

Appendix B – Resource Comments/Concerns and Response

REVISED STUDY PLAN

Name	Representing	Comment	Response	Date
Jennifer Tufts	Northfield Open Space Committee (NOSC)	Filed Northfield 2011 Open Space and Recreation Survey.	Relevant portions of the Survey will be reviewed as part of implementation of recreation use/user contact surveys and during development of Final License Application.	1/31/2013
Thomas and Patricia Shearer	Public	Letter indicating FL is still required to repair Mr. Shearer's shoreline located on the Turners Falls Impoundment.	FirstLight is aware of the shoreline stabilization measure request.	1/31/2013
Board of Selectman	Town of Montague	Filed Conceptual Plan for the Great Falls Native Cultural Park.	Relevant portions of the Plan will be reviewed as part of implementation of the archaeological surveys and during development of a Historic Properties Management Plan.	2/6/2013
Mary Joe Maffei	Public, Manager of Amherst High Nordic Ski Team	Ms. Maffei raised concerns relative to x-country skiing. More specifically she would like more access, have the facility open later, and snowmaking.	Amount of snowfall in a given year is a natural phenomenon. The lack of sufficient snow for cross-country skiing has no nexus to Project operation. Licensee will use the results of its proposed recreation studies to develop relicensing proposals for recreational measures at the Project.	2/16/2013
<ul style="list-style-type: none"> • Peter Conway • Stanley and Geri Johnson • Robert and Linda Emond • Walter and Mary Ann Patenaude • Michael and Diane Kane • Cynthia Dale • Robert Strafford and Family • Leena Newcomb • Vivien Venskowski • Betsy and Jean Egan 	River Residents Association (RRA)	RRA raised concerns about negative effects of Turners Falls Impoundment fluctuations and listed their observations of those effects. RRA favors a closed loop system. RRA are also concerned campsite license terms.	<p>Several Turners Falls Impoundment water level fluctuation studies are being proposed to address the questions raised by the RRA. They include: erosion related studies, hydraulic study of the Turners Falls Impoundment, impact of project operations on fish spawning and habitat, and impact of project operations on floodplain, wetland and riparian habitat.</p> <p>FirstLight is not proposing to conduct a closed-loop system study.</p>	Various times
Nathan L'Etoile, Co-Owner	Four Star Farms (FSF)	FSF raised concerns over their water withdrawals from Turners Falls Impoundment. Would like the FERC license amended to stipulate that FirstLight does not have authority over withdrawals for irrigation purposes.	<p>FirstLight is not proposing to conduct a closed-loop system study.</p> <p>FirstLight wishes to resolve the outstanding issues related to irrigation intake structures located on the banks of the Turners Falls Impoundment. These irrigation structures are currently using federally-regulated hydro-electric project lands and waters, which require FirstLight's authorization via a permit for this use pursuant to Articles 43 (c) and (d) of the FERC license. FirstLight has granted permits to several entities to withdraw water for irrigation purposes and will continue to grant such permits, provided that the parties can come to an agreement regarding permit terms and upon FERC approval of the water withdrawal.</p>	2/20/2013
Jeffrey Squire, President	Western Massachusetts Climbers' Coalition (WMCC)	<p>WMCC requests that rock climbing be considered a valid and important recreational opportunity within the Project boundary. He notes that the Northfield Mountain Project contains two of the most significant rock climbing resources in southern New England, Rose Ledge and Farley Ledge (aka Rattlesnake Mountain).</p> <p>WMCC seeks to change the proposed recreation survey to include online surveys and/or surveys distributed through, or with the help of, organizations such as the WMCC.</p> <p>WMCC requests additional protection efforts as the Farley Ledge and its immediate surrounding have been identified by NHESP as Core Habitat containing Priority Natural Community and Species of Concern. WMCC is seeking additional protection efforts and conservation restrictions.</p>	<p>Several studies are being proposed by FirstLight that pertain to the comments of WMCC regarding rock climbing. These studies include surveys of recreation use and demand, recreation facilities inventory and assessments, and a recreation study at Northfield Mountain.</p> <p>Licensee is not proposing to use online surveys because online surveys of recreation use and demand do not provide always provide an accurate assessment of use and demand.</p> <p>FirstLight is proposing to conduct several wildlife and botanical surveys at the Northfield Mountain Project. These surveys will identify rare, threatened, and species of special concern and whether the Project has the potential to adversely affect such species.</p>	
Bill Llewelyn, Chair	Town of Northfield Conservation Commission	NCC raised concerns over Turners Falls Impoundment fluctuations and impacts on the Northfield boat ramp, streambank erosion, water quality,	Several Turners Falls Impoundment water level fluctuation studies are being proposed to address the questions raised by the NCC. FirstLight is not proposing	2/22/2013

