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Nick Hollister  
Senior Operations Manager, North

June 18, 2021

*Via Electronic Filing*

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

Re: FirstLight MA Hydro LLC, Turners Falls Hydroelectric Project (FERC No. 1889)  
Northfield Mountain LLC, Northfield Mountain Pumped Storage Project (FERC No. 2485).  
Response #2 to FERC's April 19, 2021 Letter Regarding Additional Information Requests

Dear Secretary Bose:

On December 4, 2020, FirstLight MA Hydro LLC, owners of the Turners Falls Hydroelectric Project (Turners Falls Project, FERC No. 1889) and Northfield Mountain LLC, owners of the Northfield Mountain Pumped Storage Project (Northfield Mountain Project, FERC No. 2485) filed with the Federal Energy Regulatory Commission (FERC) Amended Final License Applications (AFLA) for the two projects.

### Background

On January 14, 2021, FERC issued separate letters to FirstLight MA Hydro LLC and Northfield Mountain LLC requesting the Licensees address deficiencies and additional information requests (AIRs) for each Project. Several of the AIRs requested information on energy impacts, water levels, flows and Northfield Mountain pumping/generation volumes under FirstLight's AFLA operating proposal. FirstLight is conducting the analyses needed to respond to these outstanding AIRs, which will be filed with FERC on June 23, 2021. However, for the remaining AIRs, FirstLight filed its responses on March 15, 2021.

On April 19, 2021, FERC issued follow-up AIRs for both the Northfield Mountain Project and Turners Falls Project on FirstLight's responses filed on March 15, 2021. Those AIRs included:

- Turners Falls TF-AIR#15- Cultural Resources
- Turners Falls TF-AIR#20- Project Boundary
- Northfield Mountain NFM-AIR#12- Project Boundary

The attached document addresses these three AIRs.

If you have any questions regarding the enclosed, please do not hesitate to contact me at the telephone number on the cover sheet.

Respectfully,

A handwritten signature in blue ink that reads "Nick Hollister". The signature is written in a cursive style with a large initial "N".

Nick Hollister  
Senior Operations Manager, North

Attachments: Additional Information Request Responses

## **Turners Falls Project- Response to Additional Information Requests**

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### ***Cultural Resources***

#### TF-AIR#15, Part 1

*The updated table of archaeological sites that was provided in FirstLight's March 15, 2021 response to item 15 of Schedule B of Commission staff's January 14, 2021 letter, indicates that there are 123 archaeological sites<sup>1</sup> located within the Turners Falls Area of Potential Effects (APE). The 123 sites identified in the updated table differs from the 109 sites identified at the project in FirstLight's proposed Historic Properties Management Plan (HPMP). The table filed on March 15, 2021, includes an additional 14 sites, including one site in the vicinity of Erving, Massachusetts (site 19FR051); eight sites in the vicinity of Gill, Massachusetts (sites 19FR266, 19FR269, 19FR309, 19FR310, 19FR348, 19FR429, 19FR430, 19FR431); one site in the vicinity of Greenfield (site 19FR012); one site in the vicinity of Montague (site 19FR353); and three sites in the vicinity of Northfield (sites 19FR001, 19FR120, 19FR344). All 14 of these sites are identified in the Phase IA archaeological reconnaissance report for the project filed with the Commission on May 15, 2015. However, they are not identified in the proposed HPMP. Please clarify why these sites are not included in the proposed HPMP and identify any potential adverse effects of the proposed project on these 14 sites.*

#### Response to TF-AIR#15, Part 1

FERC is comparing the deficiency response table to the original Final HPMP filed in December 2020. As per the Massachusetts Historical Commission's HPMP review letter dated January 7, 2020, the HPMP is being revised to update the site inventory. The revised Final HPMP will include these sites. There are no potential adverse effects to these sites.

#### TF-AIR#15, Part 2

*Site 19FR009 (the King Phillips Hill site) is identified as within the project APE in the Phase IA archaeological reconnaissance report and is included in Table 3.1-1 of the proposed HPMP. However, this site is not included in the updated table provided in FirstLight's March 15, 2021 response to item 15 of Schedule B of Commission staff's January 14, 2021 letter. Please clarify why this site, which is listed on the National Register of Historic Places, was excluded from the March 15, 2021 table.*

#### Response to TF-AIR#15, Part 2

Site 19FR009 was inadvertently left off the deficiency response table, is within the Project APE, and will be added back in. It is included on the current Project mapping.

