

FEDERAL ENERGY REGULATORY COMMISSION
WASHINGTON, DC 20426
March 17, 2022

OFFICE OF ENERGY PROJECTS

Project No. 4678-052 – New York
Crescent Hydroelectric Project

Project No. 4679-049 – New York
Vischer Ferry Hydroelectric Project

New York Power Authority

VIA Electronic Mail

Mr. Robert Daly
Director of Licensing
New York Power Authority
Robert.Daly@nypa.gov

Reference: Comments on Draft License Application

Dear Mr. Daly:

Pursuant to 18 CFR § 5.16(c), this letter contains Commission staff's comments on New York Power Authority's (NYPA) December 22, 2021 draft license applications (DLA) for the Crescent Hydroelectric Project and Vischer Ferry Hydroelectric Project. Our specific comments on the DLAs are outlined in Appendix A. Please incorporate your responses to comments on the DLAs in the final license applications (FLA). We may request additional information at a later date regarding these projects.

Project Nos. 4678-052 and 4679-049

If you have any questions, please contact Jody Callihan at (202) 502-8278, or via e-mail at jody.callihan@ferc.gov.

Sincerely,

John B. Smith, Chief
Mid-Atlantic Branch
Division of Hydropower Licensing

Attachment: Appendix A – Comments on the Draft License Applications

APPENDIX A

Comments on the Draft License Applications

General

1. Sections 5.17(e) and 4.38(b)(2)(vi) of the Commission's regulations require that every application for a license for a project with a capacity of 80 megawatts or less must include in its application copies of statements of whether it is seeking benefits under section 210 of the Public Utilities Regulatory Policies Act of 1978 (PURPA). Neither draft license application (DLA) indicates whether NYPA is seeking PURPA benefits for the projects. Therefore, in the final license applications (FLA), please indicate if benefits are being sought under section 210 of PURPA; if so, provide the necessary documentation for doing so in accordance with section 4.38(b)(2)(vi) of the Commission's regulations.

Exhibit A

2. Although the project boundary in Exhibit G for the Vischer Ferry Project includes Lock E-7 of the Erie Canal, Exhibit A of the Vischer Ferry DLA does not describe Lock E-7.¹ Therefore, please provide a description (e.g., dimensions) of the lock in Exhibit A of the Vischer Ferry FLA.

In Section 3.2.1 of Exhibit E of the Crescent DLA, NYPA proposes to remove, from the current project boundary of the Crescent Project, certain portions of the Erie Canal, including Lock E-6 and the two guard gates (Guard Gate 1 and Guard Gate 2) located at the upstream end of Waterford Flight (upstream of Lock E-6). It appears that Lock E-6 and the guard gates are needed for project purposes at the Crescent Project. Lock E-6 is likely needed to maintain the impoundment and the guard gates are needed to protect the lock during flooding. Therefore, in the Crescent FLA, please include a description of Lock E-6 and the guard gates in Exhibit A and revise the project boundary in Exhibit G to include Lock E-6, Guard Gate 1, and Guard Gate 2.

3. Section 4.51(b)(1) of the Commission's regulations requires a description of the physical composition, dimensions, and general configuration of any dams, spillways, powerhouses, or other structures. In the FLAs, please provide a description of the projects' intakes and trash racks (e.g., dimensions).

4. Section 4.51(b)(4) of the Commission's regulations requires a description of the number, length, voltage, and interconnection of any primary transmission lines to be

¹ A unique Exhibit A, B, C, D, and F was filed in each DLA, but the same Exhibit E and Exhibit H were included in each DLA.

included as part of the project. In the FLAs, please provide a description (i.e., length, voltage, whether aboveground or underground) of the generator leads (i.e., transmission lines from the project generators to the switchyard) at each project.

5. Single-line diagrams are considered Critical Electric/Energy Infrastructure Information (CEII) and should be filed as such. Please file the single-line diagrams of the projects as CEII with the FLAs.

Exhibit B

6. The DLAs for the Crescent and Vischer Ferry Projects describe project operation during normal flow conditions. However, there is little description of how the projects are operated during high-flow conditions, beyond a statement that the projects are operated in close coordination with the New York State Canal Corporation. As such, it is not clear how the projects operate during high-flow conditions. Therefore, please describe how the projects are operated during high-flow or flood conditions and if the projects are shut down and if so, under what conditions.

