



**Great River Hydro**

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April 19, 2024

Judith E. Sears Houston, P.E., Supervisor  
Water Quality Planning Section  
Watershed Management Bureau  
NH Department of Environmental Services  
29 Hazen Drive, P.O. Box 95  
Concord, NH 03302-0095

**Re: Great River Hydro, LLC; Application for Section 401 Water Quality Certifications for the Wilder Project FERC No. 1892, Bellows Falls Project FERC No. 1855 and Vernon Project FERC No. 1904**

Dear Judith:

Great River Hydro, LLC (Great River Hydro or GRH) is the Federal Energy Regulatory Commission (FERC or Commission) licensee for the Wilder, Bellows Falls, and Vernon Projects on the Connecticut River. These three projects are currently undergoing relicensing proceedings using the Integrated Licensing Process. The Department of Environmental Service (NHDES) and New Hampshire Department of Fish and Game (NHFG) have been active in study requests, designs, evaluations, and reports related to potential project impacts over the past 12 years. On February 22, 2024 the FERC issued its Notice that the applications were accepted for filing and ready for environmental analysis (REA Notice).

Great River Hydro is seeking New Hampshire Water Quality Certifications for these hydroelectric projects in accordance with NH RSA 485-A:12, III and IV, under Section 401(a)(1) of the Clean Water Act (33 USC § 1341), federal regulations promulgated under the CWA at Title 40 Code of Federal Regulations Part 121. Accompanying this letter, please find three (3) applications for Water Quality Certifications associated with new FERC licenses to operate and maintain these hydroelectric project as proposed in their respective, and accepted FERC license applications. For each of the above Projects, please find application forms and accompanying additional information pages. As part of each application, GRH has included and identified by reference and hyperlinks, key documents pertinent to the applications. These include the Final License Application for each Project; a Memorandum of Understanding between GRH, NHDES, NHFG and others regarding our proposed operation under new licenses; a Settlement Agreement on Fish Passage between GRH, NHFG and others that addresses fish

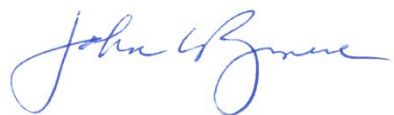
passage and arecommended plan and schedule from the State and Federal fishery agencies for the three projects; relevant Study Reports completed during the study phase of the Integrated Relicensing Process, for which NHDES and NHFG staff participated throughout; and lastly, a memo summarizing MOU related discussions specific to establishing the minimum flow in the Bellows Falls bypassed reach based on target species, IFIM results, and available habitat.

In anticipation of FERC issuing a REA Notice, Great River Hydro contacted NHDES by letter dated December 15, 2021, requesting a pre-filing meeting and on the same day, requested a similar meeting with the Vermont Department of Environmental Conservation (VTDEC). Great River Hydro stated in each letter that it had no specific reason or immediate need for such a meeting as there were many prior discussions among the parties leading up to the MOU. NHDES did not respond to the request but had previously indicated in an email to Great River Hydro, dated September 22, 2021, that it saw no reason for a pre-filing meeting. Similarly, VTDEC responded by email dated December 23, 2021, that it saw no reason for a pre-filing meeting. Due to staff changes at NHDES, Great River Hydro reached out to NHDES on June 14, 2023 to inquire if a pre-filing meeting might be beneficial. NHDES staff agreed and a meeting with NHDES, Great River Hydro and a representative from VTDEC was held on June 26, 2023. Copies of correspondence related to the above is included with this letter.

Please review the information provided and notify Great River Hydro that the applications are either accepted or require additional information. We look forward to your Department processing these applications as it is our belief that over the course of the last 12 years both Great River Hydro, NHDES, and NHFG staff have worked hard to ensure our License proposals meet New Hampshire Water Quality Standards.

If there are any questions regarding the applications or information provided in this filing or the process, please contact John Ragonese at 603-498-2851 or by emailing [jragonese@greatriverhydro.com](mailto:jragonese@greatriverhydro.com).

Sincerely,



John L. Ragonese  
FERC License Manager

Attachments:

Pre-filing meeting request correspondence documentation.

NH Water Quality Certification Application – Wilder Hydroelectric Project FERC No. 1892

NH Water Quality Certification Application – Bellows Falls Hydroelectric Project FERC No. 1855

NH Water Quality Certification Application – Vernon Hydroelectric Project FERC No. 1904