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April 18, 2008

CERTIFICATE OF THE SECRETARY OF ENERGY & ENVIRONMENTAL AFFAIRS
ON THE
EXPANDED ENVIRONMENTAL NOTIFICATION FORM

PROJECT NAME:	Ashmere Lake Dam Remedial Repairs
PROJECT MUNICIPALITY:	Hinsdale/Peru
PROJECT WATERSHED:	Housatonic
EEA NUMBER:	14198
PROJECT PROPONENT:	**Massachusetts** Department of Conservation and Recreation
DATE NOTICED IN THE MONITOR:	March 12, 2008

Pursuant to the Massachusetts Environmental Policy Act (G.L. c. 30, ss. 61-62H) and Section 11.06 of the MEPA regulations (301 CMR 11.00), I hereby determine that this project **requires** the preparation of an Environmental Impact Report (EIR).

The proposed project involves repairs to a dam owned by the Massachusetts Department of Conservation and Recreation (DCR) that has been classified as a High Hazard by the Office of Dam Safety (ODS). As outlined below, I am requiring the preparation of a Draft EIR (DEIR) for the project instead of a Single EIR, which was requested by the Proponent in the Expanded Environmental Notification Form (EENF). While I acknowledge the Proponent's efforts in developing the EENF, which contained considerable information about the project, I find that the submittal does not meet the standards for a Single EIR at 301 CMR 11.05(7) and 11.06(8). It is not my intent that the requirement for a DEIR be an impediment to achieving the important goals of the project related to dam safety. I note that MEPA and other EEA Agencies have been in consultation with the project Proponent over the past several years, during which the level of information related to project design, impact and mitigation has evolved significantly. The Scope for the DEIR is laid out in detail below. Should the DEIR fully resolve the substantive issues outlined in the Scope, I will consider the procedural options available to me at 301 CMR 11.08(8)(b)(2), as they may related to the Scope for the Final EIR. If at any time DCR finds that

a state of emergency exists at the site, the MEPA Office may find that the project can commence under the Emergency Action provisions at 301 CMR 11.13.

Project Description

As outlined in the EENF, the project involves a series of remedial repairs to the Ashmere Lake Dam. The 300-acre Ashmere Lake (the "lake") is located primarily in the Town of Hinsdale, with a portion of the lake in the Town of Peru. The lake was artificially impounded with an earthen dam around 1875 by the Crane Paper Company to facilitate manufacturing activities. In 1969, ownership of the dam was transferred from the Crane Paper Company to the Commonwealth of Massachusetts. The lake itself is owned by the Commonwealth; the dam is operated and maintained by DCR. DCR also owns an approximately 32 acre parcel of undeveloped forested land located immediately south and adjacent to the dam. This parcel of land extends south to Smith Road and is bisected by a roadway that serves as access to a public boat ramp and the dam.

The dam is a 1,525-foot long, 32-foot high earthen embankment structure with an uncontrolled spillway channel 270 feet from the left abutment. The alignment of the dam includes a 45 degree angle point 700 feet from the right abutment and a low-level outlet 520 feet from the right abutment. The dam is classified by current dam safety regulations at 302 CMR 10.06 as a large (greater than 1,000 acre-feet of storage of greater than 40 feet in height), Class I, High Hazard potential dam. The EENF lists a number of deficiencies with the current dam.

Due to existing deficiencies with the current dam, DCR has been operating the low level outlet of the dam to maintain lowered lake levels over the past several years. The lowered lake level has the following effects:

Reduces the stresses on the dam associated with higher water levels or ice sheet pressure;
- Provides extra storage during spring melt and storm events, thereby reducing the overtopping and seepage potential;

Limits motor boat activity and resulting wave erosion on the upstream slope of the dam; and,
- Allows for continued inspection of by DCR staff and consultants.

The drawdown has been authorized under an Order of Conditions issued by the Hinsdale Conservation Commission. Since about 2000, the summer and winter pool levels have been maintained at approximately elevation (El.) 1581.8 and El. 1580.8. These levels are approximately 0.5 to 1.5 feet below normal summer and winter pool elevations, and approximately 0.5 to 1.5 feet below the existing spillway crest.

