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Douglas Bennett  
Director MA Hydro Operations  
Northfield Mountain/Turners Falls Projects

June 6, 2019

**VIA ELECTRONIC FILING**

Ms. 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)  
First Monthly Progress Report for Massachusetts Phase II Archaeological Report

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), including conducting Phase II archaeological investigations in Massachusetts.

By letter dated May 6, 2019, FirstLight requested an extension of time until October 18, 2019 to file the Massachusetts Phase II Archaeological Report with FERC. In its request, FirstLight proposed to provide FERC with a progress update, on a monthly basis beginning on June 6, 2019. On May 13, 2019, FERC granted an extension of time until October 18, 2019 to file the Phase II report for Massachusetts. FERC also required in its letter that FirstLight submit progress reports on a monthly basis until the Phase II report is completed. FirstLight hereby submits its first monthly progress report.

Consultation with Massachusetts Historical Commission (MHC)

Since FirstLight filed its request for an extension of time on May 6, 2019, the Massachusetts Historical Commission (MHC) provided comments on May 10, 2019 on the Phase II Revised Research Design and requested minor revisions to the Phase II Revised Research Design. The revised Phase II Revised Research Design was submitted to the MHC on May 14, 2019. FirstLight received a State Archaeologist's permit from the MHC on May 16, 2019.

Status of Additional Local and State Permits Needed to Commence Phase II Evaluations

As noted in its May 6, 2019 request for an extension of time to complete the Massachusetts Phase II study, FirstLight must also receive permits from the Massachusetts Natural Heritage and Endangered Species Program (MA NHESP), and from the Conservation Commissions of the towns of Gill, Northfield, and Greenfield. Permit application packages for the towns of Gill and Greenfield were submitted on May 28, 2019 and June 4, 2019, respectively. The permit application package for the Town of Northfield will be submitted the week of June 10, 2019. The permit applications are anticipated to be included on the agendas for the local Conservation Commission hearings scheduled between June 4, 2019 and June 25, 2019. An assessment of the potential for the Phase II archaeological fieldwork to impact rare plants will be submitted to the MA NHESP the week of June 10, 2019.

Firstlight must also submit consultation packages to the Town of Northfield Historical Commission and Town of Gill Historical Commission to ensure compliance with their respective Archaeological

Accountability Policies. The consultation packages will include a copy of the State Archaeologist’s permit, the Phase II Research Design, the fully executed Curation Agreement with Springfield Museums, and acknowledgment to adhere to the Town’s Archaeological Accountability Policies. In addition, and per the State Archaeologist’s permit requirement, Firstlight is also preparing Notification of Fieldwork letters to tribal entities; these letters will include an invitation to share tribal knowledge of the study areas and to monitor field activities.

Assuming timely issuance of the state and local permits, FirstLight anticipates initiation of Phase II field work in mid-July. Assuming favorable weather conditions, completion of field work is anticipated in late August 2019.

Table 1 sets forth the updated anticipated schedule for completion of Phase II evaluations.

**Table 1: Updated Schedule for Completing Phase II Evaluations**

Project Element/Task	Date
➤ The MHC provided additional Phase II Revised Research Design Comments	May 10, 2019
➤ Submit revised Phase II Revised Research Design to MHC	May 14, 2019
➤ The MHC Issues State Archaeologist’s Permit to TRC	May 16, 2019
➤ Submit local permit applications to the Conservation Commissions of the towns of Gill, Northfield, and Greenfield	May 28, 2019 (Gill) June 4, 2019 (Greenfield) Week of June 10, 2019 (Northfield)
➤ Conservation Commission hearings on local permit applications	June 4, 2019 (Gill) June 25, 2019 (Greenfield, anticipated) June 19, 2019 (Northfield, anticipated)
➤ Submit Archaeology Accountability Policy Compliance Requirement Package to Town Historical Commissions	Week of June 2, 2019
➤ Submit Tribal Notification Letters of pending Phase II Fieldwork	Week of June 2, 2019
➤ Mail Landowner Notification Letters of pending Phase II Fieldwork	Week of June 2, 2019
➤ Submit rare plant assessment report to MA NHESP	Week of June 10, 2019
➤ Anticipated receipt of MA NHESP approval and local permits	July 8, 2019
➤ Begin Phase II Fieldwork	Mid-July, 2019
➤ Complete Phase II Fieldwork	Late August, 2019
➤ Submit Phase II Report to the MHC and FERC	October 18, 2019

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

Sincerely,



Douglas Bennett  
Director of MA Hydro Operations