

APPENDIX B-2

New Hampshire Department of Environmental Services  
Water Quality Monitoring Recommendations for Low Impact Hydropower Institute Certification  
of Franklin falls Hydroelectric Project (FERC Exemption No. 6950), Winnepesaukee River  
dated March 14, 2011



The State of New Hampshire  
**DEPARTMENT OF ENVIRONMENTAL SERVICES**



Thomas S. Burack, Commissioner

March 14, 2011

Stephen Hickey  
 Essex Hydro Associates, LLC  
 55 Union Street, 4th Floor  
 Boston, MA 02108

RE: Water Quality Monitoring Recommendations for Low Impact Hydropower Institute Certification of Franklin Falls Hydroelectric Project (FERC Exemption No. 6950), Winnepesaukee River

Dear Steve:

As discussed recently, we understand that Essex Hydro Associates is applying on behalf of Hydro Realty for Low Impact Hydropower Certification from the Low Impact Hydropower Institute (LIHI) for the Franklin Falls Hydroelectric Project (FERC Exemption No. 6950), on the Winnepesaukee River in Franklin, NH. We further understand that to receive LIHI certification, you need a statement from the New Hampshire Department of Environmental Services (DES) stating that the project is not causing or contributing to violations of state water quality standards. Table 1 provides the current assessment status of the parameters of concern included in the monitoring plan outlined in a later section of this letter. The information provided in Table 1 is derived from DES's 2010 305(b)/303(d) report.

**Table 1. 2010 Assessment Status for Water Quality Monitoring Parameters at the Franklin Falls Dam**

Assessment Unit	Location	Parameter	2010 305(b)/303(d) Assessment Status	
NHIMP700020203-07	Franklin Falls Dam Impoundment	Dissolved Oxygen (mg/L)	No Data	
		Dissolved Oxygen (% Saturation)	No Data	
		Chlorophyll-a	Primary Contact Recreation	Aquatic Life Use
			No Data	No Data
		Total Phosphorus	No Data	
Water Temperature	No Data Not Applicable <sup>A</sup>			
NHRIV700020203-18	Downstream of Franklin Falls Dam	Dissolved Oxygen (mg/L)	No Data	
		Dissolved Oxygen (% Saturation)	No Data	
		Chlorophyll-a	Primary Contact Recreation	Aquatic Life Use
			No Data	No Data
		Total Phosphorus	No Data	
Water Temperature	No Data Not Applicable <sup>A</sup>			

<sup>A</sup> Although there is currently no numerical water quality criteria for water temperature, NHDES is in the process of collecting biological and water temperature data that will contribute to the development of a procedure for assessing rivers and stream based on water temperature and its corresponding impact to the biological integrity of the waterbody.

In order for DES to determine if the subject hydroelectric project is causing or contributing to water quality standard violations, additional monitoring and information is needed. In general, data / information is needed to address the following water quality concerns that are typically associated with hydropower projects:

1. Impact on ambient water quality criteria;
2. Impact of pond fluctuations on aquatic habitat;
3. Maintenance of adequate minimum flows to protect downstream aquatic life; and
4. Adequate upstream and downstream fish passage.

Specifics are provided below:

1. Water Quality

Water quality parameters most vulnerable to hydroelectric projects typically include dissolved oxygen (DO), temperature, chlorophyll-a and total phosphorus. Samples are typically taken upstream and downstream of the dam. Based on our current understanding of the project, the following is recommended.

Table 2 provides proposed water quality sampling locations for the river segments of concern. Recommended parameters and frequency of monitoring are provided in Table 3 below. Figure 1, which is included at the end of this letter, depicts the project area and proposed monitoring locations.

**Table 2. Recommended Sampling Locations for Water Quality Monitoring at the Franklin Falls Dam**

Assessment Unit	Location	NHDES Station ID	Size/Acreage
NHIMP700020203-07	Franklin Falls Dam Impoundment  Route 3/11 Bridge	02-WIN	1.5 acres
NHRIV700020203-18	Downstream of Franklin Falls Dam  Franklin High School Boat Launch	01-WIN	0.58 miles

**Table 3. Recommended Water Quality Monitoring Plan for the Franklin Falls Dam**

Site ID	Location	Purpose	Parameters	Frequency
02-WIN	Route 3/11 Bridge	Determine water quality impacts of river being impounded by the Franklin Falls Dam	Continuous Dissolved Oxygen (mg/L and % Saturation) and Continuous Water Temperature (collected with Dataloggers)	At least 10 days of data collected at 15 minute increments during period of low flow ( $\leq 3 \times 7Q_{10}$ ) and high temperatures (preferably over 23 degrees C). Dataloggers should be set at the bottom of the epilimnion (if stratified) or at 25% depth if not stratified.
			Instantaneous Dissolved Oxygen (mg/L and % Saturation) and Water Temperature	2 vertical profiles collected on 2 days when continuous dataloggers are deployed. Profiles should be at 1 foot increments from surface to bottom
			Total Phosphorus and Chlorophyll-a	10 samples - once a week for 10 weeks (from May 24 through September 15)
01-WIN	Franklin High School Boat Launch	Determine water quality condition downstream of the Franklin Falls Dam	Continuous Dissolved Oxygen (mg/L and % Saturation) and Continuous Water Temperature (collected with Dataloggers)	At least 10 days of data collected at 15 minute increments during period of low flow ( $\leq 3 \times 7Q_{10}$ ) and high temperatures (preferably over 23 degrees C).
			Total Phosphorus and Chlorophyll-a	10 samples - once a week for 10 weeks (from May 24 through September 15)

Prior to sampling, a sampling plan should be submitted to DES for approval which includes sampling locations, parameters to be sampled, sample timing and frequency, sampling and laboratory analysis protocols and quality control provisions. DES can provide examples of sampling plans upon request.

