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Douglas Bennett  
Plant General Manager

***Via Electronic Filing***

June 20, 2018

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

Re: FirstLight Hydro Generating Company, Turners Falls Hydroelectric Project (FERC No. 1889) and Northfield Mountain Pumped Storage Project (FERC No. 2485). Request Regarding Phase IB Archaeological Surveys

Dear Secretary Bose:

FirstLight Hydro Generating Company (FirstLight) owns and operates the Turners Falls Hydroelectric Project and Northfield Mountain Pumped Storage Project. FirstLight is in the process of relicensing the facilities with the Federal Energy Regulatory Commission (FERC).

Turners Falls Dam is located at approximately river mile 122 on the Connecticut River and creates the Turners Falls Impoundment (TFI), which is approximately 20 miles long and extends to the base of Vernon Dam (Project No. 1904), whose licensee is Great River Hydro, LLC (GRH). Most of the TFI lies within Massachusetts, with approximately 5.7 miles of the northern portion of the impoundment located in Vermont and New Hampshire.

As part of the relicensing process for the Turners Falls Hydroelectric Project, FirstLight conducted a Phase IA reconnaissance level survey on 119,466 meters of shoreline within the Area of Potential Effect (APE). The Phase IA survey identified 24,425 meters of shoreline (all within the TFI APE) as archaeologically sensitive and actively eroding. FirstLight proposed to limit Phase IB archaeological survey to an approximate 1,000 meter segment of shoreline in Massachusetts where FirstLight's Erosion Causation Study (Study No. 3.1.2) had determined that project operation was a partial contributor to erosion in that segment. FirstLight's Erosion Causation Study determined that the erosion at the remaining 23,425 meters of shoreline was not caused in whole or in part by project operation. On February 27, 2017, FERC issued a Study Plan Modification Determination indicating that FirstLight should conduct Phase IB investigations along all legally-accessible portions of the 24,425 meters of shoreline. On March 20, 2017 FirstLight filed a request for rehearing of the Study Plan Modification Determination, contending that it should not be required to conduct Phase IB investigation on archaeologically sensitive lands in the absence of evidence of project effects on those lands. On March 15, 2018, FERC denied FirstLight's rehearing request and directed FirstLight to conduct the Phase IB archaeological survey on 24,425 meters of TFI shoreline and Phase II surveys, where applicable, by September 1, 2018.

Since the denial of the rehearing request, FirstLight has begun implementing the Phase IB survey, including preparing proposed scopes of work for Vermont and New Hampshire State Historic Preservation Offices (SHPO) approval and receiving approval from the same to conduct Phase IB survey in Vermont and New Hampshire. FirstLight also submitted to the Massachusetts Historic Preservation Commission (MHPC), a modified research permit application to conduct Phase IB (intensive) survey in Massachusetts, has identified and attempted to contact all landowners to obtain consent to either access or conduct surveys on

their property, as applicable, and has notified Tribes of the impending Phase IB survey work. FirstLight is also in the process of revising the modified research permit application as a result of comments received from the MHPC by letter dated May 17, 2018.

In identifying landowners to obtain consent to conduct the Phase IB survey work, FirstLight discovered that three of the survey segments in New Hampshire are located on land owned by GRH, licensee for the Vernon Project. In these survey segments, the Project boundaries for the the Turners Falls and Vernon Projects overlap. GRH conducted Phase IA archaeological survey in these segments, but was not required to conduct Phase IB survey.

Of the 24,425 meters of TFI shoreline FirstLight is required to conduct Phase IB survey, 1,375 meters (approximately 5%) are located on lands owned by GRH. Given that a small portion of the lands subject to Phase IB survey are on lands owned by GRH and within the FERC project boundary for the Vernon Project, FirstLight respectfully requests a waiver of the requirement to conduct Phase IB survey on the 1,375 meters owned by GRH.

If you have any questions, or need additional information, please feel free to contact me.

Sincerely,

A handwritten signature in blue ink that reads "Douglas P. Bennett". The signature is written in a cursive style with a horizontal line extending to the right.

Douglas Bennett  
Plant General Manager

Cc: FirstLight Relicensing Mailing List