Proposed Improvements

The EENF presents a comprehensive description of the proposed dam repairs, including:

- *Access Roadway Improvements*: The existing access roadway to the lake's public boat ramp is located adjacent to the western dam abutment. To provide construction vehicle access to

the dam and to improve the overall condition of the access roadway, the Proponent will regrade the existing roadway to improve surface drainage and minimize the potential for washouts, and will install dense graded crushed stone to provide a more durable wearing surface. The Hinsdale Conservation Commission has issued a Negative Determination of Applicability to authorize these activities.

- *Dam Embankment Repair and Reconstruction Activities*: The downstream slope of the embankment will be extended to create a more stable slope at 3:1 and to incorporate a filtered seepage collection system. The crest of the dam will be constructed to a constant width of 14 feet from end to end. The top of the crest will be approximately 1 to 1.5 feet higher than the existing crest. On the upstream side of the dam, the Proponent will remove existing riprap, regrade as necessary and install larger riprap with filtered bedding.
- *Low-Level Outlet*: The existing low-level outlet is a 24-inch iron pipe currently used to control the lake level. Modifications to the low-level outlet will accommodate the changes to the geometry of the dam embankment. The crest manhole structure will be raised to remain flush with the new crest elevation. A new manhole and valve will be installed near the proposed downstream toe. The downstream end of the pipe will be extended approximately 60 feet to the new downstream toe and a new outfall structure will be installed. Riprap will be installed at the outfall to decrease flow velocities and to direct flows into the low-level outlet channel.

  Spillway Reconstruction: The existing spillway is used as an overflow structure and only flows when lake levels increase significantly due to inflow in excess of the capacity of the low level outlet. The existing broad-crested spillway will be replaced by a 90-foot wide concrete spillway with an ogee weir structure. The new spillway will include the ogee weir, a concrete apron downstream of the spillway, concrete training walls, a deeper approach channel, a riprap transition downstream, a 5-foot wide stop log gate, and an access bridge and bridge piers.
- *Maintenance Activities*: The Proponent will create and maintain a 20-foot wide buffer between the downstream toe of the dam and any woody vegetation. Prior to work, this area will be cleared and used to provide access points for dam repair activities. In portions of the 20-foot buffer that are identified as wetlands, a wetland seed mixture will be used to allow the area to reestablish as a herbaceous wetland system, subject to routine mowing.

Another important component of the project involves proposed changes to Bennett Brook. Bennett Brook originates at the existing spillway and historically received perennial flows from the spillway structure. Lake drawdown activities have diminished the frequency of flows from the spillway into Bennett Brook such that the channel from the spillway now exhibits characteristics of an intermittent stream. Following the repairs to the dam, the spillway will once again serve as the primary outlet which will allow Bennett Brook to receive more consistent flow patterns through the spillway channel. A second stream channel referred to by the Proponent as a low-level outlet channel currently originates from the downstream toe of the dam. Inflows to this channel come from the 24-inch low-level outlet pipe and dam seepage. DCR's maintenance of lake levels using the low level outlet and annual winter lake drawdown activities have caused this historically intermittent channel to exhibit characteristics of a perennial stream. The proposal to use the spillway as the primary outlet will result in limited flow to this channel. As part of the project the Proponent will implement measures and a monitoring program to ensure that potential adverse impacts to Bennett Brook are adequately mitigated.

Jurisdiction and Permitting

The project is undergoing environmental review and is subject to the preparation of a Mandatory EIR pursuant to the following sections of the MEPA regulations: 301 CMR 11.03(3)(a)(1)(a) because the project will alter greater than one acre of Bordering Vegetated Wetlands (BVW); 301 CMR 11.03(3)(a)(1)(b) because the project will alter greater than ten acres of any other wetlands; 301 CMR 11.03(3)(a)(4) because the project involves structural alteration of an existing dam that will cause an expansion of greater than 20 percent; and 301 CMR 11.03(11)(b) because the project is located within an Area of Critical Environmental Concern (ACEC). The project may also meet the EIR review threshold at 301 CMR 11.03(3)(a)(1)(2) if a Variance from the Wetlands Protection Act is required. Portions of the lake are located within the habitat of a species state-listed as "Special Concern" pursuant to the Massachusetts Endangered Species Act (MGL c. 131A), however it appears that the project can be conditioned to avoid a "take".

