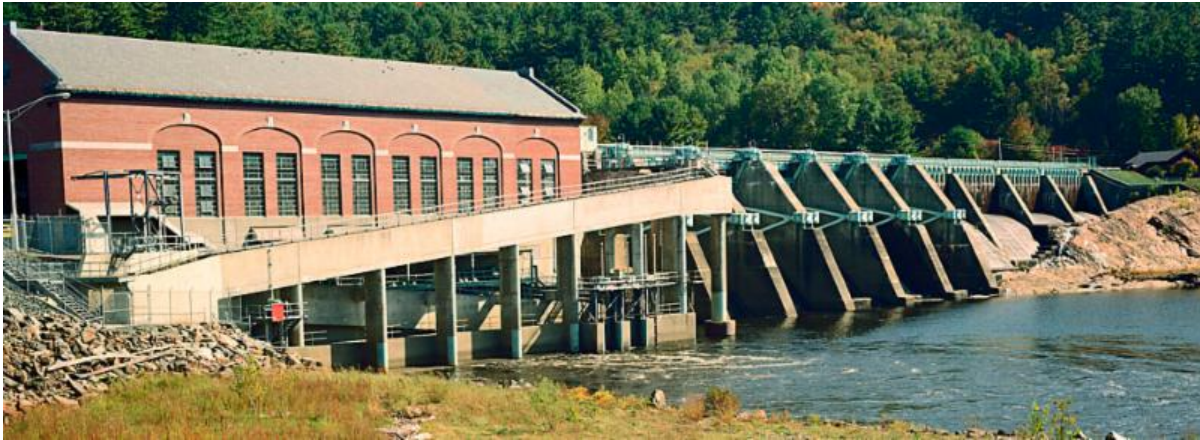


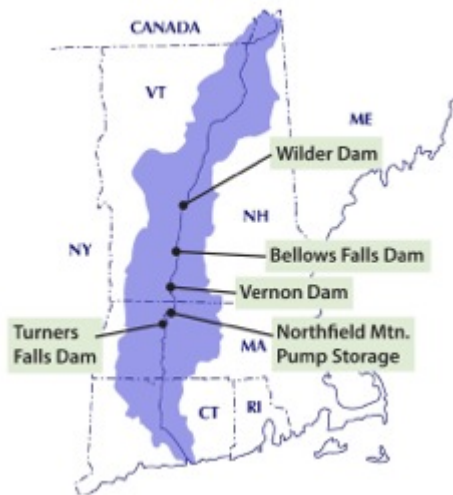
April, 2021



Clean water. Healthy habitat. Thriving communities.

**Connecticut River  
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**Take Action**  
 for Your Rivers


## Hydropower Updates



Amended Final License Applications for five FirstLight and Great River Hydro facilities on the Connecticut River have been submitted to the Federal Energy Regulatory Commission (FERC).

**Start doing your homework now to be ready to comment by July!**

**The next 12 months are critical to determine the final outcome for our rivers.** These licenses will endure for the next 30-50 years and impact hundreds of miles of the Connecticut River. FirstLight, owner of the Turners Falls Dam and Northfield Mountain Pumped Storage in MA, released their final applications Friday, December 4 and Great River Hydro, owner of the Wilder, Bellows Falls, and Vernon Dams in VT and NH, released their applications on Monday, December 7.

FERC issued a procedural schedule for all five projects on December 16, which indicates that they expect all of the applications to be ready for Environmental Analysis by May. Since then FirstLight asked for an additional 90 days to update their model at FERC's request. **We believe this pushes the public comment period back to July - September.**

The Amended Final License Applications (AFLA) are long and have many different components. Below are CRC's take on the broader elements of the AFLAs, including links for more details.

**Remember: CRC River Stewards Andrea and Kathy are available** to update your local town board or interested group on the relicensing process and CRC's concerns about the river. It is important that all parties re-engage as we come into this final stretch of this once-in-a-lifetime relicensing process

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## **FirstLight Facilities in MA**

### **Turners Falls Dam & Northfield Mountain Pumped Storage**

CRC is pleased that FirstLight is addressing what science has told us for years by proposing to build a Holyoke-style fish lift at the Turners Falls dam to improve decades of inadequate fish passage. And they will be putting more water (amount varies by season) into the river channel below the dam. There are fisheries issues that need to be better addressed or mitigated – protection for downstream migrating fish at Cabot Station, peaking operations, minimum flows at the dam during the fall and winter, and impacts to shad eggs and larvae from Northfield Mountain.