### ***Project Boundary***

#### TF-AIR#20

*Item 20 of Schedule B of Commission staff's January 14, 2021 letter, requested additional information on lands that were identified in Exhibit G as lands "to be acquired," including an explanation of what the acquisition will entail (e.g., fee ownership, land rights, flowage rights) and how the lands will be used for*

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<sup>1</sup> While the updated table identifies 125 sites at the project, two of these sites (sites 19FR110, 19FR312) have been listed twice.

project purposes. In its March 15, 2021 response, FirstLight only provided information about lands that it is proposing to add to the current project boundary. However, the Exhibit G maps identify several additional parcels of land within the current project boundary as lands “to be acquired.” The following table lists the sheets in Exhibit G on which this occurs:

<i>Sheet #</i>	<i>Description</i>
<i>1</i>	<i>No issues</i>
<i>2</i>	<i>No issues</i>
<i>3</i>	<i>No issues</i>
<i>4</i>	<i>Parcel(s) along Millers River</i>
<i>5</i>	<i>Parcel(s) on both sides of CT River</i>
<i>6</i>	<i>Parcel(s) on both sides of CT River</i>
<i>7</i>	<i>Parcel(s) on west side of CT River</i>
<i>8</i>	<i>Parcel(s) on both sides of CT River</i>
<i>9</i>	<i>Parcel(s) on west side of CT River</i>
<i>10</i>	<i>Parcel(s) on west side of CT River</i>
<i>11</i>	<i>Parcel(s) on both sides of CT River</i>
<i>12</i>	<i>Parcel(s) on both sides of CT River</i>
<i>13</i>	<i>Parcel(s) on both sides of CT River</i>

*If any of these lands have been acquired, the Exhibit G maps should be revised to reflect the current status of the lands. If these lands have not been acquired, please provide an explanation of what the acquisition would entail (e.g., fee ownership, land rights, flowage rights) and how the lands are, or would be, used for project purposes.*

Response to TF-AIR#20

Following issuance of the FERC license and establishment of the new Project Boundary, FirstLight will seek acquisition of flowage rights on the parcels listed in FERC’s AIR (see table above). Based on a hydraulic assessment of the 50-year flood conducted in the 1970’s, these parcels could be flooded, which is why FirstLight would seek to acquire flowage rights.

## Northfield Mountain Project- Response to Additional Information Requests

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### ***Project Boundary***

#### NFM-AIR#12

*Item 12 of Schedule B of Commission staff’s January 14, 2021, letter requested additional information on lands that were identified in Exhibit G as lands “to be acquired,” including an explanation of what the acquisition will entail (e.g., fee ownership, land rights, flowage rights) and how the lands will be used for project purposes. In its March 15, 2021 response, FirstLight only provided information about lands that it is proposing to add to the current project boundary. However, the Exhibit G maps identify several additional parcels of land within the current project boundary as lands “to be acquired.” The following table lists the sheets in Exhibit G on which this occurs:*

<i>Sheet #</i>	<i>Description</i>
<i>1</i>	<i>Same sheet as #TF3, no issues</i>
<i>2</i>	<i>Sheet same as TF#4, Parcel(s) along Millers River</i>
<i>3</i>	<i>Parcel(s) on east side of CT River</i>
<i>4</i>	<i>Parcel(s) along Millers River</i>
<i>5</i>	<i>No issues</i>
<i>6</i>	<i>Sheet same as TF#6, Parcel(s) on both sides of CT River</i>
<i>7</i>	<i>Sheet same as TF#7, Parcel(s) on west side of CT River</i>
<i>8</i>	<i>Sheet same as TF#8, Parcel(s) on both sides of CT River</i>
<i>9</i>	<i>Sheet same as TF#9, Parcel(s) on west side of CT River</i>
<i>10</i>	<i>Sheet same as TF#10, Parcel(s) on west side of CT River</i>
<i>11</i>	<i>Sheet same as TF#11, Parcel(s) on both sides of CT River</i>
<i>12</i>	<i>Sheet same as TF#12, Parcel(s) on both sides of CT River</i>
<i>13</i>	<i>Sheet same as TF#13, Parcel(s) on both sides of CT River</i>

*If any of these lands have been acquired, the Exhibit G maps should be revised to reflect the current status of the lands. If these lands have not been acquired, please provide an explanation of what the acquisition would entail (e.g., fee ownership, land rights, flowage rights) and how the lands are, or would be, used for project purposes.*

#### Response to NFM-#12:

See response to TF-AIR#20.