The project requires the following permits and/or approvals: a National Pollutant Discharge Elimination System (NPDES) Construction General Permit from the U.S. Environmental Protection Agency (EPA); an Individual Permit from the U.S. Army Corps of Engineers (ACOE) pursuant to Section 404 of the Clean Water Act; a Chapter 253 Dam Safety Permit from DCR's Office of Dam Safety (ODS); a 401 Water Quality Certificate and possibly a WPA Variance and Superceding Order of Conditions from the Department of Environmental Protection (MassDEP); review from the Division of Fisheries and Wildlife (DFW), Natural Heritage and Endangered Species Program (NHESP); and Orders of Condition from the Hinsdale and Peru Conservation Commissions.

Because the Proponent is a state agency, MEPA jurisdiction over the project is broad, and extends to all issues with the potential to cause damage to the environment.

SCOPE

General

The DEIR should follow the general guidance for outline and content contained in Section 11.07 of the MEPA regulations, as modified by this Scope. The DEIR should include a copy of this Certificate and a copy of each comment received. The Proponent should circulate the DEIR to those parties that commented on the EENF, to officials in the Towns of Hinsdale and Peru, to any state agencies from which the Proponent will seek permits or approvals, and to any parties specified in Section 11.16 of the MEPA regulations. A copy of the DEIR should be made available for public review at the Hinsdale and Peru Public Libraries.

Project Description and Permitting

The DEIR should include a thorough description of the project, including a detailed description of construction methods and phasing. The DEIR should include a brief description of

each state permit or agency action required or potentially required, and should demonstrate that the project will meet applicable performance standards. The Proponent should also provide an update on the local permitting process for the project.

In accordance with Executive Order No. 385, "Planning for Growth" and Section 11.03 (3)(a) of the MEPA regulations, the DEIR should discuss the consistency of the project with the local and regional growth management and open space plans. The DEIR should include a brief discussion in response to comments from the Berkshire Regional Planning Commission regarding how the project could help to fulfill the goals of the Hinsdale Open Space & Recreation Plan and the 2001 *Regional Plan for the Berkshires*. The Proponent should discuss the possibility of providing a public beach area at the end of the access road as part of the project.

Alternatives

As outlined in the EENF, the Proponent evaluated a number of design alternatives during the project planning stage including the No Repair alternative and an Extreme Permanent Lake Drawdown alternative. The No Repair alternative was rejected as it would increase the potential of dam failure and related adverse impacts. The option of a permanent extreme drawdown of the lake (greater than 6 feet) as a means to entirely avoid structural dam repair was rejected as it would result in a permanent loss of 18 acres of Land Under Water, indirect impacts to upstream wetlands, and a significant loss of recreational and economic value to the lake.

The Proponent has also evaluated a number of design alternatives related to improving the stability of the dam to determine which alternative resulted in the least environmental impacts. The Proponent should expand this discussion in the DEIR, in order to clearly demonstrate that the Preferred Alternative is consistent with the objectives of MEPA review, one of which is to document the means by which the proponent plans to avoid, minimize or mitigate Damage to the Environment to the maximum extent feasible. The DEIR should fully explain any trade-offs inherent in the alternatives analysis, such as increased impacts on some resources to avoid impacts to other resources. The DEIR should also incorporate any alternatives analyses that may be required under Section 404 and 401 of the Clean Water Act.

Wetlands and Waterways

The project site contains the following wetland resource areas: Inland Bank, Bordering Vegetated Wetland (BVW), Bordering Land Subject to Flooding (BLSF), Land Under Waterbodies and Waterways (LUWW), and Riverfront Area. In addition, two separate isolated wetlands have been identified along the access roadway into the Ashmere Lake dam. The Proponent states in the EENF that a preliminary determination has been made that these wetland areas are non-jurisdictional under the Massachusetts Wetlands Protection Act and the Federal Clean Water Act. The Proponent has filed a Notice of Intent with the Hinsdale Conservation Commission for the project (DEP #181-188). A Notice of Intent filing is also required to be submitted to the Peru Conservation Commission.