7. Annual and monthly flow statistics and flow duration curves are provided for a relatively short period of record (POR), from January 1, 2011 through December 31, 2020, and are based on “daily average total station flows” at each project. In the FLAs, please describe how total daily station outflows were measured (or calculated) at each project and whether these flows included any water releases to support navigation on the Erie Canal (e.g., releasing water from the Crescent impoundment into the nearby Waterford Flight during the navigation season).² Also, please indicate if project-specific flow data exist prior to 2011 such that the flow statistics and flow duration curves provided in the FLAs can be based on a longer POR. If such flow data exist, or can be calculated, please update all flow statistics and flow duration curves in the FLAs based on a longer POR (ideally at least 30 years, to the extent such data are available). If such data are not available, please explain why the POR for project-specific flow data cannot be extended.

² The Waterford Flight consists of a series of five navigation locks (with a total lift of 169 feet over 2.5 miles) that allows vessels to bypass the 80-foot-high Cohoes Falls, which is located downstream of the Crescent Project. Water is occasionally released from the Crescent impoundment to support navigation through Waterford Flight.

Exhibit E

Aquatic Resources

8. Section 2.1.1 of Exhibit E states there are no anadromous fish species present at the projects. However, the anadromous blueback herring is seasonally present at both projects and throughout the Mohawk River. Therefore, please correct this statement in the FLAs.

9. Section 2.4 of Exhibit E states that in an email dated May 23, 2019, NYPA received concurrence from the New York State Department of State (New York DOS) indicating the Commission's licensing of the projects would not affect resources within New York's designated coastal zone because the projects are located outside of the coastal zone. Neither DLA contains a copy of this email correspondence. Therefore, in the FLAs, please provide a copy of this email correspondence from New York DOS.

10. Figure 4-4 shows the locations of Commission licensed or exempted hydroelectric projects on the Mohawk River. The projects in the lower portion of the Mohawk River—from Vischer Ferry to the confluence of the Mohawk and Hudson Rivers—are clustered together and difficult to distinguish from one another due to their close geographic proximity. Therefore, in the FLAs, please include a revised figure 4-4 that contains an expanded view of this area of interest, and include on the map, any non-hydropower dams that could affect fish passage in the vicinity of the projects.

11. Page 39 of Exhibit E states that the POR used to develop the annual and monthly flow duration curves for each project was January 1, 2013 through December 31, 2022. However, the flow duration curves presented in Exhibit B of each FLA indicate the POR used to generate the curves was January 1, 2011 through December 31, 2022. Please clarify this discrepancy in the FLAs and specify the POR for the flow data upon which the flow duration curves for each project are based.

12. Table 4-9 of Exhibit E indicates there are some large water withdrawals from the Vischer Ferry impoundment (exceeding 1.5 million gallons per day) by the Knolls Atomic Laboratory and the General Electric Plant in Schenectady, New York. In the FLAs, please describe the purpose of these withdrawals and indicate whether they represent consumptive withdrawals, whereby withdrawn water is not returned to the river, or non-consumptive withdrawals, whereby water is returned to the river at a similar rate to which it is withdrawn (e.g., for withdrawals used as cooling waters at industrial facilities).

13. Section 4.5.1.2.4 of Exhibit E states that downstream fish passage through the navigation locks (of the Erie Canal) for adult and juvenile blueback herring is likely variable based on the frequency of operation (of the locks) during the migration season.

Additional information on the frequency of lockages at Lock E-7 (at the Vischer Ferry Project) and Locks E-2, E-3, E-4, E-5, and E-6 (at the Crescent Project) would aid Commission staff's assessment of the extent to which these navigation locks provide passage opportunities for migratory fish species occurring at the projects, namely blueback herring and American eel. Therefore, in the FLAs, please provide, to the extent such information is available, data from the past 5 years on the frequency of lockages (e.g., typical number of lockages per day) at each of the navigation locks referenced above. Lockage data should be reported by year to account for potential changes in operation of the locks due to the global Covid-19 pandemic. Also, please provide, for each of the past 5 years, the starting and ending dates of the navigation season in this portion of the Erie Canal.

