



Commonwealth of Massachusetts
Executive Office of Energy & Environmental Affairs

Department of Environmental Protection

Central Regional Office • 627 Main Street, Worcester MA 01608 • 508-792-7650

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Lieutenant Governor

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Secretary

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William P. Short III
On behalf of Central Rivers Power MA, LLC
P.O. Box 237173
New York, New York 10023-7173

November 7, 2018

Re: Request for Water Quality and Minimum Flow Status
Red Bridge Project, FERC #10676

Dear Mr. Short,

In order to achieve certification from the Low Impact Hydropower Institute, Central Rivers Power MA, LLC seeks a letter from the Massachusetts Department of Environmental Protection (Department) that discusses the water quality and the minimum flows at the Red Bridge impoundment, bypassed reach and tailrace.

Water Quality of Red Bridge Impoundment

The Department does not possess water quality data collected at the Project site; however, the Department does have data collected in the Project vicinity (river segment extending 3.8 miles upstream of the dam) and believes the presence of wet weather combined sewer overflows upstream of the Project is likely the cause for upstream waters to require a TMDL for pathogens. The likely cause of mercury in fish tissue is atmospheric deposition. The Department believes the Project does not cause nor contribute to the presence of pathogens or mercury in the Project area.

Based on the upstream impoundment estimated retention time of approximately one day and information from the 1989 Environmental Report and Water Quality Report prepared for the FERC exemption application, the Department does not expect the Project to cause or contribute to violations of state Water Quality Standards due to water chemistry.

Water Quality of Bypassed Reach to the confluence with the tailrace and Chicopee River

The Department does not possess water quality data collected at the Project site; however, the Department does have data collected in the Project vicinity (river segment extending 2.8 miles downstream of the dam) and believes state Water Quality

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Standards are met. The Department believes the Project does not cause nor contribute to any state Water Quality Standards violations.

Water Quality of Tailrace to the confluence with the bypassed reach and the Chicopee River

The Department does not possess water quality data collected at the Project site; however, the Department does have data collected in the Project vicinity (river segment extending 2.8 miles downstream of the dam) and believes state Water Quality Standards are met. The Department believes the Project does not cause nor contribute to any state Water Quality Standards violations.

Minimum Flows of Bypassed Reach to the confluence with the tailrace and Chicopee River

The Department understands that the minimum flow is 237 cfs or inflow if less, that this flow has been established based upon the actual drainage area of the Chicopee River watershed and that the Applicant has filed in 2017 and 2018 documentation with FERC certifying compliance with this minimum flow requirement for 2016 and 2017, respectively. In addition, the Department understands that the Project finalized, filed with the FERC and then received an Order Accepting the Project's Minimum Flow and Impoundment Fluctuation Monitoring Plan in late 2012. We have no record that the Project has operated in non-compliance of the Project's minimum flow since 2011. Based on the foregoing, the Department believes the Project complies fully with its FERC-mandated minimum flow requirement.

Minimum Flows of Red Bridge Impoundment and/or Tailrace to the confluence with the bypassed reach and the Chicopee River

The Department is unaware of any minimum flow requirement for Red Bridge impoundment or the tailrace to the confluence with the bypassed reach and the Chicopee River. Accordingly, the Department expresses no position on these ZoEs' minimum flows and any such associated requirements for these ZoEs

If you have any questions, please contact me at 508-767-2854.

Sincerely,



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