



August 19, 2021

Shannon Ames, Executive Director
Low Impact Hydropower Institute
1167 Massachusetts Avenue, Office 407
Arlington, MA 02476

Re: LIHI Project #19 – West Springfield Hydroelectric Project FERC P-2608

Dear Ms. Ames,

The Connecticut River Conservancy (CRC) submits the following comments on the evaluation of the West Springfield Hydroelectric Project's (West Springfield 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 this facility is the first dam on the Westfield River system, with no barriers downstream to Long Island Sound. Upstream of the project the river is designated "Wild and Scenic." The facility is currently owned by A&D Hydro, Inc. Original LIHI certification was in 2005, and the Project was re-certified in 2010 and 2015. CRC did not comment on previous certifications.

In general, we found the application information to be mostly complete and easy to understand.

Criterion C - Upstream Fish Passage

Page 14 lists the migratory species that are present at the project as sea lamprey, American eel, smallmouth bass, river herring, white suckers, carp and several species of trout. This list is a mix of resident fish and migratory fish, and leaves out American shad. Three paragraphs later, it states that the American shad run on the Westfield averages about 4,000 but has been as high as 10,000. The application also mentions future plans to improve upstream eel passage.

In August of 2019, there were news reports of arson and vandalism at the fish counting facility at the dam (see <https://www.wvlp.com/news/local-news/hampden-county/reward-offered-for-vandalism-and-arson-in-west-springfield/> for example). There was no mention of this incident in the recertification application. Has this facility been rebuilt and is it operational again?

Criterion H - Recreational Resources

The certification application mentions a river access parking area and trail downstream of the project, and that, "Signage and the pathway leading from the parking lot to the riverbank are to be upgraded, after consulting with the Town of West Springfield." I last visited this location in September of 2019, and the sign was dilapidated, the trail not obvious, and everything was overgrown, as shown in the picture that was attached as an appendix to the LIHI application. I could not tell that there was any access to the river, let alone one that was ADA compliant. CRC recommends that LIHI establish some more specifics as to what the upgrades entail and when this access to the river will be rehabilitated.

The LIHI recertification application states that License Article 412 (Appendix D) required the prior owner to “attempt to reach” an agreement to provide \$10,000 to the Town of West Springfield for design and construction of an impoundment canoe and fishing access trail in Mittineague Park that was to be constructed by the town. The agreement was signed in 1995. CRC found a letter submitted by prior project owners to FERC dated March 9, 1999 in the FERC e-library. It contained a copy of the 1995 agreement between prior owner DSI and the Town of West Springfield, along with a copy of a request for proposals to do the work in 1998. As far as we could tell, there is no documentation in the e-library that the money was ever spent. Since the legal agreement requires the money to be used strictly for the access project, and they say the designs are subject to FERC approval and it was never built, it’s possible that the money is either still in the hands of the town, or the legal agreement is null and void and the FERC requirement was never implemented. This dam, the lowermost on the Westfield, lacks a way to portage around the dam. CRC recommends that LIHI require the project owner to do further investigations as to whether the project is truly in compliance with License Article 412.

CRC appreciates the efforts made at the project to improve upstream and downstream fish passage over the last couple of decades. In 2019, A&D Hydro received a \$45,000 grant from the Massachusetts Clean Energy Center for upgrades to the facility. CRC recommends that providing access to the river be improved both upstream and downstream of the project.

CRC appreciates the opportunity to provide comments. I can be reached at adonlon@ctriver.org or (413) 772-2020 x.205.

Sincerely,



Andrea F. Donlon
River Steward

Cc: Brian Conz, President, Westfield River Watershed Association
Kristen Sykes, AMC
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Steven Mattocks, MA DFW
Melissa Grader, USFWS