

December, 2021

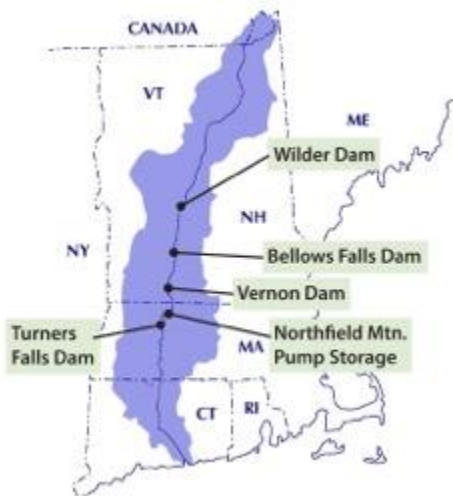


Clean water. Healthy habitat. Thriving communities.

**Connecticut River
Conservancy**

Take Action
for Your Rivers

Hydropower Updates



A year has passed since FirstLight Power (FirstLight) and Great River Hydro (GRH) filed Amended Final License Applications (AFLAs) with the Federal Energy Regulatory Commission (FERC) for the five hydropower facilities on the Connecticut River.

Here's an update on where things are in the relicensing process.

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

Happy Holidays to all our Hydro-Helpers!



This is our **Hydro-Holiday Wish List** with visions of a healthy river dancing in our heads.

(To be sung to the tune of The Twelve Days of Christmas)

In the 12th year* of the relicensing CRC wishes for:

- 12 river accesses
- 11 protected threatened and endangered species
- 10 ADA compliant river access spots
- 9 new campsites
- 8,000+ years of recognized indigenous knowledge
- 700,000 shad swimming upstream
- 6 new fishways
- 5 recreation plans
- 4 re-regulated dams
- 3 eel ladders
- 2 completed Traditional Cultural Properties studies
- **And 1 thriving river!**

*We're actually only in the 9th year, but it sure does feel like 12 years!

FirstLight Power Facilities in MA

Turners Falls Dam & Northfield Mountain Pumped Storage

Agencies, towns, and non-government organizations are involved in Settlement Discussions

For the last several months, FirstLight Power (FirstLight) has been engaging with state and federal agencies, as well as towns and NGOs (including CRC) on fish passage, flow, and recreation issues related to relicensing. The content of these meetings remains confidential until (and if) an agreement is signed and submitted to FERC. FirstLight filed a letter with FERC on November 12, 2021, asking for a delay for the issuance of a Notice of Acceptance and Ready for Environmental Analysis (REA) until after January. Under the timeline explained in the letter to FERC, **FirstLight hopes the parties will have a conceptual agreement signed by the end of January, followed by a full settlement agreement by the end of June.**

The issuance of an REA triggers the next regulatory step in the process when there is an opportunity to comment and intervene. **When FERC files an REA for these projects, we will update everyone about the timeline for submitting comments.**

CRC's experience has shown us that active stakeholder participation in settlement negotiations can lead to better license conditions than leaving the decisions fully up to FERC and the state through the 401 process.

FirstLight conducts paddling study... in November

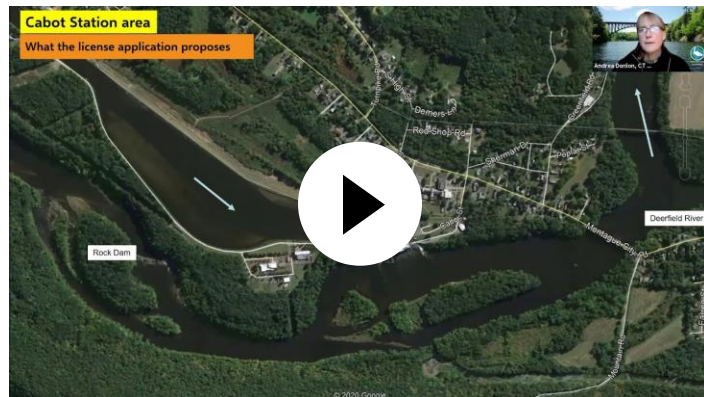
In response to requests from the MA Department of Conservation and Recreation and CRC, FirstLight and their consultants Gomez and Sullivan agreed to conduct a paddling study to see if the section of the river below the Turners Falls Dam is navigable by canoe and kayak under the minimum flows proposed in the license application.

