

**MONTAGUE SELECTBOARD MEETING**  
**1 Avenue A, Turners Falls and VIA ZOOM**  
**Monday, June 3, 2024**  
**AGENDA**

**Join Zoom Meeting <https://us02web.zoom.us/j/85330587040>**

**Meeting ID: 853 3058 7040    Passcode 775657    Dial into meeting: +1 646 558 8656**

This meeting/hearing of the Selectboard will be held in person at the location provided on this notice. Members of the public are welcome to attend this meeting. Please note that while an option for remote attendance and/or participation is being provided as a courtesy to the public, the meeting/hearing will not be suspended or terminated if technological problems interrupt the virtual broadcast, unless otherwise required by law. Members of the public with particular interest in any specific item on this agenda should make plans for in-person vs. virtual attendance accordingly.

Topics may start earlier than specified, unless there is a hearing scheduled

**Meeting Being Taped**

**Votes May Be Taken**

1. 6:30PM      Selectboard Chair opens the meeting, including announcing that the meeting is being recorded and roll call taken
  
2. 6:30            Approve Minutes: Selectboard Meeting May 20, 2024
  
3. 6:32            Public Comment Period: Individuals will be limited to two (2) minutes each and the Selectboard will strictly adhere to time allotted for public comment
  
4. 6:34            **Reorganization of Selectboard**
  
5. 6:35            **Pole Location Hearing, S. Ferry Road, Montague**
  - Request to relocate P#68/32 forty-three (43) feet easterly just past the current culvert; remove P#68/31 from current location and install new jointly owned pole in front of 29 S. Ferry Road which is approximately seventy-two (72) feet westerly of current location. Pole relocations are needed due to culvert work being done by the Town on S. Ferry Road
  
6. 6:40            **Suzanne LoManto, RiverCulture**
  - Use of Public Property: Road Closure/North Street after Union Street for Community Potluck. Saturday, August 3 from 3-8pm. Rain date August 4.
  - Use of Public Property: Peskeompskut Park, Saturday July 6, Noon-7pm for a musical event co-sponsored by RiverCulture.
  
7. 6:45            **Personnel Board**
  - Assistant Town Administrator and DPW Superintendent Hiring Updates
  - Establish Town Accountant Hiring Committee and appoint Carolyn Olsen, Walter Ramsey, Eileen Seymour, Karen Tonelli, Brandy Patch, Francia Wisniewski to serve as members

**Montague Selectboard  
Meeting June 3, 2024  
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8. 6:55      **Assistant Town Administrator's Business**
- Authorize Second Amendment to First Street Parking Lot Purchase and Sale agreement with Pioneer Valley Habitat for Humanity
  - Authorize Chair to Execute all associated grant forms associated with EPA FY24 Brownfields Grant for Strathmore Mill Demolition Project
  - Avenue A CSO Reduction/ Buffer line project updates/ alternative proposal to re-line sewer manholes
9. 7:10      **Town Administrators' Business**
- Comcast Licensing Ascertainment Hearing – Discussion of Need for Larger ADA Accessible Meeting and PEG Broadcast Room in Town Hall
  - Review of Town Submissions to FERC and MassDEP regarding the FirstLight Relicensing Application
  - Update Regarding Closing for Town Acceptance of Farren Property Donation
  - Topics not anticipated in the 48 hour posting

Executive session in accordance with G.L. c.30A, §21(a)(1) To discuss the reputation, character, physical condition or mental health, rather than professional competence, of an individual, or to discuss the discipline or dismissal of, or complaints or charges brought against, a public officer, employee, staff member or individual.

**Next Meeting:**

- Selectboard, Monday, June 10, 2024 at 6:00 PM, via ZOOM



333 West Street  
Pittsfield, MA 01201  
(413) 499-9077

April 12, 2024

Selectboard of Montague  
Town of Montague  
1 Avenue A  
Turners Falls, MA 01376

Dear Selectboard Chair,

Under the provisions of Chapter 166 of General Laws and any additions thereto or amendments thereof, a public hearing IS NECESSARY on the attached revised petition. Please schedule a public hearing at your earliest convenience.

A signed copy of each document should be returned to EVERSOURCE and VERIZON respectively, with your approval, disapproval or comment noted thereon, and the final copy may be retained for your files. Recording of the petitions is not necessary. When adopted, please forward the Orders to the Town Clerk for recording.

Town Clerk, please return signed and recorded orders to:

Joanne Fox  
District Representative  
EVERSOURCE  
333 West St.  
Pittsfield, MA 01201

Mr. Albert Bessette, Jr.  
Manager – Right of Way  
Verizon New England, Inc.  
365 State Street  
Springfield, MA 01105

NOTE: On questions pertaining to this order, please call David Meagher at (413) 585-1828, regarding 15775888.

Sincerely,

*Joanne Fox*

Joanne Fox  
District Representative

Enclosures



PETITION FOR JOINT OR IDENTICAL POLE LOCATIONS

By the Selectboard of Montague, Massachusetts:

NSTAR ELECTRIC COMPANY DBA EVERSOURCE AND VERIZON NEW ENGLAND, INC.

requests permission to locate a line of poles, wires, cables and fixtures, including the necessary sustaining and protecting fixtures to be owned and used in common by your petitioners, along and across the following public way:

Location – S. Ferry Road, Montague

- Relocate P#68/32 forty-three (43) feet easterly just past current culvert.
- Remove P#68/31 from current location and install new jointly owned pole in front of 29 S. Ferry Road which is approximately seventy-two (72) feet westerly of current location.

