



TROUT UNLIMITED

Conserving, protecting and restoring North America's coldwater fisheries and their watersheds.

DEERFIELD RIVER WATERSHED CHAPTER

Mailing address:

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SHELBURNE FALLS, MA. 01370

Honorable Kimberly D. Bose
Secretary
Federal Energy Regulatory Commission
888 First Street, NE
Washington, DC 20426

May 25, 2018

Final Spawning Trout Study Submission Bear Swamp Pumped Storage Project No. 2669

Dear Secretary Bose,

Today we are submitting the final report on our Trout Spawning Study. This compelling study proved: 1. Brown trout and some rainbow trout are spawning in the main stem of the Deerfield in the late fall; 2. spawning is successful; 3. Brookfield operations, with dramatic daily changes in flow rates, are having an impact on that effort; and 4. some eggs are maturing. Despite our findings many questions remain.

We met our study objectives to prove what we have known for many years. Now we must determine to what extent this effort is occurring, how successful is fry survival and maturity, and how daily dramatic changes in flows are impacting that effort. We appreciate your agency ordering Brookfield to conduct more analysis to determine what minimum flows are required to keep the redds adequately covered during the winter months, However egg maturity and recruitment must be assessed as well. We need to know how long dramatic hydropeaking flows are impacting the survivability of young trout fry after they emerge. We need to know what type of flows are necessary to enhance survivorship after emergence.

It is unfortunate FERC has denied for a third time a request to order a more extensive spawning trout study and IFIM. The yet to be answered questions raised by our study should be resolved. In fairness to the river and to these spawning trout, these questions need to be answered. We again implore FERC to issue an order to Brookfield to conduct a more complete spawning trout study and IFIM as requested by MF&W and USF&W and supported by Massachusetts Secretary

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of Energy and Environmental Affairs Matthew Beaton in his recent letter to your agency.

Thank you for your consideration in this regard.

Very truly yours,

(s) Kevin

Kevin D. Parsons, President