GOMEZ AND SULLIVAN
Engineers, P.C.

P.O. Box 2179
Henniker, NH 03242
T – (603) 428-4960
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August 16, 2010

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

Re: Carver Falls Hydroelectric Project
FERC Project No. 11475
Application for Non-Capacity License Amendment

Dear Secretary Bose:

In response to your letter dated August 5, 2010, Central Vermont Public Service Corporation (CVPS) is filing additional information in support of the application for a non-capacity related license amendment for the Project, which was initially filed with FERC on June 17, 2010, as follows.

Item 1: Consultation between CVPS and the New York State Office of Parks, Recreation and Historic Preservation, which includes a signed letter of concurrence and memorandum of agreement with regard to CVPS's proposal for turbine replacement.

Item 2: Evidence of filing for amended water quality certifications with the Vermont Department of Environmental Conservation on June 17, 2010, and with the New York Department of Environmental Conservation (NYSDEC) on August 16, 2010.

Item 3: Exhibit E commensurate with the scope of the project and in conformance with 18 CFR § 4.41 (f).

Item 4: CVPS intends to file revised Exhibit F drawings with FERC as Critical Energy Infrastructure Information (CEII), under separate cover.

Please contact me if you have any questions. Thank you.

Sincerely,

Jason George
Environmental Scientist

C: M. Scarzello, CVPS
B. Fitzgerald, VT Agency of Natural Resources
M. McMurray, NYSDEC, Region 5 Permit Administrator

ATTACHMENT 1:

Consultation with NY SHPO

Central Vermont Public Service Corporation

LETTER OF CONCURRENCE

May 7, 2010

Ruth L. Pierpont, Director
New York State Office of Parks, Recreation and Historic Preservation
Historic Preservation Field Services Bureau
P. O. Box 189
Waterford, NY 12188-0189

RE: Carver Falls Hydroelectric Station, FERC License No. 11475
Removal and Replacement of Unit No.1 Turbine;
Hampton, N. Y.

Dear Ms. Pierpont:

This letter treats the responsibility of the Federal Energy Regulatory Commission (FERC) and its licensee, Central Vermont Public Service Corporation (CVPS), owner of the Carver Falls Hydroelectric Station, to comply with Section 106 of the National Historic Preservation Act and 36 CFR Part 800, the Federal regulations that implement Section 106.

The Carver Falls Hydroelectric Station was developed originally during 1893-94 at the namesake 80-foot falls of the Poultney River; the boundary between Hampton, New York and West Haven, Vermont follows the river channel. A Vermont firm constructed the generating station, although favorable terrain placed most of the buildings and structures on the New York side of the river. The small complex comprises a lengthy stone and concrete dam with integral intake structure(s) and gatehouse, abandoned and active steel penstocks, twin steel surge tanks, a stone powerhouse containing two generating units with a rated capacity of 1,900 kilowatts, and an electrical substation.

The subject of this action, the historic turbine and governor of generating Unit No.1, exists within the basement of the powerhouse sited in the gorge of the river below the falls. Manufactured by the S. Morgan Smith Co., the Francis-type, double-runner turbine rated at 1150 kilowatts was installed in 1932 to replace an earlier counterpart. The governor was produced by The Lombard Governor Co. probably c. 1910, and altered in 1972 by the installation of a motor-driven Type LR head made by the Woodward Governor Co.

Already worn and unreliable, the turbine was damaged in early 2009, and given short term repairs. CVPS now plans to remove the Smith turbine and replace it with a similar counterpart manufactured by Norcan Hydraulic Turbine Inc. The new turbine will have greater output of

1450 kilowatts, and the capability of operating with either one or both runners under run-of-river conditions. The new FERC license issued in February 2009 for the Carver Falls station requires much more precise control of water flow and turbine operation. In order to meet the strict criteria, CVPS will replace the governor with a hydraulic power unit and wicket gate positioner controlled by a computer system.

In November 2009, Hugh H. Henry prepared a National Register of Historic Places Registration Form for the "Carver Falls Hydroelectric Station." (A copy of this form appears in the "Historic Properties Management Plan (HPMP) Carver Falls Hydroelectric Project" dated February 2010, and subsequently submitted to your office.) The Henry 2009 document concludes that the Carver Falls station appears to meet the criteria of eligibility for listing in the National Register, and that the powerhouse contributes to its significance. Furthermore, the cited HPMP evaluates the turbine and governor of generating Unit No.1 as also contributing to that significance.

