

# With final Environmental Impact Statement complete, FirstLight facilities clear relicensing hurdle

Stakeholders say rules are 'substantial improvement' over current conditions

by **Erin-Leigh Hoffman** **The Greenfield Recorder**, February 4, 20 26 (Updated February 8, 2026)



The Connecticut River upstream from the Northfield Mountain Pumped Storage intake and outflow in Northfield. Credit: PAUL FRANZ / Staff File Photo

**OVERVIEW:** The Federal Energy Regulatory Commission (FERC) has released the Final Environmental Impact Statement for the Turners Falls Dam and Northfield Mountain Pumped Storage Station, authorizing the relicensing of the two FirstLight Hydro Generating Co. projects. The relicensing of these facilities has been contested by regional stakeholders, including residents, conservation organizations, town officials and Indigenous groups, since the start of the relicensing process in October 2012. The final document includes measures to mitigate the negative impacts of the facilities on the Connecticut River, including the creation of a fish passage plan.

With the Federal Energy Regulatory Commission (FERC) having released its final Environmental Impact Statement for the Turners Falls Dam and Northfield Mountain Pumped Storage Station, another hurdle has been cleared toward FERC issuing a new license for FirstLight Hydro Generating Co.'s two facilities.

The completion of the final Environmental Impact Statement marks the latest milestone in the ongoing saga around the energy company seeking new licenses to operate the two hydroelectric facilities, after the company initiated the process in October 2012. FirstLight has been operating on a provisional license since 2018 and has requested a 50-year license from FERC, but has not been formally granted a license at this time.

After a summer public comment period on the draft Environmental Impact Statement, FERC released the final document on Jan. 30, agreeing to relicense the two projects as proposed by FirstLight, with "some staff modifications and additional measures." While Franklin County stakeholders agree that not everything they had hoped for has been included, the requirements represent "substantial improvement" over the current license conditions. Some requirements that have been key topics of discussion during public comment periods include the installation of a barrier net to protect migratory fish at Northfield Mountain and efforts to protect shortnose sturgeon spawning.

Since the start of the process, the relicensing of these projects has been [contested by regional stakeholders](#), including residents, conservation organizations, town officials and Indigenous groups, who have shared concern for how FirstLight's facilities negatively impact the Connecticut River. Some have argued that FirstLight should shut down Northfield Mountain altogether.

Per the final Environmental Impact Statement, 49% of the public comments were against relicensing Northfield Mountain, calling attention to the fish entrapment issues there; 29% sought a license of less than 50 years, with recommendations for 30 years or less; and 27% worried about erosion caused by the two projects, among other feedback points.

## **Operating conditions**

Under this final document, FERC recommends that the projects be operated under the "staff alternative" recommendations, meaning per the recommendations and modifications that FERC staff made to FirstLight's proposals. Recommending a "no-action alternative" would have meant that FERC supported FirstLight operating with no proposed changes to current facility operations.

The final Environmental Impact Statement explains that the staff alternative would allow the facilities to continue providing a "dependable source of electrical energy and ancillary services for the region," but the public benefits are better than taking the no-action alternative. The recommended measures would "protect and enhance fish and wildlife resources, recreation, aesthetics and cultural resources," and the overall benefits would be worth the cost of implementing those measures.

Each of FirstLight's proposed measures are listed in the final statement, plus FERC recommendations that were not initially included.

“FirstLight appreciates the efforts of the Federal Energy Regulatory Commission (FERC) in issuing a comprehensive Final Environmental Impact Statement (FEIS) for FirstLight’s Northfield Mountain and Turners Falls projects,” Claire Belanger, FirstLight’s communications manager, wrote in an email. “The delivery of the FEIS by FERC marks a key milestone in the relicensing process for our Northfield Mountain and Turners Falls projects, representing meaningful progress toward a new license and the associated standards under which our projects will operate as they continue to deliver clean, local, reliable and affordable power for generations to come.”

The FirstLight recommendations for both projects include creating a bald eagle protection plan and implementing FirstLight’s 2024 Historic Properties Management Plan. Other measures include creating a boat navigability plan for Barton Cove and a shoreline management plan, and revising the Historic Properties Management Plan to reduce impact to archaeologically significant areas in the Connecticut River. This includes having a post-licensing consultation with federally recognized tribes and leaders of the Nolumbeka Project, a nonprofit dedicated to cultural and historical preservation of Native American history, regarding traditional cultural properties located within the hydropower facilities’ “area of potential impact.”

