

October, 2021



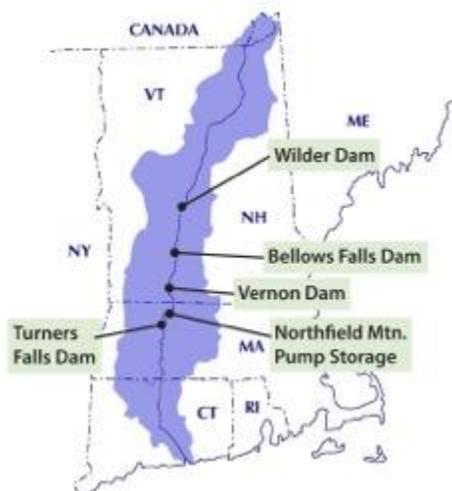
Clean water. Healthy habitat. Thriving communities.

**Connecticut River  
Conservancy**

**Take Action**  
for Your Rivers



## Hydropower Updates



Amended Final License Applications (AFLAs) for five FirstLight Power (First Light) and Great River Hydro (GRH) facilities on the Connecticut River were submitted to the Federal Energy Regulatory Commission (FERC) in December, 2020. Since then, the FERC has been requesting additional information from the companies.

**We don't know when FERC will issue a public comment period but believe it won't be until after November of this year.**

These licenses will endure for the next 30-50 years and impact hundreds of miles of the Connecticut River. FirstLight Power, owner of the Turners Falls Dam and Northfield Mountain Pumped Storage in MA, and Great River Hydro, owner of the Wilder, Bellows Falls, and Vernon Dams in VT and NH, continue to provide more detailed information as they respond to the Additional Information Requests (AIRs) from FERC.

**Start doing your homework now to be ready to comment. Find more detailed information below about the comment 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

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## Get Your Questions Answered

CRC River Stewards Kathy and Andrea provided a series of Hydro Power Coffee Hours over the last several months. We are taking a break right now, but you can find links below to the recordings for specific issues:

**March 10 Hydropower Coffee Hour:  
Traditional Cultural Properties**





to come to a settlement agreement on “outstanding issues pertaining to fish passage, flow proposals, and recreation” according to their letter to FERC.

**Four meetings have been scheduled to discuss recreation.** The first meeting took place on September 10 and was attended by many stakeholders. FirstLight has indicated they have been meeting privately with fisheries agencies; CRC was not invited to those conversations.

Since FirstLight Power is focusing on recreation for the coming two months, **interested parties should FILE COMMENTS ON RECREATION CONCERNS NOW**, so that First Light sees them and it is documented in the FERC record. Save your comments, and you can always use them again later when the official comment period is open. While you are at it, send a copy to your state legislators – they have been actively engaged and interested in this relicensing process and would like to hear from constituents. CRC reviews all letters in the FERC docket, too.

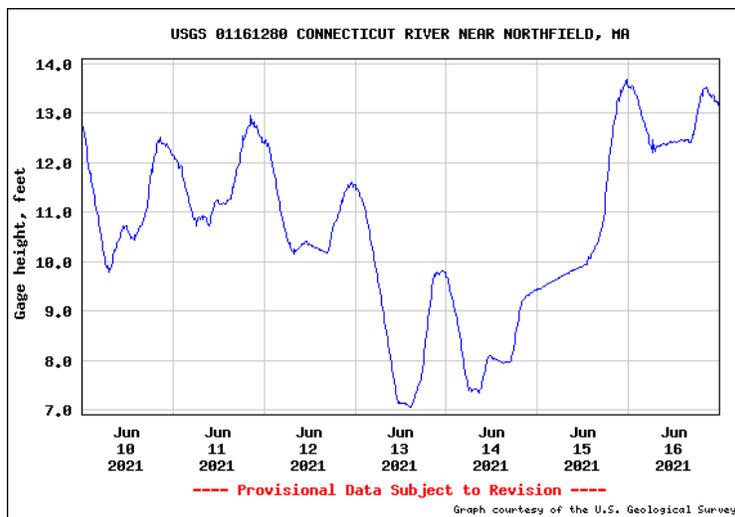
[FILE COMMENTS](#)

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**June Low Impoundment Levels**



Between Sunday, June 13 and Monday, June 14, the water levels above the Turners Falls Dam ran low enough to cause public alarm and it triggered a request from FERC that the company explain what happened. People described fish nests going dry and boaters not being able to come back to shore or launch in the river in Barton Cove. FirstLight's response to FERC indicates that the river elevation got as low as 177.5 feet (mean sea level, as measured at the dam), but since their license allows them to go as low as 176 feet, they were not out of compliance. The "normal" operating level for the Turners Falls impoundment is 183 feet. A USGS gage on the Connecticut River in Northfield, MA near the Route 10 bridge indicates that the river level got down to a gage height that has never been observed since that gage was installed in 2018 (see graph).



FirstLight said, in a public statement, they had been dispatched by the regional grid, and inflow coming from Vernon Dam was “low” for this time of year. While it may have sounded like they were asked to pump all that water out of the river, that is not the case. Unlike other wholesale users of electricity on the grid, pumped storage plants can choose when to consume electricity. They put in a bid price and are then dispatched, or allowed, to buy electricity to pump water into the upper reservoir. We can guess that Northfield was able to make a good profit that week, purchasing a lot of electricity at low prices and then releasing water later in the day and week when energy demand and prices were higher.