An architectural historian qualified under 36 CFR Part 61, Hugh H. Henry of Chester, VT, has conducted documentary research on the Unit No,1 turbine and governor, reviewed the proposed action, and prepared the Section 106 report accompanying this letter. Mr. Henry has determined that the action will have an "adverse effect" on the historic character and integrity of the hydroelectric station. The adverse effect involves the removal of components, the Unit No.1 turbine and governor that relate to the historic engineering design and operation of the generating station.

A Memorandum of Agreement regarding the removal and replacement of the Unit No.1 turbine and governor has already been prepared. An original of that document accompanies this letter for approval and signature by the State Historic Preservation Officer.

Central Vermont Public Service will mitigate the adverse effect by documenting the Unit No.1 turbine and governor with 35 mm black-and-white photographs and the Section 106 report. Both the photographs and the report have already been accomplished, and they accompany this letter.

In conclusion, Central Vermont Public Service requests the concurrence of the State Historic Preservation Officer with the determination presented above. The signature of the Officer on the line below will constitute concurrence in this process.

Sincerely,

Central Vermont Public Service Corporation

State Historic Preservation Officer — Date: 7/9/10

Enclosures

MEMORANDUM OF AGREEMENT

BETWEEN THE

NEW YORK STATE HISTORIC PRESERVATION OFFICER

AND

CENTRAL VERMONT PUBLIC SERVICE CORPORATION

REGARDING THE REMOVAL AND REPLACEMENT OF TURBINE AND GOVERNOR OF GENERATING UNIT NO.1

CARVER FALLS HYDROELECTRIC PROJECT (FERC# 11475)
HAMPTON, NEW YORK

WHEREAS, under the terms of the Programmatic Agreement executed between Central Vermont Public Service Corporation (CVPS), the Federal Energy Regulatory Commission (FERC), the New York State Historic Preservation Office, the Vermont State Historic Preservation Office, and the Advisory Council on Historic Preservation, CVPS must assess the potential effects of a proposed undertaking to historic properties in accordance with 36 CFR Part 800, with CVPS acting as the Agency Official;

WHEREAS CVPS has determined that the action to remove and replace the historic turbine and governor of generating Unit No.1 at the Carver Falls Hydroelectric Project located in Hampton, New York will have an effect on a property eligible for the National Register of Historic Places, and has consulted with the New York State Historic Preservation Officer (SHPO) pursuant to 36 CFR Part 800, regulations implementing Section 106 of the National Historic Preservation Act (16 U.S.C.470ff .);

NOW, THEREFORE, the FERC and the New York SHPO agree that the action shall be implemented in accordance with the following stipulations in order to take into account the effect of the action on historic properties.

STIPULATIONS

CVPS will ensure that the following measures will be carried out.

1. Prior to any removal or other alteration, the property owner, Central Vermont Public Service Corporation (CVPS), will document the historic Unit No.1 turbine and governor with 35mm black-and-white photographs. A summary report (the Section 106 Report) that describes the property, its history, the proposed action, and the current condition of the turbine and governor will accompany the photographs. This documentation must meet the Secretary of the Interior's Standards and Guidelines for Documentation and shall be submitted to the New York SHPO. The New York SHPO must review and approve this documentation prior to the onset of the removal.

2. The 35mm black-and-white photographs of the historic Unit No.1 turbine and governor together with the Section 106 Report will constitute sufficient mitigation for this action.

3. Should any signatory party object within 30 days to any actions proposed pursuant to this agreement, CVPS shall submit the matter to the FERC for resolution. If the FERC determines that the objection cannot be resolved, the FERC shall request the comments of the Advisory Council on Historic Preservation pursuant to 36 CFR Section 800.6(b). Any Council comment provided in response to such a request will be taken into account by the FERC in accordance with 36 CFR Section 800.6(c)(2) with reference only to the subject of the dispute; the FERC's responsibility to carry out all actions under this agreement that are not the subjects of the dispute will remain unchanged.

Execution of this Memorandum of Agreement by CVPS and the New York SHPO and implementation of its terms shall constitute evidence that CVPS has taken into account the action to remove and replace the historic Unit No.1 turbine and governor at the Carver Falls Hydroelectric Project and its effects on historic properties.

Beth Ellwson — 7 May 2010

Central Vermont Public Service Corporation — Date

Ruth A Pierpont DSHPO — 7/9/10

State Historic Preservation Officer — Date

ATTACHMENT 2:

Evidence of filing of application for amendment to water quality certifications in Vermont and New York.