Reason – Pole relocations are needed due to culvert work being done by the town on S. Ferry Road.

Wherefore they pray that after due notice and hearing as provided by law, they be granted joint or identical locations for and permission to construct and maintain a line of poles, wires and cables, together with such sustaining and protecting fixtures as they may find necessary, said poles to be erected substantially in accordance with the field plan herewith and made a part hereof marked – 15775888.

Also for permission to lay and maintain underground laterals, cables and wires in the above or intersecting public ways for the purpose of making connections with such poles and buildings as each of said petitioners may desire for distributing purposes.

Your petitioners agree to reserve space for one crossarm at a suitable point on each of said poles for the fire and police telephone signal wires belonging to the municipality and used by it exclusively for municipal purposes.

EVERSOURCE

By David Meagher, Electric Service Designer

VERIZON NEW ENGLAND, INC.

By Albert E. Bessette, Manager Right-of-Way

Dated this 12th Day of April, 2024

TOWN COPY



## ORDER FOR JOINT OR IDENTICAL POLE LOCATIONS

By the Selectboard of Montague, Massachusetts:

Notice having been given and a public hearing held, as provided by law, IT IS HEREBY ORDERED THAT:

NSTAR ELECTRIC COMPANY DBA EVERSOURCE AND VERIZON NEW ENGLAND, INC. be and they are hereby granted joint or identical locations for and permission to construct and maintain a line of poles and their respective wires and cables to be placed thereon, together with such sustaining and protecting fixtures as said Companies may deem necessary, thereon, together with such sustaining and protecting fixtures as said Companies may deem necessary, in the public way hereinafter referred to, as requested in petition of said Companies dated the 12th day of April, 2024.

All construction under this order shall be in accordance with the following conditions: Poles shall be of sound timber, and reasonably straight, and shall be set substantially at the points indicated upon the plan marked **15775888** filed with and made a part of said petition. There may be attached to said poles by said EVERSOURCE not to exceed 18 wires and 2 cables, and by VERIZON NEW ENGLAND INC. not to exceed 40 wires and 4 cables, and all of said wires and cables shall be placed at a height of not less than 18 feet from the ground at highway crossings, and not less than 12 feet from the ground elsewhere.

The following is the public way along which the poles above referred to may be erected, and the number of poles which may be erected thereon under this order:

Location – S. Ferry Road, Montague

- Relocate P#68/32 forty-three (43) feet easterly just past current culvert.
- Remove P#68/31 from current location and install new jointly owned pole in front of 29 S. Ferry Road which is approximately seventy-two (72) feet westerly of current location.

Reason – Pole relocations are needed due to culvert work being done by the town on S. Ferry Road.

Also, that permission be and thereby is granted to each of said Companies to lay and maintain underground laterals, cables and wires in the above or intersecting public ways for the purpose of making connections with such poles and buildings as each may desire for distributing purposes.

I hereby certify that the foregoing order was adopted at a meeting of the Selectboard of Montague, Massachusetts held on the 3 day of June, 2024.

\_\_\_\_\_  
Town Clerk

We hereby certify that on June 3, 2024, at 6:35 o'clock PM,  
at Via Zoom a public hearing was held on the petition of the  
EVERSOURCE and VERIZON NEW ENGLAND INC. for permission to construct the line of  
poles, wires, cables, fixtures and connections described in the order herewith recorded, and that  
we mailed at least seven days before said hearing a written notice of the time and place of said  
hearing to each of the owners of real estate (as determined by the last preceding assessment for  
taxation) along the way upon which the Companies are permitted to construct the line of poles,  
wires, cables, fixtures and connections under said order. And that thereupon said order was duly  
adopted.

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

Selectboard of Montague, MA

CERTIFICATE

I hereby certify that the foregoing is a true copy of a joint location order and certificate of  
hearing with notice adopted by the Select Board of the Town of Montague, Massachusetts, on  
the \_\_\_\_\_ day of \_\_\_\_\_ 2024 and recorded with the records of  
location orders of said town, Book \_\_\_\_\_, Page \_\_\_\_\_. This certified copy is made under the  
provisions of Chapter 166 of General Laws and any additions thereto or amendments thereof.

