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Northfield Mountain/Turners Falls Projects

July 5, 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)
Second Monthly Progress Report for Massachusetts Phase II Archaeological Report

Dear Secretary Bose:

FirstLight Hydro Generating Company (FirstLight) hereby submits its second monthly progress report in accordance with FERC's May 13, 2019 letter granting an extension of time to file the Phase II archaeological study report for Massachusetts by October 18, 2019.

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

As noted in its first monthly progress report and 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. As noted in the first monthly progress report, 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 was submitted on June 12, 2019. The permit applications were approved by the three local Conservation Commissions at hearings held between June 4, 2019 and June 26, 2019. An assessment of the potential for the Phase II archaeological fieldwork to impact rare plants was submitted to the MA NHESP on June 11, 2019. MA NHESP concurred with the recommendations in the assessment and approved the Phase II archaeological fieldwork.

FirstLight submitted 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 included 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 also sent out Notification of Fieldwork letters to tribal entities; which included an invitation to share tribal knowledge of the study areas and to monitor field activities.

FirstLight plans to initiate the Phase II field work on July 8, 2019. 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
➤ Submitted local permit applications to the Conservation Commissions of the towns of Gill, Northfield, and Greenfield	May 28, 2019 (Gill) June 4, 2019 (Greenfield) June 12, 2019 (Northfield)
➤ Conservation Commission hearings on local permit applications	June 4, 2019 (Gill) June 25, 2019 (Greenfield) June 26, 2019 (Northfield)
➤ Gill Conservation Commission approved the Phase II Fieldwork	June 4, 2019
➤ Submitted Archaeology Accountability Policy Compliance Requirement Package to Town Historical Commissions	June 4, 2019
➤ Submitted Tribal Notification Letters of pending Phase II Fieldwork	June 4, 2019
➤ Submitted rare plant assessment report to MA NHESP	June 11, 2019
➤ Mailed Landowner Notification Letters of pending Phase II Fieldwork	June 14, 2019
➤ Greenfield Conservation Commission approved the Phase II Fieldwork	June 25, 2019
➤ Northfield Conservation Commission approved the Phase II Fieldwork	June 26, 2019
➤ Received MA NHESP approval	July 1, 2019
➤ Begin Phase II Fieldwork	July 8, 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