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Alan Douglass
Regulatory Compliance Manager

November 12, 2021

Via Electronic Filing

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

Re: Turners Falls Hydroelectric Project (FERC No. 1889), FirstLight MA Hydro LLC, Northfield Mountain Pumped Storage Project (FERC No. 2485), Northfield Mountain LLC Comment Status Update and Further Request to Defer Issuance of Notice of Acceptance / Ready for Environmental Analysis

Dear Secretary Bose:

As previously reported, over the course of the past several months, FirstLight has engaged federal and state resource agencies, local communities, environmental organizations, Native American tribes, and other stakeholders in renewed discussions on outstanding issues pertaining to fish passage, flow proposals, recreation, and cultural resources related to relicensing of the above-referenced projects. The parties seek to negotiate a comprehensive settlement agreement that resolves all outstanding issues for the relicensing, or as many of those issues as possible. On August 3, 2021, the Massachusetts Department of Environmental Protection outlined these efforts and requested a delay in FERC's issuance of its Notice of Acceptance and Ready for Environmental Analysis until November 12, 2021. On August 5, the Massachusetts Division of Fisheries and Wildlife and FirstLight filed letters in support of the delay and on August 18, the United States Fish and Wildlife Service also filed a letter supporting the delay.

In the last three months, FirstLight and the other parties have made substantial progress in negotiating relicensing solutions. The settlement parties have exchanged proposals on fish passage, flows, and recreation. FirstLight is currently holding discussions on fish passage and flows with federal and state resource agencies. FirstLight and the agencies held fish passage and flow meetings on September 24, October 14, and November 10, 2021 and have established an additional meeting on December 2. FirstLight and the recreation stakeholders held meetings on September 10, September 30, October 15, October 18, and October 29, 2021, and have another meeting scheduled for November 19, 2021. The meetings so far have involved a robust exchange of ideas and proposals and have resulted in tentative agreement on a number of resource measures. Additional meetings with Tribal stakeholders revolving around cultural issues have been held on July 27, September 2 and October 20, 2021. Because of overlap between some of the recreation issues and the fish and flow issues, it will be necessary for at least some of the parties from each group to participate in combined discussions to identify and attempt to resolve any resource conflicts.

The settlement parties have expressed that they are interested in continuing these productive settlement discussions. FirstLight, therefore, proposes the following timeline:

November 2021 – fish and flow group and recreation/cultural group continue separate discussions.

December 2021/January 2022 – parties schedule meeting or meetings of combined groups (fish/flows and recreation/cultural) to discuss overlapping issues. Parties provide status update to the Commission no later than December 31, 2021.

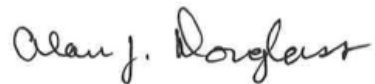
January 2022 – parties work toward achieving a conceptual agreement that can be filed with the Commission on or about January 31, 2022.

June 2022 – parties complete negotiation of a fully executed settlement agreement and file the agreement with the Commission.

The following settlement parties have affirmatively indicated that they support this timeline: the United States Fish and Wildlife Service, the National Marine Fisheries Service, and American Whitewater Association. Therefore, FirstLight requests that the Commission continue to defer the issuance of the Notice of Acceptance and Ready for Environmental Analysis until after January 31, 2022.

Thank you for your consideration.

Respectfully,

A handwritten signature in cursive script that reads "Alan J. Douglass".

Alan Douglass
Regulatory Compliance Manager