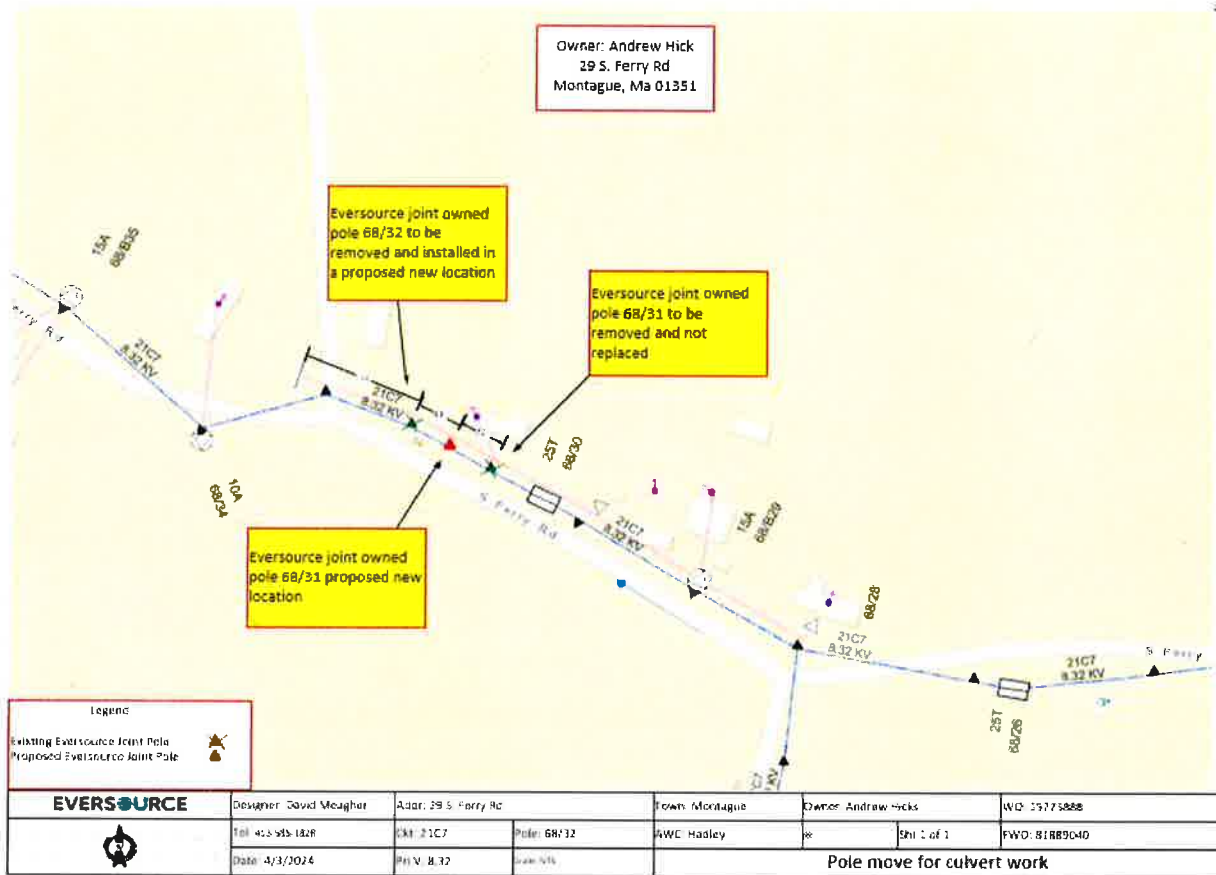
Attest:

\_\_\_\_\_  
Town Clerk

**TOWN COPY**

CITY: Montague

STREET: S. Ferry Rd



## PURPOSE AND DESCRIPTION:

Pole 68/32 needs to be moved due to culvert work being done by the town on S. Ferry Rd.

Move pole 68/32 (joint custodian) 43' to the east just past the current culvert.

The new pole location will be placed in front of 29 S. Ferry Rd making pole 68/31 no longer needed and will be removed and not replaced.



Board of Selectmen  
Town of Montague

1 Avenue A (413) 863-3200 xt. 108  
Turners Falls, MA 01376 FAX: (413) 863-3231

REGISTRATION FOR ASSEMBLY, PUBLIC DEMONSTRATION,  
OR USE OF PUBLIC PROPERTY  
(Not for Peskeompskut Park or Montague Center Common)

All information must be complete. This form must be returned to the Board of Selectmen within a minimum of 10 days prior to the assembly.

Name of applicant: Suzanne Lomanto  
Address of applicant: 1 Avenue A Turners Falls  
Phone # of applicant: 413-863-3200 ext. 115  
Name of organization: ~~Town of Montague~~ RiverCulture  
Name of legally responsible person: Town of Montague  
Location of assembly: Center St., Montague Ctr.  
Date of assembly: 8/3/24 (rain date 8/4)  
Time of assembly: Begin: 3pm End: 8pm  
Number of expected participants: 50-100

If a procession/parade:

Route: request to block off Center St. after Union Street

Number of people expected to participate: \_\_\_\_\_

Number of vehicles expected to participate: \_\_\_\_\_

Subject of demonstration: Potluck: between 37 + 40 Center Street. Set up table, chairs, (2) 10x10' tents

Attach a copy of your insurance policy or liability binder indicating a minimum policy of \$1 Million Individual/\$3 Million Group.

\*\*\*\*\*

Signatures:

