



# Franklin Regional Council of Governments

## CONNECTICUT RIVER STREAMBANK EROSION COMMITTEE

### MEMORANDUM

TO: John Howard, Director - FERC Hydro Compliance  
FROM: Kimberly Noake MacPhee, P.G., Land Use & Natural Resources Program Manager  
DATE: March 2, 2015  
RE: Request for Prioritized Site List, Relicensing Study No. 3.1.1, 2013 Full River Reconnaissance

In February 2015, FirstLight requested a meeting with the Connecticut River Streambank Erosion Committee (CRSEC) to discuss a draft list of preventative maintenance sites that was included in the 2013 Full River Reconnaissance (FRR). In follow-up emails sent to Charles Momnie, Senior Engineer, on 2/11 and 2/22, the CRSEC requested that FirstLight provide us with a prioritized list of sites to consider for this next phase of work. We requested that this list be provided to us by mid-March so that we have time to review it before meeting with FirstLight in early April 2015.

Pursuant to the 1999 Erosion Control Plan (ECP) for the Turners Falls Pool, appropriate erosion control applications will be planned, permitted and constructed in accordance with a periodically updated prioritization schedule. Since the "top 20" priority sites from the 1999 ECP have either been constructed or the licensee has provided justification for not working on some of the sites, a new prioritized site list should have been included with the 2013 FRR. The prioritized site list for the next phase of work should be 1) based on the quantitative methodology described in the ECP and used for the 2013 FRR; and 2) prioritized according to the segments that "are contributing the most sediment to the river." The ECP states that the goal is to identify the sites that are contributing the most sediment to the river and further states that these sites are to be repaired first.

We do not believe that the list of sites in the 2013 FRR is in compliance with the ECP. We question why all of the sites (except Shearer) are classified as preventative maintenance and how these sites are contributing more sediment to the river than other sites. According to the 2013 FRR, there are 1,387 ft. of active erosion; 22,642 ft. of eroded banks; and 13,705 ft. of potential future erosion. The Stages of Erosion Maps in Appendix G show many long segments (sites) of river bank classified as eroded and potential future erosion. Why weren't any of these segments included in a prioritized list so they could be evaluated by the CRSEC? These sites are likely to be contributing much more sediment to the river than the short segments identified by FirstLight. The total length of work proposed by FirstLight, excluding the Shearer site, is 1,285 feet over 3 years, which is inadequate given that FirstLight has repaired sites this long in one year.



FirstLight is currently working to obtain permits for the Shearer site. This site was constructed years ago and for years has had an undercut toe because the stone was not placed at the proper elevation to address the fluctuating river levels due to project operations. The CRSEC has, on numerous occasions over the years, encouraged FirstLight to repair the Shearer site. This site is classified by FirstLight as Stable and should be viewed as a maintenance project. The Shearer site should not be substituted for a priority erosion site or a preventative maintenance site.

FirstLight has chosen not to engage the CRSEC in a discussion of the sites until now despite having completed the FRR in 2013. The ECP states that “[t]he licensees and the ad hoc committee will meet on sufficient intervals to evaluate and prioritize the following years [sic] erosion control work.” This has not happened and we are now in “catch up” mode. We look forward to receiving the new list of prioritized sites by mid-March so that we have time to review it prior to a meeting in early April.

If you have any questions regarding the requested information, please contact me at 413.774.3167 x130 or [kmacphee@frcog.org](mailto:kmacphee@frcog.org).

cc: Christopher Chaney, FERC  
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