



Thames Valley Chapter Newsletter

Stream Lines

"The Voice for Eastern CT Trout and Salmon Anglers"

May 2015

Dear John,

Considering only one person raised their hand at the last meeting a turnout of 14 members was a great start for our first fishing trip of the year on May 3rd at the Natchaug River Trout Park. Although the river was recently stock, the hatches were very sparse and the trout had a slight case of lockjaw, but we managed to catch a few fish. Of course, the "Midge Master" (aka George DeGray) managed to entice about a dozen fish to his offerings. A "special shout-out" to Jenn Miner and Duke Preston for providing lunch for all the participants. Check out the website for photos of trip. The next scheduled trip is to the Farmington River on June 13th. This outing will be headed up by the Mianus Chapter. If you're interested, please sign-up or contact me by Memorial Day, so that I can provide Mianus with a head count. See the website and newsletter for details... it should be great time. I don't fish the Farmington much and it will be a learning experience for me. Depending on your plans we can carpool if you'd like. Also, if you're interested in a fishing trip to the Housatonic in September please sign-up at the meeting or contact me so I can provide details when I get back from my annual pilgrimage to YNP.

May has been the start of many events such as the Yantic & Moosup River clean-ups and stocking is in full swing. On the youth educational front we were involved with the release of trout raised at one of our TIC schools Westside Middle School (Groton). 85 students participated in the release, fly casting, and bio-assessment at the Eight Mile River in Devil's Hop Yard State Park. In addition, we teamed up with the Hammonasset Chapter, CARE, and No Child Left Inside at the Gay City State Park in Hebron for May 9th's CT Free Family Fishing Day. Activities included fishing, fly casting, fly tying, fishing stocking, fish fry and other fun activities for young and old. This month's meeting (19 May) with Steve Gephart should shed more light on the Shetucket River water flow situation. Right now it looks like it looks like it may be some time before the issue is settled. And May 30th and 31st we will be attending the Northeast Regional TU Conference in Providence, RI. If you're interested in learning what TU is doing on at the regional/national level, consider registering and attending the conference. If you are thinking of becoming more involved with the TVTU chapter, please contact me or Jim Smith for the possibility of covering your conference fees. Please visit the TU.org website for more details; www.tu.org/get-involved/national-events/2015-northeast-regional-meeting.

As you can see we could use more volunteers to assist or head-up the many events and projects we have currently planned and for the future. As I have said before the Chapter is only as good as its membership involvement. There is so much we could do, but resources and especially volunteers limit our reach. So again, I appeal to you to give up a just few hours of your time to make our chapter better and help improve our watersheds.

See you at The Moose! (Actually I won't be there this month... but I will be in spirit)

John Preston, *President*



Thames Valley TU, Chapter 282 jpreston44@yahoo.com



Calendar of Events

Tuesday May 19th - 6:00 pm

Chapter Membership Meeting, Moose Lodge, Bozrah CT

Steve Gephard - "Diadromous Fish Restoration in the Shetucket River"

Saturday May 30th & Sunday May 31st

Northeast Regional TU Conference, Providence, RI

Friday June 5th & Saturday June 6th

Annual Shetucket River Campout and Breakfast

Salt Rock State Park - Rte 97 Sprague

Saturday June 13th

Farmington River Fishing Trip & BBQ

(Details TBD)



April Membership Meeting Recap...

Fly Fishing Yellowstone National Park

by John Preston

What can I say the speaker ran a little long but wasn't he terrific! Just kidding... Instead of my usual recap I thought I would provide some of the information I mentioned and more information on the impact of the Lake Trout on the Cutthroat Trout in Yellowstone Lake that I didn't dwell on. Here is the information I recommended and forgot to provide copies for the audience:

Recommended Books:

- The Yellowstone Fly-Fishing Guide (Matthews & Molinero) - Everything you need to know about fishing the waters of YNP.
- Fishing Yellowstone Hatches (Juracek & Matthews) - Highly recommended.
- Fly Patterns of Yellowstone (Matthews & Juracek)
- Fishing Yellowstone National Park (Richard Parks)
- Fly Fishing YNP: 50 Best Places (Nate Schweber)

Fly Shops:

- Blue Ribbon Flies (West Yellowstone, MT) - Great shop and very helpful.
- Parks Fly Shop (Gardner, MT)

Online Sources:

- <http://www.nps.gov/yell/index.htm> - The Yellowstone NP website
- <http://www.parksflyshop.com/index.html> - They have very informative Hatch Charts and detailed information on flies, rivers and trip planning.
- <http://www.blue-ribbon-flies.com>
- <https://www.youtube.com/watch?v=DY9Olg03SI8> - YNP Video (34 min.) Sometimes words can't describe how wonderful this first National Park really is like.