The Proponent should report in the DEIR on the extent and boundaries of all wetland resource areas at the site and should clarify the status of the access road isolated wetlands. The Proponent should seek confirmation as to the jurisdictional status of the Bennett Brook stream channels currently originating at the spillway and low flow outlet, and identify applicable Riverfront Area buffers as necessary. The DEIR should include plans that clearly delineate all applicable resource area boundaries on the project site and on those portions of DCR property that are proposed as potential wetland replication sites. The Proponent should provide a functional assessment of the wetland resource areas.

According to the EENF, the project will result in the following resource area impacts:

- Bank: 105 linear feet (permanent), 1,832 linear feet (temporary)
  BVW: 46,880 sf (permanent)
- LUWW: 1,162 sf (permanent), 12,260 sf (temporary). The EENF also states that 18 acres of temporary impact to LUWW will occur due to construction period drawdown.
- Riverfront Area: 35,395 sf (permanent)

Direct wetland impacts are associated with dam widening and structural improvements to the embankment, spillway and low-level outlet. Indirect impacts are associated with the construction period drawdown and the reestablishment of perennial flow to Bennett Brook. The Proponent should clearly indicate and quantify wetland impacts associated with each component of the project, including improvements to the dam and the access road, and construction period impacts. Impacts to the adjacent wetland from direct filling and indirect impacts as a result of dewatering and dredging should be described and quantified.

The Proponent states in the EENF that the project has been designed to comply with the Performance Standards for each impacted resource area to the maximum extent feasible. The DEIR should contain more detail regarding the areas in which compliance with the Performance Standards was not feasible and why. The Proponent should specifically address compliance with the Performance Standards for Riverfront Area at 310 CMR 10.58(4). The Proponent should seek guidance from MassDEP regarding the need for a wildlife habitat evaluation per 310 CMR 10.60. If required, the Proponent should present the results of the evaluation in the DEIR.

The Proponent has requested that the project be reviewed under the Limited Project provisions outlined at 310 CMR 10.53(3)(i). I note that the regulations at 310 CMR 10.53(3)(i) may not apply to a project where repair of the dam results in a substantial enlargement of the structure. The project as proposed will increase the footprint of the dam by approximately 24% and will result in the filling of approximately 1 acre of wetland area. The project may therefore require a Variance from the WPA. The Proponent should consult with MassDEP on this issue and provide an update in the DEIR. If the project will require a Variance, the Proponent should demonstrate how it will meet the requirements of the WPA regulations at 310 CMR 10.05(10), which outline findings that the Commissioner of MassDEP must make before granting a Variance. The Proponent should also clarify whether it intends to seek limited project status for other resource areas to be altered.

Wetland Mitigation

The Proponent states in the EENF that numerous approaches to wetland mitigation have been considered during project design. I note that the BVW at the site is comprised of a conifer-dominated wetland which is a relatively uncommon natural community in Massachusetts that will be difficult to replace as part of a mitigation plan. The EENF included a discussion of potential wetland replication alternatives; according to the Proponent opportunities for on-site replication are limited. The Proponent has proposed to replicate wetlands at a ratio of slightly greater than 1:1, however the EENF highlights potential limitations with proposed replication areas. The Proponent has also evaluated several offsite areas as potential mitigation sites. Challenges associated with proposed offsite mitigation include out-of-kind mitigation, the purchase of private property, and additional permitting.

Following repairs to the dam, approximately 16,569 sf of forested BVW will be permanently cleared at the downstream toe of the dam to prevent tree growth at the base of the dam. As a mitigation measure, this area will be planted with a wetland seed mix and allowed to function as an herbaceous wetland system. The Proponent refers to this area as a Restoration Area on a Wetland Restoration and Mitigation Summary Plan submitted with the EENF. Potential wetland replication areas are also depicted on this plan, and referred to as Mitigation Areas 1 through 4. Approximately 56,000 sf of wetlands replication is shown in Mitigation Areas 1 through 4.

As part of the mitigation package, the Proponent is proposing to expand and provide permanent protection to areas along the access road identified in the EENF as non-jurisdictional isolated wetlands. These areas are referred to as Mitigation Areas 1 and 2. The EENF does not describe what kind of permanent protection is envisioned. Enlargement of these areas by means of wetland replication is proposed, which could make the resulting resource areas subject to protection under the WPA; however this does not prevent future alteration. The Proponent should clarify this issue in the DEIR.