REVISED STUDY PLAN

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	(NCC)	threatened and endangered species, fisheries, wetlands, and riparian and littoral habitat. They would like evaluation of a closed-loop system. Expressed concerns with 2008 Full River Reconnaissance Study.	to conduct a closed-loop system study.	
Barbara Skuly, Chairman	Ashuelot River Local Advisory Committee (ARLAC)	ARLAC raised concerns about upstream and downstream fish passage for migratory species. They would like consideration for operating upstream and downstream fish passage facilities year round. ARLAC is concerned about wide and frequent water level fluctuations and impacts on shoreline erosion, bird nesting areas, fish reproduction, and tributary access. Would like consideration of closed-loop system.	FirstLight is proposing to conduct upstream and downstream fish passage studies at the Turners Falls Project. Additionally, FirstLight is proposing to conduct studies to determine the impact of Turners Falls Impoundment fluctuations on various resources. FirstLight is not proposing to conduct a closed-loop system study.	2/24/2013
Karl Meyer	Public	Mr. Meyer raised concerns over the timing of the site visits prior to the scoping process, issuance of the instream flow study plan early, purported failure to comply with bypass minimum flow requirements, impacts of Turners Falls Impoundment fluctuations, fish passage. Noted that existing research has been conducted on sturgeon in project area.	Several studies are being proposed by FirstLight that will address the concerns raised by Mr. Meyer. They include fish and aquatic resource related studies, geology and soils related studies, and a hydraulic analysis within the Turners Falls Impoundment.	2/25/2013
Richard Bonanno, Director	Massachusetts Farm Bureau Federation, Inc (MFBF)	Similar to comments received by Four Star Farms, the MFBF raised concerns over water withdrawals from Turners Falls Impoundment.	FirstLight wishes to resolve the outstanding issues related to irrigation intake structures located on the banks of the Turners Falls Impoundment. These irrigation structures are currently using federally-regulated hydro-electric project lands and waters, which require FirstLight's authorization via a permit for this use pursuant to Articles 43 (c) and (d) of the FERC license. FirstLight has granted permits to several entities to withdraw water for irrigation purposes and will continue to grant such permits, provided that the parties can come to an agreement regarding permit terms and upon FERC approval of the water withdrawal.	2/25/2013
River Resident (no name given)	Public	Requester (unknown) favors a closed loop system.	FirstLight is not proposing to conduct a closed-loop system study.	2/26/2013
Chris Curtis	Public	Submittal included an article in the local paper regarding Turners Falls Impoundment low water levels.	FirstLight reviewed the newspaper article.	2/28/2013
Ken Kimball, Norm Sims	Appalachian Mountain Club (AMC)	AMC submitted specific study requests, which are addressed in the PSP. Submittal was a summary of requested studies, which focus primarily on conservation and recreation.	Several studies are being proposed by FirstLight that will address the comments in AMC's comment letter. These studies include surveys of recreation use and demand, recreation facilities inventory and assessments, a whitewater evaluation and assessment of access for non-motorized boating.	2/28/2013
Dr. Richard Palmer	University of Massachusetts at Amherst (UMass)	Dr. Palmer notes that the mission is to provide natural resource managers with the tools and information needed to develop and execute management strategies that address the impacts of climate and other ongoing global changes on fish and wildlife and their habitats.	FirstLight is using the HEC-ResSim model developed by Project Partners (UMass), TNC, US Army Corps of Engineers and US Geological Survey to evaluate the impact of current and proposed project operations on hydropower generation, as well as aquatic and botanical resources.	2/28/2013
Joseph Graveline, President	The Nolumbeka Project, Inc	<p>Study request 1 We are requesting a comprehensive investigation and mapping of the many ancient traversing trail systems and fishing stations as well as village locus and other special places that still exist all along the river's edge and up on the land of the Wissatinnewag village, as well as south down river to and beyond the area now known as Rock Dam. The northern section of this area is currently listed in the National Register of Historic Places as part of The Riverside Archaeological District. Our goal is to identify and recognize the hidden historical and cultural value in this land that will foster a stronger awareness and level of protection from the many poor development choices we experienced in the past and see on the horizon.</p> <p>Part two of request 1 We are requesting to do additional comprehensive investigations,</p>	<p>Archaeological surveys conducted in connection with the relicensing will result in reports that will discuss the cultural landscape as derived from the results of the surveys and how Native Americans may have used this landscape.</p> <p>FirstLight is proposing to conduct archaeological surveys on lands within the</p>	2/28/2013

