

FEDERAL ENERGY REGULATORY COMMISSION
WASHINGTON, D.C. 20426
January 18, 2019

OFFICE OF ENERGY PROJECTS

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

Douglas Bennett
Director – Massachusetts Hydro
FirstLight Hydro Generating Company
99 Millers Falls Road
Northfield, MA 01360

Reference: Extension of Time to Complete Phase II Archaeological Evaluations

Dear Mr. Bennett:

On March 15, 2018, the Commission issued an order on rehearing that required FirstLight Hydro Generating Company (FirstLight) to complete Phase IB and Phase II archaeological investigations on 24,425 meters (m) of shoreline in Vermont, New Hampshire, and Massachusetts as part of the relicensing process for the Turners Falls Hydroelectric Project No. 1889 (Turners Falls Project) and the Northfield Mountain Pumped Storage Project No. 2485 (Northfield Mountain Project).¹ The Rehearing Order required FirstLight to file the results of the Phase IB and Phase II investigations with the Commission by September 1, 2018.²

On July 17, 2018, FirstLight filed a request for an extension of time to complete the Phase IB archaeological survey for 12,000 m of shoreline in Massachusetts. On August 8, 2018, Commission staff granted an extension of time for FirstLight to file the Phase IB report (until December 15, 2018) and the Phase II report (until March 15, 2019) for the 12,000 m of shoreline in Massachusetts.

On December 14, 2018, FirstLight filed the Phase IB report for Massachusetts,

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

² *Id.* at Ordering Paragraph B.

and filed a request for an extension of time to file the Phase II report. FirstLight explains that it is currently consulting with the Massachusetts Historical Commission (MHC) on the Phase IB report and the extent of the Phase II archaeological evaluations in Massachusetts. FirstLight states that it must receive a number of state and local permits before conducting the Phase II evaluations, and that ground conditions in the survey areas are not currently conducive to archaeological investigations due to snow cover and frozen ground. First Light requests an extension of time until September 15, 2019 to complete the Phase II evaluations in Massachusetts.

As stated in the Rehearing Order, the purpose of the Phase IB and Phase II investigations is to determine the eligibility of archaeological sites for inclusion in the National Register of Historic Places (National Register).³ During its Phase IB study in Massachusetts, FirstLight investigated 32 sites within the area of potential effects. FirstLight was able to determine that 18 of these sites were not eligible for inclusion in the National Register. FirstLight conducted relatively extensive surveys of the remaining 14 sites that could be eligible for inclusion in the National Register, including shovel testing at regular intervals of 7.5 m along the shoreline, and shovel testing at intervals as close as 2.5 m around each site where cultural materials were identified.

Given the relatively limited size of the 14 remaining sites (approximately 0.15 acre, on average), and the number of shovel tests that have already been completed to-date, any Phase II excavations that are needed to determine site eligibility should be fairly limited in scope. In addition, FirstLight should have already applied for the relevant state and local permits to conduct the Phase II investigation, given that consultation with the MHC on the Phase IB study report was finished on December 30, 2018. Accordingly, an extension of time until September 15, 2019 is not warranted, regardless of ground conditions at this time. However, to accommodate potential delays associated with the receipt of state and local permits, FirstLight is granted 60 additional days, until May 14, 2019, to file the Phase II report for Massachusetts.

Please include documentation of consultation with the MHC when you file the report, including all comments received from the MHC on the Phase IB report. If you have any questions, please contact Amanda Gill at 202-502-6773.

Sincerely,

Vince Yearick
Director
Division of Hydropower Licensing

³ See *id.* at P 13, 18, 41, and note 31.