



MASSWILDLIFE

File Number: NOI #2026-04/DEP #229-0271

DIVISION OF FISHERIES & WILDLIFE

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MASS.GOV/MASSWILDLIFE

May 28, 2026

Walter Ramsey
Town of Montague
One Avenue A
Turners Falls, MA 01376

Montague Conservation Commission
One Avenue A
Turners Falls
Montague, MA 01376

Applicant: Walter Ramsey, Town of Montague
Project Location: 8 and 20 Canal Road
Project Description: Former Strathmore Mill Abatement, Demolition and Restoration Project
DEP Wetlands File No.: 229-0271
NHESP File No.: 24-18890
Heritage Hub Form ID: RC-98809

Dear Commissioners and Applicant:

The Natural Heritage & Endangered Species Program of the Massachusetts Division of Fisheries & Wildlife (the "Division") received a Notice of Intent in compliance with the rare wildlife species section of the Massachusetts Wetlands Protection Act Regulations (310 CMR 10.58(4)(b), 10.59). The Division also received the MESA Review Checklist and supporting documentation for review pursuant to the MA Endangered Species Act Regulations (321 CMR 10.18).

Project Description

The Project is a portion of the work associated with the demolition and restoration of the former Strathmore Mill. This submittal describes activities for the asbestos abatement and demolition of up to nine (9) buildings and ancillary structures associated with the Historic Mill Complex. Buildings #1, #2, #3, #4, #5/5A, #6/6A, #7, #8, and #11, the smokestack located in the courtyard, and the loading dock attached to Building #3 are scheduled for demolition. Tailrace #3 beneath Building #3 is also scheduled for capping and closure in situ.

Tailrace #3, located beneath Building #3, originates at the Power Canal and terminates at the riverside foundation wall along the Connecticut River. The Tailrace has an arch opening approximately 20 feet wide and 10 feet high; the area inside Tailrace #3 is approximately 20 feet across and 30 feet deep with 13-foot ceilings. Tailrace #3 is masonry and concrete construction with pipe penetrations on the back wall. Steel supports are in place for further structural stability. Debris (e.g., brick, driftwood) and silt have accumulated on the floor of the tailrace near the outlet due to water backing up from the Connecticut River. Steel I-beams on the ceiling are approximately three

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(3) feet on center. Historically, water from the Power Canal flowed through the raceway, through the tailrace, and discharged to the Connecticut River. The inlet (penstock) was capped by the Town during the summer of 2018. The outlet remains open. Under the Base Bid, the tailrace is scheduled to be sealed at the outlet archway with a concrete wall and filled with flowable concrete fill beneath Building #3 and the East Courtyard.

State-Listed Species

The Division has determined that this Project, as currently proposed, will occur **within** the actual habitat of the following species:

<u>Scientific Name</u>	<u>Common Name</u>	<u>Taxonomic Group</u>	<u>State Status</u>
<i>Acipenser brevirostrum</i>	Shortnose Sturgeon	Fish	Endangered
<i>Symphotrichum tradescantii</i>	Tradescant's Aster	Plant	Threatened
<i>Deschampsia cespitosa ssp. glauca</i>	Tussock Hairgrass	Plant	Endangered
<i>Myotis septentrionalis</i>	Northern Long-eared Bat	Mammal	Endangered
<i>Perimyotis subflavus</i>	Tricolored Bat	Mammal	Endangered

These species and their habitats are protected in accordance with the rare species provisions of the WPA and the MESA.

The purpose of the Division's review of the proposed project under the WPA regulations is to determine whether the project will have any adverse effects on the Resource Areas Habitats of state-listed species. The purpose of the Division's review under the MESA regulations is to determine whether a Take of state-listed species will result from the proposed project.

Tailrace #3 - Capping and Closure Only

Based on the information provided and the information contained in our database, it is the opinion of the Division that this portion of the project, as currently proposed, **must be conditioned in order to avoid adverse effects to the Resource Area Habitats of state-listed wetland wildlife species (310 CMR 10.37, 10.58(4)(b), 10.59; Shortnose Sturgeon, Lota lota) and must be conditioned in order to avoid a prohibited Take of state-listed species (321 CMR 10.18(2)(a); Shortnose Sturgeon, Lota lota, Tradescant's Aster, and Tussock Hairgrass).** **To avoid adverse effects to the Resource Area Habitats and to avoid a prohibited Take of the specified state-listed species, the conditions attached to this letter must be met for work associated with the Tailrace #3 Capping and Closure and any work within the Connecticut River or its banks.**

Provided these conditions are included in any approving Orders of Conditions issued by the Conservation Commission, and the applicant complies with all the above noted conditions, the project will not result in an adverse impact to the resource area habitats of state-listed wildlife species pursuant to the WPA and will not result in a prohibited Take pursuant to the MESA. A copy of the final Order of Conditions shall be sent to the NHESP simultaneously with the applicant as stated in the Procedures section of the WPA (310 CMR 10.05(6)(e)).

