



MassWildlife

Commonwealth of Massachusetts

Division of Fisheries & Wildlife

Wayne F. MacCallum, *Director*

June 17, 2012

Kimberly D. Bose, Secretary
Federal Energy Regulatory Commission
888 First Street, N.E., Room 1A
Washington, DC 20426

RE: Firstlight Hydro Generating Company
Turners Falls Hydroelectric Project, FERC No. 1889
Northfield Mountain Pumped Storage Project, FERC No. 2485
TransCanada Hydro Northeast Inc.
Vernon Hydroelectric Project, FERC No. 1904
Bellows Falls Hydroelectric Project, FERC No. 1855
Wilder Hydroelectric Project, FERC No. 1892

EXTENSION OF TIME REQUEST TO COMMENT ON PROPOSED STUDY PLANS

Dear Secretary Bose:

The Massachusetts Division of Fisheries and Wildlife (Division) is the agency responsible for the protection and management of the fish and wildlife resources of the Commonwealth. As such we monitor operations at hydroelectric projects within the Commonwealth. The Division has the following comments on the EXTENSION OF TIME REQUEST TO COMMENT ON PROPOSED STUDY PLANS filed by the US Fish and Wildlife Service (Service) in regard to the Turners Falls (FERC No. 1899), Northfield Mountain Pumped Storage (FERC No. 2485), Vernon (FERC No. 1904), Bellows Falls (FERC No. 1855), and Wilder (FERC No. 1892) projects.

REQUEST

The Service is requesting a two-week extension of time to submit our comments on the final proposed study plans (PSPs) for the following reasons:

- Providing thoughtful and well-structured comments and recommendation on the PSPs is important to the Commission staff's review of the PSPs and would ultimately help assure that all the information needed for informed licensing decisions is gathered through the two years of studies.
- The revised PSPs for each study will in many cases be major revisions to the PSPs filed in April. Substantial changes to the initial study proposals are being contemplated and a much greater level of detail not initially provided will be added to all the PSPs. Therefore, on many individual study plans, substantial review will be needed.
- The dates proposed by both applicants to file the revised PSPs will not provide the Service with the time necessary to properly review the volume of new information and provide meaningful comments by the Commission's July 15 due date. TransCanada indicates that they will post revised individual study plan re-drafts for review as they complete them, but they can only commit to having all modified individual study plans completed by July 8, 2013.
- A number of stakeholders (including the Service) believe it is imperative to participate in the held reconnaissance portion of the Instream Flow Study at the Turners Falls Project. Due to agency staff availability, Firstlight has scheduled the field reconnaissance to

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occur during the week of July 7th. Firstlight anticipates the field reconnaissance will take three full days to complete (if there are rain or flow issues, the field work would move to the following week), leaving even less time to develop thorough comments on the PSPs. The IFSP review and fieldwork will limit the time Service staff can dedicate to the PSP reviews.

COMMENTS

The Division agrees with the Service and asks FERC to grant the two week extension of time to comment on the PSPs for the Turners Falls (FERC No. 1899), Northfield Mountain Pumped Storage (FERC No. 2485), Vernon (FERC No. 1904), Bellows Falls (FERC No. 1855), and Wilder (FERC No. 1892) projects.

Sincerely,

A handwritten signature in black ink, appearing to read "Caleb Slater". The signature is fluid and cursive, with a long horizontal stroke at the end.

Caleb Slater, Ph.D.

Document Content(s)

USFWS EOT comments.PDF.....1-2