

FEDERAL ENERGY REGULATORY COMMISSION
Washington, D. C. 20426

OFFICE OF ENERGY PROJECTS

Project Nos. 2485-000 and
1889-000 – Massachusetts
Northfield Mountain
and Turners Falls Projects
FirstLight Hydro Generating Company

Mr. John S. Howard
FirstLight Power Resources
99 Millers Falls Road
Northfield, MA 01360

October 2, 2013

Re: 2013 Full River Reconnaissance Report Schedule

Dear Mr. Howard:

This letter is in response to your letter filed on June 27, 2013, regarding the schedule for filing the 2013 Full River Reconnaissance (FRR) Report. You requested a modification to the filing date for the 2013 FRR Report from April 2014 to September 2014.

In a letter dated May 3, 2012, Commission staff approved your plan to perform the 2013 FRR in the fall of 2013, and to file the associated report no later than April 30, 2014. Subsequently, you initiated the relicensing of the two projects using the Commission's Integrated Licensing Process (ILP), and as suggested by Commission staff, the 2013 FRR is now a proposed study part under the ILP. Due to the 2013 FRR being a part of the ILP, you requested the schedule modification in order to file the 2013 FRR Report in accordance with the ILP timeline. You state the schedule modification will improve efficiency due to all studies being prepared at the same time, and comments on all studies, and your responses to those comments, will be filed during the same time periods. Additionally, you state that there is no objective reason why the report needs to be filed in April 2014, and the schedule modification will not impact erosion control work planned for 2013 and 2014. In furtherance of your requested schedule modification, your revised FRR study plan filed on August 14, 2013, includes a task to recreate the photo log from the 2007 Field Geology Services study in the summer of 2014.

On July 15, 2013, the Connecticut River Watershed Council (Watershed Council), Franklin Conservation District, and National Marine Fisheries Service (NMFS) separately filed comments in opposition to the proposed schedule modification. The

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Watershed Council and NMFS both provide the following four reasons for their opposition: (1) the FRR is mainly for license compliance, (2) the FRR Report is needed to make timely decisions on sites for future restoration, (3) the FRR data will be used to inform another study, and (4) the FRR has its own schedule that allows for staggered review and input from stakeholders. The Franklin Conservation District opposes the modification in order to allow timely decisions on bank stabilization projects.

In a letter issued on September 13, 2013, the Director of the Office of Energy Projects approved the 2013 FRR plan and schedule, and we see no compelling reason to find otherwise. We made the suggestion to incorporate the 2013 FRR into the relicensing process, while also remaining a requirement under the current licenses, to increase efficiency. We agree that modifying the schedule to conform to the ILP timeline is reasonable, and is unlikely to affect work already planned for 2013 and 2014 or cause significant delay any decisions on sites for future restoration. Based on our review of your request and the stakeholder comments, your schedule modification is approved, and the 2013 FRR Report will be due no later than September 13, 2014.

If you have any questions concerning this letter, please contact Christopher Chaney at 202-502-6778.

Sincerely,

Kelly Houff
Chief, Engineering Resources Branch
Division of Hydropower Administration
and Compliance

Document Content(s)

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