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Douglas Bennett
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Northfield Mountain/Turners Falls Projects

March 12, 2019

VIA ELECTRONIC FILING

Ms. Kimberly D. Bose
Secretary
Federal Energy Regulatory Commission
888 First Street, NE
Washington, DC 20426

Re: FirstLight Hydro Generating Company, Turners Falls Hydroelectric Project (FERC No. 1889) and Northfield Mountain Pumped Storage Project (FERC No. 2485). Filing of Studies.

Dear Secretary Bose:

FirstLight Hydro Generating Company (FirstLight) owns and operates the Turners Falls Hydroelectric Project and Northfield Mountain Pumped Storage Project. FirstLight is in the process of relicensing the facilities with the Federal Energy Regulatory Commission (FERC). FERC's August 10, 2018 Revised Process Plan and Schedule required FirstLight to file reports for the following two studies on March 15, 2019 and meet to discuss the reports by March 30, 2019 (because March 30 falls on a Saturday, FirstLight proposes to hold the meeting on Friday, March 29, 2019):

- Study No. 3.3.9: Two-Dimensional Modeling of the Northfield Mountain Pumped Storage Project Intake/Tailrace Channel and Connecticut River Upstream and Downstream of the Intake/Tailrace.
- Study No. 3.3.19: 2018 Ultrasound Array Study

Relative to Study No. 3.3.9, FirstLight filed its original (no addendums) report on March 1, 2016 and FERC issued its Determination letter on this study on June 29, 2016. In its Determination letter, FERC stated "*We recommend that FirstLight consult with the fisheries agencies after the other fish migration studies have been completed to determine if additional analysis of the modeling results is necessary to describe how velocities and flow fields near the Northfield Mountain Project intake/tailrace may be affecting fish migration*". Study No. 3.3.9 was included on FirstLight's October 9, 2018 agenda to permit time to consult with the agencies. Agencies did not request further analysis at the meeting and no comments were filed on Study No. 3.3.9. FirstLight believes it has fulfilled FERC's request to consult; however, it will include Study 3.3.9 on the March 29, 2019 meeting agenda.

In addition, FERC required that FirstLight file Phase IB Archaeological Survey (Study No. 3.7.1) reports by December 15, 2018 and the Phase II archaeological reports for Massachusetts and New Hampshire by March 15, 2019.¹ On December 14, 2018, FirstLight filed with FERC the Phase IB Archaeological Survey reports for Massachusetts, Vermont, and New Hampshire and the Phase II Archaeological Survey report for New Hampshire. As a result of comments from the Massachusetts Historical Commission, on February 8, 2019 FirstLight submitted a revised Phase IB archaeological survey report to the MHC and is hereby filing the revised Massachusetts Phase IB Archaeological Survey report with FERC. As required by regulation, the revised Phase IB report is being filed as privileged. On January 18, 2019, FERC granted

¹ No Phase II archaeological surveys were required in Vermont.

FirstLight an extension of time to May 14, 2019 to file the Phase II report for Massachusetts.

Also note that FirstLight is voluntarily conducting a 2019 Ultrasound Array Control Study this coming spring. The 2019 Study Plan is being filed along with the study reports noted above. The 2019 study plan includes two main components: a) radio tagging 250 early migrating shad at Holyoke Dam to evaluate upstream passage and b) evaluating the rates of immediate and latent survival for emigrating post-spawn shad passing through the Cabot units. For the 2019 study, there will be no ultrasound array component—FirstLight is trying to determine if shad are moving to the bypass based solely on the magnitude of bypass flow. The 2019 study will also include additional receivers to evaluate passage success at two natural barriers- Rawson Island and Rock Dam. FirstLight is also proposing to evaluate a different flow split of 50% from the Turners Falls Dam (spill) and 50% from Station No. 1 to determine if shad will continue upstream migration past the Station No. 1 tailrace and up to the Turners Falls Dam. Please note that FirstLight is not requesting the FERC to issue a Determination on the proposed 2019 Ultrasound Array Control Study Plan. We propose to discuss the study plan at the March 29 meeting.

Please note that following the FERC study plan meeting, FirstLight is scheduling a separate meeting with all interested stakeholders to discuss stakeholder views regarding recreation and shoreline erosion. The agenda for this meeting is included in [Attachment A](#). For the convenience of those who do not plan to attend the FERC study plan meeting, the stakeholder meeting on recreation will start no earlier than 1:00 p.m., even if the FERC study plan meeting ends early. For both the recreation and shoreline erosion sessions, FirstLight will provide a brief overview of relevant study results and, with respect to recreation, FirstLight's proposed changes in its April 2016 Final License Application. However, the primary purpose of the meeting will be for FirstLight to receive input from stakeholders on any proposals regarding recreation and erosion for the new license. FirstLight will then consider these proposals in developing its Amended Final License Application.

FirstLight will hold the March 29, 2019 meeting at the Northfield Visitors Center at 99 Millers Falls Road, Northfield, MA. For those wishing to call into the meeting the following conference call-in number is provided: 1-866-228-9900, Passcode 946935.

If you have any questions regarding the enclosed material, please call me at the number above.

Sincerely,

A handwritten signature in blue ink that reads "Douglas P. Bennett". The signature is fluid and cursive, with a long horizontal stroke at the end.

Douglas Bennett
Director of MA Hydro Operations

Attachment A

Attachment A

Agenda for March 29, 2019 FERC Study Report Meeting & Stakeholder Meeting

Meeting Date: March 29, 2019

Meeting Location: Northfield Mountain Visitors Center, 99 Millers Falls Road, Northfield, MA

Time	Study
<i>FERC Study Report Meeting</i>	
9:00-9:15 am	Introductions & Overall FERC Relicensing Schedule
9:15-10:00 am	Study 3.7.1 Phase 1A, 1B and II Archaeological Surveys
10:00-10:45 am	Study 3.3.19 2018 Ultrasound Array
10:45-11:00 am	Break
11:00-11:30 am	2019 Ultrasound Array Control Study Plan
11:30 am-Noon	Study 3.3.9 Two-Dimensional Modeling of the Northfield Mountain Pumped Storage Project Intake/Tailrace Channel and Connecticut River Upstream and Downstream of the Intake/Tailrace
<i>Stakeholder Meeting</i>	
1:00-2:30 pm	Discussion of Recreation Interests
2:30-2:45 pm	Break
2:45-4:15 pm	Discussion of Shoreline Erosion Interests
4:15-4:30 pm	Wrap-Up