Regarding Northfield Mountain-specific operations, the statement includes 17 measures suggested by FirstLight, such as installation of a barrier net to protect migratory fish at the pump facility’s intake location between June 1 and Nov. 15 each year and testing of the net’s effectiveness, along with the creation of a fish passage plan and new recreation opportunities along the Connecticut River. Recommendations include limiting additional water storage for power generation, and water storage beyond 12,318 acre-feet between April 1 and May 31 to protect shortnose sturgeon spawning; adopting an operations compliance plan; and modifying the fish barrier net installation timeline.

For the Turners Falls Dam, measures include implementing a regimen of minimum flows downstream to accommodate fish passage, adding recreational boating opportunities, water flow stabilization, creating a shoreline erosion monitoring plan, and creating a publicly available website to convey water levels inside the Turners Falls Dam impoundment and dam discharge, along with an estimation of the annual power canal drawdown dates. More recommendations entail conducting the first erosion survey within the first two years of a license and crafting a sturgeon stranding management plan.

Notably, the final statement includes a section titled “Unavoidable Adverse Effects” that explains that the continued operation of both the Turners Falls and Northfield Mountain facilities will have some negative impact on the Connecticut River, but that the conditions set forth can alleviate some of these.

## **Local reaction**

Franklin Regional Council of Governments’ Senior Land Use and Natural Resources Planner Andrea Donlon, who has been involved in the relicensing process in her capacity at FRCOG and formerly at the Connecticut River Conservancy, contacted town officials in Montague, Gill, Erving and Northfield, along with the state and federal legislative delegation and the Nolumbeka Project, regarding the release of the final document. In her email, she highlighted some of the new recommendations in the revision to the Historic Properties Management Plan, limiting extra water at Northfield Mountain from being

used for generation, and rewriting erosion guidelines to match the state's Water Quality Certification. While Donlon said FRCOG doesn't agree with all of "FERC's analyses and conclusions," the new license requirements are a "substantial improvement over the current license conditions."

Sen. Jo Comerford, D-Northampton, shared her perspective on this relicensing milestone, saying that she is appreciative of the work done over the last 13 years, with regional stakeholders "joining together" to put pressure on FirstLight, state agencies and FERC to ensure better conditions for the river.

In a phone interview, Donlon expressed that she felt FERC was able to correct errors from the draft Environmental Impact Statement, including the exclusion of Northfield from the project area. She said FRCOG's main focus was on limiting erosion of the river due to FirstLight's operations, and since the release of the draft statement, misunderstandings and errors by FERC related to previous settlement agreements over water flow downstream of the Turners Falls Dam have been corrected, though erosion remains a concern.

Donlon said she does think FERC took into account the public comments made on the draft Environmental Impact Statement, given some of the changes that she saw in the final document.

"I do think that they made some adjustments. Northfield Mountain and Turners Falls [projects] have a big impact on the river, and they will continue to, but when you think about all this work over the last 13 years, what's proposed in the final EIS is a lot better for the river than the current license," Donlon said.

Nina Gordon-Kirsch, Massachusetts river steward with the Connecticut River Conservancy, has been part of this relicensing process, attending public comment sessions and hosting information sessions about the FERC process. In reflecting on what she's reviewed of the final Environmental Impact Statement thus far, Gordon-Kirsch said she was "impressed and glad" to see how the final document appeared to take into account the public comments on the draft version.

However, Gordon-Kirsch also noted that the Connecticut River Conservancy advocated for higher flows between the Turners Falls Dam and Cabot Station below the dam, and was disappointed to see that the final document allows water flow below the Turners Falls Dam to be a maximum of 560 cubic feet per second. Based on research that experts have shared with the Connecticut River Conservancy, Gordon-Kirsch said this is not a suitable level to support most habitats for the fish and other species in that part of the river.

Besides the content of the final document, Gordon-Kirsch said public comment has been significant in this relicensing process. Without the 13 years of opportunities for the community to weigh in, she said, a new license would have "more shortcomings."

## **Moving forward**

While the final statement has been released, the [appeal of the state Water Quality Certification](#) by FRCOG, the Connecticut River Conservancy, American Rivers and citizens through the Office of Appeals and Dispute Resolution is still underway, Donlon confirmed. While she could not comment on

specifics of the case at this stage, she noted that, with this challenge underway, FERC's issuance of final license to FirstLight could be delayed until the appeal has been resolved.

In terms of the timeline of a license being issued, Donlon said a formal license may not be granted for "another couple of years," citing the case of [Bear Swamp Power Co.'s](#) 40-year license, which was granted for its operations on the Deerfield River. An environmental analysis from FERC was released in 2020, and an appeal to the state's 401 Water Quality Certification was settled three years before a license was issued by FERC in December 2025.

As updates about the relicensing of the two projects and the appeal of the state Water Quality Certification continue, Gordon-Kirsch said updates will be made available on the Connecticut River Conservancy's website under the "Hydropower Relicensing" tab.