Vermont Department of Environmental Conservation *Agency of Natural Resources*
Water Quality Division
103 South Main Street, 10 North [phone] 802-241-3468
Waterbury, VT 05671-0408 [fax] 802-241-4537
http://www.vtwaterquality.org

DISTRIBUTED ELECTRONICALLY

July 1, 2010

Michael J. Scarzello, P.E.
Central Vermont Public Service Corporation
77 Grove Street
Rutland, VT 05701

RE: Carver Falls Hydroelectric Project – FERC Project No. 11475
Application for Amended Water Quality Certification

Dear Mr. Scarzello:

The Agency of Natural Resources acknowledges receipt of the June 17, 2010 water quality certification amendment application for the Carver Falls Hydroelectric Project. The application was filed by Gomez and Sullivan Engineers, P.C. on behalf of Central Vermont Public Service and was received by the Department on June 21, 2010.

The application is administratively complete. We will begin processing the application and keep you apprised of our progress.

Thank you for your cooperation.

Very truly yours,

Brian T. Fitzgerald
Streamflow Protection Coordinator

c: Ralph Abele, EPA Region 1
Mark Woythal, New York DEC
Jason George, Gomez and Sullivan

GOMEZ AND SULLIVAN
Engineers, P.C.

P.O. Box 2179
Henniker, NH 03242
T – (603) 428-4960
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August 16, 2010

Michael J. McMurray
Environmental Permits
Region 5 Headquarters
NYS Dept. of Environmental Conservation
1115 Route 86
Ray Brook, NY 12977-0296

Re: Carver Falls Hydroelectric Project
FERC Project No. 11475
Application for Amended Water Quality Certification

Dear Mr. McMurray:

Enclosed please find three copies of the completed Joint Application for Permit for an Amended 401 Water Quality Certification for the Carver Falls Hydroelectric Project (FERC Project No. 11475). The Project is located on Poultney River in the towns of West Haven, Vermont and Hampton, New York. Central Vermont Public Service Corporation (CVPS) initially received water quality certification for the Project from the State of New York on April 21, 1995, which was subsequently modified on December 13, 1996. An original FERC license was issued to CVPS for the Project on February 25, 2009.

CVPS is seeking to replace their existing Unit 1 turbine at the Project and has previously submitted an application for a Non-Capacity Related License Amendment to FERC on June 17, 2010 (attached). Also attached is CVPS's response to the FERC's request for additional information dated August 5, 2010. Item number 2 of that request requires CVPS to file either an amended water quality certification, waiver, or evidence of filing for amended certification from both New York and Vermont. An application for amended water quality certification was previously submitted to the Vermont Department of Environmental Conservation on June 17, 2010.

Please contact me if you have any questions. Thank you.

Sincerely,

Jason George
Environmental Scientist

C: M. Scarzello, CVPS

Enclosures: Joint Application for Permit for Amended Water Quality Certification w/ attachments
Application to FERC for Non-Capacity License Amendment
Response to FERC additional information request

ATTACHMENT 3:

Exhibit E

EXHIBIT E

ENVIRONMENTAL REPORT

CENTRAL VERMONT PUBLIC SERVICE CORPORATION
RUTLAND, VERMONT

CARVER FALLS HYDROELECTRIC PROJECT
FERC PROJECT NUMBER 11475

APPLICATION FOR NON-CAPACITY LICENSE AMENDMENT
FOR A MAJOR WATER POWER PROJECT
5 MEGAWATTS OR LESS

EXHIBIT E
ENVIRONMENTAL REPORT

INTRODUCTION

The Carver Falls Hydroelectric Project (Project) is an existing licensed development located at river mile 3.8 on the Poultney River on the border between New York and Vermont. The project is owned and operated by Central Vermont Public Service Corporation (CVPS). On February 25, 2009, the Federal Energy Regulatory Commission (FERC) issued CVPS an initial license for the Project.

CVPS is proposing to replace the Unit 1 turbine at the Project, which would result in a total installed nameplate capacity of 2.2 MW. The current maximum hydraulic capacity of the Project equals 254 cfs. The replacement of the Unit 1 turbine would result in a total maximum hydraulic capacity of 269 cfs, an increase of approximately 6 percent.

CVPS is not proposing to change their mode of operation as a result of this upgrade and has previously filed an application for non-capacity license amendment with FERC on June 17, 2010. FERC responded on August 5, 2010 requiring CVPS to file an Exhibit E commensurate with the scope of the project and in conformance with 18 CFR § 4.41 (f).