Terrestrial Resources and Threatened and Endangered Species

14. Section 4.8.1.1 of Exhibit E identifies the monarch butterfly (*Danaus plexippus*), which is a federal candidate species, as a species that may use habitat in the vicinity of the Crescent and Vischer Ferry Projects. However, table 4.31 indicates there are no known occurrences of this species at the projects. In the FLAs, please describe whether suitable monarch butterfly habitat is present at the projects and summarize any expected impacts of project operation and maintenance on this species.

15. The DLAs do not include any information on vegetation management at the project. In the FLAs, please describe your proposed vegetation management activities to support project operation and maintenance (e.g., tree removal or trimming), including a description of the locations where such activities are conducted and the specific methods used (e.g., mechanical or herbicide use).

16. As described in section 4.6.1.4.3 of Exhibit E, bald eagles are known to nest and forage in the vicinity of the projects, as well as other resident and migratory birds (as indicated in tables 2.24 and 4.32 of Exhibit E). Therefore, in the FLAs, please describe any mitigation measures currently being taken or planned, such as following the Avian Powerline Interaction Committee's or U.S Fish and Wildlife Service's guidelines to minimize impacts to bald eagles and other birds.³

Recreation Resources

17. Section 4.9.1.1.1.1 of Exhibit E describes both the FERC-approved project recreation sites and facilities, as well as non-project recreation sites available at the

³ The APLIC and FWS guidance documents are available at:
<https://www.aplic.org/mission> and
<https://ecos.fws.gov/ServCat/DownloadFile/104185?Reference=60102>.

Crescent Project, and section 4.9.1.1.1.2 describes the same for the Vischer Ferry Project. In the FLAs, please clarify each site's relationship to the project boundary (i.e., fully contained within the project boundary, a portion of the site is within the project boundary, or it is adjacent to the project boundary).

Cultural Resources

18. Section 4.10.1.2 of Exhibit E states that the inventoried historic architectural resources within or adjacent to the Crescent and Vischer Ferry Projects are listed in the May 3, 2019 Pre-Application Document. Please also include them in the FLAs, as well as any new properties identified through NYPA's updated search of the New York State Office of Parks, Recreation and Historic Preservation's Cultural Resources Information System (CRIS).⁴

19. Section 4.10.3 of Exhibit E states that because the Crescent and Vischer Ferry dams and their associated impoundments are contributing properties of the New York State Barge Canal National Register Historic District, which was designated as a National Historic Landmark in January 2016, project elements are covered under an Historic Properties Management Plan (HPMP) that is in development for the New York State Barge Canal National Historic Landmark. In the FLAs, please describe the status of this HPMP and whether it has been completed and approved or if it is still being developed. If it is complete, please provide a copy of the document with the FLAs. If it is not complete, please provide a timeframe for expected completion.

Tribal Resources

20. Section 4.12.1 of Exhibit E states there are several known properties of traditional cultural significance (i.e., traditional cultural properties or TCPs) or religious properties or National Register-eligible sites associated with Native American nations within the boundaries of the Crescent and Vischer Ferry Projects. In the FLAs, please clarify that these sites are discussed in section 4.10 *Cultural Resources*, and if not, please provide a description of them either in section 4.12 *Tribal Resources*, or section 4.10 *Cultural Resources*. If the information surrounding these sites is sensitive, please provide at least a basic description of the sites and their general location.

21. Section 4.12.1 of Exhibit E states that NYPA consulted with the St. Regis Mohawk Tribe for the relicensing of the Crescent and Vischer Ferry Projects, but also contacted the Stockbridge Munsee Community, the Delaware Tribe, the Mohawk Nation,

⁴ CRIS (<https://cris.parks.ny.gov>) is a Geographic Information System program that provides access to New York State's historic and cultural resource databases and digitized paper records.

and the Mohican Tribe. The DLA does not, however, indicate whether NYPA received any responses from these Tribes. In the FLAs, please clarify if responses were received from the Stockbridge Munsee Community, the Delaware Tribe, the Mohawk Nation, and/or the Mohican Tribe and, if so, summarize those responses.

Exhibit G

22. Section 4.41(h) requires that Exhibit G includes: (1) project boundary data in a geo-referenced electronic format (i.e., ArcView shape files or similar format); (2) electronic boundary data that is positionally accurate to ± 40 feet; and (3) a text file describing the map projection used for the Exhibit G data. The Exhibit Gs filed with the DLAs do not include this information; therefore, please file, with the FLAs, Exhibit G maps that provide this information.

