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Northfield Mountain/Turners Falls Project

May 30, 2019

VIA ELECTRONIC FILING

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

Re: FirstLight Hydro Generating Company, Turners Falls Hydroelectric Project (FERC No. 1889) and Northfield Mountain Pumped Storage Project (FERC No. 2485).
Response to Massachusetts Division of Fisheries and Wildlife relative to Mussel Assessment

Dear Secretary Bose:

FirstLight Hydro Generating Company (FirstLight) owns and operates the Turners Falls Hydroelectric Project and Northfield Mountain Pumped Storage Project. FirstLight is in the process of relicensing the facilities with the Federal Energy Regulatory Commission (FERC). FirstLight filed several study addendums with FERC between April 3, 2017 and May 1, 2018. On October 9, 2018, FirstLight held its Study Report meeting and filed its meeting minutes on October 24, 2018. Stakeholders submitted timely comments on the study addendums. On December 21, 2018 FirstLight filed its responsiveness summary that addressed questions raised by stakeholders. In its responsiveness summary, FirstLight stated it would file an addendum by March 1, 2019 relative to mussels on the following study:

Study No. 3.3.1 *Instream Flow Studies in Bypass Channel and below Cabot Station* including:

- Provide persistent habitat maps for Reach 3 for Yellow Lampmussels over a range of Project operations.

On January 22, 2019, FERC issued its Determination on Requests for Study Modification and New Study. In its Determination, FERC required FirstLight to expand its mussel assessment to include an assessment of Project effects on Yellow Lampmussel¹ in Reach 4 and file the results by April 22, 2019. FERC also discussed the status of the study process, including Study No. 3.3.1 as it pertains to mussels. In its Determination letter, FERC stated “*FirstLight has filed multiple study reports for studies 3.1.2, 3.3.1, 3.3.2, 3.3.15, 3.3.20, and 3.5.1, including initial and updated study reports. FirstLight has therefore fulfilled the requirements of section 5.15 of the Commission’s regulations for these studies. Accordingly, the study process for studies 3.1.2, 3.3.1, 3.3.2, 3.3.15, 3.3.20, and 3.5.1 is complete, and no additional study modification requests for these studies will be considered by Commission staff*”.

¹Specifically, FirstLight should evaluate the 4-variable (depth, substrate, benthic velocity, and shear stress) WUA versus flow relationship, conduct dual flow analysis using the 4-variable WUA and conduct shear stress mapping for adult and juvenile lampmussel at the range of flows modeled in Reach 4 for other species (1,200 to 37,500 cfs)

On March 1, 2019, FirstLight filed Addendum 5 to Study No. 3.3.1 which included an assessment of Yellow Lampmussels in Reach 3.

On April 19, 2019, FirstLight filed Addendum 6 to Study No. 3.3.1, which included an assessment of Yellow Lampmussels in Reach 4. FirstLight specifically addressed FERC's request for additional information (see footnote 1).

On May 14, 2019, the Massachusetts Division of Fisheries and Wildlife (MDFW) submitted comments on Study No. 3.3.1- Addendums 5 and 6. In its letter, MDFW requests FERC to require FirstLight to conduct additional mussel analyses in Reach 4 and 5. In addition, MDFW states that FirstLight *"is not adequately consulting with the Division in its assessment of how Project operations are impacting state-listed mussels in the Connecticut River"*.

Although FirstLight disagrees with a number of MDFW's conclusions regarding project impacts, FirstLight believes it is more appropriate to address those issues in FirstLight's amended Final License Application. Regarding MDFW's request for further studies, FirstLight agrees with FERC's January 22, 2019 Determination Letter that no additional study modifications for Study No. 3.3.1 are appropriate.

Relative to MDFW claims that FirstLight has inadequately consulted with MDFW, FirstLight has extensively consulted with MDFW both as part of the FERC Integrated Licensing Process and in stakeholder discussions and negotiations. That FirstLight has not agreed with or adopted all of MDFW's recommendations is not a reflection of failure to consult, and FirstLight looks forward to continuing to work with MDFW as the relicensing process advances.

If you have any questions regarding the above, please do not hesitate to contact me. Thank you for your assistance in this matter.

Sincerely,

A handwritten signature in blue ink that reads "Douglas P. Bennett". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Douglas Bennett
Director of MA Hydro Operations