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Douglas Bennett  
Director MA Hydro Operations  
Northfield Mountain/Turners Falls Projects

March 1, 2019

**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).

- Addendum 5 for Study No. 3.3.1
- Addendum 3 for Study No. 3.5.1

Dear Secretary Bose:

FirstLight Hydro Generating Company (FirstLight) owns and operates the Turners Falls Hydroelectric Project and Northfield Mountain Pumped Storage Project. FirstLight is in the process of relicensing the facilities with the Federal Energy Regulatory Commission (FERC). FirstLight filed several study addendums with FERC between April 3, 2017 and May 1, 2018. On October 9, 2018, FirstLight held its Study Report meeting and filed its meeting minutes on October 24, 2018. Stakeholders submitted timely comments on the study addendums. On December 21, 2018 FirstLight filed its responsiveness summary that addressed questions raised by stakeholders. In its responsiveness summary, FirstLight stated it would file addendums by March 1, 2019 on the following studies:

*Study No.3.3.1 Instream Flow Studies in Bypass Channel and below Cabot Station*

- Provide persistent habitat maps for Reach 3 and dual flow analysis in Reach 4 for the new Sea Lamprey Habitat Suitability Index (HSI) curves.
- Provide persistent habitat maps for Reach 3 for yellow lampmussels over a range of Project operations.

*Study No. 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*

- Provide additional information relative to FirstLight's analysis of Puritan and Cobblestone Tiger Beetles.

On January 22, 2019, FERC issued its Determination on Requests for Study Modification and New Study. In its Determination, FERC required FirstLight to expand its mussel assessment to include an assessment of Project effects on yellow lampmussel<sup>1</sup> in Reach 4 and file the results by April 22, 2019. Although

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<sup>1</sup> Specifically, FirstLight should evaluate the 4-variable (depth, substrate, benthic velocity, and shear stress) WUA versus flow relationship, conduct dual flow analysis using the 4-variable WUA and conduct shear stress mapping for adult and juvenile lampmussel at the range of flows modeled in Reach 4 for other species (1,200 to 37,500 cfs).

FirstLight was striving to complete the new Sea Lamprey HSI curve dual flow analysis in Reach 4 by March 1, 2019; however, it will be delayed and filed on April 22, 2019. All Reach 4 findings (Sea Lamprey and the FERC-required yellow lampmussel assessment) will be filed on April 22, 2019.

If you have any questions regarding the enclosed material, please call me at the number above.

Sincerely,

A handwritten signature in blue ink that reads "Douglas P. Bennett". The signature is written in a cursive style with a long horizontal stroke at the end.

Douglas Bennett  
Director of MA Hydro Operation