23. Section 4.41(h) of the Commission's regulations require Exhibit G maps to identify by legal subdivision, lands that are owned or planned to be acquired in fee by the applicant, and lands over which the applicant has acquired or plans to acquire rights to occupancy and use (e.g., easement, lease). In the FLAs, please include Exhibit G maps that distinguish lands owned or planned to be acquired in fee by the applicant from those lands over which the applicant has acquired or plans to acquire rights to occupancy and use.

24. Section 4.39 of the Commission's regulations require Exhibit G maps to be stamped by a registered land surveyor and contain true and magnetic norths. Please include the required stamp and both true and magnetic norths on the Exhibit Gs filed with the FLAs.

Exhibit H

25. The Exhibit H filed for the projects does not include information on NYPA's need over the short- and long-term for the electricity generated by the projects [section 5.18(c)(1)(i)(B) of the Commission's regulations], the reasonable cost and availability of alternative sources of power [5.18(c)(1)(i)(C)], and a comparison of the impact on the operations and planning of the NYPA's transmission system of receiving or not receiving licenses for the projects [section 5.18(c)(1)(i)(F)]. In addition, Exhibit H lacks a statement of the measures taken or planned by NYPA to ensure the safe management, operation, and maintenance of the projects, as required by section 5.18(c)(1)(ii)(B) of the Commission's regulations. Therefore, in the FLAs, please file an Exhibit H that provides all of the information required by sections 5.18(c)(1)(i)(B), 5.18(c)(1)(i)(C), 5.18(c)(1)(i)(F), and 5.18(c)(1)(ii)(B) of the Commission's regulations.



**New York State
Parks, Recreation and
Historic Preservation**

KATHY HOCHUL
Governor

ERIK KULLESEID
Commissioner

December 29, 2021

To: Kimberly D. Bose, Secretary
Federal Energy Regulatory Commission
888 First St. NE
Washington, DC 20426

Re: Vischer Ferry Hydroelectric Project (FERC No. P-4679-049) Draft License Application

Dear Secretary Bose:

Thank you for the opportunity to comment on the above referenced project. OPRHP submits the following comments for your consideration.

New York State facilities that are directly or indirectly adjacent to the project area include Mohawk River State Park and Rexford Aqueduct State Historic Site. Neither is cited in the Draft License Application.

The Application does discuss the NYS Canalway's Lock 7 Boat Launch, located within the NYPA project area. It notes that the launch and associated parking lot are not ADA-compliant (p. 142), and that one launch lane is closed due to erosion and settlement of its concrete planks. However, there are no proposed improvements to the launch as part of this relicensing. In addition to boating activities, the Lock 7 Boat Launch parking area is used for parking and trailhead access to the OPRHP Mohawk River State Park and the Mohawk-Hudson Bike Trail. Please consider including appropriate upgrades to this facility as part of the project.

Please don't hesitate to contact me at diana.carter@parks.ny.gov or (518) 474-8288 if you have any questions or need clarification.

Sincerely,

Diana Carter
Assistant Division Director for Planning and Analysis
Alternate State Liaison Officer

Cc via email: Alane BallChinian, OPRHP, Saratoga-Captial District
Tana Bigelow, OPRHP, DESP Planning and Analysis Bureau
Shari Carlnero, OPRHP, Counsel's Office
Kurt Kress, OPRHP, Hudson Valley Capital District
Rob Daly, NYPA, Licensing

NEW YORK STATE DEPARTMENT OF ENVIRONMENTAL CONSERVATION

Division of Environmental Permits

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April 1, 2022

VIA ELECTRONIC FILING

Kimberly D. Bose
Secretary
Federal Energy Regulatory Commission
888 First Street NE, Room 1a
Washington, DC 20426

RE: Comments on Draft License Application
Crescent Vischers Ferry Hydroelectric Projects (FERC No. 4678 and 4679)
Mohawk River
Schenectady, Saratoga and Albany Counties

Dear Secretary Bose:

The New York State Department of Environmental Conservation ("NYSDEC" or "Department") is providing the following comments on the December 2021 Draft License Application (DLA) submitted by the New York Power Authority ("Applicant") for relicensing the existing Crescent and Vischers Ferry Hydroelectric Projects, FERC No. 4678 and 4679 (the "Project") located on the Mohawk River.

The NYSDEC provides the following comments:

Exhibit A, Vischers Ferry.

