

FEDERAL ENERGY REGULATORY COMMISSION
Washington, D.C. 20426
November 9, 2023

OFFICE OF ENERGY PROJECTS

Project No. 1889-085 – Massachusetts/New
Hampshire/Vermont
Turners Falls Hydroelectric Project
FirstLight MA Hydro LLC

Project No. 2485-071 – Massachusetts/New
Hampshire/Vermont
Northfield Mountain Pumped Storage Project
Northfield Mountain LLC

VIA FERC Service

Alan Douglass
Regulatory Compliance Manager
FirstLight MA Hydro LLC and Northfield Mountain LLC
99 Millers Falls Road
Northfield, MA 01360

Reference: Additional Information Request

Dear Mr. Douglass:

On June 12, 2023, FirstLight MA Hydro LLC, licensee for the Turners Falls Hydroelectric Project No. 1889, and Northfield Mountain LLC, licensee for the Northfield Mountain Pumped Storage Project No. 2485 (collectively, FirstLight), filed a settlement agreement for the relicensing of the Turners Falls Project and the Northfield Mountain Project (together, “projects”). The purpose of the settlement agreement is to resolve, among the signatories, relicensing issues related to protecting and enhancing public recreation at the projects. The settlement agreement includes a proposed license article for each project that requires FirstLight to implement a Recreation Management Plan that was attached to the settlement agreement.

After reviewing the settlement agreement, we have determined that we need the information described in the attached Schedule A. Please provide this information within 30 days from the date of this letter, pursuant to section 5.21 of the Commission’s regulations. If the information causes another part of the application to be inaccurate, that part must be revised and refiled by the due date. When you file the requested information

with the Commission, please provide a complete copy of the information to each settlement agreement participant and each agency and Indian Tribe consulted during the relicense proceeding.

The Commission strongly encourages electronic filing. Please file the requested information using the Commission's eFiling system at <https://ferconline.ferc.gov/eFiling.aspx>. For assistance, please contact FERC Online Support at FERCONlinesupport@ferc.gov; (866) 208-3676 (toll-free); or (202) 502-8659 (for TTY). In lieu of electronic filing, you may submit a paper copy. Submissions sent via the U.S. Postal Service must be addressed to: Kimberly D. Bose, Secretary, Federal Energy Regulatory Commission, 888 First Street NE, Room 1A, Washington, D.C. 20426. Submissions sent via any other carrier must be addressed to: Kimberly D. Bose, Secretary, Federal Energy Regulatory Commission, 12225 Wilkins Avenue, Rockville, Maryland 20852. The first page of any filing should include the applicable docket numbers P-1889-085 and P-2485-071.

If you have any questions, please contact Steve Kartalia at (202) 502-6131, or stephen.kartalia@ferc.gov.

Sincerely,

Emily Carter, Chief
New England Branch
Division of Hydropower Licensing

Attachment: Schedule A – Additional Information

ADDITIONAL INFORMATION

1. The proposed Recreation Management Plan (RMP), which covers both projects, describes eleven recreation measures for the Turners Falls Project and six recreation measures for the Northfield Mountain Project; however, neither the settlement agreement nor the RMP provide costs for these measures. Please provide an estimate of the capital cost and annual operation and maintenance cost for each proposed measure. These estimates should only cover incremental costs of the proposed measures relative to current conditions, with any existing costs for associated facilities assumed to be already accounted for in Exhibit D of the April 29, 2016 license application, as amended on December 4, 2020.

2. Table 6.3-1 of the RMP, labeled *Existing and Proposed Recreation Facilities or Features at the Northfield Mountain and Turners Falls Projects, Listed by Town*, refers both to recreation facilities and recreation features. While the settlement agreement and the RMP generally refer to establishing Rose Ledges as a recreation facility, section III.B.2 of the Explanatory Statement, labeled *Farley Ledges Conservation Restriction*, refers to designating Rose Ledges as a recreational feature. Table 7.0-1 of the RMP, labeled *Recreation Implementation Schedule*, refers to establishing Rose Ledges as a recreation facility, but the measure is listed under the column heading, "Feature." Please clarify: (1) the distinction between a recreation facility and a recreation feature, and (2) whether Rose Ledges is proposed to be established as a recreation facility or as a recreation feature.

3. Table 6.3-1 of the RMP, labeled *Existing and Proposed Recreation Facilities or Features at the Northfield Mountain and Turners Falls Projects, Listed by Town*, summarizes all existing and proposed (new/upgraded) recreation facilities and features associated with the projects. Tables 8.0-1 and 8.0-2, labeled *Amenities at [Turners Falls and Northfield Mountain Project Recreation Sites (respectively)] to which Management and Maintenance Measures Apply*, identify the amenities at the projects' recreation sites that FirstLight would manage and maintain. Please clarify: (1) whether there would be any amenities at the recreation facilities/features listed in Table 6.3-1 that FirstLight would not manage and maintain; and (2) if so, who would be responsible for managing and maintaining these amenities.