For each sampling station and event the following should be provided:

- Site map with longitudinal and latitudinal coordinates
- Site description including weather, vegetation, flow conditions, and any other site conditions that would potentially impact water quality
- Photographs of each monitoring location.

With regards to quality assurance/quality control, the following is recommended:

- During two sampling events replicate samples should be collected for laboratory analysis.
- A suite of field blanks should be collected for laboratory analysis during one sampling event.
- Multiparameter dataloggers and handheld meters should be calibrated for dissolved oxygen before each sampling event on-site according to the manufacturer's instructions.
- Field sampling quality control should consist of 1) replicate analysis, 2) maintenance records, 3) field calibration and record of calibration, and 4) record of equipment used.
- Instrument and equipment maintenance should include: 1) checking field test kits to be sure all reagents are in good working order and are not beyond expiration dates, 2) replacing reagents in accordance with manufacturer's recommendations, 3) calibrating

equipment before each sampling event, and 4) recording of maintenance and calibration activities.

- Chain of custody forms and information regarding laboratory standard methods should be submitted to DES with the data.

The sampling plan should also specify that water quality data will be collected under critical low flow/high water temperature conditions. The United States Geologic Services maintains a stream gage (USGS 01081000) in Tilton, NH on the Winnepesaukee River approximately five miles upstream of the Franklin Falls Dam. Data from this gage can be used to estimate when the Winnepesaukee River at the Franklin Falls Dam is flowing below 3 x 7Q10 low flow conditions. The 3 X 7Q10 value for USGS stream gage 1081000 is 529 cfs. During the sampling period the Franklin Falls Hydroelectric dam should be operating under normal operating procedures.

Finally, the plan should specify that all data should be submitted to DES electronically and in a form that can be automatically uploaded into the DES Environmental Monitoring Database (EMD). Information on uploading data to the EMD can be found at <http://des.nh.gov/organization/divisions/water/wmb/emd/index.htm> or by contacting Melanie Titus at (603) 271-1152 or [Melanie.Titus@des.nh.gov](mailto:Melanie.Titus@des.nh.gov).

## 2. Pond Fluctuation

Pond fluctuations due to operation of hydroelectric projects can negatively impact aquatic habitat and aquatic life. To determine the impact of pond fluctuations on aquatic life, the following is typically needed:

- a. A description and schematic of the project including the dam height, length, control structures and elevations, crest elevation, flashboard elevations, and impoundment depth, elevation, area and volume at full pool, normal and maximum drawdown elevations;
- b. Timing, frequency, duration and magnitude of drawdowns
- c. Historical water level fluctuations over the past 5 years
- d. Map of fringing wetlands preferably delineated from high-resolution aerial photography
- e. An estimate of the average and maximum percent of the littoral zone (preferably based on accurate bathymetry) that is dewatered as well as average and maximum duration of dewatering for each quarter of the calendar year

## 3. Minimum Flows

To determine if adequate flow to support aquatic life is provided downstream of the facility, the following is typically needed:

- a. Minimum flow requirements through the penstock and bypass reach;
- b. Information on how the minimum flows were determined;
- c. Information on how compliance with minimum flow requirements is determined; and
- d. Documentation proving compliance with minimum flow requirements for the past five years.

Based on the data received, additional analyses may be required.

## 4. Fish Passage

To address fish passage concerns, DES will need notification from the New Hampshire Fish and Game Department stating that they are satisfied with upstream and downstream fish passage provisions associated with the subject project. Once the project receives a letter of approval from Fish and Game a

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copy of this letter should be provided to DES. Contact information for obtaining fish passage certification from Fish and Game is provided below.

Carol Henderson  
NH Fish and Game Department  
11 Hazen Drive, Concord, NH 03301  
603-271-3511  
[carol.henderson@wildlife.nh.gov](mailto:carol.henderson@wildlife.nh.gov)

Once all of the data has been submitted, NHDES will make a determination regarding compliance of the project with NH water quality standards.

Should you have any questions regarding these recommendations or wish to arrange a meeting, please contact me at (603)271-2083 ([ted.walsh@des.nh.gov](mailto:ted.walsh@des.nh.gov)).

Sincerely,

A handwritten signature in black ink, appearing to read "Ted Walsh", written in a cursive style.

Ted Walsh, Surface Water Monitoring Coordinator  
NH DES Watershed Management Bureau

cc: Fred Ayer, Low Impact Hydropower Institute  
Carol Henderson, New Hampshire Fish and Game

Figure 1. Project Area and Proposed Monitoring Locations – Franklin Falls Hydroelectric Dam

