

FEDERAL ENERGY REGULATORY COMMISSION  
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OFFICE OF ENERGY PROJECTS

Project No. 2485-063—Massachusetts  
Project No. 1889-081—Massachusetts  
FirstLight Hydro Generating Company

Mr. John Howard  
Director – FERC Hydro Compliance  
FirstLight Hydro Generating Company  
North Field Mountain Station  
99 Millers Falls Road  
Northfield, MA 01360

**Reference: Clarification of Study Plan Determination**

Dear Mr. Howard:

On February 21, 2014, the Director, Office of Energy Projects, issued a study plan determination (determination) for the relicensing of FirstLight Hydro Generating Company's (FirstLight) Turners Falls Hydroelectric (P-1889) and the Northfield Mountain Pumped Storage (P-2485) projects. In Appendix B of the determination, *Study 3.3.7 - Fish Entrainment and Turbine Passage Mortality Study, Shad Egg and Larval Entrainment at Northfield Mountain*, our recommendation erroneously referenced "...the 2014 results of the Evaluate Downstream Passage of Juvenile American Shad study (study 3.3.3)."

The determination adjusted the schedule for study 3.3.3 to initiate the study during the 2015 study season; as such, results from study 3.3.3 would not be available in 2014. Consequently, our recommendation in the *Shad Egg and Larval Entrainment at Northfield Mountain* issue under study 3.3.7 should read as follows:

*"We recommend that FirstLight consult with FWS, NMFS, MADFW, and the Watershed Council after the 2015 results of the Evaluate Downstream Passage of Juvenile American Shad study (study 3.3.3) are available to assess the need for a second year study to further evaluate American shad egg and larval (or juvenile) entrainment at the Northfield Mountain project."*

Additionally, we note that some of our recommended modifications to FirstLight's proposed studies may result in the collection of data that is incidental to the modified study but may be relevant to other studies. It is our expectation that data collected in study "A" that may be incidental to the analysis or goals and objectives for study "A" but relevant to study "B" would be utilized in the analysis for study "B". For example, to provide information on the migration route selection and potential delayed downstream passage of American eels, in study 3.3.5 – *Evaluate Downstream Passage of American Eel*, the determination required that FirstLight provide radio-telemetry detection coverage upstream of the Turners Falls Gatehouse. Study 3.3.3 – *Evaluate Downstream Passage of Juvenile American Shad*, which is scheduled to be implemented concurrently with study 3.3.5, would also employ radio-telemetry technology. As a result, telemetry data collected at the required antenna array at the Turners Falls Gatehouse will include tag data from tagged American Eel and tagged juvenile American shad. While the shad data would be irrelevant to study 3.3.5, they are relevant to study 3.3.3 and should be utilized in that study's analysis.

If you have any questions or concerns, please contact Kenneth Hogan at (202) 502-8434 or via email at [kenneth.hogan@ferc.gov](mailto:kenneth.hogan@ferc.gov).

Sincerely,

Timothy J. Welch, Chief  
West Branch  
Division of Hydropower Licensing

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Document Content(s)

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