



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

February 10, 2014

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
Additional Information on Study Plan 3.6.3, Whitewater Boating Evaluation

Dear Secretary Bose:

On January 13, 2014, FirstLight Hydro Generating Company (FirstLight) filed its Modified Revised Study Plan for Study No. 3.6.3, Whitewater Boating Evaluation (MRSP). The purpose of this letter is to provide additional information in response to comments on the MRSP filed by American Whitewater on January 22, 2014, and in a memo posted to the Turners Falls Hydroelectric Project and Northfield Mountain Pumped Storage Project dockets by Federal Energy Regulatory Commission Staff on January 31, 2014.

In the MRSP, FirstLight indicated that discharges from Turners Falls Dam for the whitewater evaluation to be conducted in July, August, or September 2014 will be provided from Bascule Gate No. 1. Bascule Gate No. 1 is the gate closest to the gatehouse on river left, and the preferred point of release for the whitewater boating evaluation because of the four bascule gates, Gate No. 1 is automated to discharge the same desired flow, if the pond elevation fluctuates. FirstLight indicated in the MRSP, however, that it may conduct maintenance work on Bascule Gate No. 2 starting in July 2014, extending over approximately three months, which could restrict the use of and passing flows through the adjacent bascule gates. FirstLight stated that in the event that the maintenance work on Bascule Gate No. 2 impacts FirstLight's ability to use Bascule Gate No. 1 for the whitewater boating evaluation, FirstLight would consider releasing whitewater boating evaluation flows through the taintor gates on river right.

In its comments dated January 22, 2014, American Whitewater suggested that releases from the taintor gates would allow for an evaluation of the whitewater boating features on river right. It also recommended that FirstLight should be required to release flows for the whitewater evaluation using both the bascule gates and taintor gates.¹

¹ At the same time, American Whitewater stated that releasing water from the taintor gates may prevent an evaluation of the whitewater boating features on river left and may impact boater access for the study. FirstLight agrees with these concerns.

FirstLight hereby clarifies that it is committed to releasing the test flows from Bascule Gate No. 1 in order to evaluate whitewater releases on river left in the bypass reach; FirstLight will pull the maintenance equipment and crews working on Bascule Gate No. 2 on the weekends (anticipated to be a Friday, Saturday, and Sunday period) selected for the test flows in order to utilize Bascule Gate No. 1 for the whitewater boating evaluation. As explained below, using the taintor gates for the test flows—alone or in combination with the bascule gates—is not a safe or feasible option, and even if it were, it would not provide an accurate representation of the whitewater resource at the Turners Falls Project under normal project operation.

Barring significant unusual circumstances, FirstLight typically operates the taintor gates only when discharge at the Turners Falls Dam is expected to exceed approximately 20,000 cfs. Unlike Bascule Gate No. 1, which can be operated automatically and manipulated remotely, operation of the taintor gates is manual, local, and labor-intensive. FirstLight's normal practice is to open the taintor gates one at a time, beginning with an optimal minimum five foot opening. Use of the taintor gates at an opening of less than five feet can damage the gates' submerged seals and result in leaks. A five foot opening—the minimum opening for safe operation of the gates—allows large debris to hurl beneath the gates, which would pose a significant safety hazard to whitewater boaters in the vicinity of the gates.

A five foot opening of a single taintor gate results in releases of approximately 5,000 cfs. Coupled with the 20,000 cfs released through the bascule gates, use of the taintor gates under normal project operations results in a flow of 25,000 cfs in the bypass reach. Notwithstanding the safety concerns associated with large debris passing through the taintor gates, use of the taintor gates alone for testing while the bascule gates are not operating would be exceptional, and even if FirstLight did use the taintor gates alone, the normal minimum release from a single gate—5,000 cfs—is far in excess of the 2,500 – 3,500 cfs the MRSP envisions for the first day of the whitewater boating evaluation. It would not reflect normal operating conditions and would not accurately represent the whitewater resource at the Turners Falls Project. Moreover, discharge at the Turners Falls Dam at the level required for normal operation of the taintor gates—in excess of 20,000 cfs—is not typical of the July, August, and September timeframe, when the whitewater evaluation will be conducted.

Given these safety, operational, and practical concerns, FirstLight is committed to releasing the whitewater boating evaluation through Bascule Gate No. 1. If you have any questions regarding this filing, please feel free to contact 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

Document Content(s)

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