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Low Impact Hydropower Institute
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Re: LIHI Pending Application --- (FERC #7791 & #8235) Ashuelot and Lower Robertson Hydroelectric Projects on the Ashuelot River, New Hampshire

The Connecticut River Watershed Council, Inc. (CRWC) is a nonprofit membership citizen group that was established in 1952 to advocate for the protection, restoration, and sustainable use of the Connecticut River and its four-state watershed. CRWC's organizational mission is directly impacted by the presence and operation of any hydro facility within the watershed. As examples of our attention to the hydroelectric sites in the watershed CRWC is an intervener in new licenses for the Holyoke Dam (Project No. 2004), Canaan Dam (Project No. 7528) and Fifteen Mile Falls Dams (Project No. 2077), and for license amendments at Vernon Dam (Project No. 1904) and Northfield Mountain Pumped Storage project (P-2485).

From the CRWC perspective and despite the fact that the USF&W set the target fish passage numbers for American shad at the Fiske Mill dam, the dam downstream of the two dams under consideration for LIHI certification, it seems at odds with good river management that these dams would be issued low impact certification from LIHI based on a condition for passage of 750 shad at the Fiske Dam before Ashuelot and Robertson must install upstream fish passage. That is not low impact in the opinion of the Watershed Council. What anadromous fish face getting up river to the Ashuelot River are the ENVY thermal discharge plume and the poorly designed passage facilities at the Turners Falls Dam. Unfortunately shad are stopped in their upstream migration in the Turners Falls reach of the river before they even get to the Ashuelot River. In addition I have to wonder about how a 750 trigger number was established in a small tributary to the main river when the main river dams now are required to provide downstream passage, period and installing upstream passage would be triggered by as few as 20 salmon over Wilder dam all the way up through the Fifteen Mile Falls dam complex.

Fish passage into tributaries is NOT a matter solely of passing anadromous fish. Resident species use our rivers to spawn including any trout that remain in the main river, small mouth bass and rock bass. They do not find good spawning habitat in the main river and there is an upstream migration every year of these species into the tributaries. So the Ashuelot dams do more damage than just stop shad in their migration. Passage would help mitigate this impact.

Given the reality of the conditions in the main river, the return numbers that would trigger fish passage are artificially high. Unfortunately the resource agencies have not set standards for passage of our resident fish although NH is thinking about the whole issue of resident fish passage because of the Vermont 401 Certification requirement for potential up and down stream resident fish passage at Canaan Dam but that discussion is taking place way up where NH meets Canada and VT.

CRWC does not feel that relying on a high number of American shad returns at Fiske dam is a rationale to certify Lower Robertson and Ashuelot dams as low impact relative to fisheries. It would be a show of good faith to the health of the Ashuelot River if the project owner would underwrite the cost of studies to be conducted by NH F&G to evaluate the effects of these two dams on resident species. Once those impacts are understood and addressed LIHI certification would make more sense in terms of protecting the health of the Ashuelot River.

Sincerely

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