REVISED STUDY PLAN

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		<p>documents searches and other research and field studies and inventory and formal archaeological digs, to address the project areas north up to and around the Wilder and Vernon Falls (dam) on the New Hampshire, Vermont, and Massachusetts sides of the river. Any time there are obstructions on the river, like a falls, we understand that a fishing site and a village would have been a part of the landscape. This is where fish are held and create fishing opportunities. These areas hold a wealth of archaeological information that needs to be taken into account when projects are undertaken on the river's edge, or on infrastructure upgrades that are made inland of the project area and might cause the loss of those cultural assets. The Nolumbeka Project, Inc. sees the access to background literature reviews of previous cultural resources and archaeological study reports, and the development of archaeological sensitivity models and focused field reconnaissance studies, which include access to the existing archaeological study data in the files of the Vermont, New Hampshire, and the Massachusetts, State, corporate and other NGO archives, as an important component for use in our historical archive research library. This would add a centralized and accessible body of knowledge for use in determining the cultural assets at risk in the project scope area. Because of the current disconnect to the past cultural data, and lax attitude of past project's responsibility to that data, we see a need to organize that data in a central location and make it digitally available. At this point in the conversation, without knowing all the parties who would need or want to be involved, it would be nearly impossible to do a cost projection for this request.</p>	<p>FERC project boundary. The survey includes the shoreline within the Turners Falls Impoundment. (The Wilder and Vernon hydroelectric projects are not owned by FirstLight.) The surveys will consist of research at the SHPOs and local historical repositories, interviews with persons knowledgeable of the local cultural history, development of a sensitivity model, and field reconnaissance work. Survey reports will include reviews of previous archaeological research; provide detailed cultural contexts, and present results of field investigations. The reports will be made available as part of this relicensing process and will be filed with FERC and the SHPOs. Publicly available reports, however, will not contain precise location information regarding archaeological sites, as required by state and federal regulation.</p>	
		<p>Study request 2 We request that a comprehensive field survey of wildlife and botanical species/habitat to identify, catalogue, digitize, and show the association and use of the many indigenous plant species, both protected, and unprotected, that played a part in the cultural lifestyles of the people who used them. This information would prove to be useful for endangered species protection and life ways studies of the ancient river tribes. The cost of this process would be determined by the number of sites that give indication of Native land use in the projects areas, and that has yet to be fully determined.</p>	<p>FirstLight is proposing to conduct a terrestrial baseline survey of wildlife and botanical resources, including rare, threatened and endangered species within the Turners Falls Impoundment and below the Turners Falls Dam. The results of this survey will be available to parties interested in the relicensing process, such as The Nolumbeka Project, for their use in the study of past Native American use. FirstLight is also proposing to conduct archaeological surveys. The survey reports will discuss features from archaeological sites that may contain paleobotanical remains and present the results of any paleobotanical analysis conducted, if any paleobotanical remains are found. In accordance with state and federal regulations, however, the precise locations of archaeological sites may not be published.</p>	
		<p>Study request 3 We request a project be undertaken to stabilize the exposed sand bank and protect from erosion damages other disturbed areas on the Wissatinnewag property damaged during mining and contracting work or the result of storm damage experienced prior to the acquisition of the land by The Nolumbeka Project. The goal would be to return the site to a green-fields condition for use as a cultural educational resource. This should include planting of indigenous grasses and plants known to have existed here prior to the land being disturbed. In addition, this would allow an experienced team of botanists, historians and archaeologists to do the basic research to develop a more complete cultural profile on the Wissatinnewag site and other important sites on the river in the resource areas under the license obligations from the utilities. The cost for this process would be impacted by the results of the second study request, which we do not have at this time.</p>	<p>The Wissatinnewag property is not within the Project boundary as shown in Figure B1. It appears that the exposed bank referenced in the letter is within the Wissatinnewag property, which has no nexus to project operations. Therefore, FirstLight is not proposing to conduct studies or bank stabilization work on this property.</p>	