Yellowstone Lake Information (Lake trout impact): These two links will provide a wealth of information on how the introduction of Lake Trout into the Yellowstone Lake has decimated the native species... the Yellowstone Cutthroat.

- <http://idahotrout.org/yellowstone-cutthroat-trout/> - Idaho TU Council presents just about all the information one can imagine on the Yellowstone Lake situation..
- <http://www.youtube.com/watch?v=ATb5wUNxlbq> - This is a 9 1/2 minute video describing the blight of the Yellowstone Cutthroat and what is being done to save them from extinction. And you'll get a tiny glimpse of this beautiful national park.

Please consider contributing to Saving the Yellowstone Cutthroat. www.ypf.org/site/RedirectHandler?key=SaveTheTrout



TVTU Annual Shetucket River Campout & Breakfast

What: Campout, Breakfast, Casting Contest, and Fishing!

When: Friday June 5th, Camping & Fishing (starts 12-noon)
Sat June 6th Breakfast Served (7:30am-10:00)

Where: State of CT Salt Rock Campground
173 Scotland Road (Rte 97), Sprague, CT

Breakfast Menu

Pancakes, French toast, Sausage, Home Fries, Eggs to order, Orange Juice, Donuts and more...

*Fly Casting Contest after breakfast, with Prizes!



New Women's Initiative Newsletter Launched

TU's Women's Initiative was launched in 2011 to address the concern that only 6% of all TU members were women, while at the same time women made up 36% of all anglers in the U.S.

Early on, volunteer leaders and staff developed the initiative's mission: To create effective strategies and programs to recruit more women in TU, encourage more women to accept leadership roles at the chapter, state, and national levels, and ensure every chapter creates a welcoming environment for women members to achieve the stated TU conservation mission.

Since the initiative was started, over 10,000 more women have joined TU - a 25% increase in women membership!

The new Women's Initiative Newsletter "On the Rise" is designed to share the best practices and lessons learned by your fellow volunteers in recruiting, retaining and engaging women in TU and in leadership roles.

[Click here to read the inaugural issue of "On the Rise"](#)



Trout in the Classroom (TIC) - Trout Fry Release

by John Preston

**TIC - Westside Middle School, Groton, CT - Trout Release
Devil's Hop Yard State Park - 7 May 2015**

85 Westside Middle School students of TIC teacher Martha Parker released 128 trout that they had raised from 200 eggs they received in November 2014. You could see from the faces of the students there was mixed emotions of joy, pride and anxiety as they released their "babies" into the cool water of the Eight Mile River. Students later took part in some stream assessments with Patricia Young, Program Director of the Eight Mile River Watershed; a hike led by Rob Smith (former Park Manager) to the falls and nature trail; and, a little fly casting instruction from TVTU volunteers (Charley, McCaughtry, John Manfred & John Preston). Great students and a delightful spring day for learning and fun. Visit the TVTU website for more photos and information about TIC. [Visit our Website](#)





Fly of the Month

"Olive X- Caddis"

Video and tying by Matt Grobert, Tightlines Productions

The X-Caddis is the brainchild of Craig Mathews from Blue Ribbon Flies in West Yellowstone, Montana. It's a simple and effective caddis pattern that's relatively easy to tie, even in small sizes. Try the X-Caddis in different colors and sizes to match the naturals. It's just an all around great pattern... it is a killer during the Green Caddis hatch this time of the year on the Shetucket River. [Link to tying video](#)

Fly Tying Recipe: Olive X-Caddis

Hook: Standard dry-fly hook (e.g. Dai-Riki #305), sizes 12-16.
Thread: Olive, 6/0.
Shuck: Olive Zelon.
Body: Olive dubbing (rabbit/Antron blend).
Wing: Natural deer hair, cleaned and stacked.
Head: Deer-hair butts.



Scotland Dam Update Shetucket River

Run of River Flows challenged by FirstLight Power

By TVTU Conservation Committee

CT DEEP responds to FirstLight Power and denies request to evaluate fish passage design until run of river flows are resolved.