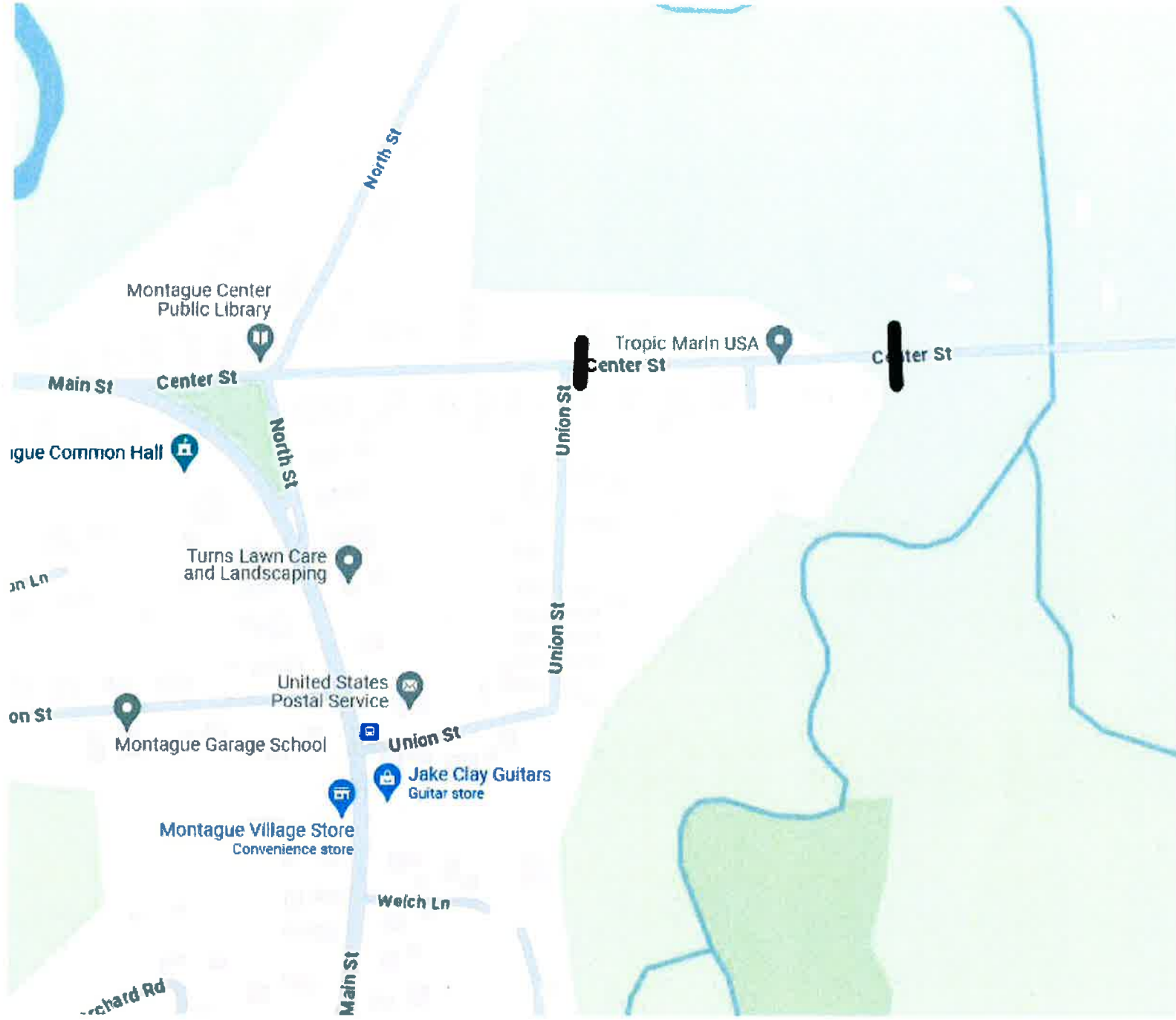
Police Chief: [Signature] Date: 5-30-24

Comments/Conditions: \_\_\_\_\_

Board of Selectmen, Chairman: \_\_\_\_\_ Date: \_\_\_\_\_

Comments/Conditions: \_\_\_\_\_





Local organizer : Deborah Radway  
413-345-8570  
413-367-2483



**Board of Selectmen  
Town of Montague**

1 Avenue A (413) 863-3200 xt. 108  
Turners Falls, MA 01376 FAX: (413) 863-3231

**Event Application for use of  
PESKEOMPSKUT PARK and MONTAGUE CENTER TOWN COMMON**

Name of applicant Suzanne LoManto

Name of business/group sponsoring proposed event if applicable: River Culture

If applicable, number of years your organization has been running this event in Montague? N/A

Address 1 Avenue A Turners Falls Falls

Contact phone 413-863-3200 Contact email riverculture@montague-ma.gov

FID \_\_\_\_\_  
Dates of proposed event Sat. July 6 2024 Location: Peskeompskut Park

Hours noon-7pm Set Up: 11am Clean Up: 7:30pm

Approximate number of people expected to attend \_\_\_\_\_

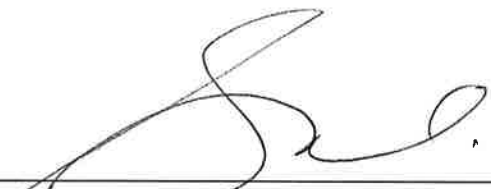
What provisions will be made regarding clean up of site? \_\_\_\_\_

Will the proposed event be:

- Musical
- Theatrical
- Exhibitions
- Amusements
- Wedding
- Other \_\_\_\_\_

Fully & specifically describe content of the proposed exhibition, show and/or amusements:

Music Festival Co-sponsored  
by River Culture

Signature of applicant 

Date 5/28/24

License fees:

Monday – Saturday = \$25.00 per day

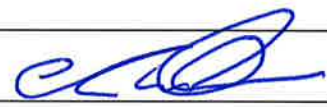
Sunday = \$50.00

BOARD OF SELECTMEN – Approval

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

Date: \_\_\_\_\_

POLICE CHIEF - Approval / Comments

\_\_\_\_\_  
  
\_\_\_\_\_

Date: 5-30-24

BOARD OF HEALTH – Approval / Comments

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

Date: \_\_\_\_\_

**Town Accountant**

**Hiring Committee**

**Charge:** To recruit, screen, vet, and recommend a slate of exceptional candidates to the Selectboard for the Town Accountant position.

