



MEMORANDUM

To: Shannon Ames
From: Maryalice Fischer
Date: April 6, 2021

Subject: Recertification Recommendation - Mechanicsville Project, LIHI #74

This memo contains my recommendation for recertification of the Mechanicsville Hydroelectric Project (Project), a 0.337 MW facility located on the French River in Thompson, Connecticut. The Project was originally certified under the 1st Edition LIHI Handbook with an effective date of January 27, 2011. The Project was recertified in 2016 under the 2nd Edition LIHI Handbook with an expiration date of January 27, 2021 which was extended to May 15, 2021.

1. Recertification Standards

This is the first project to submit a recertification application for the second time under the 2nd Edition Handbook. LIHI developed a streamlined application format for such projects to facilitate review in accordance with Handbook Section 6.1. Similar to the recertification process that was used in the 1st Edition Handbook, the current review verifies the information submitted, considers any public comments received, and assesses whether there have been any material changes at the facility or in the LIHI Handbook that affect compliance with the LIHI Criteria.

a) Adequacy of the Recertification Application Package

The application package was submitted on January 26, 2021. The initial review found the application to be complete, that no material changes have occurred at the Project during the current certification term, and that no material changes have occurred in the Handbook since the last recertification. Therefore, only a Stage I review is required, and the application was posted on February 3, 2021 for the 60-day public comment which closed on April 4, 2021. No public comments were received, and the available materials made it unnecessary to reach out to agencies or stakeholders for clarification of any aspect of the application.

In my opinion, the materials now in LIHI's possession are sufficient to make a recertification recommendation and no Stage II review is needed.

b) There have been no “material changes” at the facility that would affect the certification.

In accordance with the recertification standards, “material changes” mean non-compliance, operational changes, and/or new or renewed issues of concern relevant to the LIHI Criteria.

Compliance Status

My assessment of the Project included review of the recertification materials, the last recertification application and review report, annual compliance statements submitted during the current certification term, and FERC's public records during the same period.

There are no conditions on the current Certificate. Facility changes reported in annual compliance statements are positive changes related to fish passage and include:

- In 2018 the owner reported they added a concrete ramp on the dam to aid upstream American eel passage. That change was made at the request of the Connecticut Department of Energy and Environmental Protection (CTDEEP).
- In 2019, the owner reported they voluntarily replaced trash racks with ones having larger overall area and smaller spacing.

The recertification application stated the new trash racks have 1.375-inch spacing as opposed to the prior 1.75-inch spacing and that the new trash racks increased the intake area by 12% and reduced attraction flows by 11% such that maximum attraction flow at the intake is 1.38 ft/sec. Both changes are positive and support upstream passage for eels (via reduction in false attraction) and downstream passage protection for all fish species.

A search of the FERC elibrary from January 1, 2016 to present revealed no reports of deviations or non-compliances and only dam and public safety documents.

New/Renewed Issues of Concern

No other changes have occurred at the facility which affect the LIHI criteria and no issues of concern were identified. The application included the following updated information:

- The 2020 state impaired waters list confirmed no impairments in the Project reach, and lists the French River as fully supporting its designated uses for aquatic habitat and recreation.
- Updated threatened and endangered species information includes only the Northern

long-eared bat (federally threatened) which could be present. Project operations and the lack of need to cut potential roosting trees within in the small Project footprint are unlikely to affect the species. No state-listed species or critical habitats are present in the Project area.

- In early 2021, the State requested the impoundment be temporarily lowered by 2 feet to facilitate repairs at an upstream tunnel. While this could have a short-term effect of exposing portions of the shoreline, run-of-river operations continue and there is unlikely to be any significant adverse affect on littoral species or habitats.

This review discovered a 2017 French River Watershed-Based Plan that was issued by the Eastern Connecticut Conservation District, Inc.¹ The purpose of the plan is to identify sources of fecal coliform bacteria and other common contaminants that have degraded water quality in several waterbodies in the French River watershed and to provide management recommendations to improve water quality to meet established water quality standards for all their designated uses. Sampling was conducted in the reach just below the Project tailrace, about 500 feet upstream of the French River confluence with the Quinebaug River. Monitoring results did not exceed state water quality standards, and as noted above, the river in the Project vicinity is not listed as impaired as of 2020.

c) LIHI's certification criteria have not materially changed since the previous certification was issued in 2016.

The LIHI Criteria have not materially changed from the original 2nd Edition Handbook issued in 2016 to the current Revision 2.04 issued April 1, 2020.

2. Conclusion

In light of the above, I recommend recertification of the Project for a five (5)-year term with no conditions.

¹ https://portal.ct.gov/-/media/DEEP/water/watershed_management/wm_plans/french/frenchrivernoappendicespdf.pdf