



October 22, 2015

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 and 1889
Connecticut River Streambank Erosion Committee Request for Data Relating to Relicensing
Study No. 3.1.2

Dear Secretary Bose:

At the September 30, 2015 Updated Study Report (USR) meeting for the relicensing of FirstLight Hydro Generating Company's (FirstLight) Turners Falls Hydroelectric and Northfield Mountain Pumped Storage Projects, the Franklin Regional Council of Governments, on behalf of the Connecticut River Streambank Erosion Committee (CRSEC), requested data relating to Relicensing Study No. 3.1.2, *Northfield Mountain/Turners Falls Operations Impact on Existing Erosion and Potential Bank Instability*. Specifically, CRSEC requested at the meeting the georeferenced Exhibit K drawings that FirstLight developed for the study.

As FirstLight indicated in its May 26, 2015 filing with the Commission and again in the USR, the Exhibit K drawings were of little use in regards to a historic geomorphic assessment of the Turners Falls Impoundment. Upon preliminary review of the Exhibit K drawings it appeared that the Minimum Flow Line depicted the edge of water; however, as the drawings were reviewed more closely that does not appear to be the case. As such, FirstLight determined that the Exhibit K drawings would not be useful for the historic geomorphic assessment recommended in the Federal Energy Regulatory Commission's (FERC) January 22, 2015 Study Plan Determination (SPD).

Nonetheless, FirstLight will provide the georeferenced Exhibit K drawings, which were scanned and imported into ArcGIS, to CRSEC. Due to the size of the files, FirstLight is sending the georeferenced Exhibit K drawings for CRSEC's use on a flash drive via U.S. mail. FirstLight offers its technical assistance to CRSEC if needed to view the georeferenced Exhibit K information at various scales.

John S. Howard
Director FERC Compliance, Hydro

FirstLight Power Resources, Inc.
99 Millers Falls Road
Northfield, MA 01360
Tel. (413) 659-4489/ Fax (413) 422-5900/
E-mail: john.howard@gdfsuezna.com

As FirstLight indicated in the USR, because it has determined that the Exhibit K drawings will not be useful in conducting a historic geomorphic assessment as recommended in FERC's SPD, FirstLight is looking at the availability of alternatives to compare historic aerial imagery from multiple decades to present day for context purposes. This analysis is ongoing. The methodology used for the historic aerial imagery comparison, as well as any qualitative results or observations, will be included in the study report for Study No. 3.1.2 when it is filed in second quarter of 2016.

CRSEC also requested the survey records for the permanent transects used in Study No. 3.1.2. The survey data are being reviewed in conjunction with the BSTEM runs, which is ongoing, and will be provided to CRSEC with the study report.

If you have any questions, or need additional information, 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 larger and more prominent than the last name "Howard".

John Howard

Cc: Kimberly MacPhee, Franklin Regional Council of Governments
Tom Miner, Connecticut River Streambank Erosion Committee
John Bennett, Franklin Conservation District
Andrea Donlon, Connecticut River Watershed Council