**Proposed Committee Membership:**

1. Outgoing Accountant- Carolyn Olsen
2. DPW Office Manager- Brandy Patch
3. ATA/ TA- Walter Ramsey
4. Treasurer- Eileen Seymour
5. Assessor- Karen Tonelli
6. FinCom Chair- Franca Wisnewski

**Proposed Hiring Timeline:**

<b>Task</b>	<b>Date</b>
Committee appointed by Selectboard	Monday June 3
Hiring Committee convenes to determine advertising and recruitment strategy	Week of June 17
Position Advertised	Thursday June 20
Hiring Committee convenes to screen candidates	Week of July 8
Interviews	Week of July 15
Target Start Date	September 16
Carolyn's Last Day	September 22

Name: Olsen, Caroyln

**MONTAGUE APPOINTED OFFICIAL**

**NAME:** Carolyn Olsen

**DATE:** 6/3/2024

**COMMITTEE:** Town Accountant Hiring Committee

**TERM:** Until finished

**TERM EXPIRATION:** Until Finished

**SELECTMEN, TOWN OF MONTAGUE**

**TERM STARTS:** 06/04/24

Carolyn Olsen personally appeared and made oath that he/she would faithfully and impartially perform his/her duty as a member of the Town Accountant Hiring Committee according to the foregoing appointment.

Received \_\_\_\_\_ and entered in the records of the Town of Montague.

\_\_\_\_\_  
**MONTAGUE TOWN CLERK**

This is to acknowledge that I have received a copy of Chapter 30A, Sections 18 - 25, of the General Laws, the Open Meeting law.

\_\_\_\_\_  
**APPOINTED OFFICIAL**

\*\*\*If you choose to resign from your appointed position during your term, you must notify the Town Clerk in writing before such action takes effect.

Name: Ramsey, Walter

**MONTAGUE APPOINTED OFFICIAL**

**NAME:** Walter Ramsey

**DATE:** 6/3/2024

**COMMITTEE:** Town Accountant Hiring Committee

**TERM:** Until finished

**TERM EXPIRATION:** Until Finished

**SELECTMEN, TOWN OF MONTAGUE**

**TERM STARTS:** 06/04/24

Walter Ramsey personally appeared and made oath that he/she would faithfully and impartially perform his/her duty as a member of the Town Accountant Hiring Committee according to the foregoing appointment.

Received \_\_\_\_\_ and entered in the records of the Town of Montague.

\_\_\_\_\_  
**MONTAGUE TOWN CLERK**

This is to acknowledge that I have received a copy of Chapter 30A, Sections 18 - 25, of the General Laws, the Open Meeting law.

\_\_\_\_\_  
**APPOINTED OFFICIAL**

\*\*\*If you choose to resign from your appointed position during your term, you must notify the Town Clerk in writing before such action takes effect.

Name: Seymour, Eileen

**MONTAGUE APPOINTED OFFICIAL**

**NAME:** Eileen Seymour

**DATE:** 6/3/2024

**COMMITTEE:** Town Accountant Hiring Committee

**TERM:** Until finished

**TERM EXPIRATION:** Until Finished

**SELECTMEN, TOWN OF MONTAGUE**

**TERM STARTS:** 06/04/24

Eileen Seymour personally appeared and made oath that he/she would faithfully and impartially perform his/her duty as a member of the Town Accountant Hiring Committee according to the foregoing appointment.

Received \_\_\_\_\_ and entered in the records of the Town of Montague.

\_\_\_\_\_  
**MONTAGUE TOWN CLERK**

This is to acknowledge that I have received a copy of Chapter 30A, Sections 18 - 25, of the General Laws, the Open Meeting law.

\_\_\_\_\_  
**APPOINTED OFFICIAL**

\*\*\*If you choose to resign from your appointed position during your term, you must notify the Town Clerk in writing before such action takes effect.

Name: Tonelli, Karen

**MONTAGUE APPOINTED OFFICIAL**

**NAME:** Karen Tonelli

**DATE:** 6/3/2024

**COMMITTEE:** Town Accountant Hiring Committee

**TERM:** Until finished

**TERM EXPIRATION:** Until Finished

**SELECTMEN, TOWN OF MONTAGUE** **TERM STARTS:** 06/04/24

Karen Tonelli personally appeared and made oath that he/she would faithfully and impartially perform his/her duty as a member of the Town Accountant Hiring Committee according to the foregoing appointment.

Received \_\_\_\_\_ and entered in the records of the Town of Montague.

\_\_\_\_\_  
**MONTAGUE TOWN CLERK**

This is to acknowledge that I have received a copy of Chapter 30A, Sections 18 - 25, of the General Laws, the Open Meeting law.

\_\_\_\_\_  
**APPOINTED OFFICIAL**

\*\*\*If you choose to resign from your appointed position during your term, you must notify the Town Clerk in writing before such action takes effect.



Name: Patch, Brandy

**MONTAGUE APPOINTED OFFICIAL**

**NAME:** Brandy Patch

**DATE:** 6/3/2024

**COMMITTEE:** Town Accountant Hiring Committee

**TERM:** Until finished

**TERM EXPIRATION:** Until Finished

**SELECTMEN, TOWN OF MONTAGUE** **TERM STARTS:** 06/04/24

Brandy Patch personally appeared and made oath that he/she would faithfully and impartially perform his/her duty as a member of the Town Accountant Hiring Committee according to the foregoing appointment.

Received \_\_\_\_\_ and entered in the records of the Town of Montague.

\_\_\_\_\_  
**MONTAGUE TOWN CLERK**

This is to acknowledge that I have received a copy of Chapter 30A, Sections 18 - 25, of the General Laws, the Open Meeting law.

\_\_\_\_\_  
**APPOINTED OFFICIAL**

\*\*\*If you choose to resign from your appointed position during your term, you must notify the Town Clerk in writing before such action takes effect.

