



Kimberly D. Bose, Secretary  
Federal Energy Regulatory Commission  
888 First St., NE  
Washington, D.C. 20426

**Subject: Request for Extension of Public Comment Period: Turners Falls Hydroelectric Project (Project No. 1889) and Northfield Mountain Pumped Storage Project (Project No. 2485)**

April 2, 2024

Dear Secretary Bose,

On February 22, 2024, the Federal Energy Regulatory Commission (the Commission) filed its Ready for Environmental Analysis (REA) notice for the Turners Falls Hydroelectric Project No. 1889<sup>1</sup> and Northfield Mountain Pumped Storage Project No. 2485<sup>2</sup>. This initiated a 60-day period soliciting public comments on the FirstLight Amended Final License Application. In the Commission's REA notice, they requested final amendments to the applications be submitted within 30 days or by March 22, 2024.

On March 22, 2024, half way through the 60-day public comment period, FirstLight submitted final amendments<sup>3</sup> to their application including six different documents totaling over 800 pages of new material. Two of the new documents filed are lengthy Biological Assessment studies and a third is a 126-page Supplemental BSTEM Modeling Report, all of which constitute new technical and scientific information and analysis that Connecticut River Conservancy (CRC) and other stakeholders may need expert consultants to interpret and assist with commenting on. CRC requests that the public comment period be extended 30 days in order to review and analyze the new materials. Stakeholders and the public should be given ample time to review this new information in order to fully consider and respond to the provisions in the amendments as part of this final opportunity to comment on FirstLight's Amended Final License Application.

We understand that this extension would possibly put the timing of the Commission's REA process for FirstLight out of step with the relicensing of the Wilder (P-1892), Bellows Falls (P-1855) and Vernon (P-1904) dams. We are not opposed to an extension of that comment period as well if the Commission considers it prudent. Likewise, CRC is not opposed to an extension of the Motion to Intervene deadline if the Commission thinks it should coincide with the comment deadline, but CRC is not requesting an extension of the current Motion to Intervene deadline.

Thank you for your consideration of this request,



Nina Gordon-Kirsch  
Connecticut River Conservancy

---

<sup>1</sup> [https://elibrary.ferc.gov/eLibrary/filelist?accession\\_num=20240222-3011](https://elibrary.ferc.gov/eLibrary/filelist?accession_num=20240222-3011)

<sup>2</sup> [https://elibrary.ferc.gov/eLibrary/filelist?accession\\_num=20240222-3014](https://elibrary.ferc.gov/eLibrary/filelist?accession_num=20240222-3014)

<sup>3</sup> [https://elibrary.ferc.gov/eLibrary/filelist?accession\\_num=20240322-5086](https://elibrary.ferc.gov/eLibrary/filelist?accession_num=20240322-5086)

Document Content(s)

CRC Request for Extension on FERC Public Comment Period 04-01-2024.pdf....1