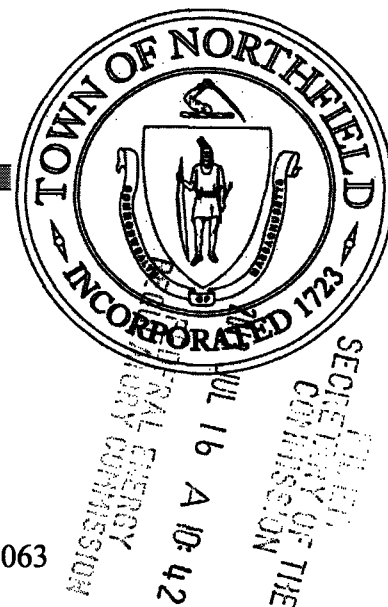


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**TOWN OF NORTHFIELD
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July 15, 2013

Honorable Kimberly D. Bose
Secretary
Federal Energy Regulatory Commission
888 First Street, NE
Washington, DC 20426

Re: Northfield Mountain Pumped Storage Project, FERC No. 2485-063
Turners Falls Project, FERC No. 1889-081

Comments on the Updated Proposed Study Plan (PSP) Section 3.1 Geology and Soils,
3.1.1 2013 Full River Reconnaissance Study and 3.1.2 Northfield Mountain/Turners Falls
Operations Impact on Existing Erosion and Potential Bank Instability.

Dear Secretary Bose:

The Town of Northfield is pleased to submit comments on the above-referenced sections of the Updated Proposed Study Plan submitted by FirstLight. The Town of Northfield is the only Town in the Commonwealth of Massachusetts to straddle the Connecticut River, having land on both the western and eastern banks. We therefore have considerable interest in all Connecticut River issues, including physical, biological, ecological, and economic.

The Town strongly supports the comments of the Franklin Regional Council of Governments (FRCOG) submitted to you on the Updated Proposed Study Plan. We are particularly concerned that bank erosion is the predominant environmental problem in the Turners Falls Pool and impacts all the other resources listed in the Proposed Study Plan – Water Resources; Fish and Aquatic Resources; Terrestrial Resources; Wetlands, Riparian and Littoral Habitat; Recreation and Land Use; Cultural Resources; and Developmental Resources. We urge FERC to require FirstLight to develop clear and scientifically defensible studies that will provide valid and useful data about the impacts of project operations on river bank stability and erosion in the Turners Falls Pool.

As an example, we are concerned that the findings, conclusions and recommendations of the *Fluvial Geomorphology Study of the Turners Falls Pool on the Connecticut River Between Turners Falls, MA and Vernon, VT*, prepared by Field Geology Services of Farmington, ME (Field, 2007) have been completely ignored by the licensee in the formulation of their proposed Study Plans to gather information on the geology and soils of the Turners Falls Pool. Dr. Field's study was commissioned by the FirstLight to "understand the causes of bank erosion and identify the most appropriate methods for bank stabilization on this section of river." We believe that Dr.

Field's work is a comprehensive, well researched and scientifically-based document and one that provides a solid foundation for the additional data collection efforts to be undertaken during relicensing.

We support FRCOG's assertions that Study 3.1.1, 2013 Full River Reconnaissance (FRR) study plan and Study 3.1.2 Northfield Mountain/Turners Falls Operations Impact on Existing Erosion and Potential Bank Instability are not adequate for relicensing purposes. We are disappointed that once again the detailed, comprehensive comments prepared by the Town of Northfield's Conservation Commission, FRCOG and other stakeholders on the 2008 FRR methodology and the findings of the 2008 FRR have not been addressed or included in the 2013 FRR methodology. **The proposed methodology for the 2013 FRR is exactly the same as that used in 2008, which is unacceptable.**

Field (2007) stated that future efforts for monitoring erosion in the Turners Falls Pool must utilize a consistent, well documented technique for identifying erosion sites that is conducted in the early Spring or late Fall when bank exposures are least obscured by vegetation: *"such a technique should be based on the types of erosion observed and stage of erosion present not proxies for erosion or erosion susceptibility such as the amount of vegetation, percentage of exposed soil, bank height and slope, or soil type"*. [emphasis added].

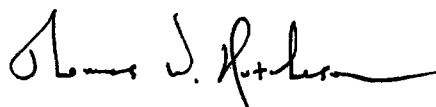
Unfortunately, FirstLight ignored Dr. Field's recommendations and instead both the 2008 and 2013 FRR methodologies (see Tables 3.1-1 and 3.1-2) **use all of the "proxies for erosion or erosion susceptibility"** described by Dr. Field. The spatial and temporal extent of the erosion cannot be documented by the methods proposed for the 2013 FRR. We urge an approach that documents the type and stage of erosion according to Field (2007) so that maps can be generated that show, for example, the linear extent and location of all types and stages of erosion. Knowing this information is critical to any efforts to understand the causes of erosion, which FirstLight proposes to do in Study 3.1.2. **Data that are proxies for erosion should not be used as data in the study to determine the causes of erosion.**

Please be sure that FERC exercises its public authority to maintain and enhance the best qualities of the Connecticut River during this relicensing process, while eliminating or at least minimizing those qualities which detract from the health of the river.

Thank you very much.

On behalf of the Board of Selectmen of the Town of Northfield,

Sincerely yours,



Thomas W. Hutcheson
Town Administrator

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