



Commonwealth of Massachusetts
Executive Office of Energy & Environmental Affairs

Department of Environmental Protection

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Lieutenant Governor

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Kimberly D. Bose, Secretary
FERC
888 First Street, NE
Washington, D.C. 20426
Via efile

December 14, 2016

Re: FirstLight Hydro Generating Company
Northfield Mountain Pumped Storage Project, No. 2485-000
Turners Falls Hydroelectric Project No. 1889-000

Dear Secretary Bose:

The Massachusetts Department of Environmental Protection (MassDEP) has reviewed (1) the Northfield Mountain Project Sediment Management Plan and (2) the Erosion Causation Report relative to the Northfield Mountain/Turners Falls Operations Impact on Existing Erosion and Potential Bank Instability. MassDEP staff attended the study presentations on October 31, 2016 and November 1, 2016.

1. Fisheries Reports.

With respect to the Fisheries Studies presented on October 31, 2016, MassDEP does not provide comments herein, however, the Commonwealth's Department of Fish and Game, Division of Fisheries and Wildlife (DFW) is expected to provide comments as the Commonwealth's fisheries expert. MassDEP understands that two studies are to be redone due to failure of the studies for reasons beyond the control of the parties.

DFW plays a role in MassDEP's water quality certification process and to the extent DFW's comments are applicable to MassDEP's Water Quality Certification process, such comments are likely to be significant to MassDEP's Water Quality Certifications process.

2. Sediment Management Plan.

With respect to the Northfield Mountain Project Sediment Management Plan, MassDEP does not have any specific requests for additional studies at this time. MassDEP reserves the right to request additional information / studies in connection with any permit(s) that it may issue with respect to sediment management matters within its jurisdiction. In addition, MassDEP does not adopt any of the conclusions in the Sediment Management Plan and will make its own determinations based upon the data in the Sediment Management Plan and any additional information MassDEP deems appropriate. MassDEP would expect that any final Sediment Management Plan would include specific parameters and details for the dredge activities such as a schedule or triggers for dredging, sediment dewatering and disposal, targets for dredging and evaluation of dredging after each event to determine appropriate dredging parameters or intervals.

3. Erosion Causation Report.

With respect to the Erosion Causation Report relative to the Northfield Mountain/Turners Falls Operations Impact on Existing Erosion and Potential Bank Instability (the "Study"), it appears that the Study is rooted in the B-Stem Model that is the industry standard. The Study includes a substantial number of data input points which would be expected to lead to the generation of valuable data when the model is run. Further, the data incorporated into the B-Stem Model includes the information that MassDEP sought to have included as input data. Inclusion of this data appears to have resulted in the use of additional modules which are not traditionally part of the B-Stem Model. MassDEP does not have any specific requests for additional study parameters with respect to erosion at this time. MassDEP would like FirstLight to provide an explanation of the additional modules used in the B-Stem Model which are not typical of a B-Stem Model and the effect of those modules on the B-Model and results.

MassDEP reserves the right to request additional information/studies in connection with any permit(s) that it may issue with respect to erosion and/or bank instability. In addition, MassDEP does not adopt any of the conclusions in the Study and will make its own determinations based upon the data available, data generated by the B-Stem model and any additional information MassDEP deems appropriate. For example, bank failures attributed to a high flow event by the model due to a failure during a high flow event will also consider other elements such as erosion during lower flow events, bank conditions, land use and other information gathered by the Study.

4. Third Party Comments.

MassDEP notes that numerous individuals and groups, such as the Connecticut River Watershed Council (CRWC) and the Franklin Regional Council of Governments (FRCOG), attended the presentation of the studies by FirstLight. Many of those individuals and groups are likely participants in any state permitting proceedings and may have appeal rights in connection with those permit proceedings as well. In so far as comments by those parties on the various studies may be relevant to MassDEP's permitting process and may be raised as issues in those proceedings, MassDEP believes it is in the interest of all parties for FirstLight to address those issues at this time rather than wait for permitting at the state level.

I thank you for your consideration of MassDEP's comments, the comments of the Massachusetts DFW, as well as the comments of the stakeholders that have reviewed FirstLight's studies and provided feedback.

Respectfully Submitted,



Brian D. Harrington
Deputy Regional Director

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