



COMMONWEALTH OF MASSACHUSETTS
EXECUTIVE OFFICE OF ENERGY & ENVIRONMENTAL AFFAIRS
DEPARTMENT OF ENVIRONMENTAL PROTECTION

Division of Watershed Management, 627 Main Street 2nd Floor, Worcester, MA 01608

DEVAL L. PATRICK
Governor

TIMOTHY P. MURRAY
Lieutenant Governor

IAN A. BOWLES
Secretary

LAURIE BURT
Commissioner

Mr. Fred Ayer, Executive Director
Low Impact Hydropower Institute
34 Providence Street
Portland ME 04103

March 25, 2010

Re: Woronoco Hydroelectric Project Comments (FERC #2631)
LIHI Certification

Dear Mr. Ayer,

The Massachusetts Department of Environmental Protection (the Department) is the state agency responsible for issuing the 401 Water Quality Certificate for hydroelectric projects. In regard to fish passage and aquatic habitat issues, the Department relies on the expert opinion of the MA Division of Fisheries & Wildlife. Accordingly, the Department concurs with the February 23, 2010 letter from the MA Division of Fisheries & Wildlife (the Division) to the Low Impact Hydropower Institute that states the Division does not support the Woronoco Hydro, LLC application for LIHI certification, at this time, due to its potential adverse impact on migratory fish passage and on riverine habitat upstream of the dam.

The currently installed fish passage facility has not proven to be adequately effective. It is expected effectiveness testing will again be conducted in the spring of 2010 and a new downstream fish passage facility constructed in the summer of 2010.

The applicant has proposed installing 30 inches of flashboards on the dam thus raising impoundment water levels. The Water Quality Certification issued by the Department for this project requires the pond height above the dam be maintained at 229.0 feet. Since adverse effects to wetlands and free flowing habitats are expected should this proposal be implemented, changes to this Water Quality Certification requirement are not anticipated.

According to the Department's Westfield River Watershed 2001 Water Quality Assessment Report, this hydroelectric facility is located in segment MA32-05 and supports the Class B warm water fishery classification. Water quality testing demonstrated a status of support for the Aquatic Life and Aesthetics designated uses. Primary and Secondary Contact Recreational uses were not assessed for this segment of the Westfield River due to limited recent bacterial data.

Please note this office has not been notified of any deviations from minimum flow and head pond level requirements at this project since the new FERC license was issued in 2002.

Thank you for the opportunity to comment on this project. If you have any questions, please call me at 508-767-2854.

Sincerely,

A handwritten signature in black ink, appearing to read 'R. Kubit', with a long horizontal flourish extending to the right.

Robert Kubit, P.E.

Cc: Peter Clark/Woronoco Hydro
Alfred Nash/Renewable Power Consulting
Caleb Slater