Exhibit E is hereby revised to reflect the replacement of the Unit 1 turbine, commensurate with the scope of the project, and has been organized in accordance with 18 CFR § 4.41(f).

(1) General Description of the Locale

CVPS's proposal will not change the general description of the environment of the Project area and its immediate vicinity provided in the original license application.

(2) Report on Water Use and Quality

(i) Water Use

The Project is currently operated in a strict run-of-river mode in accordance with the new FERC license. Flows in excess of the maximum turbine capacity or below the minimum turbine capacity (30 cfs) are spilled at the dam. The current maximum hydraulic capacity of the Project equals 254 cfs. The replacement of the Unit 1 turbine would result in a total maximum hydraulic capacity of the project of 269 cfs. As a result, the maximum flows provided downstream through the turbines will increase by 15 cfs.

When inflows are at or below the design flow plus the minimum bypass flow (269+18.5 cfs) the impoundment will remain constant except following flashboard removal or failure or scheduled dam maintenance. Project operation will be based on an active storage volume of zero cubic feet at all times. CVPS will not permit the elevation of the Project impoundment to drop below one inch above the top of the flashboards (on the southern spillway) when flashboards are in the raised position, or to drop below one inch above the crest of the dam when flashboards are down, pursuant to Condition 3 of the New York State Water Quality Certification. Therefore, the instantaneous sum of all discharges and releases from the impoundment will equal the instantaneous inflow into the impoundment. Additional details regarding the mode of operation are presented in the Project's Operations Compliance Plan, approved by FERC on January 21, 2010.

There will be no change to the bypass flows provided at the Project as a result of CVPS's proposal. A flow of 18.5 cfs, or instantaneous inflow if less, is passed at the Carver Falls Dam continuously in order to maintain water quality, aquatic habitat, and a zone-of-passage for

aquatic organisms in the lower bypass reach. The bypass flow will be passed through a combination of leakage flows and spillage over the dam.

In order to protect walleye spawning requirements, CVPS is providing at least 50 cfs (or inflow, if less) from April 1 through May 15 of each year to the Project's bypassed reach. In addition, CVPS will release a flow over the southern spillway of at least 2.5 inches (or inflow, if less) for aesthetic purposes during daylight hours on Memorial Day, Independence Day, Labor Day, Columbus Day and every Sunday during the months of July and August.

(ii) Water Quality

The additional 15 cfs provided downstream under maximum turbine discharge is not expected to adversely affect water quality in the vicinity of the Project.

(iii) Impoundment

CVPS's proposal will not affect the characteristics of the Project's 10 acre impoundment.

(iv) Anticipated Impacts

The construction work associated with turbine upgrade will occur within the Project's powerhouse. No adverse effects on water quality and downstream flows are anticipated as a result of the installation or operation of the new turbine.

(v) Mitigation Measures

Because no adverse effects on water use or quality are anticipated, CVPS is not proposing any mitigation measures. No specific comments or recommendations were received from Federal or state agencies for the purpose of protecting or improving water quality and stream flows as a result of CVPS's proposal. CVPS is, however, in the process of implementing their Operations Compliance Plan for the Project in association with the new license and

associated water quality certificates which will protect water quality and stream flows at the Project.

(vi) Groundwater

No effects to groundwater in the Project vicinity are anticipated due to CVPS's proposal.

(3) Report on Fish, Wildlife, and Botanical Resources

(i) Description of Existing Fish, Wildlife, and Plant Communities

CVPS is unaware of any changes to the fish, wildlife, and botanical resources in the vicinity of the Project since the license application was filed.

(ii) Anticipated Impacts

Wildlife and Plant Communities

The utilization of an additional 15 cfs of water at the Project is not expected to affect wildlife or plant communities upstream or downstream of the Project. The strict run-of-river mode of operations employed at the Project will ensure protection of wildlife and botanical resources.

Fisheries and Aquatic Resources

The run-of-river mode of operations employed at the Project will also ensure protection of fisheries and aquatic resources. In addition, CVPS will continue to provide minimum bypass flows of 18.5 cfs, or instantaneous inflow if less, in order to protect aquatic habitat and a zone-of-passage in the lower bypass. The bypass flow will be passed through a combination of leakage flows and spillage over the dam.