Robert Hannon, Supervising Environmental Analyst with the CT Department of Energy and Environmental Protection (DEEP) sent a letter to FirstLight Power Resources indicating that DEEP will not evaluate FirstLight's proposed fish passage design until the run of river operations are resolved and is recommending that FirstLight request an extension from the Federal Energy Regulatory Commission (FERC) relative to submitting fish passage plans. The fish passage plans are a requirement of the FERC license issued to FirstLight in November 2013.

After a meeting with DEEP on May 5th 2014, DEEP agreed to allow FLPR to operate flows at a modified pond and release schedule between the licensing time, Nov 2013, and until the low flow turbine was to be installed by the due date of Nov 2016. At a subsequent meeting on May 5th, 2015 FirstLight notified DEEP it would not be able to install a low flow turbine and considered its current modified operations consistent with run of river operations meeting the requirements of the license agreement. DEEP, USFWS, and NOAA have all voiced strong opposition to FirstLight's position.

FirstLight is claiming that .50 feet of headpond elevation provided in the license as a buffer to allow for fluctuations for rain, wind, etc., gives them the ability to pond and release for power generation. Keep in mind, 6" of water elevation on the reservoir above the dam is a great deal of water. DEEP stated that information

originally provided by FLPR in the license application for Scotland Dam is, at a minimum, inaccurate given the existing set of circumstances surrounding the Project. Therefore DEEP intends to initiate a review of FirstLight's 401 WQC application and determine whether or not the 401 WQC should be revoked.

FirstLight went to Washington D.C. for a Meeting with FERC on May 4th, 2015. No meeting minutes were taken as part of this meeting. FERC Staff told the TU Conservation Committee that the meeting was merely informative in nature, and that FERC has no actions to take in regards to the DEEP letter 1) because the meeting with FERC was "one-sided" and CT DEEP was not present to provide input. 2) FERC does not need to look into any issues further until CT DEEP makes a ruling on the WQC. 3) FirstLight stated at the meeting that they were still in negotiations with CT DEEP.

FERC stated that there are no plans to revoke Firstlight's operation because of their non-compliance, and they are also not considering other qualified applicants whom may be able to reach the T&Cs. FERC stated that there goal is to "work with FirstLight to get them into compliance", and that revoking or transferring the FERC License "is not a foreseeable option at this time."

Stayed tuned for future updates as they become available and join us at the next membership meeting on Tuesday May 19th for additional discussion. The IDEEP letter can be viewed in its entirety below.

CT DEEP Letter to FirstLight Power Regarding Scotland Dam Run-of-River Flows

- 2 -



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In the matter of

FERC Project No. 2662
FirstLight Power Resources
Scotland Hydroelectric Project
Shetucket River
COMMENTS ON FISH PASSAGE DESIGN PLANS

Rich Laudanat
FirstLight Power Resources
143 West Street, Suite E
New Milford, Connecticut 06776

Dear Mr. Laudanat:

You requested that the Department of Energy and Environmental Protection (DEEP) submit comments to FirstLight Power Resources (FLPR) and the Federal Energy Regulatory Commission (FERC) regarding the design of upstream and downstream fish passage at the Scotland Dam, as stipulated in conditions of the 401 Water Quality Certification (WQC) under the Clean Water Act and FERC license. DEEP had been preparing such comments based on many weeks of consultation and review. However, such review was based on the assumption that the Project would be operated as instantaneous run-of-river and include the operation of a low flow turbine. Due to FLPR's proposed changes in operation, as described in the body of this letter, DEEP cannot effectively evaluate the suitability of the proposed fish passage designs. Until the run-of-river aspect of this Project is resolved, it is pre-mature to consider finalizing plans for the design and construction of the fish passage. There are too many variables surrounding the Project that currently make the design and construction of effective fish passage facilities a speculative endeavor at the Scotland Dam. We recommend that FLPR request an extension from FERC relative to submitting fish passage plans.

With respect to the instantaneous run-of-river issue, we believe the following facts are relevant and noteworthy:

1. On November 1, 2013, FERC issued a new license for the Scotland Project that included ordering paragraph E:

"(E) This license is subject to the conditions submitted by the Connecticut Department of Energy and Environmental Protection under section 401(a)(1) of the Clean Water Act, 33 U.S.C. § 1341(a)(1) (2012), as those conditions are set forth in Appendix A to this order."