Name: Wisnewski, Francia

**MONTAGUE APPOINTED OFFICIAL**

NAME: Francia Wisnewski

DATE: 6/3/2024

COMMITTEE: Town Accountant Hiring Committee

TERM: Until finished

TERM EXPIRATION: Until Finished

SELECTMEN, TOWN OF MONTAGUE TERM STARTS: 06/04/24

Francia Wisnewski personally appeared and made oath that he/she would faithfully and impartially perform his/her duty as a member of the Town Accountant Hiring Committee according to the foregoing appointment.

Received \_\_\_\_\_ and entered in the records of the Town of Montague.

\_\_\_\_\_  
**MONTAGUE TOWN CLERK**

This is to acknowledge that I have received a copy of Chapter 30A, Sections 18 - 25, of the General Laws, the Open Meeting law.

\_\_\_\_\_  
**APPOINTED OFFICIAL**

\*\*\*If you choose to resign from your appointed position during your term, you must notify the Town Clerk in writing before such action takes effect.

**SECOND AMENDMENT  
TO PURCHASE AND SALE AGREEMENT  
BY AND BETWEEN  
TOWN OF MONTAGUE  
AND  
PIONEER VALLEY HABITAT FOR HUMANITY, INC.**

NOW COME the Town of Montague (“Seller”) and Pioneer Valley Habitat for Humanity, Inc. (“Buyer”), parties to a Purchase and Sale Agreement dated June 30, 2023 (the “Agreement”), for certain real property located at First Street, Montague, Massachusetts (the “Premises”).

WHEREAS, under Section 23 of the Agreement, the Buyer has the right to conduct certain inspections at the Premises, subject to the terms and conditions set forth in the Agreement (the “Inspection Contingency”);

WHEREAS, the Closing Date under the Agreement is December 27, 2023;

WHEREAS, the Seller and Buyer entered into a First Amendment to Purchase and Sale Agreement (“First Amendment”) extending the Inspection Contingency and the Closing Date to June 30, 2024; and

WHEREAS, the Seller and the Buyer desire to extend further both the Inspection Contingency and the Closing Date to June 30, 2025, as set forth herein.

NOW, THEREFORE, for good and valuable consideration, receipt whereof is hereby acknowledged, the Seller and the Buyer hereby agree to amend the Agreement as amended by the First Amendment as follows:

1. The Inspection Contingency and the Closing Date under the Agreement are extended to June 30, 2025.
2. In all other respects, the terms of the Purchase and Sale Agreement as previously amended by the First Amendment shall remain in full force and effect.

**[Signature Page Follows]**

Executed under seal this \_\_\_\_\_ day of May, 2024.

**SELLER:**  
TOWN OF MONTAGUE  
By Its Selectboard

**BUYER:**  
PIONEER VALLEY HABITAT  
FOR HUMANITY, INC.

\_\_\_\_\_  
Richard Kuklewicz, Chair

By: \_\_\_\_\_  
Megan McDonough,  
Executive Director

\_\_\_\_\_  
Christopher Boutwell, Vice Chair

\_\_\_\_\_  
Matthew Lord, Clerk



**OFFICE OF BROWNFIELDS AND LAND REVITALIZATION**

WASHINGTON, D.C. 20460

May 20, 2024

The Honorable Richard Kuklewicz  
Selectboard Chair  
Town of Montague  
One Avenue A  
Turner Falls, MA 01376

Dear Mr. Kuklewicz:

On behalf of the United States Environmental Protection Agency (EPA), I am pleased to congratulate you and confirm that the Town of Montague was selected as one of the entities EPA will begin negotiations with to award a cooperative agreement for a Cleanup Grant. The Town of Montague submitted an outstanding application, and we deeply appreciate the tremendous commitment of time and energy that went into its preparation.

Since its inception in 1995, EPA's Brownfields Program has worked to help states, Tribal Nations, and communities around the country clean up and revitalize brownfield sites. We fully expect that these brownfield projects will provide benefits to the environment and economy of local communities. Jim Byrne, your Regional Brownfields Contact, will work closely with the Town of Montague to negotiate the cooperative agreement prior to the grant award. You may contact Jim Byrne at 617-918-1389 or [byrne.james@epa.gov](mailto:byrne.james@epa.gov).

Again, congratulations on being selected! We look forward to working with you.

Sincerely,

A handwritten signature in blue ink, appearing to read "Patricia Overmeyer".

Patricia Overmeyer, Acting Director  
Office of Brownfields and Land Revitalization