Section 2.1.1 Project Dam: Please describe the substrate of the bottom of the headrace channel.

Table 2-2: Please include the Turbine Design Head with and without flashboards

Exhibit B, Crescent

Section 3.3 Project Hydrology; it is unclear why only 10 years of flow data (January 2011 to December 2020) is being used. Please provide reasoning.

Exhibit E Crescent and Vischers Ferry

Section 3.1.3 Project Operations, Crescent Project, page 14 states, after describing the minimum flow regime for the project, that "these flows are for fish protection measures." This seems contradictory to the statement above which indicates that the minimum flows provide are for navigation, please clarify.

Section 4.1 Cumulation effects state "FERC indicated in SD2 that based upon review of the PAD and preliminary staff analysis, it identified water quality and diadromous fishes (including blueback herring and American eel (*Anguilla rostrata*), as having the potential to be cumulatively affected by the continued operation and maintenance of the Crescent and Vischer Ferry Projects in combination with other hydroelectric projects and activities in the Mohawk and Hudson River Basins". It's unclear from this statement if FERC will conduct its NEPA analysis.



Department of
Environmental
Conservation

Please clarify if FERC is proposing to conduct its NEPA analysis considering water quality and diadromous fishes cumulative impacts including direct, indirect and cumulative?

Section 4.4.1.1.2 It's unclear why the Applicant is using only 10 years worth of data for determining annual monthly minimum, mean, and maximum flows. Please clarify if more data is available. If so that should be included in the FLA so there is a longer period of record.

On Page 68, the applicant states that *"DO levels in the Project areas are influenced by natural aquatic plant production and organic processes in the Project impoundments as evidenced by the large daily fluctuations observed in the Project forebays and downstream"*. In the previous sentence the applicant states that *"both of the brief excursions below the instantaneous standard were likely the result of the respiration effects of the vast amounts of aquatic vegetation (mostly water chestnut (*Trapa natans*)) found in the Mohawk River at the Crescent Project"*. Please revise this statement to make a distinction between native aquatic plants and invasive aquatic plants. Water chestnut, an invasive out competes submergent and emergent native plants. NYSDEC suggests that a discussion of invasive species management and an aquatic invasive species control plan be included in the FLA to address the effects of water chestnut on DO levels in the project area.

On Page 77 The eel study only targeted juvenile eels migrating up the Mohawk River but it did not target mature eels moving down the Mohawk River. Other methods could have been implemented to target mature eels.

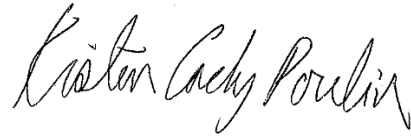
Page 85 states " The study looked specifically at juvenile blueback herring survival rates through the Kaplan turbine unit and over the spillways. The study was completed using a tag-recapture technique. Survival was estimated to be $96 \pm 6.7\%$ through a Kaplan turbine and $88.3 \pm 10.7\%$ over a spillway associated with a low-head hydro dam." Please confirm that the 96 % survival is for the turbine and 88% is over the spillway.

On page 90 the applicant states that they found freshwater mussels during their 2020 mesohabitat study. A drawdown management plan / freshwater mussel protection plan should be included in the FLA to ensure that the mussel communities are not affected by drawdowns and fluctuations caused by the projects.

On Page 91 *"A study of the American eel conducted by the Power Authority in 2021 found no evidence of upstream migrating juvenile eels, or of more mature yellow or silver eels at the Projects. Because the numbers of eels occurring at the Projects are so small, continued operation of the Projects will have no adverse effects on American eel in the lower Mohawk River"*. Dams certainly effect the migration of eels upstream and downstream and are a major reason why eels are not seen in their historic ranges. The statement made by the applicant claiming that *"the projects have no adverse effects on American Eels"* is false. There is evidence of eels upstream of the projects, and the applicant indicates that *"data support that while American eel are likely in the vicinity of the Projects, they are uncommon"* (page 81 Exhibit E). In general, dams are detrimental to eel migration. Crescent and Vischer Ferry dams aren't the first impassable barriers on the Mohawk River so there aren't large groups of eels trying to climb these facilities, like there are at the Federal Dam in Troy, but an eel ramp is being installed at the Federal dam in Troy in order to get more eels above the dam. This means there will be more eels trying to migrate within the Mohawk river system in the future. Please modify the statement regarding no adverse effects.

