



Douglas Bennett

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June 30, 2017

VIA ELECTRONIC FILING

Honorable Kimberly Bose, Secretary
Federal Energy Regulatory Commission
888 First Street
Washington, DC 20426

Ralph Abele
Chief, Water Quality Branch
EPA Region 1
5 Post Office Square – Suite 100
Boston, MA 02109-3912

Robert Kubit, PE
Massachusetts Department of Environmental Protection
Division of Watershed Management
8 New Bond Street
Worcester, MA 01606

Re: Northfield Mountain Pumped Storage Project (FERC No. 2485) Sediment Management Plan –
Upper Reservoir Dewatering Protocols

Dear Secretary Bose, Mr. Abele, Mr. Kubit:

FirstLight Power Resources (FirstLight) submits the enclosed report for the Northfield Mountain Pumped Storage Project (FERC No. 2485) (Project), located along the Connecticut River near Northfield, MA.

In response to the August 3, 2010 Administrative Order issued to FirstLight by the U.S. Environmental Protection Agency (USEPA), FirstLight filed a Sediment Management Plan (Plan) with the Federal Energy Regulatory Commission (FERC or Commission) on July 15, 2011. The Plan was developed in consultation with the USEPA and the Massachusetts Department of Environmental Protection (MADEP). The Plan contained proposed methods to assess sediment dynamics in the Project's Upper Reservoir and Turners Falls Impoundment (Connecticut River). Following initial field efforts and comments from the agencies, FirstLight revised its initial Plan and filed its revised Plan with the Commission on February 15, 2012. FERC issued its Order approving the Plan on March 28, 2012. In August 2013, at the request of USEPA, FirstLight included the Plan in its Revised Study Plan as Relicensing Study No. 3.1.3 *Northfield Mountain Project Sediment Management Plan*. The final report for this study was filed with the Commission and USEPA in October 2016. On December 15, 2016, USEPA Region 1 filed comments with the Commission. The comments requested that FirstLight provide greater detail on dewatering protocols, plans, procedures, and schedule for their review and update. The comments also requested FirstLight propose additional monitoring of discharges during a dewatering.

As part of the Final Report (Section 5-1), FirstLight indicated that it would develop dewatering protocols for future Upper Reservoir dewatering's. FirstLight committed to filing these protocols with FERC, USEPA, and MADEP by June 30, 2017. To satisfy this commitment, enclosed please find the *Northfield Mountain Pumped Storage Project Sediment Management Plan – Upper Reservoir Dewatering Protocols*. The enclosed document addresses the issues identified above, and includes discussion pertaining to relevant background information, measures to minimize the risk of excessive sediment releases during a dewatering,

dewatering protocols, reviewing and updating, monitoring, and agency notification. Upon review of the enclosed document, if you have any questions, or need additional information, please feel free to contact me.

Sincerely,

A handwritten signature in blue ink that reads "Douglas P. Bennett". The signature is fluid and cursive, with a horizontal line extending from the end of the name.

Douglas Bennett
Acting Plant Manager

cc:

George Harding, USEPA Region 1
David Cameron, MADEP
Brian Harrington, MADEP