



April 24, 2020

Shannon Ames, Executive Director
Low Impact Hydropower Institute
329 Massachusetts Avenue, Suite 6
Lexington, MA 02420

Re: LIHI Project #68 – Woronoco Hydroelectric Project FERC P-2631

Dear Ms. Ames,

The Connecticut River Conservancy (CRC) submits the following comments on the evaluation of the Woronoco Hydroelectric Project's (Woronoco or Project) adherence to LIHI's certification criteria. CRC is the principal nonprofit environmental advocate for protection, restoration, and sustainable use of the Connecticut River watershed. The Westfield River is a major tributary of the Connecticut River, and is designated "Wild and Scenic" upstream of the hydroelectric project, and we therefore take interest in this re-certification. The facility is currently owned by Woronoco Hydro LLC, which is now owned by Eagle Creek Renewable Energy. Under previous certifications, the project was owned by Swift River Hydro.

Despite the Wild and Scenic status, the Westfield River has multiple hydroelectric and Army Corps flood storage dams that cumulatively have a high impact on this special river system. The Woronoco Dam is the second most downstream dam on the Westfield River. We have reviewed the entire application, and have comments on just a few of the criteria, but we do think there are issues that need to be addressed.

Criterion C - Upstream Fish Passage

CRC's understanding is that the falls where the dams are located is the natural upstream limit of the shad migration and possibly sea lamprey on the Westfield River. Therefore, upstream passage for those species is not required. As stated in the LIHI certification, the Federal Energy Regulatory Commission (FERC) License and the 401 Water Quality Certificate required the Project to install upstream eel passage. Woronoco installed two upstream passage facilities for American eels at the South Dam in 2008, and one at the North Dam in 2011. The two ladders on the South Dam typically pass an average total of about 2,000 eel annually, during the upstream passage season from May to November. The third ladder, on the North Dam, has fallen into disrepair and has not been maintained. Page 3-13 indicates that the ladder on the North Dam will not be repaired, and references a letter from Caleb Slater of MA DFW that approves of this plan. CRC could not find the letter from Caleb Slater attached to the application, but we did obtain a copy of the letter from Dr. Slater himself. The Project owners capture, count, and release eels upstream, but the procedures for checking the eels in the holding tank and transporting them at a safe location upstream are not described.

CRC's recommendations:

- Eagle Creek should file plans to discontinue the North Dam eel ladder with FERC and MassDEP to make it official that this eel passage no longer be required under the FERC license and 401 Water Quality Certificate.
- Eagle Creek should document how often the holding tanks are inspected during eel passage season, the location that eels are returned to the river upstream (ensuring fallback into the turbines is not an issue), and reports of any eel mortality events in the holding tank.
- CRC would very much like to be on the distribution list for the annual eel passage reports. Ideally, the report could be posted on a project website for members of the public to have access to this information.

Criterion G - Cultural and Historic Resource Protection

The LIHI application indicates that the Project believes it meets standard G-2. The 2nd edition handbook states, “STANDARD G-2. Approved Plan: The facility is in compliance with approved state, provincial, federal, and **recognized tribal plans** for protection, enhancement, or mitigation of impacts to cultural or historic resources affected by the facility.” (emphasis ours) The application does not indicate any attempt to contact state or federally-recognized Native American tribal groups. Please see <https://www.mass.gov/service-details/indian-affairs> for state-recognized tribal contacts. Woronoco was historically the location of a Pocumtuck village.

Criterion H - Recreational Resources

The Project has a Recreation Plan that was approved by FERC on March 3, 2005. The application does not document that the facility is currently in compliance with its 2005 Recreation Plan. The application asserts compliance with the Recreation Plan by citing inspections that were done 5-10 years ago. No documentation other than two photos were provided in the application.

The five recreational facilities listed as required in the Project Recreation Plan are as follows:

1. a put-in/take out for canoes and small boats on the southwest portion of the impoundment, including a 15-vehicle parking area;
2. a take-out area for canoes upstream of the project’s two dams, on the southeast shoreline;
3. a canoe portage path, including rest stops, racks, and directional signs directing persons to the downstream put-in (Photo 5-7);
4. a put-in area along the east shoreline of the Westfield River, a short distance downstream from the project powerhouse, for canoeists and persons with hand-carried boats; and
5. a parking area located near Bridge Street for approximately 15 vehicles with an associated trail for persons with canoes and hand-carried boats who desire to access the Westfield River downstream of the project powerhouse.

Eagle Creek has a web page that lists their projects by state, and boxes are checked off for recreation facilities that are available at each location. **According to this website, no recreation facilities are offered at the Woronoco site.** See <https://www.eaglecreekre.com/community/recreation> . The page specific to the hydro facilities on the Westfield River (<https://www.eaglecreekre.com/facilities/operating-facilities/westfield-river-facilities>) contains no information on recreation at this location. The link to flows at the nearest upstream gages is helpful. The photos do not have information on recreation or upstream fish passage. Compare this to the helpful information on the portage route available online at <https://massachusettspaddler.com/wf6-woronoco-dam-to-greatriver-bridges-westfield> and <https://massachusettspaddler.com/wf5-crescent-dam-russell-to-woronoco-dam-russel>.

Thanks to one of the board members from the Westfield River Watershed Association who went to check out the recreation facilities today, it appears that some of the recreation facilities need some attention. Overall, she reported that it is very confusing trying to figure out where the recreational sites are. The put-in and takeout on the west side of the river in the impoundment (requirement #1 above) has a dilapidated platform that does not sound like the ADA fishing spot described in the plan. There are many no parking signs and it's not clear where the 15-vehicle parking area is. On the river left side (#2), the take-out has no parking signs all over the road. The portage route (#3) is not clear, one of the rest stops needs to be repaired, and at least one sign needs to be cleared of vines. The put-in downstream of the dam (#4 or 5) has a private property/no trespassing sign on the trail, and it's not clear if this is where the portage route is. If this is still a viable put-in location, signage indicating public access should be posted. Please see photos attached at the end of this letter.

CRC recommendations

- Eagle Creek should submit a map indicating the location of the portage route and all other facilities, with an up-to-date photo of each recreation facility and the signage associated with it.
- Eagle Creek should maintain and improve any recreation facility/sign shown to be in disrepair.
- Signage should be clear as to where public parking and access is allowed. Signage should be updated to comply with FERC's recent revisions to 18 CFR §8.1.
- Eagle Creek should post recreation information on their website, and users that conduct an internet search of search terms like "Portage around Woronoco Dam" or "Recreation Woronoco Dam" should be able to find up-to-date project information about how to access the river and what recreational facilities exist.

CRC appreciates the opportunity to provide comments. I can be reached at adonlon@ctriver.org. For the time being while we are all working from home, the best number to reach me is my cell phone: (413-325-4426. Ordinarily, my office number is (413) 772-2020 x.205.

Sincerely,



Andrea F. Donlon
River Steward

Cc: Brian Conz, President, Westfield River Watershed Association
Kristen Sykes, AMC
Kevin Mendik, NPS
Bob Kubit, MassDEP
Caleb Slater, MA DFW
Melissa Grader, USFWS

PHOTOS OF PROJECT RECREATION SITES THAT NEED ATTENTION



Portage rest stop in need of repair (photo taken on April 24, 2020)



Woronoco portage route sign in need of maintenance (photo taken on April 24, 2020)



Likely put-in trail downstream of the Woronoco Dam, with "Private Property/No Trespassing" sign