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December 11, 2013

VIA ELECTRONIC FILING

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

Re: FirstLight Hydro Generating Company, FERC Project Nos. 2485-063 and 1889-081
Submittal of Modified Revised Study Plan, Study No. 3.6.7 (Recreation Study at Northfield Mountain, including Assessment of Sufficiency of Trails for Shared Use).

Dear Secretary Bose:

On September 13, 2013, the Commission's Director of the Office of Energy Projects issued a Study Plan Determination Letter (SPDL) for FirstLight Hydro Generating Company's (FirstLight) Turners Falls Hydroelectric Project (FERC No. 1889) and Northfield Mountain Pumped Storage Project (FERC No. 2485). The SPDL contained a determination on 20 of FirstLight's proposed 38 studies, and required FirstLight to modify three of the 20 study plans—for Study Nos. 3.5.1, Study 3.6.3, and Study 3.6.7—and file them for Commission approval no later than December 12, 2013.

On October 25, 2013 FirstLight filed a letter with the Commission requesting an extension to file modified revised study plans for Study Nos. 3.5.1 and 3.6.3 by January 13, 2014 due to the government shutdown and FirstLight's inability to consult with the federal agencies. On November 8, 2013, FERC granted the extension request.

Please find enclosed FirstLight's modified revised study plan for Study No. 3.6.7 entitled *Recreation Study of Northfield Mountain including Assessment of Sufficiency of Trails for Shared Use*. Note that the Commission did not require consultation with stakeholders regarding the revision required by FERC. Thus, there is no consultation record that needs to be filed with the modified revised study plan for Study No. 3.6.7.

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

Sincerely,

John Howard

3.6.7 *Recreation Study at Northfield Mountain, including Assessment of Sufficiency of Trails for Shared Use*

Background

In its Study Plan Determination Letter, FERC requested that FirstLight amend this study to include a proposed methodology for collecting the trail design and condition characteristics listed in the study plan. FERC required the modified study plan be submitted for FERC approval by December 12, 2013. No stakeholder consultation was required.

General Description of Proposed Study

A number of stakeholders requested this study including: NPS, AMC, VRC, FCRP, and Ms. Krug. This study is designed to determine the number of existing recreation facilities, the number and types of amenities available at each facility and the overall condition of the facilities associated with the Northfield Mountain Project. This will include a review of the trail system and climbing ledges located within the Northfield Mountain Project boundary.

NPS/AMC et al request that the study of the Northfield Project recreation facilities include a survey that seeks to determine what discourages the public from using the facilities. FirstLight proposes to use the contact and mail surveys conducted as part of the *Recreation Use/User Contact Survey* (Study No. 3.6.1) to seek out what improvements may be needed. As set forth, however, in the *Assessment of Day Use and Overnight Facilities Associated with Non-Motorized Boating* (Study No. 3.6.4), FirstLight does not propose to conduct a survey of non-users or displaced users because such a survey will not yield reliable or meaningful information in consideration of the level of effort required.

Ms. Krug requests that FirstLight evaluate trail networks in Franklin County to determine the need for additional trails and to conduct a site visit to some of these trails. This was not adopted because these trails are located outside of the Project area. FirstLight is proposing to gather information regarding the trail needs for mountain biking as part of the user contact survey proposed in *Recreation Use/User Contact Survey* (Study No. 3.6.1).

NPS requests that FirstLight evaluate its expenditures over the term of the current license in support of the facility, its promotion, and usage and extrapolate in current dollars, what would be necessary to bring the facility up to the quality and level of use that applicable FERC regulation prescribe. Past expenditure information is available on the FERC Form 80 and has not been included as part of this study. As part of its license application, FirstLight will provide estimates for any proposed recreational improvements.

Ms. Krug asks for online user surveys to talk to mountain bike groups regarding the needs of mountain bicyclists and assess interest in opportunities at Northfield Mountain. Internet surveys are not appropriate for quantitative analysis because they are not representative of the general recreational user population and do not provide reliable results. FirstLight proposes to use the results of the surveys proposed in the *Recreation Use/User Contact Survey* (Study No. 3.6.1) to seek out what improvements may be needed.

Study Goals and Objectives (18 CFR § 5.11(d)(1))

The goal of the study is to compile existing data and develop additional information to support a new FERC license application for continued future operation of the Project.