Despite several weather-related delays, the study finally took place on a delightfully warm and sunny day in November. (Phew!) We were thankful to have a bunch of incredibly hardy volunteers wearing wetsuits to paddle that stretch of river several times with varied flows, as well as photographers documenting water levels.

Ultimately, we learned that the highest flow of the day (~**500-600 cubic feet per second**) released at the dam was navigable by canoe and kayak. The whitewater study conducted as part of relicensing a few years ago did not cover these lower flows.

We also learned that what FirstLight thought was a 500 cfs release at the bascule gate (one of the sections of dam that can be rotated to spill water downstream) was actually much lower. This highlights the need to calibrate their gates periodically, since the new license will require various seasonal minimum flows to be released.

You can learn more about the details of the FirstLight Power application by viewing our January 27, 2021 LiveStream virtual presentation:



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

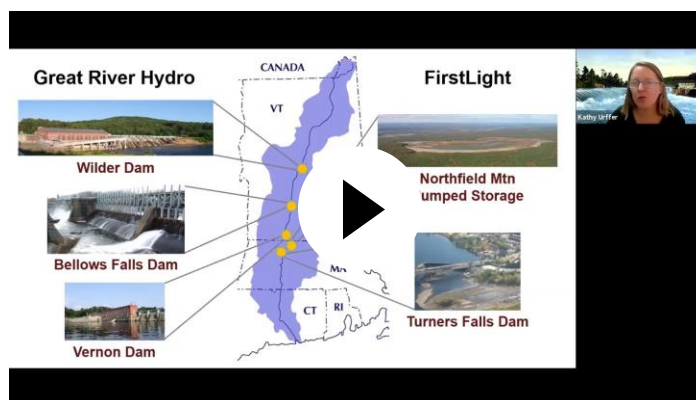
The Great River Hydro (GRH) relicensing process continues to be delayed by FirstLight's settlement discussions and requests for

delays in the regulatory timeframe. Based on previous conversations with FERC staff, CRC's understanding is that FERC wants to have all five of these projects go through the final commenting and Environmental Impact Statement process together. Since FirstLight will be engaging in discussions over the coming months, we assume that the process for GRH will be delayed on the same timeline and **we don't expect an opportunity to comment until after June 2022.**

It is our understanding, however, that GRH is continuing to use this time to have discussions with state and Federal fisheries biologists to come to a more comprehensive agreement about upgrades to enhance fish passage under the new license. CRC is hopeful that we will see additional information clarifying these mitigation measures filed with FERC in the coming months.

We are hopeful that GRH will be willing to discuss additional recreation considerations once this effort to resolve fish passage is complete.

You can learn more about the details of the Great River Hydro application by viewing our January 13, 2021 LiveStream virtual presentation:



Next Steps

There is no official comment period open until FERC issues the Ready for Environmental Analysis (REA) document.

However, you can prepare by doing the following:

- 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,
- AND CONTACT US with your questions.

Additional Resources

Full License Applications submitted to the Federal Energy Regulatory Commission (FERC) in December 2020:

- **[Great River Hydro](#)**: Open “80 - Amended Final License Application” folder. Most information is in “Exhibit E.”
- **[FirstLight Power](#)**: The Executive Summary is a concise summary of what the application package includes, although CRC believes the total costs associated with their proposed environmental measures are inflated. (NOTE: Ongoing settlement negotiations may result in different proposed measures than those initially submitted.)

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:**



CRC Filed Comments on Low Impact Hydropower Re-certification

The Low Impact Hydropower Institute (LIHI) has been proposing new protocol for re-certification, include lengthening the certification period from 5 to 10 years, unless a significant change triggers a mid-term review. CRC participated in an ad hoc committee with LIHI to provide feedback on these potential changes, submitted comments on an initial proposal in January of 2021, and just [submitted additional comments on a revised proposal early in December](#).

LIHI released their final changes to the handbook on December 20. LIHI adopted several of CRC's recommendations, but kept the lengthened certification period as proposed, which CRC did not support.

[READ OUR COMMENTS](#)

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



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