This determination is a final decision of the Division of Fisheries and Wildlife pursuant to 321 CMR 10.18. Any changes to the proposed project or any additional work beyond that shown on the site plans may require an additional filing with the Division pursuant to the MESA. This project may be subject to further review if no

physical work is commenced within five years from the date of issuance of this determination, or if there is a change to the project.

Please note that this determination addresses only the matter of state-listed species and their habitats. If you have any questions regarding this letter please contact Melany Cheeseman, Endangered Species Review Assistant, at Melany.Cheeseman@mass.gov, (508) 389-6357.

Sincerely,

A handwritten signature in black ink, appearing to read "Jesse Leddick". The signature is fluid and cursive, with a large loop at the beginning and a smaller loop at the end.

Jesse Leddick
Assistant Director

cc: Melissa Coady
Lucas Acaba
Walter Ramsey, Town of Montague
Montague Conservation Commission
DEP Western Region

Attachment: List of Conditions

List of Conditions

Applicant: Walter Ramsey, Town of Montague
Project Location: 8 and 20 Canal Road
Project Description: Former Strathmore Mill Abatement, Demolition and Restoration Project
NHESP File No.: 24-18890
Heritage Hub Form ID: RC-98809
Approved Plan: FORMER STRATHMORE MILL ABATEMENT, DEMOLITION AND RESTORATION PROJECT
TURNER FALLS, MASSACHUSETTS PERMIT SET
Plan date: April 2026 (prepared by Tighe & Bond, 7 sheets)

To avoid adverse effects to the Resource Area Habitats and to avoid a prohibited Take of state-listed species, the following condition(s) must be met for all work associated with the Closure and Capping of Tailrace #3 and any work within the Connecticut River or its banks:

- Authorization Duration:** This authorization is valid for 5 years from the date of issuance. Work may be completed at any time during this 5-year period in compliance with the conditions herein. Thereafter, the Applicant must re-file pursuant to the MESA.
- Plant Surveys and Avoidance, Tradescant's Aster and Tussock Hairgrass:** Prior to the start of work, surveys shall be conducted to delineate and avoid impacts to this plant species in all areas of potential habitat associated with Tailrace #3.
 - Botanical field surveys must be conducted by a qualified botanist in appropriate habitats throughout all areas of proposed work and areas within 20 feet of the limit of work, including any access routes or staging areas, using methodologies consistent with the State-listed Species Habitat Assessment And Survey Guidelines: Plants (dated March 2016), see <https://www.mass.gov/doc/state-listed-species-habitat-assessment-and-survey-guidelines-plants/download>
 - The Division requires pre-approval of the botanist prior to conducting surveys. Please submit a copy of the botanist's resume/curriculum vita for review.
 - The approved botanist shall submit to the Division a time-table and survey protocol for written approval prior to initiation of field work. The survey protocol shall list the specific taxonomic characteristics for definitive identification as well as the characteristics of similar or easily confused species. Surveys should be successful at detecting the target plant in June.
 - If state-listed plants are encountered within the proposed work areas or within 20 feet of the limit of work, the Applicant must provide a detailed protection plan specifying measures to ensure the project does not result in a Take of state-listed plants to the Division for review and written approval. Please note the protection plan may necessitate additional or subsequent botanical survey work to implement required Take avoidance measures.
- Time of Year, Shortnose Sturgeon:** No work shall occur within the tailrace or Connecticut River during the spring spawning period between March 15 - June 15.
- Restoration or Stabilization:** The Division does not approve of the planting of state-listed species, even if the seeds are sourced outside of Massachusetts. Please carefully review seed mixes at the time of purchase as the specific composition and mixes frequently change, even within a year(<https://www.mass.gov/info-details/list-of-endangered-threatened-and-special-concern-species>).
- Use of Native Species:** Unless otherwise approved in writing by the Division, all seed and plantings not

thereafter maintained as lawn shall be native to the county of the project as provided in current version of the The Vascular Plants of Massachusetts: A County Checklist (see <https://www.mass.gov/doc/the-vascular-plants-of-massachusetts-a-county-checklist/download>).

6. **Completion of Construction:** Written notification shall be submitted to the Division within thirty (30) days of the completion of construction activities associated with the Project.

RECOMMENDATIONS

7. **Bat Protection:** To avoid harm to state- and federally-listed bat species, the Division recommends implementation the following measure as part of the project. To the greatest extent possible, closure of Tailrace #3 shall be avoided between October 15 and May 1, to avoid the staging and hibernation period of the Northern Longeared Bat and Tricolored Bat.