NYSDEC appreciates the opportunity to review and comment on the Draft License Application. If you have any questions or would like to discuss further, please feel free to contact me at Kristen.Cady-Poulin@dec.ny.gov.

Sincerely,

A handwritten signature in black ink that reads "Kristen Cady-Poulin". The signature is written in a cursive, flowing style.

Kristen Cady-Poulin
Environmental Analyst
Energy Bureau Management
Division of Environmental Permits

ecc: M. Porter, NYSDEC
C. VanMareen, NYSDEC
J. Wiley, USFWS
A. Ramirez, USFWS



United States Department of the Interior

FISH AND WILDLIFE SERVICE

3817 Luker Road
Cortland, New York 13045



May 4, 2022

Robert Daly, Licensing Director
New York Power Authority
123 Main Street
White Plains, NY 10601
rob.daly@nypa.gov

Via FERC e-File

**RE: Crescent Hydroelectric Project (Project No. 4678-052)
Vischer-Ferry Hydroelectric Project (Project No. 4679-049)
Updated Study Report and Draft License Application**

Dear Robert Daly:

The U.S. Fish and Wildlife Service (Service) has reviewed the February 17, 2022, Updated Study Report (USR) and March 23, 2022, Draft License Application (DLA) from the New York Power Authority (Applicant) for the Crescent and Vischer Ferry Hydroelectric Projects (Project or Projects, collectively) (Project Nos. 4678 and 4679, respectively), located on the Mohawk River in Saratoga, Albany, and Schenectady counties, New York. The Service is providing additional information pertaining to American Eel (*Anguilla rostrata*), below.

2021 Applicant Eel Study

The Applicant did not observe American Eel during a 2021 eel study at the Projects. The Applicant utilized stationary eel traps, nighttime observations, and nighttime electrofishing techniques. The Applicant states in the DLA that because no eels were observed at the Projects, the number of eels occurring at the Projects is likely small; therefore, the operation of the Projects has no adverse effects on the American Eel.

2021 USGS eDNA Study

In addition to the effort conducted by the Applicant in 2021, the U.S. Geological Survey conducted an environmental DNA (eDNA) study in segments of the Hudson River, Mohawk River, and New York State Barge Canal to identify the presence of American Eel in the study area.¹ The study found that American Eel eDNA was detected below both the Crescent and the

¹ George, S.D., Baldigo, B.P., Rees, C.B., Bartron, M.L., and Winterhalter, D.R. 2022. Environmental DNA and

Vischer Ferry Project dams (Enclosure A). The detection of eel eDNA was strongest below the first barrier at the Green Island Project (Project No. 13) dam, as would be expected. Above Green Island, detections dropped by an order of magnitude in the Hudson River and confluence with the Mohawk River. Detections subsequently declined within the Waterford Flight of the New York State Barge Canal and in the Mohawk River upstream of the confluence. At the time of the study, none of the barriers in the study area provided upstream eel passage facilities; therefore, it is not unexpected to see strong declines in American Eel detection above subsequent barriers in a river system.

American Eel in the Mohawk River

The positive American Eel eDNA detections at the Projects confirm our understanding that a small population of eels exists in the vicinity of the Projects. The Projects obstruct the upstream migration of American Eel, once historically abundant upstream of the Projects, and can cause mortality and injury during downstream migration. The Service expects an increased occurrence of American Eel in the vicinity of the Projects during the new license terms. The Green Island Project is required to provide upstream passage and downstream protection for American Eel and has begun an interim upstream passage effort for 2021 until the final facilities are constructed.² The New York State Dam Project (Project No. 10457), the first barrier on the Mohawk River where regular detections of eel eDNA occurred in 2021, will be relicensing during the first quarter of the new license terms. The Service will evaluate potential upstream and downstream fish passage measures, including measures for American Eel, at the Projects during the development of our fishway prescription during this relicensing.

Thank you for the opportunity to comment on the USR and the DLA. In order to address substantive concerns in the DLA proposals, we encourage the Applicant to engage in settlement negotiations with all stakeholders to address the outstanding resource issues at the Projects, including fish passage and protection, water quality, and recreation. If you have any questions or desire additional information, please contact John Wiley at john_wiley@fws.gov, or at 607-753-9334.