The objectives of this study are as follows:

- Determine whether the Northfield Mountain Tour and Trail Center has met recreation needs and if improvements or additions are necessary at the Center with a consideration of potential needs over the course of the 30 to 50 year new license; and
- Identify uses taking place on the current trail system and whether the current trail system is suitable and adequate for sustaining those uses, including evaluating the condition of existing trails e.g., erosion, drainage, width, slope, or obstacles.

Resource Management Goals of Agencies/Tribes with Jurisdiction over Resource (18 CFR § 5.11(d)(2))

The resource management goals are to enhance the recreation opportunities associated with the operation of the Northfield Mountain Project.

Existing Information and Need for Additional Information (18 CFR § 5.11(d)(3))

Existing Information:

The Northfield Mountain Tour and Trail Center, Northfield Mountain Trail System and Northfield Mountain Mountaintop Observation Area provide numerous recreation opportunities within the Northfield Mountain Project boundary. Although they are not formal recreation facilities, Rose Ledge and Farley Ledge provide climbing opportunities to the public. The three formal recreation facilities are described in detail below.

Northfield Mountain Tour and Trail Center: This site, which is also known as the Visitor Center, is located within the Northfield Mountain Project, off Millers Falls Road (Rt. 63) in Northfield, MA. The Center is owned and managed by the Licensee and is available for day use activities. Available opportunities include viewing interpretive displays, picnicking, and educational programs. The Center has restrooms, cross-country ski rental equipment, and parking. It is open for year-round recreational and educational use.

Northfield Mountain Trail System: The trail system is located at the Northfield Mountain Project, off Millers Falls Road (Rt. 63) in Northfield, MA. Over twenty-six miles of trail are available for hiking, biking, trail running, horseback riding, snowshoeing, and cross-country skiing. Climbers currently utilize a portion of the trail system to access Rose Ledge.

Trails vary in width, terrain, surface, and difficulty, and some trails are designated for specific trail uses. Northfield Mountain trails are rated (and signed) as “easier”, “more difficult”, and “most difficult” for activity levels. Trail design and construction range from hard surface gravel road-like trails (suitable for e.g., Nordic skiing, equestrian use) to narrow, natural surface primitive trails (suitable e.g., for hiking, snowshoeing).

Northfield Mountain Mountaintop Observation Area: This site is located adjacent to the Northfield Mountain Project Upper Reservoir. The Observation Deck is owned and managed by the Licensee and is accessible to the public by the existing trail system. The access road leading up to the Observation Area is gated and restricted to Licensee’s vehicle traffic only.

Project Nexus (18 CFR § 5.11(d)(4))

FERC regulations require that the license application include a statement of the existing recreation measures or facilities to be continued or maintained and the new measures or facilities proposed by the

applicant for the purpose of creating, preserving, or enhancing recreational opportunities at the Projects and in their vicinities, and for the purpose of ensuring the safety of the public in its use of Project lands and waters. In addition, recreation is a recognized project purpose at FERC-licensed projects under section 10(a) of the FPA.

Methodology (18 CFR § 5.11(b)(1), (d)(5)-(6))

Task 1: Review of Existing Information

The Licensee proposes to use data collected as part of the *Recreation Use and User Contact Survey* (Study No. 3.6.1) to identify opinions of current recreation users of the Northfield Mountain recreation facilities and public education programs offered at the visitor's center. Prior to conducting field work associated with this study, a review of proposed trails, existing aerals and property ownership will be conducted.

Existing hiking and biking trail information for the Northfield Mountain area will be reviewed, as well as best management practices set forth by the International Mountain Bicycling Association (IMBA), the USFS Trail Classifications, and the MA Department of Conservation & Recreation's (MADCR) Trail Guidelines and Best Practices standards.

Task 2: Field Work

The Licensee will conduct a field review of the current trail system, climbing sites, and the existing portion of the New England National Scenic Trail that is within the Project boundary. This will include locating the sites with a GPS, if the information does not currently exist; photographing and recording the current amenities and typical conditions of the sites; and determining if there is a need for improvement.

Northfield Mountain trail characteristics, such as grade, cross slope, width, surface material/firmness, width, and drainage, will be assessed for representative sections of trails using standard methodologies adopted from the Universal Trail Assessment Process (UTAP), IMBA guidelines, and/or MADCR guidelines. Sections of trails with steep slopes, drainage/erosion issues, and areas subject to regular maintenance will also be assessed. Field staff will conduct on-the-ground measurements to determine trail characteristics and conditions, with particular attention to areas where repair/stabilization measures may be required.