REVISED STUDY PLAN

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		<p>Study request 4 We request a project be undertaken to identify and implement the formation of a National Historic Park around the Great Falls fight site in the Gill and Turners Falls area. A Historic Educational Park and self guided hiking trails, would allow the story of the May 19, 1676 attack on the refugee camp at the Wissatinnewag and the Peskeompskut village sites to be told from the indigenous point of view, and would help to educate and celebrate the importance of the relationship The Great Falls played in the lives of the indigenous people, who for over 200 generations, considered it to be a village of peace and place of cultural and technical exchange and celebration. This educational experience fits right into the Town of Montague’s efforts to establish the River Culture and history of the Great Falls as a destination for historical tourism. The Town of Northfield is also talking about historic tourism as part of their new Master Plan. As part of this process we would like to also request a central housing facility in the Gill or Turners Falls area for our historic archives and study programs. Researchers, educators, and THPO’s across the northeast and beyond could use this office. It could also be a central location for preservation efforts here in Western Massachusetts. A study needs to be done first to arrive at the cost of this project. An office location for the Nolumbeka Project might be incorporated into a River Culture complex with the Town of Montague and other NGO’s, to offset the expense of the project.</p>	<p>FirstLight is proposing to conduct archaeological surveys, which will identify historic properties and whether the Projects have an adverse effect on historic properties. As part of the relicensing process, FirstLight will be required to develop an HPMP, which will address the protection of historic properties. The HPMP may include measures to provide cultural resources public outreach programs, but such programs typically would not include providing central housing facilities or offices for others.</p>	
		<p>Study request 5 In the early sixties a construction company mined the northern portion of the Wissatinnewag Village area we are responsible for preserving. During that time period sand and gravel from the Wissatinnewag Village site was taken for the building of Route 2 in Greenfield across the street and Route 10 in the Northfield area. During this phase of history on the site, part of the village was destroyed and untold numbers of unmarked burials were displaced. Sadly, human remains mixed in the sand and gravel often became part of the road base for the Route 2 and Route 10 road construction projects at that time. The construction company used the mined out portion of the village to deposit and bury construction debris. Old tires, discarded construction materials and steel barrels were buried there. That portion of the village leaches into Falls Brook, which goes into the Falls River and within a few hundred feet into the Connecticut River. We would like to clean up the pollution going into Falls Brook and restore the area to a clean and healthy ecosystem. Addressing this challenge would make the area safer and more useful in our educational and preservation programs on the site. The cost of this effort could only be determined by testing for the extent of the contamination on the site impacted, and that has yet to be done.</p>	<p>The Wissatinnewag site is not located within the Project boundary. The damage cited by the Nolumbeka Project was also not caused by Project operation but as noted in the study request, by non-Project construction projects. Thus, there is no nexus to the Project.</p>	
Mike Bathory	LCCLC	LCCLC requests that FERC direct FirstLight to provide the data from Cross Section 8A from the start of erosion monitoring to the present and make it available on the licensing proceeding.	On January 22, 2013, FirstLight filed with FERC information on 22 long-term monitoring transects, including cross-section 8A.	3/1/2013
Roger Noonan, President	New England Farmers Union (NEFU)	Similar to comments received by Four Star Farms, the NEFU raised concerns over water withdrawals from Turners Falls Impoundment.	FirstLight wishes to resolve the outstanding issues related to irrigation intake structures located on the banks of the Turners Falls Impoundment. These irrigation structures are currently using federally-regulated hydro-electric project lands and waters, which require FirstLight’s authorization via a permit for this use pursuant to Articles 43 (c) and (d) of the FERC license. FirstLight has granted permits to	3/1/2013

