



FirstLight Power Resources
99 Millers Falls Road
Northfield, MA 01360
Ph.: (413) 659-4416
Email: alan.douglass@firstlight.energy

Alan Douglass
Regulatory Compliance Manager

March 22, 2024

Via Electronic Filing

Ms. Debbie-Anne Reese
Acting 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
Final Amendments to Applications

Dear Acting Secretary Reese:

On February 22, 2024, the Federal Energy Regulatory Commission (FERC) issued its Ready for Environmental Analysis (REA) notice for the Turners Falls Hydroelectric Project (FERC No. 1889) (Turners Falls) and Northfield Mountain Pumped Storage Project (FERC No. 2485) (Northfield Mountain). In FERC's REA notice, it requested final amendments to the applications within 30 days or by March 22, 2024.

FirstLight Power Services LLC (FirstLight), as agent for both FirstLight MA Hydro LLC and Northfield Mountain LLC, the current licensees of the referenced Projects, is filing the following documents, as separate attachments, to complete its license application:

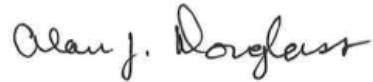
- A report entitled *Supplemental BSTEM Modeling Report Reflecting Operating Conditions in the Flows and Fish Passage Settlement Agreement* (F/F Agreement). The Bank Stability and Toe Erosion Model (BSTEM) was used to evaluate erosion in the Turners Falls Impoundment (TFI) under the operating conditions in the F/F Agreement.
- FirstLight's proposal regarding monitoring and mitigation for streambank erosion in the TFI.
- FirstLight's updated Invasive Plant Species Management Plans for the Turners Falls and Northfield Mountain Projects, which replaces those in the Amended Final License Application (AFLA).
- Revised Applicant-Prepared Draft Biological Assessments (Revised BA's) for the federally endangered Shortnose Sturgeon and Puritan Tiger Beetle incorporating the changes to Project operations in the F/F Agreement. The BA's also include the correspondence records with the National Marine Fisheries Service and the U.S. Fish and Wildlife Service on the Revised BA's.

To ensure all stakeholders understand FirstLight's final licensing proposal, Table 1 (attached) lists those sections of the AFLA that included FirstLight's proposal. FirstLight then highlighted whether the proposal measures in the AFLA are: a) replaced by the conditions in the F/F Agreement, b) replaced by the conditions in the Recreation Settlement Agreement, c) the same as the AFLA, d) new or replaced by amendments contained in this filing or e) are no longer included in FirstLight's final proposal.

As noted in its recent February 23, 2024, filing, FirstLight has requested a pre-filing 401 Water Quality Certificate meeting with the Massachusetts Department of Environmental Protection (MDEP). FirstLight will file its Application for Water Quality Certification with MDEP within 60 days of the REA Notice.

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

Sincerely,

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

Alan Douglass
Regulatory Compliance Manager

Attachments to this Cover Letter

- Table 1- FirstLight's Proposal Summary

Separately Filed Attachments:

- BSTEM Modeling Report Reflecting Operating Conditions in the Flows and Fish Passage Settlement Agreement
- FirstLight Streambank Erosion Proposal for the Turners Falls Impoundment
- Turners Falls Hydroelectric Project- Invasive Plant Species Management Plan
- Northfield Mountain Pumped Storage Project- Invasive Plant Species Management Plan
- Revised Draft Biological Assessment for Shortnose Sturgeon
- Revised Draft Biological Assessment for Puritan Tiger Beetle

Table 1. FirstLight Proposal Summary

AFLA Section No.	Issue	Replaced by Conditions in F/F Agreement	Replaced by Conditions in Recreation Agreement	Same as the AFLA	New or Replaced by Amendments in this filing	No longer included in FirstLight's Final Proposal
2.2	FirstLight's Proposal					
2.2.1	Proposed Project Facilities					
2.2.1.1	Proposed Generation Facilities- <i>Turners Falls Project</i>					
	Station No. 1 Upgrades					
	Modifications to Turners Falls Bascule No. 1 Gate (was in Section 2.2.5.1 but is more appropriately shown here)					
	Proposed Generation Facilities- <i>Northfield Mountain Project</i>					
	No proposed modifications to generation facilities					
2.2.1.2	Proposed Non Generation Facilities- <i>Turners Falls Project</i>					
	Infrastructure Need to Pass Winter Bypass Flows					
	Proposed Upstream and Downstream Fish Passage Facilities					
	Proposed Recreation Features					
	Recreation Management Plan (one plan for both projects)					
	Historic Properties Management Plan					
	Bald Eagle Protection Plan					
	Invasive Species Management Plan				Replaces AFLA	
	Bat Protection Measures (was in Section 2.2.5.1 but is more appropriately shown here)					
	TFI Streambank Erosion Proposal				New	
2.2.1.2	Proposed Non Generation Facilities- <i>Northfield Mountain Project</i>					
	Periodic Dredging of the Upper Reservoir Intake Channel/Upper Reservoir Sediment Management Plan					
	Proposed Fish Passage Structure					
	Proposed Recreation Features					
	Recreation Management Plan (one plan for both projects)					
	Historic Properties Management Plan					
	Bald Eagle Protection Plan					
	Invasive Plant Species Management Plan				Replaces AFLA	
	Bat Protection Measures (was in Section 2.2.5.1 but is more appropriately shown here)					

AFLA Section No.	Issue	Replaced by Conditions in F/F Agreement	Replaced by Conditions in Recreation Agreement	Same as the AFLA	New or Replaced by Amendments in this filing	No longer included in FirstLight's Final Proposal
2.2.2	Turners Falls and Northfield Mountain Proposed Project Boundary					
	Turners Falls and Northfield Mountain Proposed Project Boundary		Footnote 1	Footnote 1		
2.2.3	Proposed Turners Falls Project and Northfield Safety					
	Proposed Turners Falls Project and Northfield Safety					
2.2.4	Proposed Project Operations					
2.2.5	Proposed License Conditions					
2.2.5.1	Turners Falls Project- operating conditions					
	Northfield Mountain Project- operating conditions					
2.2.6	Proposed License Term					
	Proposed License Term					

Footnote 1: The proposed Project Boundary adjustments in the AFLA remain the same. In addition, as part of the Recreation Settlement Agreement, an additional Project Boundary adjustment included removing 52.3 acres from the Northfield Mountain Project Boundary to exclude a portion of Farley Ledges that is not needed for Project purposes. A revised Exhibit G was filed with the Recreation Settlement Agreement reflecting this proposed change.