2. Special Condition 1 of DEEP's 401 WQC states that:

"The permittee shall operate the project in an instantaneous run-of-river mode, maintaining the headpond at elevation 126.27 feet USGS datum (±0.25 feet)."

3. Upon issuance of the license, DEEP notified FLPR that it expected instantaneous run-of-river (ROR) operation. FLPR met with DEEP staff in Hartford on May 16, 2014 and explained that it could not comply with that part of the license articles and still generate electricity most of the time without a new low flow turbine. Therefore, DEEP agreed to allow FLPR to operate at a modified pond-and-release mode during the time between licensing and the time the low flow generator would be installed in November of 2016. Changes were made to the flashboards to result in smaller headpond fluctuations during this interim period, but the tailwater fluctuations remain significant.

4. Recently, DEEP has been in consultation with FLPR and the U.S. Fish and Wildlife Service (USFWS) about the design of upstream fish passage at the Scotland project. During a March 25, 2015 meeting, FLPR changed its position from May 2014, and announced that it would not be installing a low flow turbine (due to cost) and considered its current operation consistent with ROR operation and license requirements. Representatives from DEEP, USFWS and NOAA voiced strong opposition to FLPR's assessment that its current operation was consistent with instantaneous ROR license conditions. It is the stated intention of FLPR to continue to operate in this manner indefinitely, regardless of the lack of a low flow turbine. FLPR based its claims solely on the reduced fluctuation of the headpond elevation and compliance with the stipulated headpond elevations, as stated in the WQC, without any consideration of tailwater fluctuations. Figure 1 (attached) depicts two sample hydrographs from a downstream U.S. Geological Survey (USGS) water gage on the Shetucket River. The top one is from 2010 when the Project was operated under its previous license which allowed store-and-release. The bottom one is from earlier this year when the Project is operating under its current "modified" mode. While there may be a difference in the headpond elevation, there are no discernable differences downstream between the 2010 hydrograph and the 2015 hydrograph, other than perhaps periodicity.

Figure 2 (attached) depicts a hydrograph of an upstream USGS water gage in 2015 on the Shetucket River. If the lower hydrograph of Figure 1 (measured below Scotland) is compared with the hydrograph in Figure 2 (measured above Scotland), it is apparent that during the time period of March 21 and 27, 2015 when the project was generating, the streamflow rate ranged from 800 to 1,000 cfs, while the flow rate below Scotland ranged from 350 to 1,500 cfs. This does not comply with the requirement of instantaneous ROR, whereby outflow from the project equals inflow to the project.

5. With regard to the WQC-stipulated headpond elevation range of ± 0.25 feet, we note that such a range was never intended to allow for a 0.50 foot reservoir for storage-and-release but rather this range was offered in recognition that due to wind, waves, and short-term rain events water surfaces typically experience constant oscillations. It was not expected that the FLPR would be able to keep a large impoundment surface precisely at 126.27 feet nor should FLPR be required to turn on and off its turbine to maintain such a precise elevation. Therefore, this range was offered as an acceptable fluctuation within ROR operation, which had already been defined without any linkage to headpond elevation.
6. FLPR stated that its position on flow management and interpretation of ROR is no different than what they had previously identified. However, the final license application that FLPR filed with the FERC made clear that the Project would be operated in an instantaneous run-of-river mode, whereby inflow equals outflow on an instantaneous basis and the pond would not be drawn down for the purposes of generation. Relevant excerpts include:

Page A-1 (iii)

"...FirstLight is proposing to change the mode of operation to run-of-river..."

Page E-14, 4.4 Summary of Proposed Operational Changes

"...FirstLight proposes to modify Project operations by converting...to a run-of-river operation, whereby inflow equals outflow on an instantaneous basis."

Page E-19 5.1 Summary of Proposed Measures and Proposed Implementation Schedule

"...FirstLight proposes to convert the Scotland Project...to run-of-river, whereby inflow equals outflow on an instantaneous basis."

Page E-22

"This mode of operation is expected to minimize the potential for shoreline erosion...due to limiting headpond fluctuations and maintaining run-of-river flows below the dam."

Page E-25 Environmental Impacts and Recommendations, Proposed Operation

"...FirstLight proposes to modify Project operations by converting...to a run-of-river operation, whereby inflow equals outflow on an instantaneous basis. The hydrologic regime below the Scotland Dam under the proposed run-of-river operation will mimic the natural inflow hydrologic regime on an instantaneous basis."