cc: Jim Byrne  
Walter Ramsey

**BROWNFIELDS CLEANUP GRANTS  
MAJOR TASKS**

TASK	CLEANUP GRANT RECIPIENT	STATE ENVIRONMENTAL PROJECT MGR	EPA
<b>General Requirements</b>			
<i>Site must be enrolled in the appropriate State response program to be eligible to receive federal brownfields cleanup funds</i>	X		
<i>Identifies State environmental project manager to review the proposed cleanup plans and actions</i>		X	
<i>Assist EPA in complying with Historic Preservation Act for site cleanup</i>	X		
<b>Community Involvement &amp; Public Participation Requirements</b>			
<i>Designates Community Relations Spokesperson</i>	X		
<i>Prepares a draft Community Relations Plan (CRP) and submits to EPA for review</i> <ul style="list-style-type: none"> <li>■ CRP must be prepared before an ‘analysis of cleanup alternatives’ is complete.</li> <li>■ CRP outlines steps to provide reasonable notice of proposed cleanup, opportunity for involvement, response to comments, and administrative records that are available to the public.</li> </ul>	X		
<i>Reviews and comments on draft CRP</i>			X
<i>Establishes information repository and maintains administrative record for the site</i> <ul style="list-style-type: none"> <li>■ The repository must be established before the analysis of cleanup alternatives is made available for public review and comment.</li> </ul>	X		
<b>Analysis of Brownfields Cleanup Alternatives Requirement</b>			
<i>Drafts an ‘analysis of cleanup alternatives’ document</i> <ul style="list-style-type: none"> <li>■ Identifies the objectives of the environmental response action and provides an analysis of cleanup alternatives</li> <li>■ Documents that the situation meets the need for an environmental response action</li> <li>■ Provides information pertaining to site background; threats to public health and/or the environment posed by the site; enforcement activities; and projected costs</li> <li>■ Incorporates Green and Sustainable Remediation and Resiliency considerations</li> <li>■ Identifies the proposed action, and explains the rationale for its selection.</li> </ul>	X		
<i>Provides public notice of availability of draft analysis of cleanup alternatives document and conducts a 30-day public comment period</i>	X		
<i>Conducts a public meeting during the 30-day public comment period to inform public of the proposed cleanup plans and to elicit comments</i>	X		

**BROWNFIELDS CLEANUP GRANTS  
MAJOR TASKS**

<b>TASK</b>	<b>CLEANUP GRANT RECIPIENT</b>	<b>STATE ENVIRONMENTAL PROJECT MGR</b>	<b>EPA</b>
<i>Reviews &amp; approves the draft analysis of cleanup alternatives document</i>		X	X
<i>Revises analysis of cleanup alternatives document as necessary</i>	X		
<i>Develops and submits State-required remedial design and engineering documents (i.e., RAM, RAP, HASP, etc.) to the State for review</i>	X		
<i>Reviews State-required remedial design and engineering documents and provides written comments (CT &amp; MA) or approval (ME, NH, RI &amp; VT)</i> <ul style="list-style-type: none"> <li>■ This step may occur simultaneously with the submittal of the analysis of cleanup alternatives document</li> </ul>		X	
<i>Submits copy of written approval letter to EPA</i>	X		
<i>Submits budget of proposed cleanup to EPA that details activities to be funded with EPA funds</i>	X		
<i>Reviews and approves budget of anticipated cleanup activities and costs</i>			X
<b>Quality Assurance Project Plan (QAPP) Requirements</b>			
<i>Prepares quality assurance project plan if environmental sampling is to be conducted and submits to EPA for approval</i>	X		
<i>Reviews and approves quality assurance project plan</i>			X
<b>Cleanup Activities</b>			
<i>Conducts periodic site visits during implementation</i> <ul style="list-style-type: none"> <li>■ Ensure compliance with approved plans</li> <li>■ Ensure compliance with Davis Bacon requirements (payrolls, labor interviews, signage, etc.)</li> </ul>	X	X	
<i>Prepares cleanup closeout documentation at the conclusion of the cleanup and submits to State for review and approval</i> <ul style="list-style-type: none"> <li>■ Documents that cleanup is complete and is protective of human health and the environment.</li> <li>■ Identifies any institutional controls used and long-term monitoring requirements.</li> <li>■ If State response program does not require such documentation, see EPA model documents for an example.</li> </ul>	X		
<i>Reviews and provides written comments (CT &amp; MA) or approval (ME, NH, RI &amp; VT) of the cleanup closeout documentation</i>		X	
<i>Submits copy of written comment or approval letter to EPA</i>	X		

Date: 4/26/2024

Project No.: 21745

To: Walter Ramsey, Assistant Town Administrator; Tom Bergeron, DPW Superintendent

From: Steve Guerrette, PE; Alex Liptak, PE; Lisa Muscanell-DePaola, PE

Subject: DRAFT - Montague, MA – Avenue A Buffer Line Hydraulic Modeling Evaluation

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## Introduction

This memorandum summarizes the results of an alternatives analysis of the Avenue A buffer line system for the Town of Montague, Massachusetts. The buffer line consists of 750-feet of 48" reinforced concrete pipe installed in Avenue A located immediately downstream of the Avenue A Combined Sewer Overflow (CSO) diversion structure. The purpose of the buffer line is providing storage when the sewer system reaches or exceeds capacity, reducing total CSO volumes during rainfall events. This analysis was completed per the recommendations of the May 2023 memorandum by Wright-Pierce titled *Turners Falls Wastewater Collection System Study, Hydraulic Modeling Summary* dated May 10, 2023. The memo, also included as part of the June 2023 CSO Long-Term Control Plan (LTCP) Update, showed evidence the buffer line was not performing optimally in the existing configuration and may be substantially improved with construction of minor modifications to the hydraulics of the system near the inlet of the buffer line.

As part of this analysis, the model was updated with additional survey information collected by Wright-Pierce field staff, which is described in greater detail in the following sections. The goal of the alternatives analysis presented below was to re-assess the performance of the existing buffer line and its impact on CSO reduction as well as to assess the performance of improvement projects on the buffer line. System performance was considered in terms of net CSO reduction at the CSOs impacted by the buffer line (Avenue A and Greenfield Road) as well as control of system surcharging downstream of the buffer line. Existing and proposed alternatives were assessed under a 3-month, 24-hour design storm event and a 1-year, 24-hour design storm event respectively.