An upland parcel of land exists south and directly adjacent to the dam; this parcel, which was recently purchased by DCR, is referred to in the EENF as the Fahey property and is the location of proposed Mitigation Areas 4 and 5. This parcel is surrounded by BVW, Bennett Brook and the low-level outlet channel. The Proponent states in the EENF that limitations exist to using the Fahey property for a replication area due to potential impacts to BVW, buffer zone, and mature upland within the Riverfront Area that would result from construction of the replication area.

The Proponent should clarify the amount of wetland replication that will be required by both state and federal requirements, and should outline how the regulations for ACECs at 301 CMR 12.00 will affect mitigation requirements. The Proponent should demonstrate how proposed replication areas would comply with the standards for BVW at 310 CMR 10.55(4). The DEIR should also discuss mitigation requirements for all other resource areas to be impacted. For all proposed wetland replication areas, the Proponent should prepare a detailed wetlands replication plan for submittal in the DEIR which, at a minimum, should include: replication location(s); elevations; typical cross sections; test pits or soil boring logs; groundwater

elevations; the hydrology of areas to be altered and replicated; list of wetlands plant species of areas to be altered and the proposed wetland replication species; planned construction sequence; and a discussion of required long-term monitoring.

In light of the difficulties involved in directly replicating impacted BVW at the site, NHESP has proposed that the Proponent conduct and/or fund a detailed inventory of conifer dominated wetland systems within the Hinsdale Flats ACEC as a means to provide mitigation for lost resource areas. I note that the ACOE indicates that the proposed inventory would not result in the replication of wetland functions and values as required under Federal Clean Water Act requirements. In its comments on the EENF, the ACOE notes that wetlands preservation may possibly be considered as a component of the mitigation plan. The Proponent should report in the DEIR on potential alternatives to achieving the necessary state and federal mitigation requirements, based on consultation with the relevant permitting agencies.

Bennett Brook Impacts

The Proponent states in the EENF that the project will result in the restoration of perennial stream flows to a section of Bennett Brook that has been artificially intermittent due to DCR's maintenance of decreased lake water levels. The project will also have the related outcome of reducing flows to the low level outlet channel, which, as noted above has been functioning as a perennial stream. The Proponent has been working with the Massachusetts Riverways Program and the Housatonic Valley Association to investigate base flow issues to Bennett Brook and potential impacts of the proposed project. The Proponent should provide supporting documentation in the DEIR regarding Bennett Brook historic flows and a reasonable estimate of the Brook's 'natural' streamflow, following guidance from the Riverways Program comment letter on the EENF.

The Proponent states that the project will incorporate measures to provide a determinable base flow to downstream resource areas through dam design and operation. According to the EENF, the goal is to provide for a low-maintenance system that provides base flows and that mimics natural flow regimes. The DEIR should describe what constitutes a determinable base flow to downstream resource areas and how that has been determined. The Proponent should provide additional information regarding how the project as currently designed will be able to provide the recommended range of flows on a consistent basis. The Proponent should clarify whether a controllable outlet structure will be installed as part of the spillway.

Construction Period Impacts

The EENF included a discussion of potential environmental impacts associated with the construction period. The project has been designed to allow the lake level to be at or near normal pool elevations for the summer recreation season, defined as the period between Memorial Day and Labor Day. In order to complete construction activities that are dependent on lake level, the Proponent will initiate a temporary drawdown of approximately 6 feet below normal pool elevation at El. 1576.0. This drawdown will allow sufficient space for the contractor to repair the upstream slope of the dam. The Proponent may also use a series of temporary cofferdams along

the upstream slope to provide adequate dry land to complete the upstream slope modifications. The Proponent should provide more information in the DEIR on the proposed drawdown and refill methodology. The Proponent should discuss how the drawdown and refill will be conducted and should clarify the rate of refill.

The Proponent states in the EENF that some dewatering is expected and has indicated that some dredging may be required as part of the project. The DEIR should clarify what areas will be dewatered and dredged and should specify the amount of fill to be dredged. The Proponent should indicate whether a Section 401 dredge permit is required, and if so, should outline how the project will comply with 314 CMR 9.07. A dewatering plan should be submitted with the DEIR.

