



February 26, 2018

VIA ELECTRONIC FILING

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

Re: FirstLight Hydro Generating Company, Turners Falls Hydroelectric Project (FERC No. 1889) and Northfield Mountain Pumped Storage Project (FERC No. 2485).
Study No. 3.7.1 Phase IB and Phase II Archaeological Investigations

Dear Secretary Bose:

On February 17, 2017, the Federal Energy Regulatory Commission (FERC or the Commission) issued a Study Plan Determination (SPD) with respect to the Turners Falls Hydroelectric Project No. 1889 and Northfield Mountain Pumped Storage Project No. 2485 (collectively, "Project"). The SPD required FirstLight Hydro Generating Company (FirstLight) to complete Phase IB and Phase II archaeological investigations on 24,425 meters of the shoreline identified in FirstLight's Phase IA archaeological study as archaeologically sensitive and actively eroding and report the results of those studies by March 1, 2018. The SPD rejected FirstLight's proposal to conduct Phase IB investigations on only those archaeologically sensitive portions of shoreline in which the active erosion was in part Project-induced (approximately 1,000 meters of shoreline in Massachusetts; First Light's *Northfield Mountain/Turners Falls Operations Impact on Existing Erosion and Potential Bank Instability Causation Study* (Study No. 3.1.2) found no project-induced erosion on archaeologically sensitive portions of shoreline in Vermont and New Hampshire).

On March 20, 2017, FirstLight filed a Request for Rehearing of the determination in the SPD related to Phase IB and Phase II archaeological investigations. Among other requests, FirstLight requested the Commission to allow FirstLight to defer Phase IB and Phase II investigations unless and until the Commission makes a final determination regarding the impacts of Project operation, including Project-induced erosion, on the entire 24,425 meters of archaeologically sensitive shoreline. The Request for Rehearing is awaiting Commission determination.

In the meantime, by letter dated May 9, 2017, TRC Environmental Corporation (TRC; FirstLight's archaeological consultant) filed a revised application with the Massachusetts Historical Commission (MHC) for a State Archaeologist's permit to conduct Phase IB archaeological investigations on the estimated 1,000 meters of archaeologically sensitive portions of shoreline in which the active erosion was in part Project-induced. By letter dated June 7, 2017, the MHC notified TRC and FirstLight that it would only evaluate the State Archaeologist's permit application filed by TRC once it receives a

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copy of FERC's decision on the rehearing request.¹ By letter also dated June 7, 2017, the MHC requested FERC to submit a copy of FERC's decision on the rehearing request when it becomes available.²

Because the MHC will only evaluate the permit application to undertake Phase IB archaeological investigation at the Project after FERC has issued its determination on FirstLight's Request for Rehearing of the SPD, FirstLight has been unable to undertake Phase IB or Phase II archaeological investigation of the 1,000 meters of shoreline in which erosion is in part Project-induced. After receipt of FERC's determination on the Request for Rehearing, FirstLight will consult with the MHC and with the Vermont and New Hampshire State Historic Preservation Offices (SHPOs), as appropriate, regarding procedures for initiating Phase IB and Phase II investigations. To the extent FERC deems it necessary, FirstLight asks FERC to consider this letter as a request for extension of time to conduct the relevant investigations and file the associated study reports until a reasonable period of time after FERC issues an order on rehearing and FirstLight is able to obtain permits and approvals from the MHC and the Vermont and New Hampshire SHPOs to conduct the studies FERC determines are necessary.

If you have questions regarding the above, please do not hesitate to contact me. Thank you for your assistance in this matter.

Sincerely,



Douglas Bennett
Plant General Manager

Cc: Brona Simon, Massachusetts State Historic Preservation Officer
Laura V. Trieschmann, Vermont State Historic Preservation Officer
Elizabeth H. Muzzey, New Hampshire State Historic Preservation Officer
Frank Winchell, Federal Energy Regulatory Commission

¹ A copy of the MHC's letter to TRC was filed with the Commission on June 16, 2017.

² The MHC's letter to FERC was also filed on June 16, 2017.