Ashuelot River Local Advisory Committee

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Low Impact Hydropower Institute
329 Massachusetts Avenue, Suite 6
Lexington, MA 02420

RE: Ashuelot River/Lower Robertson Hydroelectric Projects (LIHI #46)
Low Impact Recertification

Reviewing the criteria for low impact hydroelectric project certification, the Ashuelot River LAC believes the principals of Ashuelot River Hydro Inc. (ARH) generally continue to operate within the criteria stipulated by LIHI for certification. However, inherent in the presence of dams is the obstruction created for fish passage.

While ARH is committed to installing upstream fish passage in response to trigger numbers of American Shad found at Fiske Hydro, fish passage in this river segment remains our greatest concern. The fish ladder at Fiske Hydro has not been operational and efforts are being made to encourage functional operation and accountability at this site.

In the meantime, migratory species are present in this stretch of river with adult American Shad trapped yearly at the Holyoke Massachusetts project and stocked upstream of the Lower Robertson Dam. This year a survey conducted by US Fish and Wildlife found 135 Sea Lamprey nests from the Rte 63 bridge in Hinsdale and downstream. The sea lamprey is a Species of Concern in New Hampshire due to significant declines in its historic spawning range following the construction of large mainstem dams.

NH Fish and Game reports in their online NH Fish Survey Map the presence of American Eels both upstream and downstream of the two ARH projects and states that "eel numbers have been greatly reduced upstream of dams constructed on North American rivers and streams over the past 300 years."

It can be conjectured that the presence of the dams on the Ashuelot greatly influences the low eel numbers and ARLAC would like to see the construction by ARH of ramps with wetted surfaces to enable eels to climb over the dams. It is noted that the last donation by ARH towards preservation of the Ashuelot watershed was in 2014. We would see this effort to promote the continuity of fish passage at the dam sites as showing a commitment to preservation of the integrity of the river system.

We see no impacts to water quality resulting from the operation of the dams at this time. However, we understand that data to support water quality standards are being collected this summer and we reserve the right to comment if an impact is determined.

The last documentation noted regarding cultural and historical resources in the project area is from 2005. We would like to see an updated inquiry with the NH State Historic Preservation Office for this recertification.

Respectfully submitted,

Barbara Skuly

Barbara Skuly, Chairman

Ec: T. Sales, NHRMPP; T. Walsh, NHDES
B. King, ARH