



MassWildlife

Commonwealth of Massachusetts

Division of Fisheries & Wildlife

Wayne F. MacCallum, *Director*

April 28, 2014

Dana Hall
LIHI
PO BOX 194
Harrington Park,
New Jersey 07640

Glendale Hydroelectric Project (FERC No. 2801).

Dear Dana,

The Massachusetts Division of Fisheries and Wildlife (Division) is the agency responsible for the protection and management of the fish and wildlife resources of the Commonwealth, including the regulatory protection of imperiled species and their habitats as codified under the Massachusetts Endangered Species Act (M.G.L. c.131A). As such, we review and monitor operations at hydroelectric projects for impacts to aquatic resources in the Commonwealth. This letter is in response to your request for comments regarding a future filing with the Low Impact Hydropower Institute for certification of the Glendale Hydroelectric Project (FERC No. 2801).

After review of the materials provided with your request the Division has the following comments.

Endangered Species

The Massachusetts Natural Heritage and Endangered Species Program (NHESP) of the Division has indicated that there are records of state-listed mussels in the project area. The project owner participated in a Massachusetts Endangered Species Act (MESA) review during the FERC re-licensing process (the project received a new FERC license in 2009) and NHESP has approved a plan for impoundment drawdowns that will protect these species. Since the 2009 license, impoundment work has been conducted in compliance with NHESP requirements.

Fish Passage

Review of the project's FERC license indicates that passage for anadromous and/or catadromous (American eel) fish is not currently required. However, the potential of fish passage needs at some future date was raised during FERC relicensing and the project's new FERC license requires the owner to build upstream and downstream anadromous and/or catadromous fish passage when notified to do so by the Division and/or the USFWS.

Due to the recent dramatic decline of American eel stocks, the Division and other fishery agencies are engaged in efforts to facilitate upstream eel passage and to implement downstream eel passage measures at hydropower facilities in areas where American eels exist. However, no American eel were collected during the most recent Division fish survey of the Housatonic River. This is not surprising, given that the State of Connecticut found limited numbers of eel upstream of the Stevenson Dam and no eel above the Shepaug Dam (both associated with the Housatonic River Project, FERC No. 2576). However, the new license issued for this Project requires eel passage facilities at the Stevenson, Shepaug and Bulls Bridge dams. Eel presumably can ascend the Great Falls at the Falls Village Dam. Therefore, passage would only need to be provided at the downstream Risingdale dam before eel have access to the Glendale Dam.

Project Flows

www.mass.gov/masswildlife

Division of Fisheries and Wildlife
100 Hartwell Street, Suite 230, West Boylston, MA 01583 (508) 389-6300 Fax (508) 389-7890
An Agency of the Department of Fish and Game

Run-of-River operation: The project already operates in an instantaneous run-of-river mode. Run-of-river operation is a requirement for the Division to consider any project as eligible for low impact certification.

Bypass Flows: During FERC relicensing the Division raised concerns about the project's bypass reach minimum flow (then set at 10 cfs). In response the project owner conducted an IFIM study and the Division and the USFWS agreed with the report's conclusions that the minimum flow be increased to 90 cfs. The Project owner is now in the process of installing a minimum flow turbine at the dam which will release the required flow.

Recreation

During relicensing the project owner agreed to install a new canoe portage trail with take-out and put-in areas and to construct a parking area for anglers near the bypass reach.

Conclusions

The Division does not protest Low Impact Hydropower certification of the Glendale Hydroelectric Project.

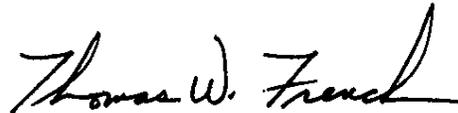
Thank you for the opportunity to comment,

Sincerely,



Caleb Slater, Ph.D.
Anadromous Fish Project Leader

Sincerely,



Thomas W. French, Ph.D.
Assistant Director for the Natural Heritage &
Endangered Species Program