REVISED STUDY PLAN

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			several entities to withdraw water for irrigation purposes and will continue to grant such permits, provided that the parties can come to an agreement regarding permit terms and upon FERC approval of the water withdrawal.	
Elizabeth Muzzey, Director and State Historic Preservation Officer	New Hampshire Division of Historical Resources (NHDHR)	The NHDHR comment letter refers specifically to the TransCanada Projects.	The letter does not pertain to the Turners Falls and Northfield Mountain Projects, although it was filed in the FERC dockets for the Turners Falls and Northfield Mountain Projects.	3/1/2013
Howard Fairman	Public	The commenter is concerned about the impact of project operations on migratory fish.	FirstLight is proposing studies to evaluate upstream and downstream of the fish passage facilities on migratory fish.	3/1/2013
Stephanie Krug, President	New England Biking Association (NEBA)	The commenter would like a study evaluating the trail system at Northfield Mountain for mountain biking. The comment letter notes that over the past few years, deep water bars have been dug diagonally across the 10th Mountain road at Northfield Mountain to help with drainage. These water bars have been challenging to negotiate on a bike or on horseback and she has witnessed two accidents.	FirstLight is proposing to conduct a recreation study at Northfield Mountain, including assessing shared-use trails.	3/1/2013
Joanne McGee	Public	The commenter would a new access spot for launching canoes and kayaks at the Bennett Brook Wildlife Management Area. She notes that there is ample parking and that canoes/kayaks will not disturb the wildlife in the area.	FirstLight is proposing to conduct surveys of recreation use and demand and an assessment of recreation facilities. These surveys along with others will inform the need for new access spots.	3/1/2013
Kurt Heidinger	Director, BioCitizens	The commenter would like a report to include information on various resources between Turners Falls and Rainbow Beach for educational purposes. He notes that a good report would collect data on how from Turners Falls to Rainbow Beach is a valuable educational resource, used by many schools and nonprofits, for many years. Notes that during an educational visit there were dead fish floating in the river and dessicating on the river banks.	FirstLight is proposing to conduct several surveys on various resources between Turners Falls and Rainbow Beach, including wildlife and botanical surveys. These reports will be part of the FERC relicensing record and available to interested parties.	3/1/2013
Don Stevens, Chief	Nulhegan Band of the Coosuk-Abenaki Nation	The Nulhegan Band of the Coosuk- Abenaki Nation would like to know if any Native sites have been identified and would like to know if there are plans to make sure that wildlife can move freely.	FirstLight is proposing to conduct standard archaeological surveys to identify cultural resources, including Native sites, and whether the Projects have any adverse effects on those resources. FirstLight is also proposing to conduct a survey to assess the effects of the Northfield Mountain Project's land-management practices and recreational use on terrestrial habitat.	3/18/2013



FIRSTLIGHT POWER RESOURCES

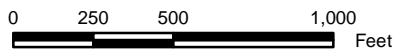


Figure B1: Location of the Friends of Wissatinnewag, Inc Property Relative to the FirstLight Project Boundary

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