



June 12, 2020

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

Re: LIHI Certification of Dwight Dam on the Chicopee River, FERC Exempt P-10675

Dear Ms. Ames,

The Connecticut River Conservancy (CRC) submits the following comments on the evaluation of the Dwight Hydroelectric Project's (Dwight 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 Chicopee River is a major tributary of the Connecticut River. The facility is currently owned by Central Rivers Power MA LLC, which is now owned by the private equity company Hull Street Energy LLC.

The Dwight Project (FERC No. 10675, exempt) is located in the City of Chicopee in Hampden County, Massachusetts, at approximate river mile 1.2 on the Chicopee River.

Criterion C - Upstream Fish Passage

The Dwight Dam is the first of several dams on the Chicopee River, none of which currently have upstream fish passage facilities. This dam would be the natural starting point for improving fish access to the Chicopee River. For example, this year, over 5,000 American shad have traveled beyond the first dam on the Westfield River, a tributary that, like the Chicopee, is downstream of the Holyoke Dam and there are no barriers between this tributary and Long Island Sound. CRC notes that in Attachment 33 to the LIHI application, which is the Chicopee River Watershed 5-year action plan (2005-2010), on page 33 it says, "Evaluate the need for and increase upstream and downstream fish passage for diadromous fish species. Initially, emphasis should be placed on the Dwight Dam (i.e., the lowermost dam on the Chicopee River). After installing passage structures, fish passage triggers should be established at the Dwight Dam to determine when fish passage is required at subsequent upstream."

Unfortunately, agency funding and staffing limits have made it so that there has been no progress since the 5-year action plan was written, to evaluate the Chicopee River for shad or lamprey habitat. CRC concurs with the letter from the Massachusetts Division of Fisheries and Wildlife to have the project owner install upstream and downstream fish passage facilities for American eel.

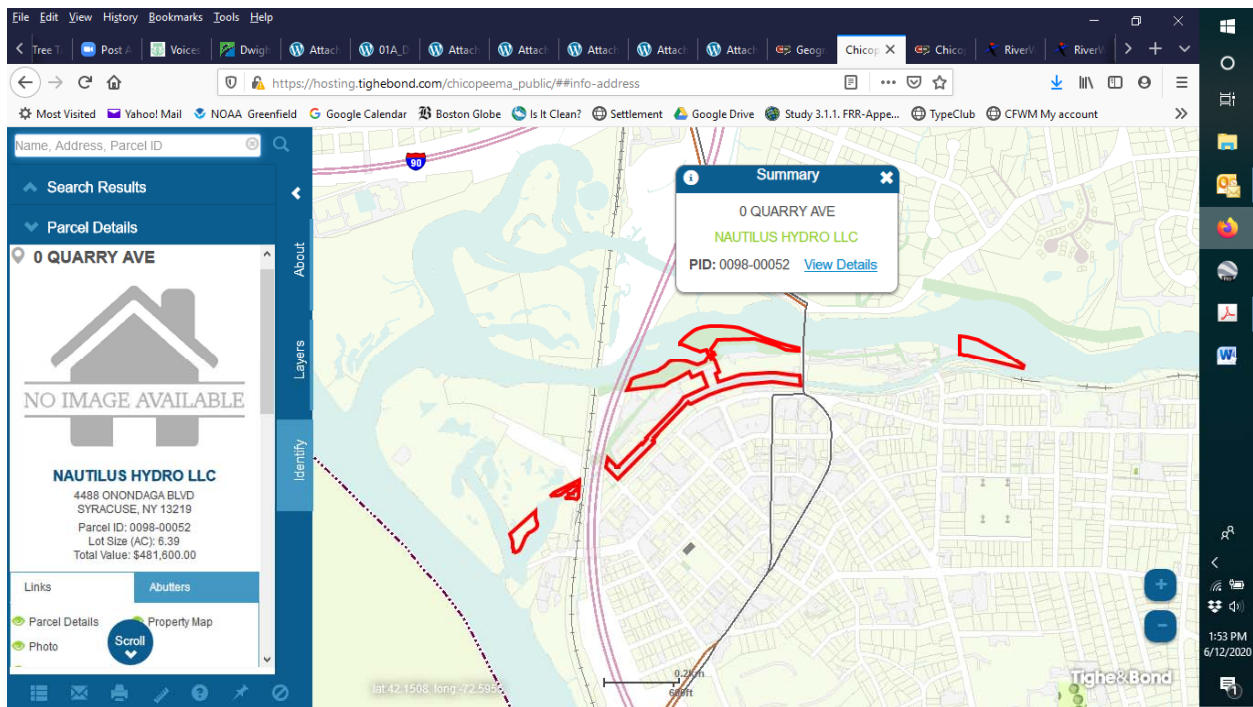
CRC's recommendations:

- Central Rivers Power should install upstream and downstream American eel passage.
- If requested by state and/or federal agencies, Central Rivers Power should work collaboratively to assess fish habitat in the Chicopee River, along with other dam owners.

Criterion H - Recreational Resources

As the applicant states on page 41, the US Fish and Wildlife Service mandated as part of the FERC Exemption that the applicant will cooperate with the City of Chicopee in procuring a conservation easement along a proposed riverside nature trail above and below the project. The application indicates that this happened below the project. There is no mention of any access that has happened above the project. The applicant stated that there is limited land it owns surrounding the project. We could find no maps of the trails described in the application packet.

The Chicopee Assessor's maps available online indicate project ownership shown below in the red line. CRC could not find this type of map in the application packet.



The City of Chicopee is in the process of building a river walk and bike path near the project along the old rail line. Additionally, the mill building associated with the hydropower facility is being prepped for redevelopment. The City Planning Department representative I spoke with on the phone indicated that the applicant has been open to collaborating on these projects.

CRC recommendation

- CRC recommends a clarification on the location of the trails below the dam, and what happened to plans for access above the dam.

CRC appreciates the opportunity to provide comments. I can be reached at adonlon@ctriver.org. For the time being while I am 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,

A handwritten signature in black ink that reads "Andrea F. Donlon". The signature is written in a cursive, flowing style.

Andrea F. Donlon
River Steward

Cc: Keith Davies, Chicopee4Rivers Watershed
Bob Kubit, MassDEP
Caleb Slater, MA DFW
Melissa Grader, USFWS