CRC is disappointed that FirstLight offers nothing to minimize or fix erosion that has been a huge issue since Northfield Mountain Pumped Storage began operating in 1972. FirstLight is proposing to use additional water in the upper reservoir, and they propose no changes to the 9-ft variation allowance in the river levels in the Turners Falls impoundment.

While the company will maintain existing recreational offerings, they propose only meager additions of three paddling put-ins and a renovation of an access spot (Poplar Street) that has needed work for the past 20 years. FirstLight has also proposed a series of whitewater

releases at the Turners Falls Dam. CRC expects and the public deserves for the company to invest significantly in resources for recreation patterns through 2070.

FirstLight continues to downplay the amount of revenue they make and highlight expected losses in generation or costs to build enhancements, many of which are the cost of doing business, like dredging the upper reservoir and moving the Riverview boat dock to accommodate the proposed Northfield barrier net.

[CRC submitted a letter](#) on January 27 to FERC requesting more information than FirstLight provided in their Amended Final License Applications (AFLA).

**You can learn more about  
the details of the  
FirstLight application by  
viewing our January 27  
LiveStream virtual  
presentation:**



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## **Great River Hydro Facilities in VT & NH Wilder, Bellows Falls, and Vernon Dams**

Great River Hydro proposed an alternative operational scenario that will be much better for the river, but they offered little else in the Amended Final License Applications (AFLA) for protection, enhancement, and mitigation for our communities over the next 30 to 50 years.

CRC was concerned with information lacking in the AFLA so we [submitted comments](#) to FERC on January 28.

**You can learn more about  
the details of the Great**



**River Hydro application by  
viewing our January 13  
LiveStream virtual  
presentation:**

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## Next Steps

The Federal Energy Regulatory Commission (FERC) is in the process of collecting additional information between now and May. We can expect a notice that the application will be ready for environmental analysis sometime after May 2021. This gives us time to fully analyze and understand the applications and **prepare to file comments and interventions between July and September.**

CRC encourages the public to get involved in this once-in-a-lifetime opportunity to influence these operating licenses. You can prepare by:

- think about what you would say in a letter to FERC,
- [sign up for the FERC docket](#) to receive notices,
- get in touch with legislators,
- get in touch with your town administrator or select board,
- be in touch with the state recreation staff,
- tell all your friends and neighbors,
- write a letter to the editor.



**CRC River Stewards Kathy and  
Andrea will be holding virtual events  
on the following dates to answer  
questions and help with this process:**

**April 6 at 6:30PM  
Hydropower Happy Hour: VT-NH Dams**

**REGISTER**

**April 14 at 9:30AM**  
**Hydropower Coffee Hour: River Critters**

**REGISTER**

**May 12 at 9:30AM**  
**Hydropower Coffee Hour: Recreation**

**REGISTER**

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## **Additional Resources**

**Full License Applications** submitted to the Federal Energy Regulatory Commission (FERC):

- **Great River Hydro:** Open “Final Licensing Application” folder. Most information is in “Exhibit E.”
- **FirstLight:** Executive Summary Table ES-1 shows inflated cost amounts that include a hidden expected energy revenue loss, whereas Exhibit D for the two facilities show lower costs. Otherwise, the Executive Summary is a concise summary of what the application package includes. **NOTE:** This website has been down for some time. FirstLight is aware and "working on it."

**More info about hydropower** on [CRC's website](#)

**CRC and Appalachian Mountain Club's [recreation recommendations](#)** submitted to FERC

Video that covers some of our concerns about **riverbank erosion:**



Video that covers some of our concerns about **recreation:**



## Great River Hydro's Low Impact Hydropower Re-certification Application for Deerfield River Projects

The [Deerfield River Project](#) (also owned by Great River Hydro) in Vermont and Massachusetts applied for recertification by the Low Impact Hydropower Institute (LIHI), which would maintain their access to lucrative Renewable Energy Credits.

CRC and partners provided [comments](#).

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## Low Impact Hydropower Institute (LIHI) Proposal to Change Recertification Process

In January, LIHI requested comments on a proposed change to their recertification process. Currently, all LIHI certified facilities must undergo a complete review every 5 to 10 years. Under this proposed change, full recertification reviews would be required only under a limited number of circumstances. Partial reviews would be required only in response to certain triggering events, such as changes to the facility or its operations, a new watershed management plan that is applicable to the facility, significant changes to the LIHI Criteria, facility non-compliance, or new formal resource agency recommendations.

CRC opposed these changes and submitted [comments](#).

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**If you have any questions or comments, please do not hesitate to contact us.**





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