



Commonwealth of Massachusetts

Division of Fisheries & Wildlife

Wayne F. MacCallum, *Director*

March 3, 2012

James M. Lavelle
City of Holyoke Gas and Electric Department
99 Suffolk Street
Holyoke MA 01040-5082

RE: Compliance with recreational mandates of license
P-2004 Holyoke hydroelectric project

Dear James Lavelle,

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. As such we monitor operations at hydroelectric projects within the Commonwealth.

The Division is a signatory to the 2004 Settlement Agreement which resulted from the relicensing of the Holyoke Project (FERC No. P-2004) on the Connecticut River in Holyoke, MA. The Division believes that the annual HG&E Shad Derby scheduled for only one weekend in 2012 does not satisfy the requirements set out in Settlement Agreement.

The Comprehensive Recreation and Land Management Plan (required under the Settlement Agreement) states that HG&E will continue to fund and organize the annual Shad Fishing Derby. Traditionally the Shad Derby has been held over two consecutive weekends in May (see attachment from HG&E website). Last year (2011) HG&E made the unilateral decision to shorten the Shad Fishing Derby to one weekend. The Division believes that while not explicit, the meaning of "continue the Shad Fishing Derby" was understood by all to be a continuation of the derby as it has always been- an event held over two consecutive weekends.

Inclement weather or high flows in the river could easily ruin a weekend for fishing. Holding the derby over two weekends greatly reduces the chances of a total loss due to bad weather or poor river conditions and continues the tradition of a two weekend event.

The Division understands that HG&E has cited declining attendance and financial hardship as factors in its decision. Since registration is not required to fish in the Derby (see attached rules) any statements about declining attendance are purely anecdotal and the relatively small amount of money that shortening the derby will save will have no meaningful effect on the Project's bottom line.

Sincerely,

Caleb Slater, Ph.D.
Anadromous Fish Project Leader

cc: Paul Ducheneay, HG&E; Secretary, FERC; Nancy Skancke, GKRSE; Andrea Donlon, CRWC;
Don Pugh, TU; John Warner, USFWS, Bob Kubit, MADEP

www.masswildlife.org

Division of Fisheries and Wildlife
Field Headquarters, One Rabbit Hill Road, Westborough, MA 01581 (508) 389-6300 Fax (508) 389-7890
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