CRC has been trying to understand the energy market conditions that are likely to contribute to this type of situation into the next license. In FirstLight’s hydro license application, they have requested to keep the same 9-foot fluctuation range that they have in their existing license for the section of river above the dam. **CRC will be arguing that the new license must establish river level limits that protect the public’s ability to use the river all the time.**

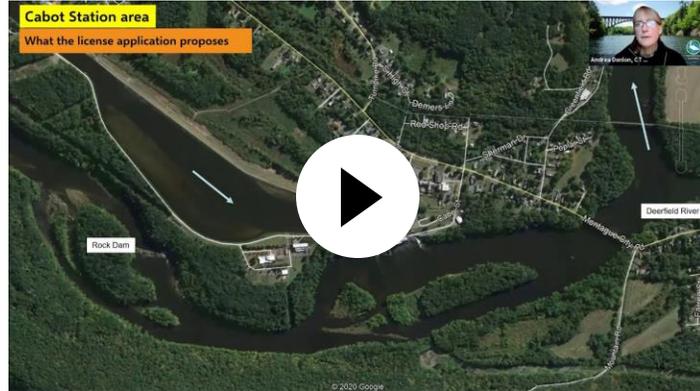
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### **Get to work MassDEP**

CRC is working to make sure that the flows provided below the Turners Falls Dam will meet water quality standards year-round in the new license. That means there will be **enough water to support “aquatic life use” and protect “existing and designated uses” such as paddling and fishing.** These terms are used in the Clean Water Act that was passed in 1972, and MassDEP will eventually have to prepare a 401 Water Quality Certificate, a permit that is meant to ensure project operation will meet the standards of the Clean Water Act. To that end, **we are engaging additional biological, administrative, and legal expertise to evaluate the current license flows** and what is being proposed by FirstLight for the periods outside of fish migration season.

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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 in their Amended Final License Applications (AFLA) that will be much better for the river, but they offered little else for protection, enhancement, and mitigation for our communities over the next 30 to 50 years.

In a response to an Additional Information Request (AIR) from FERC, on March 29, GRH submitted specific annual cost estimates for environmental, cultural, and historic measures they plan to implement over the course of the coming 40 years. This filing includes an updated Exhibit D for each project – Wilder, Bellows Falls, and Vernon – indicating that they are willing to provide more mitigation than what was initially included in their AFLA.

**Still, what they have proposed in this filing is far less of an investment than what would be appropriate for the scale of impact over the next 40 years.** They are proposing only \$2.3M in recreation mitigation over the 40-year license, which amounts to \$58,575 annually! This is 0.17% of their estimated revenue of at least

\$33M/yr for all three projects. The March 29 letter also indicates a “Cultural and Historic Fund” of \$450,000 over the course of the license, but there is no indication as to what this is or how it would be expended.

On April 29, FERC issued a second AIR asking for more detailed flow information and an estimate of annual generation under the new modified run of river operational scenario by June 29, 2021. This information was provided in a filing made by GRH on June 24.

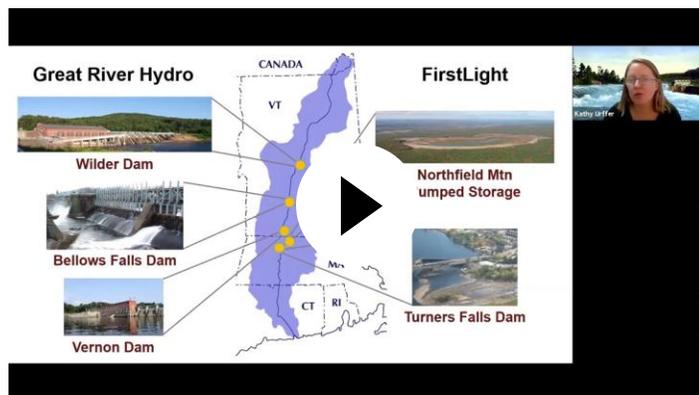
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### **GRH Process Delayed by FirstLight Power Discussions**

Based on previous conversations with FERC staff, CRC’s understanding is that FERC wants to have all five of these projects go through the relicensing process together. Given that, since FirstLight Power will be engaging in discussions over the coming months, we assume that the process for GRH will be delayed and we don’t expect an opportunity to comment until after November, 2021.

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**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**

While FERC has not yet issued a determination, we assume they will continue to have staff evaluate the AFLAs and allow for a delay until after November 12 to issue a notice that the applications are ready for environmental analysis.

In the meantime, **CRC is preparing template comment letters and a list of possible comments that interested people like you, towns, and agencies can use when the comment period opens.**

CRC encourages the public to get involved in this once-in-a-lifetime opportunity to influence these operating licenses. **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.

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## **Kudos to Representative Kuster**

**Annie Kuster (D-NH) has been instrumental in pushing forward HR 4375 the 21st Century Dams Act.** This bipartisan legislation makes a \$25.8 billion investment in enhancing the safety, grid resilience benefits, and power generating capacity of America's existing dams while also providing historic funding to remove dams that are no longer necessary.

CRC staff joined the Congresswoman along with representatives from American Rivers, National Hydropower Association, Stanford Steyer-Taylor Center for Energy Policy and Finance, New Hampshire Department of Environmental Services, Low Impact Hydropower Institute, Great River Hydro, and Granite State Hydropower Association on August 26th at the Wilder Dam for a press event to publicize this important legislation.

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## Additional Resources

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

- **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.

**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:**



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



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