



Northfield Mountain Station
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Alan Douglass
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December 11, 2023

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
Response to Additional Information Requests relative to Recreation Settlement Agreement.

Dear Secretary Bose:

On June 12, 2023, FirstLight MA Hydro LLC and Northfield Mountain LLC (collectively, FirstLight), licensee of the Turners Falls Hydroelectric Project (Turners Falls Project, FERC No. 1889) and Northfield Mountain Pumped Storage Project (Northfield Mountain Project, FERC No. 2485) (collectively Projects), respectively, filed with the Federal Energy Regulatory Commission (FERC) a Recreation Settlement Agreement. As part of the Recreation Settlement Agreement, FirstLight included a single Recreation Management Plan for both Projects.

On November 9, 2023, FERC issued FirstLight three additional information requests (AIRs) pertaining to the Recreation Settlement Agreement with responses due in 30 days. Please find attached the AIRs (verbatim) and FirstLight's responses.

If you have any questions regarding this filing, please feel free to contact me at the above number.

Respectfully,

A handwritten signature in black ink that reads "Alan J. Douglass".

Alan Douglass
Regulatory Compliance Manager

AIR No. 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.

AIR No. 1 Response

Shown in Table AIR1-1 are the capital costs and annual operation and maintenance (O&M) costs for the recreation measures included in the Recreation Settlement Agreement. The annual O&M cost estimates were developed in 2022 and were not inflated over a 50-year license term. The costs included in Table AIR1-1 were developed at a conceptual level.

Table AIR1-1: Capital Cost and Annual Operation and Maintenance Cost/Year for Recreation Measures at the Northfield Mountain Pumped Storage Project and Turners Falls Hydroelectric Project

Recreation Measure	CapEx (\$2022)	O&M Cost/Yr (\$2022)
Northfield Mountain Pumped Storage Project		
Enhance Existing Bennett Meadow Trails	\$5,000	\$500
Construct Riverview Improvements (Docks)	\$138,000	\$5,500
Construct New Mountain Biking Trails at Northfield Mountain	\$264,000	\$7,500
Construct Barton Cove Campsite	\$32,000	\$2,600 ^{1,2}
Establish Rose Ledge as a Project Recreation Facility	\$5,000	\$500
Implement Barton Cove Improvements (Locking Canoes and Kayaks)	\$6,000	\$500
Turners Falls Hydroelectric Project		
Construct Pocket Park	\$54,000	\$5,200
Construct Mallory Brook Campsite	\$32,000	\$2,600 ^{1,2}
Construct Formal Access and Put-In at Cabot Camp	\$39,000	\$8,600
Construct Car-Top Access at East End of Unity Park and Reconfigure Parking Lot	\$276,000	\$9,800
Construct River Access and Two Put-Ins below Turners Falls Dam	\$252,000	\$8,200
Construct Viewing Platform and Picnic Area just below Turners Falls Dam	\$382,000	\$7,400
Construct River Access Trail at Station No. 1	\$111,000	\$8,200
Install Stairs at Cabot Woods Fishing Access	\$150,000	\$3,200
Construct Portage Around Rock Dam	\$100,000	\$5,000
Improve Poplar Street River Access	\$368,000	\$8,800
Install Interpretive Cultural Signage at Key Locations	\$50,000	\$2,000

¹As discussed in FirstLight's response to AIR No. 3, the Appalachian Mountain Club (AMC), or its designee, will inspect the Mallory Brook and Barton Cove campsites at the beginning of the camping season and maintain the campsites throughout the season. AMC, or its designee, will be responsible for notifying FirstLight upon completion of its inspection and indicate what, if any, repairs are needed or if equipment replacement is needed. FirstLight will

be responsible for major repairs to the two campsites and replacing equipment, specifically tent platforms, stairs (if applicable) and moldering privy.

²It was assumed the campsite would need to be rebuilt every 10 years or 4 times over the license term.

$\$32,000 \times 4 = \$128,000/50 \text{ year license term} = \$2,560$. Annual O&M rounded to \$2,600.

AIR No. 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.

AIR No. 2 Response

To clarify, a recreation feature is something used by the public where FirstLight provides access but does not maintain it. A recreation facility is something used by the public where FirstLight provides access and maintains it. All the proposed recreation measures listed in Table 6.3-1 of the RMP should be considered recreation facilities with the exception of Rose Ledges. At Rose Ledges, FirstLight is providing access for climbing but is not responsible for operating and/or maintaining the site.

Other proposed items in Table 6.3-1 that are not recreation features or facilities include:

- FirstLight will permanently conserve its lands within Bennett Meadow that are not already under conservation easement.
- FirstLight will donate used sporting equipment to local youth organizations.
- FirstLight will attempt to find a qualified organization to take responsibility for preserving the Cabot Camp historic buildings.
- FirstLight will make safety improvements to abandoned water passages, under FirstLight's ownership, in the Turners Falls bypass (focused between the dam and upstream of Station No. 1 on river left).
- FirstLight will add the ability to lock canoes and kayaks during the day at Barton Cove in the Town of Gill.
- Flow Notification (real-time Turners Falls Impoundment water level information and flow data, monitoring plan, etc.).
- American Disabilities Act— for any new construction and rehabilitation of existing recreation facilities, FirstLight will complete them in compliance with 521 CMR to the extent applicable.
- The RMP will be revisited every 10 years.
- FirstLight will establish conservation easements.
- FirstLight will conserve the approximately a 1.3-mile-portion of the New England Scenic Trail in the Project Boundary.

AIR No. 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

AIR No. 3 Response

FirstLight is responsible for managing and maintaining all the recreation facilities with the exception of the following:

Mallory Brook Campsite- per the RMP: *FirstLight will provide paddle access camping at a new campsite at Mallory Brook (if for some reason that location proves to be problematic, another site will be chosen) in the town of Northfield in consultation with AMC, and the town of Northfield.* It was agreed, as part of the Recreation Settlement Agreement, that the Appalachian Mountain Club will maintain this site.

Construct Barton Cove Campsite- per the RMP: *FirstLight will provide paddle access camping at a new campsite in the Barton Cove area in Gill, in consultation with the town of Gill and AMC.* Again, as agreed to as part of the Recreation Settlement Agreement, the Appalachian Mountain Club will maintain this site.

Also, per the RMP: *For the two new primitive campsites at Mallory Brook and Barton Cove, subject to a maintenance agreement, AMC, or its designee, will inspect the facilities at the beginning of the camping season and maintain the campsites throughout the season. AMC, or its designee, will be responsible for notifying FirstLight upon completion of its inspection and indicate what, if any, repairs are needed or if equipment replacement is needed. FirstLight will be responsible for major repairs to the two campsites and replacing equipment, specifically tent platforms, stairs (if applicable) and moldering privy.*