 (Wilder).**

Dear Secretary Bose:

As the agency responsible for protecting fish and wildlife resources in New Hampshire, the New Hampshire Fish and Game Department (NHFGD) monitors and attempts to reduce the impacts of hydroelectric facilities on fish and wildlife species and their habitats. The mission of the New Hampshire Fish and Game Department (NHFGD) is to conserve, manage and protect the state's fish, wildlife and marine resources and their habitats, and to provide the public with opportunities to use and appreciate these resources.

The NHFGD submits the following comments after a review of Updated Study Reports filed on May 15, 2016, for Vernon (FERC No. 1904), Bellows Falls (FERC No. 1855), and Wilder (FERC No. 1892) projects. We also support any comments received regarding these reports from the Vermont Agency of Natural Resources (VT Fish and Wildlife Department and VT Department of Environmental Conservation, The Nature Conservancy, the USFWS, and the NH Department of Environmental Services.

## **Study 19: American Eel Downstream Passage Assessment**

The goal of this study was to “assess whether operations at the Wilder, Bellows Falls, and Vernon Projects affect the safe and timely passage of adult silver phase American Eels (*Anguilla rostrata*) emigrating out of the Connecticut River”. Study 19 presents adequate data for evaluating passage at each of the three dams in the project area, but a better understanding of the cumulative effects of the three dams on downstream eel passage requires a closer look at the eels which were documented as passing multiple dams. A total of 118 eels passed all three projects, although the ultimate fate of eels that passed the Vernon Dam cannot be assessed. If you exclude the 16 eels that were not detected at any project after release, there were 154 eels documented as passing at least one dam. This translates into a cumulative passage rate (118/154) of 76.6% for the Wilder and Bellows Falls Projects.

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Additional data should be provided for the following categories of eels:

Category 1: The 24 eels that were released above the Wilder Dam and passed all three projects.

Category 2: The 21 eels that passed the Wilder Dam and not detected at Vernon.

Category 3: The 44 eels that passed both Bellows Falls and the Vernon Dam.

Category 4: The 21 eels released above Bellows Falls, which passed Bellows Falls and did not pass Vernon.

In a separate table, route of passage/total number of eels should be listed for each dam for the 24 eels that were released above the Wilder Dam and passed all three projects (Category 1). This should be compared with route of passage/total number of eels for the 21 eels that passed the Wilder Dam but did not pass Vernon (Category 2). The same comparison should be done between eels in Category 3 and Category 4.

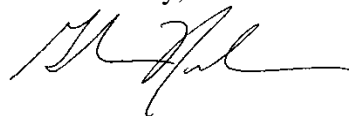
Residency and travel times at each dam should be compared between eels in Category 1 and Category 2. The same should be done for eels in Category 3 and Category 4.

The probability of detection at the next dam downstream should be calculated by passage route for the 45 eels that passed the Wilder Dam and the 98 eels that passed the Bellows Falls Dam.

The individual routes taken by eels depicted in Appendix E (2D Maps of Eel Movement and Passage) should be color coded by the four categories of eels listed above).

Thank you for this opportunity to comment on this very important relicensing project. If you have any questions or comments regarding these recommendations, please do not hesitate to contact either Fisheries Biologist, Matt Carpenter at 603-271-2501 or Carol Henderson, Environmental Review Coordinator at 603-271-3511.

Sincerely,



Glenn Normandeau  
Executive Director

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