

FEDERAL ENERGY REGULATORY COMMISSION  
WASHINGTON, D.C. 20426  
August 10, 2018

OFFICE OF ENERGY PROJECTS

Project No. 1889-085 – Massachusetts/New  
Hampshire/Vermont  
Project No. 2485-071 – Massachusetts  
FirstLight Hydro Generating Company

**Subject: Revised Process Plan and Schedule – Northfield Mountain Pumped  
Storage Project and Turners Falls Hydroelectric Project**

To All Interested Parties:

On April 29, 2016, FirstLight Hydro Generating Company (FirstLight) filed a license application for the Turners Falls Hydroelectric Project No. 1889 (Turners Falls Project) and the Northfield Mountain Pumped Storage Project No. 2485 (Northfield Mountain Project). In the license application, FirstLight indicated that it would amend its license application after completing additional field work, consultation, and analyses on studies that were not complete when the application was filed. On May 13, 2016, the Commission issued public notice of the license application, stating that Commission staff would issue a revised procedural schedule after FirstLight files the remaining study reports and amends the license application.

As of April 29, 2016, FirstLight had completed 11 of the 39 studies required for the relicensing process.<sup>1</sup> Since filing its license application, FirstLight has completed an additional 19 studies.<sup>2</sup> Study determinations requiring additional information for the nine

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<sup>1</sup> A study determination for studies 3.1.1, 3.2.2, 3.3.14, 3.3.17, 3.4.2, 3.6.2, 3.6.3, 3.6.4, 3.6.7, 3.7.2, and 3.7.3 was issued on January 15, 2016, with no modifications to those studies.

<sup>2</sup> A study determination for studies 3.2.1, 3.3.4, 3.3.11, 3.3.18, 3.4.1, 3.6.1, and 3.6.5 was issued on June 29, 2016, with no modifications to those studies. A study determination for studies 3.1.3, 3.3.6, 3.3.7, 3.3.8, 3.3.12, 3.3.13, 3.3.16, and 3.6.6 was issued on February 17, 2017, with no modifications to those studies. A study determination for studies 3.3.5, 3.3.10, and 3.8.1 was issued on June 27, 2017, with no modifications to those studies. A study determination for study 3.3.3 was issued on May 31, 2018, with no modifications to that study.

remaining studies were issued on June 29, 2016, February 17, 2017, and June 27, 2017.<sup>3</sup>

### *Revised Study Reports Filed with the Commission*

Between April 3, 2017 and May 1, 2018, FirstLight filed revised study reports for six of the remaining nine studies as follows. On April 3, 2017, FirstLight filed a revised study report for study 3.1.2 (*Northfield Mountain/Turners Falls Operations Impact on Existing Erosion and Potential Bank Instability Study*), and study report addenda for studies 3.3.1 (*Conduct Instream Flow Habitat Assessments in the Bypassed Reach and Below Cabot Station*) and 3.5.1 (*Baseline Inventory of Wetland, Riparian, and Littoral Habitat in the Turners Falls Impoundment, and Assessment of Operational Impacts on Special Status Species*). On May 1, 2017, FirstLight filed a study report addendum for study 3.3.2 (*Evaluate Upstream and Downstream Passage of Adult American Shad*) and a study report errata for study 3.3.1. On July 28, 2017, FirstLight filed a study report addendum for study 3.3.20 (*Entrainment of American Shad Ichthyoplankton at the Northfield Mountain Pumped Storage Project Study*). Finally, on May 1, 2018, FirstLight filed study report addenda for studies 3.3.1 and 3.3.15 (*Assessment of Adult Sea Lamprey Spawning within the Turners Falls Project and Northfield Mountain Project Areas*).

### *The Three Remaining Ongoing Studies*

The June 29, 2016 study determination required FirstLight to consult with fisheries agencies after all fish migration studies are completed to determine if additional analysis of the modeling results from study 3.3.9 (*Two-Dimensional Modeling of the Northfield Mountain Pumped Storage Project Intake/Tailrace Channel and Connecticut River Upstream and Downstream of the Intake/Tailrace*) is necessary to describe the effects of the Northfield Mountain Project on fish migration. FirstLight has not filed information on its consultation efforts or whether additional analysis is anticipated.