Task 3: Desktop Analysis

A desktop analysis will be conducted to compare field data, survey data, and existing information. The analysis will determine if the current facilities are meeting the existing recreation needs at Northfield Mountain and provide a list of potential improvements that could be completed if the need arises over the course of the license.

Task 4: Report Development

The information collected will be compiled within a written report and will include tables containing recreation user survey results relating to the Northfield Mountain trails and education programs. The report will utilize existing information to determine, if possible, trends in use of the facilities' educational programs and will describe existing educational programs offered at the Northfield Mountain Project. Maps showing the trail locations and amenity locations will also be included.

The report will include a description of trail conditions based on the field assessment, including geo-referenced maps of the assessed trail sections and a summary of the Licensee's trail maintenance program. The description of trail conditions will utilize the standards or guidelines, if applicable, from UTAP, IMBA, and/or MADCR.

Level of Effort and Cost (18 CFR § 5.11(d)(6))

FirstLight believes that the proposed level of effort is sufficient to obtain information on recreational facilities and amenities at Northfield Mountain, within the Northfield Mountain Project boundary. The estimated cost for the study outlined in this plan is approximately \$55,000-\$60,000.

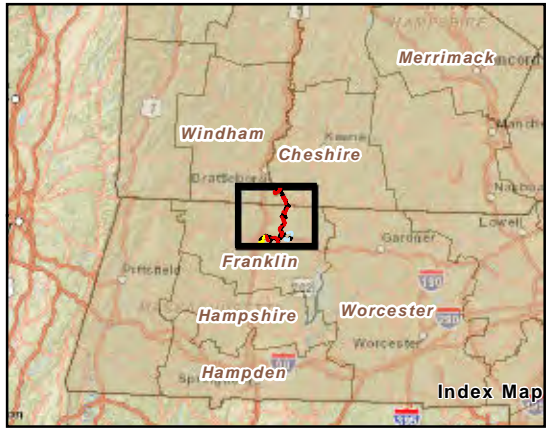
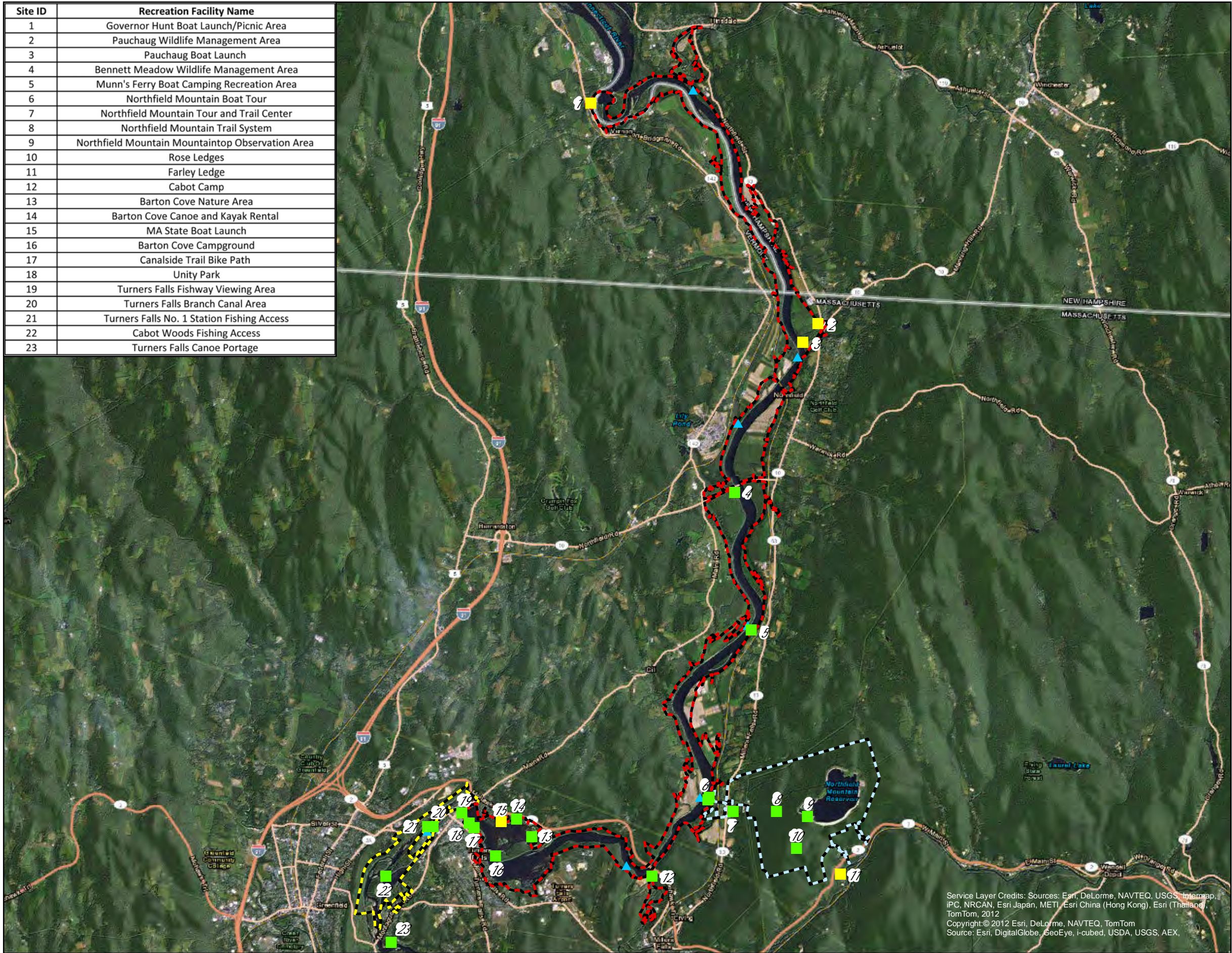
Study Schedule (18 CFR § 5.11(b)(2) and (c))

