

How to provide public comments in a few simple steps:

1. Familiarize yourself with the issues by reading through some of the materials that American Whitewater and the VPC have prepared. We've attached a "fact sheet" that summarizes a few of those issues. Better yet, read through the draft water quality certification issued by the State of Vermont, peruse the FERC elibrary docket, and consider some of your own experiences paddling on the Green or elsewhere.
2. The best public comments will include at least a few thoughtful points. The ANR is required to review and respond to each point you raise - so the stronger your points are, the more likely it is that they'll change their mind.
3. Once you have some comments developed, either put them in an email and send it to Jeff Crocker ([Jeff.Crocker@vermont.gov](mailto:Jeff.Crocker@vermont.gov)), or use the template we've created, below. Be sure to clearly identify what you are responding to ("*Comments on the Draft Water Quality Certification for the Morrisville Project, Green River Development. FERC docket P-2629*") You can even just put your name and info into the template and send what we've already written. That can be emailed or mailed to Jeff Crocker as well.
4. If possible, blind-copy American Whitewater ( [bob@americanwhitewater.org](mailto:bob@americanwhitewater.org) ) or the Vermont Paddler's Club ( [mainer.michael@gmail.com](mailto:mainer.michael@gmail.com) ).
5. Then, encourage your friends to submit comments as well.
6. Comments are due no later than 4 pm on February 19th.

## The Facts –

- 1) Scheduled recreational whitewater releases are not all that is being eliminated; natural flow opportunities are highly likely to be eliminated due to the management regime being mandated.**

*Contrary to what DEC asserts, the Draft WQC will likely eliminate the extent of whitewater boating opportunities that would naturally occur in the spring and beyond during all year types. Based on analysis of historic flows, the elimination of spring and early summer whitewater boating opportunities could be as excessive as a 100% loss of what would naturally occur due to prescriptions requiring unnaturally high base flows followed by storage of all but base flows in order to refill a depleted reservoir.*

- 2) Existing Uses and Anti-Degradation.**

*Whitewater boating is clearly identified as a recreation activity protected under the Anti-Degradation Policy of Vermont's Water Quality Standards. As such, DEC is required under its Anti-Degradation Implementation Procedure to conduct a detailed analysis of the impact of its preferred flow regime on existing and potential whitewater boating opportunities. It has not done so at this time.*

- 3) The Green River Project is not a Hydropeaking Project.**

*Unlike other projects (for example, the Little River) which peak daily based on electric demands and rates on the market, the Green is not a hydropeaking project. In 2013 there were 32 high flow events, 23 of which were below 100 cfs and often about 70 cfs. Only 9 releases were above 100 cfs and none above 140 cfs. There is no significant difference in the number of flows above 100 cfs as compared with natural flow regime. In some years, regulated flow regime has even fewer high flow releases that occur with the natural flow regime. Given the small amount of storage and the flashy watershed, this shouldn't be characterized as a hydro peaking project.*

- 4) Limited whitewater releases do not unduly favor whitewater boating interests over angling interests.**

*There is limited angling on the Green River below the reservoir because most of the land is privately owned. Additionally, at least a half of the whitewater releases occur when trout fishing is out of season. Given that we are proposing releases on 7-8 days annually, releases would have a limited impact on angling opportunities. Whitewater releases can draw 50-75 participants, and as such, there is significant beneficial use of the resource that should be supported.*

- 5) Whitewater boating opportunities will have positive economic impact on the Morrisville area.**

*Scheduled weekend whitewater releases with sufficient flows will draw an even larger group of participants supporting restaurants and other businesses. Studies on the West and elsewhere have shown positive economic impact associated with whitewater boating.*

**6) Whitewater boating is not harmful to aquatic habitat.**

Studies on the Indian and Hudson Rivers in New York looked at the effects of frequent whitewater releases and found limited or non-existent impacts of releases. Releases on the Deerfield and Nantahala rivers have turned those rivers into veritable trout farms and fish benefit from the cold water releases and flushing flows that move sediment and increase dissolved oxygen. Issues of fish strandings is overstated as a study by (Pacific Gas and Electric Company) PGE in California displayed that recreational releases cause an insignificant amount of strandings, and the mortality from these releases is a tiny fraction of the mortality caused by fishing. No studies of fish mortality have been performed on the Green that have been documented. Lastly because MWL does not operate the Green River Project as a hydropeaking facility stranding is a non-issue.

**7) There is no Evidence that Green River is not providing suitable habitat for native or non-native fish species**

*All fish species are naturally reproducing and the Green provides valuable habitat. There is no creel or other data to indicate that the fish species in the Green River are anything but thriving under the current operating regime. What data we do have indicate that there may not be a significant impact in need of corrective management.*

**8) Whitewater releases do not cause significant fluctuation in the pool height of the Green River Reservoir.**

*It has been calculated that a 6 hour release of 283cfs would drop the pool height by approximately 3 inches assuming that there is no inflow to the reservoir. That is also what FERC calculated in their Environmental Assessment. This small fluctuation would have no impact on recreational use of the reservoir, loon nesting habitat, nor cause even a fraction of the erosion and shoreline disturbance that foot traffic causes during busy summer months from visitors and campers.*

**A few more useful resources:**

[Draft 401 Water Quality Certification for the Morrisville Hydroelectric Projects](#)

[Public Hearing Notice](#)

[FERC Environmental Assessment](#) (note that it recommends whitewater releases)

[AW Response to FERC Environmental Assessment](#)

[FERC eLibrary](#) (enter docket P-2629)

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February 5, 2016

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Watershed Management Division  
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Re: Response to Draft Water Quality Certification for the Morrisville Project. (FERC docket P-2629)

Dear Jeff,

Please accept these comments to the Vermont Agency of Natural Resources (ANR) concerning the Agency's Draft Water Quality Certification for the Morrisville Project, Green River development.

- As a dedicated whitewater paddler, I have enjoyed paddling on the Green River many times. It is a valuable whitewater run that has become central to New England's whitewater community. I was disappointed to see that the ANR's Draft Water Quality Certification illegally and incorrectly makes no allowance for scheduled whitewater releases, and would in fact have a severe negative impact on whitewater paddling on the Green River.
- Whitewater paddling is a recreational use of the Green that is protected under Vermont's Anti-Degradation policy. Any activity that degrades the Green's ability to support whitewater paddling is illegal.
- The ANR has mischaracterized the hydrology of the Green River and current proposed dam operations. The 7-8 whitewater releases per year that the boating community has requested are consistent with naturally occurring high-flow events.
- There is no evidence that periodic whitewater releases are harmful to aquatic habitat. Releases on the Deerfield and other rivers in the northeast have turned those rivers into veritable trout farms. None of the studies conducted on the Green indicate that periodic whitewater releases are harmful.

- Whitewater releases would not cause a significant or harmful fluctuation in the pool height of the Green River Reservoir. A 6-hour release at 283 cfs would drop the pool height by no more than 3 inches. The artificially high base flows prescribed by the ANR would actually have a much larger negative impact on reservoir pool levels.
- Whitewater boating opportunities will have a positive economic impact in the Morrisville area. Whitewater releases could draw 50 or more participants, who would support restaurants and other local businesses.

Clearly, the Agency of Natural Resources needs to reconsider their opposition to whitewater releases.

Respectfully

Your name here