The February 17, 2017 study determination for study 3.7.1 (*Phase IA Archeological Survey*) clarified that FirstLight is required to conduct Phase IB surveys along all legally-accessible portions of 24,425 meters of shoreline that was identified as archaeologically sensitive and actively eroding within the Turners Falls Project boundary,

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<sup>3</sup> The June 29, 2016 study determination required modifications to study 3.3.9. The February 17, 2017 determination required modifications to studies 3.3.1, 3.3.15, and 3.5.1, and accounted for FirstLight's commitment to provide additional information to stakeholders on studies 3.1.2, 3.3.2, and 3.5.1. In addition, the February 17, 2017 determination clarified the scope of study 3.7.1, including the need to conduct additional field surveys. The June 27, 2017 determination accounted for FirstLight's commitment to provide additional information to stakeholders on studies 3.3.19 and 3.3.20.

and conduct Phase II investigations on sites that are identified as archaeologically sensitive during the Phase IB surveys. FirstLight sought rehearing of the study determination, which the Commission denied on March 15, 2018.<sup>4</sup> The Commission established a September 1, 2018 deadline for FirstLight to file the results of the Phase IB and Phase II investigations. On August 8, 2018, staff provided an extension of time until December 15, 2018 for FirstLight to file the New Hampshire and Massachusetts Phase IB reports, and an extension of time until March 15, 2019 to file the New Hampshire and Massachusetts Phase II reports.

In its April 13, 2018 filing, FirstLight states that the revised study report for study 3.3.19 (*Evaluate the Use of An Ultrasound Array to Facilitate Upstream Movement to Turners Falls Dam by Avoiding Cabot Station Tailrace*) will be completed by October 15, 2018.

#### *Revised Process Plan and Schedule*

To establish a schedule for stakeholders to request modifications to the revised study reports that have been filed with the Commission and the revised study reports that will be filed in the future for ongoing studies, we are issuing the attached revised process plan and schedule for the nine studies that are pending and have not yet been completed, including studies 3.1.2, 3.3.1, 3.3.2, 3.3.9, 3.3.15, 3.3.19, 3.3.20, 3.5.1, and 3.7.1.<sup>5</sup> The process plan and schedule may be revised in the future, as appropriate. After FirstLight files the amended license application, Commission staff will issue a revised procedural schedule with target dates for the milestones needed to process the application. If you have any questions, please contact Brandon Cherry at (202) 502-8328 or [brandon.cherry@ferc.gov](mailto:brandon.cherry@ferc.gov).

Sincerely,



Vince Yearick  
Director  
Division of Hydropower Licensing

Attachment: Revised Process Plan and Schedule

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<sup>4</sup> *FirstLight Hydro Generating Company*, 162 FERC ¶ 61,235 (2018).

<sup>5</sup> Commission staff last issued a process plan and schedule for FirstLight's projects on May 5, 2016.

## REVISED PROCESS PLAN AND SCHEDULE

The process plan and schedule do not include all milestones that will be needed to process the amended license application. Shaded milestones are unnecessary if there are no study disagreements. If a due date falls on a weekend or holiday, the due date is the following business day. Early filings or issuances will not result in changes to these deadlines.

<b>Responsible Party</b>	<b>Milestone</b>	<b>Date</b>	<b>FERC Regulation</b>
FirstLight	Filed Revised Study Reports for Studies 3.1.2, 3.3.1, 3.3.2, 3.3.15, 3.3.20, and 3.5.1	4/3/17 to 5/1/18	5.15(f)
All Stakeholders	Study Report Meeting	10/9/18	5.15(c)(2) 5.15(f)
FirstLight	File Study Report Meeting Summary	10/24/18	5.15(c)(3) 5.15(f)
All Stakeholders	File Requests for Study Plan Modifications	11/23/18	5.15(c)(4) 5.15(f)
All Stakeholders	File Responses to Disagreements/Amendment Requests	12/23/18	5.15(c)(5) 5.15(f)
FERC	Issue Director's Determination on Disagreements/Amendments	1/22/19	5.15(c)(6) 5.15(f)
FirstLight	File Revised Study Reports for Studies 3.3.9, 3.3.19, and 3.7.1 <sup>1</sup>	3/15/19	5.15(f)
All Stakeholders	Study Report Meeting	3/30/19	5.15(c)(2) 5.15(f)
FirstLight	File Study Report Meeting Summary	4/14/19	5.15(c)(3) 5.15(f)
All Stakeholders	File Requests for Study Plan Modifications	5/14/19	5.15(c)(4) 5.15(f)
All Stakeholders	File Responses to Disagreements/Amendment Requests	6/13/19	5.15(c)(5) 5.15(f)

<b>Responsible Party</b>	<b>Milestone</b>	<b>Date</b>	<b>FERC Regulation</b>
FERC	Issue Director's Determination on Disagreements/Amendments	7/13/19	5.15(c)(6) 5.15(f)
FirstLight	File Amended License Application	TBD	5.27
FERC	Issue Notice of Acceptance and Ready for Environmental Analysis	TBD	5.22(a)

<sup>1</sup> On August 8, 2018, staff provided an extension of time until December 15, 2018 for FirstLight to file the New Hampshire and Massachusetts Phase IB reports for study 3.7.1, and an extension of time until March 15, 2019 to file the New Hampshire and Massachusetts Phase II reports for study 3.7.1.