



Northfield Mountain Station
99 Millers Falls Road
Northfield, MA 01360
Ph: (413) 659-4489
Fax: (413) 422-5900
Internet: john.howard@gdfsuezna.com

John S. Howard
Director FERC Hydro Compliance
Chief Dam Safety Engineer

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VIA ELECTRONIC FILING

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

Re: FirstLight Hydro Generating Company, FERC Project Nos. 2485-063 and 1889-081
Request for Extension of Time to File Modified Study Plans

Dear Secretary Bose:

On September 13, 2013, the Commission's Director of the Office of Energy Projects issued a Study Plan Determination Letter (SPDL) for FirstLight Hydro Generating Company's (FirstLight) Turners Falls Hydroelectric Project (FERC No. 1889) and Northfield Mountain Pumped Storage Project (FERC No. 2485). The SPDL contained a determination on 20 of FirstLight's proposed 38 studies, and required FirstLight to modify three of the 20 study plans—for Study 3.5.1, Study 3.6.3, and Study 3.6.7—and file them for Commission approval no later than December 12, 2013. The purpose of this letter is to request additional time to submit two of the modified study plans.

The SPDL's recommendations for Study 3.5.1, *Baseline Inventory of Wetland, Riparian and Littoral Habitat in Turners Falls Impoundment, and Assessment of Operational Impacts on Special-Status Species*, require FirstLight to consult with the U.S. Fish and Wildlife Service (USFWS) and Massachusetts Department of Fish and Game (MADFW) on the appropriate number and location of additional transects, mapping techniques, and additional study analyses, among other aspects. It further requires FirstLight to allow at least 30 days for these agencies to comment on the proposed modifications. Due to the federal government shutdown, FirstLight has been unable to schedule a meeting to consult with these agencies. Although FirstLight has scheduled a meeting with USFWS and MADFW for November 1, it needs additional time to modify the study plan following the meeting, allow the agencies 30 days to comment on the proposed modification, and address the agencies' comments before submitting the modified plan to the Commission.

The SPDL also requires FirstLight to develop a modified plan for Study 3.6.3, *Whitewater Boating Evaluation*, in consultation with stakeholders. Specifically, the SPDL requires FirstLight to develop a detailed plan for the controlled whitewater boating assessment of the Turners Falls bypass reach, including methods to identify and evaluate access to the reach, in consultation with the National Park Service, American Whitewater, Appalachian Mountain Club, Vermont River Conservancy, the Connecticut River Watershed Council, the Friends of the Connecticut River Paddlers' Trail, MADFW,

USFWS, and the National Marine Fisheries Service.¹ The SPDL also requires FirstLight to determine the goals and concerns of each stakeholder group, and allow the stakeholders at least 30 days to comment on proposed modifications to the study. FirstLight was forced to cancel a meeting it had scheduled with these stakeholders for October 7 because of the federal government shutdown and the inability of federal resources agencies to participate. FirstLight is working with stakeholders to find a mutually agreeable meeting time for early November, and will need additional time to modify the study plan following the meeting, allow stakeholders 30 days to comment on the proposed modification, and address stakeholders' comments before submitting the modified plan to the Commission.

Finally, the SPDL also requires FirstLight to submit a modified plan for Study 3.6.7, *Recreation Study of Northfield Mountain, Including Assessment of Sufficiency of Trails for Shared Use*. The modifications include a proposed methodology for collecting the trail design and condition characteristics described in the revised study plan. The SPDL did not require FirstLight to consult with stakeholders prior to modifying this study. As a result, FirstLight intends to file the modified plan for Study 3.6.7 by the December 12 deadline.

Because the federal government shutdown required postponement of many aspects of FirstLight's study plan—including the Commission's postponement of the technical meeting to discuss the 18 studies proposed by FirstLight that were not covered by the SPDL—FirstLight respectfully requests additional time to submit the modifications to Study Plan 3.5.1 and Study Plan 3.6.3. FirstLight believes it can complete the modifications for these two study plans 30 days from the original December 12, 2013 deadline, or by January 13, 2014.

If you have any questions regarding this request, please feel free to call me.

Sincerely,

A handwritten signature in black ink, appearing to read "John Howard". The signature is fluid and cursive, with the first name "John" being more prominent than the last name "Howard".

John Howard

cc: Service Lists

¹ Although not specifically required by FERC, FirstLight will also reach out to the Massachusetts Department of Conservation and Recreation.

Document Content(s)

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