In accordance with 18 CFR § 5.15(c), Study Plan Meetings were held on May 14 and June 11, 2013. The purpose of the Study Plan Meetings were to informally resolve any outstanding issues with respect to FirstLight's PSP and the study requests filed by stakeholders, and to clarify the PSP and any information gathering and study requests. As set forth in Study No. 3.6.1, a meeting was held on August 8, 2013 to review comments on the Northfield Mountain Trail User Survey ([Figure 3.6.1-2](#)).

The review of existing information will be conducted in January through May of 2014. The field work will be completed during all four seasons of 2014. The desktop analysis will be conducted November of 2014 through February of 2015.

Study reporting will be conducted in accordance with FirstLight's Process Plan and Schedule (18 CFR § 5.6(d)(1)), as provided in the PAD, and FERC's SD1.

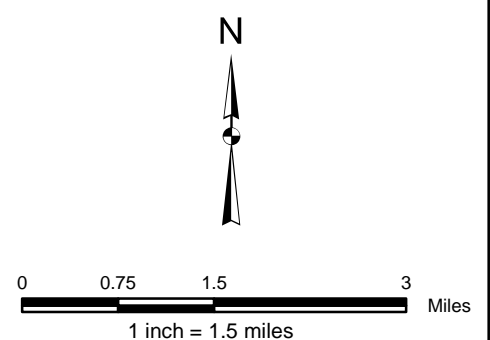
Site ID	Recreation Facility Name
1	Governor Hunt Boat Launch/Picnic Area
2	Pauchaug Wildlife Management Area
3	Pauchaug Boat Launch
4	Bennett Meadow Wildlife Management Area
5	Munn's Ferry Boat Camping Recreation Area
6	Northfield Mountain Boat Tour
7	Northfield Mountain Tour and Trail Center
8	Northfield Mountain Trail System
9	Northfield Mountain Mountaintop Observation Area
10	Rose Ledges
11	Farley Ledge
12	Cabot Camp
13	Barton Cove Nature Area
14	Barton Cove Canoe and Kayak Rental
15	MA State Boat Launch
16	Barton Cove Campground
17	Canalside Trail Bike Path
18	Unity Park
19	Turners Falls Fishway Viewing Area
20	Turners Falls Branch Canal Area
21	Turners Falls No. 1 Station Fishing Access
22	Cabot Woods Fishing Access
23	Turners Falls Canoe Portage



**FIRSTLIGHT POWER RESOURCES
REVISED STUDY PLAN**

**Figure 3.6.2-1
Recreation Facilities Map**

- Legend**
- Recreation Site Owned by FirstLight
 - Recreation Site Owned by Others
 - ▲ Informal Recreation Site
 - Turners Falls Project Boundary
 - Turners Falls/Northfield Mountain Project Boundary
 - Northfield Mountain Project Boundary



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