



Central Rivers Power

Boott Hydropower, LLC

Subsidiary of Central Rivers Power US, LLC
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Via eFiling

February 25, 2021

Kimberly D. Bose, Secretary
Federal Energy Regulatory Commission
888 First Street, N.E.
Washington, D.C. 20426

**Re: Lowell Hydroelectric Project (FERC No. 2790-072);
Revised Initial Study Report**

Dear Secretary Bose:

Boott Hydropower, LLC (Boott), a subsidiary of Central Rivers Power US, LLC, is the Licensee, owner, and operator of the 20-megawatt Lowell Hydroelectric Project (Project) (FERC No. 2790). Boott operates and maintains the Project under license from the Federal Energy Regulatory Commission (FERC or Commission). The Project's existing license expires on April 30, 2023. Boott is pursuing a new license for the Project using the Commission's Integrated Licensing Process (ILP) as defined in 18 Code of Federal Regulations (C.F.R.) Part 5.

On June 12, 2020 the Commission issued a *Revised Process Plan and Schedule and Determination on Requests for Study Modifications for the Lowell Hydroelectric Project* (Revised PPS). In accordance with the Revised PPS, on September 30, 2020, Boott filed the Revised Initial Study Report (ISR) containing the following studies: Downstream American Eel Passage Assessment; Juvenile Alosine Downstream Passage Assessment; Upstream and Downstream Adult Alosine Passage Assessment; Fish Assemblage Study; and the Recreation and Aesthetics Study. The Commission's regulations at 18 C.F.R. § 5.15(c)(2) and the Revised PPS require Boott hold a Revised ISR Meeting with relicensing participants and FERC staff within 15 days of filing the Revised ISR. Accordingly, Boott held the Revised ISR Meeting on October 15, 2020. Pursuant to 18 C.F.R. § 5.15 of the Commission's regulations, FERC issued a *Determination on Requests for Study Modifications for the Lowell Hydroelectric Project* (February 2021 Study Determination) on February 2, 2021.

In accordance with the Revised PPS, Boott is filing a second Revised ISR containing the following studies: Fish Passage Survival Study; Three-Dimensional Computational Fluid Dynamics Modeling Study; Instream Flow Habitat Assessment and Zone of Passage Study in the Bypassed Reach; Resources, Ownership, Boundaries, and Land Rights Study; Historically

Significant Waterpower Equipment Study; and Operation Analysis of the Lowell Canal Study. Boott is also filing an updated Recreation and Aesthetics Study report and additional information on the upstream fish ladder in accordance with the February 2021 Study Determination. Additionally, to address minor agency comments from the October 15, 2020 Revised ISR Meeting, Boott is filing an updated Downstream American Eel Passage Assessment; Fish Assemblage Study; Upstream and Downstream Adult Alosine Passage Assessment; and Juvenile Alosine Downstream Passage Assessment.

The report for the Water Level and Flow Effects on Historic Resources Study (Study 11) has been largely completed but is not ready for submission at this time. Boott experienced a delay in obtaining necessary SCADA system log data for 2019, when Boott Hydropower, LLC and the Project were owned by Enel North America. The data have been recently received and are being incorporated into the study report. Boott will submit the final report and will distribute it to the stakeholders within one week of this filing, i.e., by March 4, 2021, so that the study results can be reviewed and discussed during the upcoming Revised ISR Meeting.

Notably, on January 19, 2021, Boott verbally informed the Commission that the Whitewater Boating and Access Study would not be complete by the February 25, 2021 deadline due to lack of sufficient river flow. Boott also filed a Quarterly Progress Report with the Commission on January 19, 2021 detailing the reasons for study delay. On November 17, 2020 Boott held a conference call with the study requestor, American Whitewater, and it was determined that the projected Merrimack River flows were too low, such that the Whitewater Boating and Access Study should be delayed until more appropriate and safe environmental conditions were available.

Boott will hold a second Revised ISR Meeting from 9:00 a.m. to 5:00 p.m. on March 11, 2021. Boott will hold this meeting by a video conference call and will provide the meeting information to the distribution list several days beforehand. To allow for adequate planning, Boott respectfully requests that those planning to attend the ISR Meeting RSVP by emailing Kelsey Scott with HDR at Kelsey.Scott@hdrinc.com on or before March 8, 2021.

Pursuant to 18 C.F.R. § 5.15(c)(3) and the Revised PPS, Boott will file a Revised ISR Meeting Summary with the Commission on or before March 27, 2021. Within 30 days of the filing of the Revised ISR Meeting Summary (i.e., April 26, 2021), stakeholders may file a disagreement with the summary and/or any proposals to modify ongoing studies with the Commission.

Please do not hesitate to contact me at (978) 935-6039 or kwebb@centralriverspower.com if you have any questions concerning this submittal.

Sincerely,
Boott Hydropower, LLC



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cc: M. Stanley, CRP
C. Mooney, CRP
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Attached Distribution List

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