Page E-28 Cumulative Impacts

"FirstLight's proposal to convert to run-of-river operation will provide...a more stable hydrologic regime (i.e., matching natural inflows). This mode of operation will prevent short-term fluctuations of flows in the Project's impoundment as well as downstream to the upstream extent of the Occum Dam headpond."

Page E-41 Environmental Impacts and Recommendations, Run-of-River Operation

"The conversion to run-of-river will improve the hydrologic regime below the Scotland Dam by mimicking natural inflows on an instantaneous basis."

- Anecdotally, in FLPR's August 2007 Pre-Application Document to FERC, the FLPR stated, "In short, operating the existing unit under run-of-river operations would result in spilling water a high percentage of time." That statement was based on a minimum turbine operating range of 450 cfs, not 600 cfs as calculated in 2013, or 900 cfs as calculated in 2014.
- In reliance upon FLPR's proposal both to upgrade the existing facility with a low flow turbine and to operate the facility in an instantaneous ROR mode, DEEP dropped its requirement that the FLPR conduct in-stream flow, thermal refuge and recreational studies. If DEEP had considered allowing the project to operate without the low flow turbine and the instantaneous ROR mode, it would have adopted a different position on the need for these and possibly other studies and conditions.

The information originally provided in the FLPR license application for the Scotland Dam is, at a minimum, inaccurate given the existing set of circumstances surrounding the Project. Therefore, DEEP, pursuant to the Section 5 of the General Terms and Condition section of the 401 WQC as demonstrated by the operational changes and inconsistencies referenced above, intends to initiate a review of FLPR's 401 WQC application and determine whether or not the 401 WQC should be revoked.

Respectfully submitted,



Robert J. Klee
Commissioner
Department of Energy & Environmental Protection
79 Elm Street
Hartford, CT 06106-5127

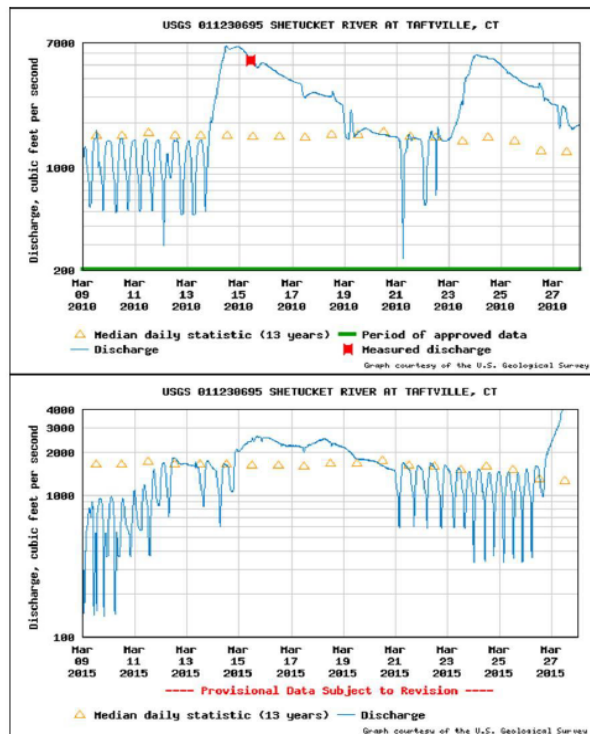
Therefore, based upon both the cumulative written record of the FLPR license and the oral representations made by the FLPR to DEEP on March 25, 2015, DEEP has concluded that the FLPR is operating and is proposing to continue to operate the Scotland Dam in a manner that is significantly and materially different than the requirements specified in its FERC license and State 401 WQC and their stated intent.

Furthermore, the 401 WQC issued to FLPR under the Clean Water Act, dated May 5, 2012, contains a section entitled GENERAL TERMS AND CONDITIONS. Section 5 of said 401 WQC makes reference to "Reliance on Application." More specifically, this section states: "In evaluating the permittee's application, the Commissioner has relied on information provided by the permittee. If such information subsequently proves to be false, deceptive, incomplete or inaccurate, this certificate may be modified, suspended or revoked."