Sincerely,

David A. Stilwell
Field Supervisor

Enclosure

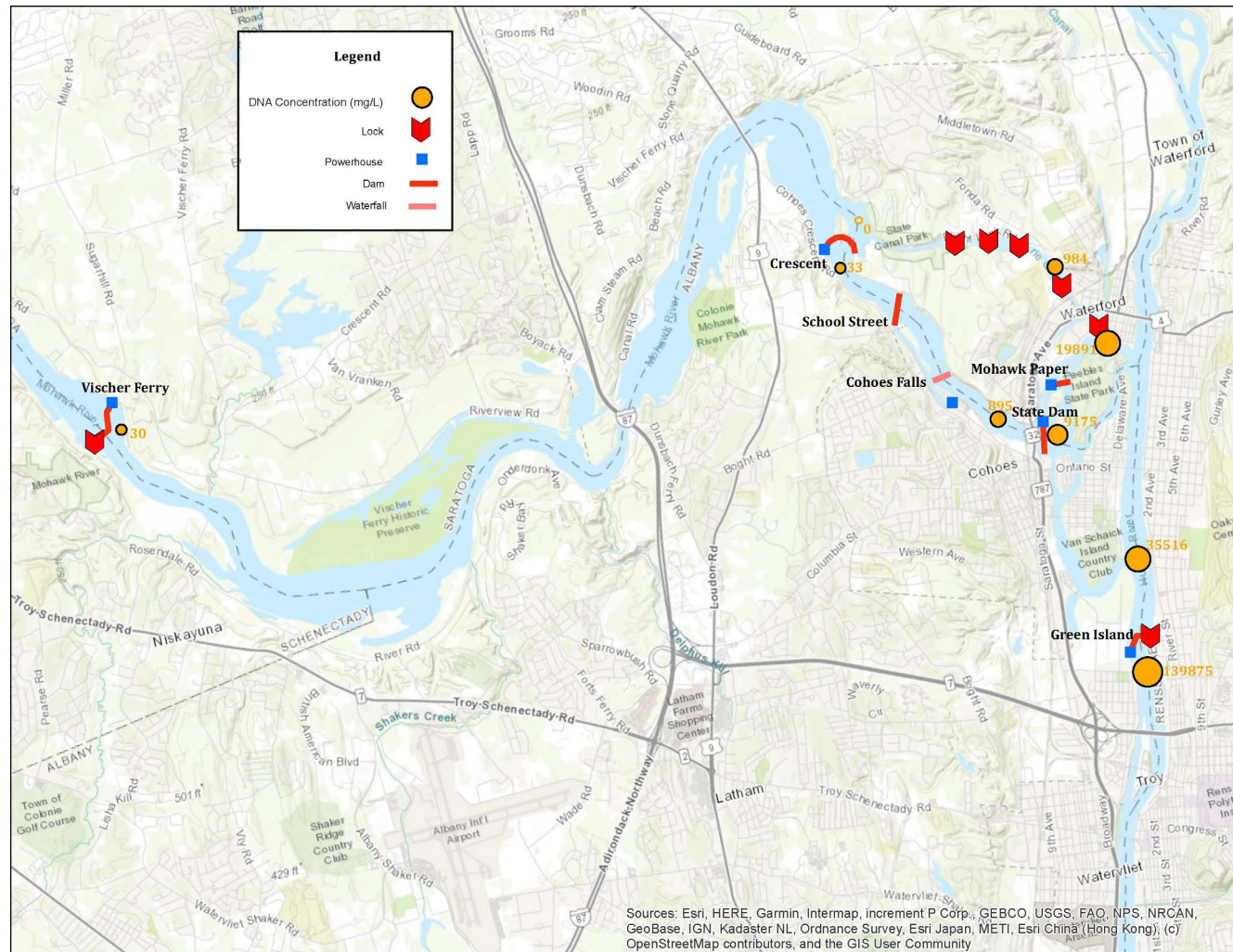
cc: J. Epstein, jepstein@riverkeeper.org

electrofishing data for American Eel in the Mohawk and Hudson River Watersheds: U.S. Geological Survey data release. <https://doi.org/10.5066/P9UGE0CF>.

² FERC Accession No. 20220411-3007.

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electrofishing data for American Eel in the Mohawk and Hudson River Watersheds: U.S. Geological Survey data release. <https://doi.org/10.5066/P9UGE0CF>.