



MASSWILDLIFE

DIVISION OF FISHERIES & WILDLIFE

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MASS.GOV/MASSWILDLIFE

November 7, 2018

William P. Short III
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RE: LIHI Re-Certification of Red Bridge Project

Dear Bill,

The Department of Fish and Game (“DFG”) hereby submits the following comments on the Low Impact Hydropower Institute’s (“LIHI”) pending application for the proposed LIHI re-certification of the Red Bridge Project (FERC No. 10676) located on the Chicopee River in the Towns of Wilbraham, Ludlow, Palmer and Belchertown in Hampden and Hampshire Counties, Massachusetts:

DFG is submitting these comments to LIHI in order to fulfill the requirements of the Massachusetts Department of Energy Resources (“DOER”) Renewable Energy Portfolio Standard Regulations (225 CMR 14.00; “RPS I” and 225 CMR 15.00; “RPS II”). The RPS I and RPS II regulations were promulgated by DOER on January 1, 2009 and require that any hydroelectric project wishing to qualify as either a RPS I or RPS II generator first obtain LIHI certification. These regulations also require all relevant regulatory agencies to comment on the pending LIHI application.

In response to your inquiries about LIHI re-certification:

1. Minimum Flows in Bypassed Reach to the confluence with the tailrace and Chicopee River

The minimum flow for this reach is 237 cfs or inflow if less. The Massachusetts Division of Fisheries and Wildlife (MassWildlife) has no record that the Project has operated in non-compliance of the Project’s minimum flow.

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

MassWildlife 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. Therefore, MassWildlife expresses no position on these minimum flows and any associated LIHI requirements for these flows.

3. Upstream Fish Passage of the Bypassed Reach to the confluence with the tailrace and Chicopee River, Red Bridge Impoundment or Tailrace to the confluence with the bypassed reach and the Chicopee River.

There is no current requirement for upstream fish passage at the project and none is installed. However, the FERC exemption requires that once upstream fish passage is determined to be necessary (by MassWildlife and/or other relevant Federal or Massachusetts agencies) the Project Owner shall install acceptable upstream fish passage within two years. Given the Project

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has no upstream fish passage requirements at this time, MassWildlife finds that the Project is in compliance with its FERC-mandated requirements for upstream fish passage.

4. Downstream Fish Passage of the Bypassed Reach to the confluence with the tailrace and Chicopee River, Red Bridge Impoundment or Tailrace to the confluence with the bypassed reach and the Chicopee River.

There is no current requirement for downstream fish passage at the project and none is installed. However, the FERC exemption requires that once downstream fish passage is determined to be necessary (by MassWildlife and/or other relevant Federal or Massachusetts agencies) the Project Owner shall install acceptable downstream fish passage within two years. Given the Project has no downstream fish passage requirements at this time, MassWildlife finds that the Project is in compliance with its FERC-mandated requirements for downstream fish passage.

Please let me know if you need anything further.



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