The circumstances surrounding both the current and proposed operation of the Scotland Dam is significantly different than the information provided in FLPR's application and contained in the record relied upon by the other interested parties. At a minimum, the information provided to and relied upon by DEEP to prepare a 401 WQC was inaccurate given the newly identified change in operations. Operational changes based on information provided in FLPR's original FERC license application and compared to recent verbal and written communications, includes but is not limited to the following:

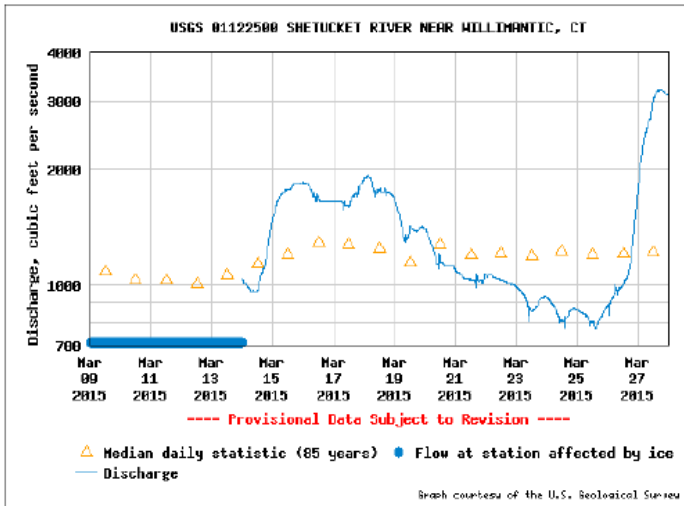
- The original application stated that FLPR would install a low flow turbine. FLPR now states that it will not install a low flow turbine at the Scotland Dam. FLPR's current approach is inconsistent with the Scotland Hydroelectric Project documents DEEP has received and reviewed since 2008 when FLPR submitted its Revised Proposed Study Plan thereby agreeing to upgrade the facility and operate the Project in an instantaneous ROR as part of its proposal to FERC.
- The original application stated that the current propeller type turbine cannot operate under ROR conditions when inflows are less than 450 cfs. In January 2013, FLPR provided DEEP with documentation that estimated the minimum operating capacity of the turbine to be "600 cfs with sufficient head to prevent vortex." Based on testing performed by FLPR in 2014 and information provided to DEEP in March 2015, FLPR now states the minimum operating range of the turbine is 900 cfs, not the 450 cfs stated in its application to FERC nor the 600 cfs calculations established in January 2013. Based on the latest round of information provided by FLPR, it would appear that the existing turbine cannot operate under ROR conditions where inflows fall below 900 cfs.
- The original application stated that on an average annual basis, the existing Project's minimum generating capacity of 450 cfs is equaled or exceeded 53% of the time. At the maximum range of 1,300 cfs, generating capacity is equaled or exceeded only 15% of the time. Based on the flow duration curve in the license application, the newly established minimum generating range of 900 cfs, would be exceeded less than 30% of the time.

FIGURE 1



Upper hydrograph shows Shetucket River flows when the Scotland Project was operating in a store-and-release mode; lower hydrograph shows river flows during a time when FL states the Project was operating in instantaneous run-of-river.

FIGURE 2



CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon each person designated on the official service list compiled by the Secretary in this proceeding.

Dated at Hartford, Connecticut this 30th day of April 2015.

Robert J. Hanlon
Supervising Environmental Analyst
Department of Energy & Environmental Protection
Office of Environmental Review
79 Elm Street
Hartford, CT 06106-5127

Help Raise Funds for Thames Valley TU



Jim Clark

Dear Chapter Members...

Here is a way you can help us raise funds to support our various projects. Donate your no longer used Fly Fishing equipment and books. We will raffle them off and use the money raised to support the chapter's various projects. As a non-profit chapter we can give you a letter for the value of your items which you can use for tax filing purposes.

For more information and to make a donation call Jim Clark at 860-546-6924.

Thanks for your support!




Place an Advertisement in "Stream Lines"

Looking to reach a new and diverse audience? Presently we have over 470 members in Eastern CT and the newsletter is published September through May (9 issues). If you have a service or product and would like to reach out to our outdoor and conservation minded readership, consider placing an advertisement in the chapters newsletter "Stream Lines". The cost is only \$50 for the entire year (9 Issues). For more information and to purchase an ad contact Jim Smith via email at, jsmiththamesvalleytu@gmail.com. Thanks for your support!

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