Rare Species

The proposed work to repair the dam is not located within Priority or Estimated Habitats of rare species, however the proposed construction-period drawdown will result in impacts to mapped state-listed species habitat located within Priority Habitat (PH 897) and Estimated Habitat (272), and therefore within the regulatory jurisdiction of the Massachusetts Endangered Species Act (MESA). NHESP's primary concern about the project relates to an unnamed stream located in the southeastern corner of Ashmere Lake's south basin between Main Road and Hickingbrotham Road in Peru). This stream is mapped as habitat for the Wood Turtle (*Glyptemys insculpta*, Special Concern).

As proposed in the EENF, the Proponent would follow guidance in the *GEIR: Eutrophication & Aquatic Plant Management in MA* (July 2002) (the "GEIR") to initiate the drawdown in the fall and achieve refill by April. In this instance, NHESP is concerned that the deep drawdown may reduce the above-noted stream's baseflow sufficiently to expose Wood Turtles to thermal stress at a time of year that the species is least able to behaviorally respond. NHESP has determined that the project must be conditioned to avoid a "take" of the above-listed species. NHESP has directed the Proponent to commence the drawdown early enough to achieve the drawdown by the end of September, and otherwise to follow the guidance in the GEIR. The earlier drawdown will reduce the risk to overwintering Wood Turtles. The Proponent should commit to this condition in the DEIR and should demonstrate that it will be able to comply with this requirement given its intention to start work following Labor Day. The Proponent should also outline permitting requirements under MESA should it not be able to adhere to required NHESP conditions.

Fisheries

NHESP's comment letter on the EENF lists 10 species of fish present in Ashmere Lake and 12 species in Bennett Brook. Bennett Brook is a significant coldwater fishery resource. NHESP states in its comment that coldwater fishery resources are highly susceptible to changes in water quality and/or quantity such as siltation, water level fluctuations and alterations of temperature regime and that the project must not in any way diminish the ability of the brook to

support coldwater fish species. NHESP recommends that the Proponent follow the guidelines related to drawdown in the GEIR, specifically:

> Keep outflow during the drawdown below a discharge equivalent to 4 cubic feet per second (cfs) per square mile of watershed. Once the target water level is achieved, match outflow to inflow to the greatest extent possible, maintaining a stable water level, and
> Keep outflow during refill above a discharge equivalent to 0.5 cfs per square mile of watershed.

The Proponent should demonstrate in the DEIR that project design will allow for compliance with the above-listed guidance. The Proponent should address concerns regarding potential impacts to the thermal regime of Bennett Brook that could result from the proposed reconfiguration of downstream flows from the lake. As currently designed, the proposed weir design will result in warmer surface water entering Bennett Brook, possibly degrading water quality for the coldwater species that live there. The DEIR should include a discussion of potential thermal impacts and should outline measures that could be implemented to avoid, minimize and mitigate this impact.

Mitigation

The DEIR should contain a separate chapter on mitigation measures. It should include a Draft Section 61 Finding for all state permits that includes a clear commitment to mitigation, an estimate of the individual costs of the proposed mitigation, and the identification of the parties responsible for implementing the mitigation. A schedule for the implementation of the mitigation, based on the construction phases of the project, should also be included. As outlined above, the Proponent should clarify required wetland replication mitigation for the state and federal wetlands permitting processes and should demonstrate that required mitigation will be able to be constructed, or that permitting agencies are amenable to alternative approaches.

Comments

The DEIR should include copies of all comments submitted on the EENF. In order to ensure that the issues raised by commenters are addressed, the DEIR should include a response to comments. The DEIR should present additional narrative and/or technical analysis as necessary to respond to the concerns raised. This directive is not intended to, and shall not be construed to, enlarge the scope of the DEIR beyond what has been expressly identified in this Certificate.

April 18, 2008
Date

Ian A. Bowles

Comments received:

3/14/2008	Berkshire Environmental Action Team
3/20/2008	Division of Fisheries & Wildlife, Natural Heritage and Endangered Species Program
4/2/2008	Berkshire Regional Planning Commission
4/11/2008	Housatonic Valley Association
4/11/2008	Department of Environmental Protection, Western Regional Office
4/11/2008	Alan R. Anacheka-Nasemann, U.S. Army Corps of Engineers
4/11/2008	Massachusetts Riverways Program

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