

## Landowners and Concerned Citizens for License Compliance

August 29, 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  
And the Turners Falls Project, FERC No. 1889-081

Comments on the Revised Study Plan (RSP) submitted by FirstLight August 14, 2013

Section 3.1 Geology and Soils, 3.1.1 *2013 Full River Reconnaissance Study*, 3.1.2  
*Northfield Mountain/Turners Falls Operations Impact on Existing Erosion and Potential Bank  
Instability, and Appendix D: 2013 Quality Assurance Plan (QAPP)*

Dear Secretary Bose:

The Landowners and Concerned Citizens for License Compliance (LCCLC) consists primarily of Gill and Northfield farm and conservation landowners who organized after seeing our riverbanks continue to wash down the Connecticut River in the Turners Falls Pool. Current and previous landowners have consistently advocated for more and better work to stabilize and repair areas of bank erosion with numerous filings to FERC, including professional studies commissioned by LCCLC, all of which have been made a part of the licensing proceeding.

The LCCLC has been and continues to be concerned with the frequent and significant water level fluctuations associated with the operation of the Northfield Mountain Pumped Storage and Turners Falls projects which contribute to streambank erosion and impacts water quality, threatened and endangered species, fisheries, and riparian and littoral habitat. In particular, we believe that the Northfield Mountain Pumped Storage project and its operational use of the Connecticut River have been a long-term experiment that has resulted in significant adverse environmental impacts.

The LCCLC has active members on the Connecticut River Streambank Erosion Committee (CRSEC), a committee of the Franklin Regional Council of Governments' (FRCOG). The CRSEC, convened in 1994 and formalized by FERC in the 1999 Erosion Control Plan, brings together the Northfield Mountain Pumped Storage Project operator, state and municipal entities, landowners, and NGO's to select and prioritize bioengineering projects to stabilize and repair areas of bank erosion in the Turners Falls Pool. More recently, the LCCLC and the CRSEC attempted to work with FirstLight to develop a suitable Quality Assurance Project Plan (QAPP) and appropriate methodology for the 2013 FRR, but the QAPP has not been finalized since FirstLight stopped collaborating on the Plan.

The LCCLC as a member of the Connecticut River Streambank Erosion Committee (CRSEC) attempted to work with FirstLight and FERC on the 2013 FRR methodology and the Quality Assurance Project Plan (QAPP). However, the 2013 FRR has not been significantly improved from its 2008 predecessor. The 2013 FRR methodology and QAPP still need significant improvements. We still want to be involved in the process to refine the methodology and the tasks that would need to be added to the 2013 FRR to gather data to inform relicensing. With this in mind, the 2013 FRR should be confined to the compliance arena, and FirstLight should be directed to work with the CRSEC to develop an appropriate methodology and QAPP.

The LCCLC supports the Franklin Regional Council of Governments' (FRCOG) Comment Letter on the Revised Study Plan (RSP) that states that although the RSP contains the fourth version of the study plans for Section 3.1 Geology and Soils, these study plans still do not meet the standard of technically defensible and rigorous scientific investigations with clearly stated goals, objectives and deliverables. We also have no confidence that the data collected as part of these studies can be used in a meaningful way to evaluate the potential impacts project operations have on the natural resources of Franklin County.

Thus, we are not providing additional comments on Appendix D – Quality Assurance Project Plan (QAPP) since this document accompanies Section 3.1.1 2013 Full River Reconnaissance (FRR) Study, which continues to be inadequate for relicensing and compliance purposes. The 2013 FRR should be removed from the relicensing process because, as written in the RSP, the data gathered from this study will not provide scientifically defensible information nor will it provide sound data for the other studies that rely upon it.

We regret that the short timeframe to provide comments on these studies precludes detailed comments. However, we would like to express our strong support of the detailed comments submitted to you by the Franklin Regional Council of Governments (FRCOG) as we emphasize the following points below on Section 3.1.2 raised by the FRCOG and the Connecticut River Watershed Council (CRWC).

Section 3.1.2 Northfield Mountain/Turners Falls Operations Impact on Existing and Potential Bank Instability

*Resource Management Goals of Agencies*

*Task 2: Geomorphic Understanding of Connecticut River*

The 2007 Field Report accomplished much of tasks 1 and 2. Data gaps were identified in that study, and study 3.1.2 should simply proceed with filling in data gaps and analysis.

At the top of page 3-30, the RSP indicates that historic geomorphology will be analyzed and discussed. As noted, stakeholders requested an historical analysis. The RSP does not give any details on what data will be used or how it will be analyzed and presented, other than referring to the list existing information. We request a specific description of what the historical analysis and discussion will entail. By comparison, TransCanada's RSP study 3 page 34 says, "Changes in the location of erosion through time will be achieved through comparisons of at least 3 map years of GIS data (1979, 2010, and to be completed in 2014) with pie charts and maps to be used to determine if river bank erosion has increased through time as suggested in some of the study requests." And, we recommend Field's 2007 recommendation #9 in Section 9.b Monitoring of Erosion was that, "An attempt should be made to overlay the 1961 aerial photographs with a current flight and to create a topographic map from the 1961 flight. The feasibility of this effort has been confirmed by Eastern Topographics, Inc. This effort will identify the previous extent of the low bench (Figure 7a-b) and identify areas of the most significant bank recession in the past 45 years." Recommendation #10 in the 2007 Field report was "Portions of the 1971 ground surveys by Ainsworth and Associates, Inc. of Greenfield MA should be resurveyed to identify changes in bank position since the opening of the Northfield Mountain Pumped Storage Project."

*Task 4a: Install Proposed Water Level Monitors in Turners Falls Impoundment.*

We request that a water level monitor be installed between the TF boat barrier line and the tailrace, upstream of the Narrows or French King Gorge. Figure 3.2.2-2 shows a dramatic grade change at and upstream of the gorge. The tailrace site has its own set of dynamics that might not be representative of upstream of the gorge.

We also request that the water level monitors be installed for a full calendar year or longer.

*Task 4c: Identification and Examination of Fixed Riverbank Transects*

We concur with the Connecticut River Watershed Council's (CRWC) in their comment letter on the RSP recommendation that fixed transects selected for detailed study be identified in

conjunction with the Connecticut River Streambank Erosion Committee, the Massachusetts Department of Environmental Protection (MassDEP) and other interested stakeholders.

*Task 5b: Evaluation of Hydrodynamic Forces Due to Boat Waves*

The second paragraph on page 3-43 says that erosion associated with boat waves will be documented “through measurements of the amount of erosion.” No further information is provided about what that entails, but a study plan should explain what will be measured and how it will be done. The flow rate of the river and the high and low flow or gage height for that day should be recorded for the days of analysis as a backdrop to any erosion measurements.

*Task 7: Report*

Few details are provided as to what will be in the final report to this complicated study with multiple components. We recommend something akin to TransCanada’s revised Study 2 (Riverbank Transect Study).

Thank you for the opportunity to submit comments on FirstLight’s Revised Study Plan. The LCCLC looks forward to continuing our active engagement in the relicensing of the Turners Falls Dam and Northfield Mountain Pumped Storage Projects. We request having a local representative from the FRCOG, Franklin Conservation District, Gill Conservation Commission, CRWC, or LCCLC accompany FirstLight when they conduct the FRR after the methodology and the QAPP have been revised. The more eyes on the river the better!

Respectfully submitted,

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