

FEDERAL ENERGY REGULATORY COMMISSION
WASHINGTON, D.C. 20426
June 21, 2018

OFFICE OF ENERGY PROJECTS

Project No. 1889-085 – Massachusetts/New
Hampshire/Vermont
Project No. 2485-071 – Massachusetts
FirstLight Hydro Generating Company

Project No. 1904-078 – New Hampshire/Vermont
Great River Hydro, LLC

Douglas Bennett
Plant General Manager
FirstLight Power Resources, Inc.
99 Millers Fall Road
Northfield, MA 01360

John L. Ragonese
FERC License Manager
Great River Hydro, LLC
One Harbour Place, Suite 330
Portsmouth, NH 03801

Reference: Additional Information Request on Cultural Resource Surveys

Dear Mr. Bennett and Mr. Ragonese:

On March 15, 2018, the Commission issued an order on rehearing that requires FirstLight Hydro Generating Company (FirstLight) to complete Phase IB and Phase II archaeological investigations by September 1, 2018 on 24,425 meters (m) of shoreline as part of the relicensing process for the Turners Falls Hydroelectric Project No. 1889 and the Northfield Mountain Pumped Storage Project No. 2485.¹ On May 31, 2018, FirstLight filed a request for a waiver of the requirement to conduct the Phase IB survey on 1,375 m of the 24,425 m of shoreline at issue in the Rehearing Order.² FirstLight

¹ *FirstLight Hydro Generating Company*, 162 FERC ¶ 61,235 (2018) (Rehearing Order).

states, as a basis for its waiver request, that the 1,375 m is located on land owned by Great River Hydro, LLC (GRH), and within the boundary of GRH's Vernon Hydroelectric Project No. 1904 (Vernon Project). We need additional information to make a more informed decision on FirstLight's waiver request.

We are requesting that FirstLight file a map identifying the precise location and ownership of the 1,375 m that is at issue in the waiver request. Prior to submitting the filing, FirstLight should consult with GRH to confirm property ownership, and determine whether or not GRH has already conducted a Phase IB survey on any of the 1,375 m as part of the relicensing process for the Vernon Project. FirstLight should submit the filing as "privileged," in accordance with section 388.112 of the Commission's regulations.

Second, after examining FirstLight's waiver request, it has come to our attention that GRH recently reclassified the archaeological sensitivity of land within the APE of the Vernon Project. This land appears to include some (if not all) of the 1,375 m of shoreline at issue in FirstLight's waiver request. Specifically, GRH's 2008 Phase IA Archaeological Reconnaissance Survey for the Vernon Project shows that archaeologically sensitive areas occur downstream of Vernon dam;³ whereas, GRH's 2016 Phase IB Archaeological Identification Survey shows that the same areas downstream of Vernon dam are not archaeologically sensitive.⁴ To address this issue, we are requesting that GRH provide the following information:

1. Please identify why GRH reclassified the archaeological sensitivity of the land downstream of Vernon dam, as described above;
2. Please explain whether GRH conducted a Phase IB survey of the land that was previously classified as archaeologically sensitive, and discuss the criteria that GRH used to determine whether a Phase IB survey of the land was necessary as

² FirstLight's May 31, 2018 filing was submitted to the Commission as a privileged document. FirstLight refiled its waiver request on June 20, 2018 as a publicly available document, with certain sensitive cultural resources information removed.

³ See TransCanada Hydro Northeast, Inc.'s April 16, 2013 filing at Attachment F (2008 Phase IA Archaeological Reconnaissance Survey for the Vernon Hydroelectric Project (FERC No. 1904)), Appendix A, sheet 5 of 5.

⁴ See TransCanada Hydro Northeast, Inc.'s March 23, 2016 Phase IB Archaeological identification Survey for the Wilder Hydroelectric Project (FERC No. 1892-026), Bellows Falls Hydroelectric Project (FERC No. 1855-045), and Vernon Project (FERC No. 1904-073), Appendix B, sheet 15 of 15.

part of study 33 (*Cultural and Historic Resources Study*),⁵ including whether or not the land is actively eroding.

Prior to submitting the filing, GRH should consult with FirstLight to evaluate any differences between GRH's and FirstLight's assessment of the archaeological sensitivity and erodibility of the land at issue in the waiver request.⁶ Please consult with the Vermont and New Hampshire State Historic Preservation Officers to rectify any inconsistencies on the archaeological sensitivity of the land at issue in this information request.

Please file this information within 30 days from the date of this letter. If you have any questions, please contact Dr. Frank Winchell at (202) 502-6104, or by email at Frank.Winchell@ferc.gov.

Sincerely,



Vince Yearick
Director
Division of Hydropower Licensing

⁵ Study 33 was required by Commission staff's September 13, 2013 study plan determination for the relicensing of the Vernon Project.

⁶ See FirstLight Hydro Generating Company's December 31, 2014 Historical Architectural Resources Survey and National Register Evaluation, Phase IA (Reconnaissance) Archaeological Survey for the Northfield Mountain Pumped Storage Project (No. 2485) and Turners Falls Hydroelectric Project (No. 1889), Cheshire County, New Hampshire and Windham County, Vermont, Appendix B, Cultural Sensitivity Map 1.