



Commonwealth of Massachusetts

Division of Fisheries & Wildlife

Wayne F. MacCallum, *Director*

February 11, 2013

Kimberly D. Bose, Secretary
Federal Energy Regulatory Commission
888 First Street, N.E., Room 1A
Washington, DC 20426

Turners Falls Project, FERC No. 1889
Northfield Mountain Project, FERC No. 2485
Request by the Massachusetts Division of Fisheries and Wildlife

Dear Secretary Bose:

The Massachusetts Division of Fisheries and Wildlife (Division) is refiling its request to have the Massachusetts State Wildlife Action Plan added to the list of Relevant Qualifying Resource Management Plans for the relicensing of the Turners Falls Project, FERC No. 1889, and Northfield Mountain Project, FERC No. 2485. Please disregard and delete the original filing.

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. The Division is also responsible for the regulatory protection of imperiled species and their habitats as codified under the Massachusetts Endangered Species Act (M.G.L. c.131A). The Massachusetts Endangered Species Act (MESA) was enacted in December 1990. Implementing regulations (321 CMR 10.00) were promulgated in 1992 and recently revised and implemented as of November 2010. The MESA provides a framework for review of projects or activities that occur within mapped areas of the state, called *Priority Habitat*, and published in the Natural Heritage Atlas. As such, we monitor operations at hydroelectric projects within the Commonwealth, as well as comment on proposed hydroelectric facilities. The Division requests that the FERC include the Massachusetts State Wildlife Action Plan as a Relevant Qualifying Resource Management Plans for the relicensing of these projects.

In the Pre-Application Document for these projects the Massachusetts State Wildlife Action Plan is not listed as a Relevant Qualifying Resource Management Plan.

In 2006, the Massachusetts Division of Fisheries and Wildlife received approval for its State Wildlife Conservation Strategy, most often referred to as the State Wildlife Action Plan (SWAP). The SWAP is a comprehensive document that will help guide wildlife conservation decision making for Massachusetts' wildlife for many years. The Massachusetts Action Plan represents an important effort by the Division to engage the public in a dialogue about the future of our wildlife resources. During development of the Massachusetts Plan, we sought public input and comment through presentations of a draft to the Fisheries and Wildlife Board, the Natural Heritage and Endangered Species Advisory Committee, and the Massachusetts Teaming With Wildlife Coalition. In addition, the Fisheries and Wildlife Board held a public informational hearing. A draft copy of the Plan was posted prominently on the agency website for public comment. At least 4300 entities were directly notified of this website posting through the Division's newsletter, including media outlets, conservation organizations, sportsmen and other private citizens. As a result, we received over 600 website visits to the Plan. The final Plan incorporated public comments and was reposted on the website for further public review prior to formal submission to the US Fish and Wildlife Service.

www.mass.gov/masswildlife

The Plan includes:

- A brief history of the Division and past successful efforts to conserve the biodiversity of the Commonwealth.
- A review of the landscape changes which have affected wildlife populations and sets the stage for problems we see facing these species today.
- An explanation of the process used to identify the habitats and species in the greatest need of conservation.
Identifies the primary strategies needed to conserve these species and their habitats
- An recognition of the need to monitor these efforts as strategies are implemented both to ensure that time and money are providing the expected results and to determine if changing conditions require a change in strategy.

Massachusetts' Plan is organized around 22 habitat types and 257 wildlife species in greatest need of conservation. The habitat types range from large-scale habitats such as Upland Forests; to medium-scale habitats like Grasslands, to small-scale habitats such as Vernal Pools. Information for each habitat type includes

- habitat description;
- the suite of species in associated with that habitat;
- the problems and threats faced by them;
- a map showing the distribution of the habitat type across the state, when available;
- a listing of the conservation strategies needed to conserve the habitat; and
- monitoring requirements that will ensure the success of the conservation strategies.

There is also information about the 257 wildlife species in greatest need of conservation occurring in one or more of the above 22 habitat types including:

- Conservation status ranking and habitat association
- Species Life History
- State distribution and abundance
- Habitat requirement
- Conservation threats

The Division Requests that FERC add the MA SWAP to the list of Relevant Qualifying Resource Management Plans for these projects. The plan is attached and available online at (http://www.mass.gov/dfwele/dfw/habitat/cwcs/pdf/mass_cwcs_final.pdf).

Sincerely,



Caleb Slater, Ph.D.
Anadromous Fish Project Leader

cc: Melissa Grader, USFWS
Robert Kubit, MA DEP