



August 23, 2017

**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).  
Study No. 3.3.1 Instream Flow Study- Reach 5 Mussels

Dear Secretary Bose:

On October 14, 2016, FirstLight Hydro Generating Company (FirstLight) filed with the Federal Energy Regulatory Commission (FERC), the study report for Relicensing Study No. 3.3.1 *Instream Flow Studies in the Bypass Reach and below Cabot Station*. On October 31 and November 1, 2016, FirstLight held its study report meeting in which Study No. 3.3.1 was discussed. After filing meeting minutes on November 15, 2016, comments on Study No. 3.1.1 were filed by the United States Fish and Wildlife Service (USFWS), the National Marine Fisheries Service (NMFS), and the Massachusetts Division of Fisheries & Wildlife (MADFW). On January 17, 2017, FirstLight filed its responsiveness summary and agreed to file an addendum to the report to address the commenters' concerns.

On January 4, 2017, FirstLight had a conference call with the USFWS and MADFW (specifically the Natural Heritage and Endangered Species Program, NHESP) to discuss how to assess mussels in Reach 5. Following this call, FirstLight agreed to provide USFWS and MADFW with conference call minutes and a proposed enhanced mussel screening level analysis in Reach 5. On January 17, 2017, FirstLight provided, via email, to USFWS and NHESP a draft study plan for an enhanced screening-level mussel analysis in Reach 5. On February 27, 2017, MADFW and USFWS emailed FirstLight, separately, their comments on the proposed enhanced screening analysis. Both agencies were seeking a more in-depth analysis. Given this, FirstLight reconsidered its approach and on May 19, 2017, FirstLight emailed all stakeholders a revised study plan to conduct an instream flow study in Reach 5 for state-listed mussels and host fish.

In the afternoon of June 1, 2017, FirstLight had a meeting at the Northfield Visitors Center to discuss the study plan and solicit comments. In attendance were NHESP, USFWS, The Nature Conservancy (TNC) and FERC. Comments were provided at the meeting. With these comments, FirstLight updated the instream flow study plan addendum and emailed it to all stakeholders on June 5, 2017. In the email, FirstLight requested any final comments on the study plan.

On June 9, 2017, NHESP emailed FirstLight agreeing to the study, but had additional notes relative to the shear stress analysis. USFWS and TNC also emailed FirstLight on June 9, 2017 concurring with NHESP comments.

**Douglas Bennett**  
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FirstLight revised the study plan again based on the comments received and sent it to all stakeholders on July 28, 2017, requesting the concurrence of USFWS, NHESP and TNC on the final plan. On August 7, 2017, NHESP emailed FirstLight expressing its support of the final study plan. On August 8, 2017, USFWS and TNC expressed their support of the final study plan.

FirstLight is not seeking FERC approval of the study plan as Study 3.3.1 was already approved by FERC on February 21, 2014. The plan is being filed for informational purposes, such that FERC has a complete understanding of the proposed work being conducted as an addendum to Study 3.3.1 in Reach 5 for state-listed mussels.

If you have 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 written in a cursive style with a horizontal line extending to the right.

Douglas Bennett  
Plant General Manager