



United States Department of the Interior



FISH AND WILDLIFE SERVICE

New England Field Office
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In Reply Refer To: FERC Nos. 1889 and 2485 February 12, 2014
FirstLight Power Resources/GDF Suez
Connecticut River
SUPPLEMENTAL COMMENTS ON REVISED STUDY PLANS:
REQUEST FOR ADDITIONAL CONSULTATION
ON STUDIES 3.3.6 AND 3.3.11

Kimberly D. Bose, Secretary
Federal Energy Regulatory Commission
888 First Street, N.E., Room 1A
Washington, DC 20426

Dear Secretary Bose:

The following comments and requests from the U.S. Fish and Wildlife Service (Service) are in response to recent submittals by the National Marine Fisheries Service (NMFS) and FirstLight Power Resources (FLPR) pertaining to study plans 3.3.6 and 3.3.11 for the relicensing of the Turners Falls Hydroelectric Project (FERC No. 1889).

Letters from NMFS dated July 15, 2013 and November 22, 2013 indicated that unless changes were made to the methodologies for the two studies, formal consultation under section 7 of the Endangered Species Act would be required due to their potential to adversely affect shortnose sturgeon. By letter dated January 28, 2014, FLPR submitted modifications to the study plans intended to preclude the need to enter into formal consultation.

The change to study plan 3.3.6, pertaining to shad spawning, calls for replacing the egg collection effort with enhanced visual observation of shad spawning behavior. The changes to study plan 3.3.11, a fish assemblage study, involve placing a seasonal restriction on electrofishing in Transect 5 (the bypass reach) and eliminating electrofishing entirely from Transect 6 (the reach of the Connecticut River from Cabot Station downstream to the Route 116 bridge).

The Service has no objection to placing a seasonal restriction on electrofishing in Transect 5; however, we are concerned about FLPR's other proposed modifications to study plans 3.3.6 and 3.3.11. FLPR did not consult with the Service in developing these modifications and there is no indication in its January 28, 2014 letter that other alternatives were considered.

Kimberly D. Bose, Secretary
February 12, 2014

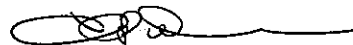
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The Service requests that stakeholders be provided an opportunity to consult with FLPR between now and when the Interim Study Report (ISR) is scheduled to be issued (September 2014), to determine if there are alternative sampling protocols that would allow for the collection of information the Service believes is necessary in order to assess project effects while addressing shortnose sturgeon concerns.

Our goal would be to have the stakeholders, including NMFS, reach consensus in time for FLPR to submit modified study plans within the ISR. Providing additional time to attempt to resolve these issues should not impact the overall study schedule, as the two studies in question will not be initiated until the 2015 field season.

Thank you for the opportunity to provide these supplemental comments on FLPR's proposed modifications to study plans 3.3.6 and 3.3.11. If you have any questions regarding these comments, please contact John Warner of this office at 603-223-2541.

Sincerely yours,



Archie
Thomas R. Chapman
Supervisor
New England Field Office

Kimberly D. Bose, Secretary
February 12, 2014

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cc: John Howard
FirstLight Power Resources
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