In order to protect walleye spawning requirements, CVPS will continue to provide at least 50 cfs (or inflow, if less) from April 1 through May 15 of each year to the to the Project's

bypassed reach. Fisheries and aquatic habitat are not anticipated to be impacted as a result of CVPS's proposal for a turbine upgrade.

(iii) Mitigation Measures

Because they are not anticipating any adverse effects on fish, wildlife, or botanical resources, CVPS is not proposing any mitigation measures. No specific comments or recommendations have been received from Federal or state agencies for the purpose of protecting or improving these resources as a result of CVPS's proposal.

(4) Report on Historic and Archaeological Resources

The impact of CVPS's proposal on historical and archaeological resources and the mitigation measures proposed by CVPS are summarized below. Additional information developed in consultation with the New York State Office of Parks, Recreation and Historic Preservation related to historical and archaeological resources was previously submitted to FERC on August 5, 2010.

(i) Anticipated Impacts

CVPS has determined that the Project appears to meet the criteria of eligibility for listing in the National Register of Historic Places, and that the powerhouse contributes to its significance. Furthermore, CVPS has determined that the action to remove and replace the historic turbine and governor of generating Unit 1 at the Project will have an adverse effect on the historic character and integrity of the hydroelectric station. The adverse effect involves the removal of components of the Unit 1 turbine and governor that relate to the historic engineering design and operation of the generating station.

(ii) Mitigation Measures

In accordance with the Programmatic Agreement, executed on August 8, 1997 among FERC, the Advisory Council on Historic Preservation, and the New York and Vermont SHPOs,

CVPS has consulted with the New York State Office of Parks, Recreation and Historic Preservation (the SHPO of the state in which the work will occur). A Memorandum of Agreement regarding the removal and replacement of the Unit 1 turbine and governor has subsequently been approved and signed by the New York State Historic Preservation Officer.

CVPS will mitigate the adverse effect by documenting the Unit 1 turbine and governor with 35 mm black-and-white photographs and prepare a summary report (the Section 106 Report) that describes the property, its history, the proposed action, and the current condition of the turbine and governor. The photographic documentation and the report have been completed and submitted to the New York State Historic Preservation Officer.

(5) Report on Socio-Economic Impacts

CVPS's proposal will not adversely impact socio-economic resources of the Project area. Replacement of the Unit 1 turbine will allow for CVPS to continue providing electricity to its customers.

(6) Report on Geological and Soil Resources

All work will be performed inside the powerhouse and therefore, no effects to geological or soil resources in the Project vicinity are anticipated.

(7) Report on Recreational Resources

CVPS is currently implementing recreation enhancements at the Project in accordance with their new FERC license and approved recreation pan. No effects to recreational resources in the Project vicinity are anticipated due to CVPS's proposal.

(8) Report on Aesthetic Resources

CVPS will continue to protect the aesthetic resources at the Project by releasing a flow over the southern spillway of at least 2.5 inches (or inflow, if less) on Memorial Day,

Independence Day, Labor Day, Columbus Day and every Sunday during the months of July and August.

All construction work will be performed inside the powerhouse and therefore, no effects to aesthetic resources in the Project vicinity are anticipated due to CVPS's proposal.

(9) Report on Land Use

CVPS's proposal will not affect land use in the Project area.

(10) Alternative Locations, Designs, and Energy Sources

The powerhouse currently contains two generating units with an existing capability of 1.9 MW. The proposed turbine can be seamlessly installed in the powerhouse and is more efficient than the existing turbine. CVPS's proposal will result in a total installed nameplate generating capacity of 2.2 MW.

(11) List of Literature

CVPS. 1994. Carver Falls Hydroelectric Project. Application for Initial License for a Major Water Power Project 5 Megawatts or Less. Submitted by CVPS to FERC on April 22, 1994.

CVPS. 2009. Carver Falls Hydroelectric Project. Operations Compliance Plan. Submitted by Central Vermont Public Service Corporation to FERC on November 19, 2009. Approved by FERC Order issued January 21, 2010.

FERC. 2009. Order on Offer of Settlement and Issuing Original License. Carver Falls Hydroelectric Project. February 25, 2009.

NYSDEC. 1996. Carver Falls Hydro Power Project, FERC No. 11475. Modification of Water Quality Certificate. New York State Department of Environmental Conservation. Dated December 13, 1996.

VANR. 2009. Water Quality Certification for the Carver Falls Hydroelectric Project Vermont Agency of Natural Resources, Department of Environmental Conservation. Issued on February 5, 2009.