The results of the analysis summarized below recommend that the Town move forward with the design and installation of a flow control orifice on the outlet pipe of structure AV-13, which is the buffer line diversion structure. Additionally, it is also recommended that flow monitoring devices be installed within the buffer line to monitor system performance and confirm that the buffer line is filling up as predicted by the model. This alternative would provide the Town the opportunity to improve the performance of the system without a high capital cost or high level of commitment while collecting further information to inform future decisions if greater capacity or buffer line performance is required by regulatory agencies or desired by the Town of Montague.

## 2023 Collection System Model

The hydraulic model of the Montague sewer system was initially developed by Wright-Pierce as part of the May 2023 study. The model was developed in EPASWMM 5.1 and extends from the intersection of 7<sup>th</sup> and L Streets, just upstream of the CSO diversion structures, and extends downstream to the Clean Water Facility (CWF). An in-system flow monitoring program was conducted, which supported the calibration of wet weather flows in the hydraulic model. The model network was based upon several information sources including Town GIS data, existing GIS layers from sewer maps prepared by others, field data collection performed by Wright-Pierce in 2022, and available



record drawings. It was later updated with new survey data at select locations that influence the buffer line to support this analysis of the buffer line performance as described in the following sections.

## Updated Hydraulic Model

### Field Survey Data Collection

On February 22, 2024, Wright-Pierce field staff performed confined space entry of structures in the sewer collection system in the vicinity of the Avenue A CSO and buffer line. The goal of the survey effort was to collect detailed information on pipe sizes, inverts, invert offsets, system geometry, and other observations to support an update and/or verification of the hydraulic model's configuration around the CSO buffer line. Three structures were entered for direct measurement where possible or measured via survey equipment from the surface if an obstruction prevented entry into the structure (flow meter equipment). Surveyed structures included the buffer line diversion manhole (MH AV-13), the Avenue A CSO diversion structure (MH AV-12), and the manhole that contains the buffer line outlet conduit (MH AVP-3).

### Model Updates

The survey effort provided Wright-Pierce with valuable information to further refine the hydraulic model in the vicinity of the buffer line structure. A summary of model updates is given below:

Table 1 Hydraulic Model Updates Following Survey Effort

Model Input	Previous Model	Updated Model
CSO Weir Elevation	180.55'	180.77'
Buffer Line Pipe Size	12"	20"
Buffer Line Pipe Invert Offset	2.0'	1.5'
Downstream Gate Opening Size	5" x 5" Square	7" x 5" (Open bottom)

## Alternatives Analysis

The model was updated with the collected survey information, and an alternatives analysis was conducted using the hydraulic model. The alternatives analysis was conducted to determine whether the buffer line was performing as expected in the existing conditions during the selected design storm events and to determine what feasible improvements could be made to improve buffer line performance in terms of CSO volumes and/or downstream surcharging. The CSO at 7<sup>TH</sup> & L Avenue was not included in the results as it is not impacted by the buffer line or the proposed improvements discussed below.

### Improvements Considered in Proposed Alternatives

The proposed alternatives considered modifying various aspects of the sewer system geometry upstream of the buffer line that influence the ability for the buffer line to fill and their impact on CSOs. These included various combinations of the following improvements:

- **Buffer line diversion pipe invert**, to control the elevation at which the buffer begins to fill.
- **Pipe diameter between AV-12 to AV-13**, to improve conveyance capacity between the Avenue A CSO structure (AV-12) and the buffer line diversion structure (AV-13).
- **Addition of a flow control orifice at AV-13**, to limit flow rates impacting the sewer system downstream of the buffer diversion structure and the Greenfield Road CSO, forcing more flow into the buffer line and/or over the Avenue A CSO.

The results of the proposed improvement alternatives are described in the following sections and are summarized in Tables 2 and 3. Several more configurations and combinations of improvements were analyzed within the hydraulic model than are presented. The alternatives summarized are those that notably improved system performance in terms of buffer utilization and/or overall CSO volume while modeling reasonable surcharging results downstream.

#### Alternative 0 - Existing Conditions

The updated model showed that the buffer line partially fills under existing conditions for the 3-month (~50% full) and 1-year (~75% full), 24-hour storm events. The updated model shows the buffer line performs far better than previously thought. For example, it was previously estimated that the buffer line only filled to approximately 30% of its full volume under the 1-year event, whereas, it is now estimated to be filling to approximately 75%. Additionally, the model predicts the sewer system downstream of the buffer line surcharges under peak conditions but does not predict flooding to grade (sanitary sewer overflow (SSO)) for the 1-year event.

The buffer line in existing conditions results in a moderate reduction in CSO volume when compared to the absence of a buffer line. Under 1-year, 24-hour conditions, the model predicted a combined total of 194,000 gallons of CSO for Avenue A and Greenfield Road. If there were no buffer line, this total would be estimated at 225,000 gallons, a net increase in CSO volume of approximately 16.0%. For the 3-month, 24-hour event, these volumes are 121,000 gallons and 131,000 gallons respectively, a net increase of approximately 7.4% if the buffer line were not in use. While the buffer line has a positive impact on CSO volumes, the lack of full utilization of the buffer line volume suggests that system modifications may improve the performance of the line. The following proposed alternatives assessed the benefits and drawbacks of various improvements that could be made to the system hydraulics.

#### Alternative 1 - Proposed 13.5" Diameter Flow Control Orifice (AV-13)

This alternative considered the effects of installing a 13.5" diameter flow control orifice on the primary outlet pipe (which handles dry weather flow) in the buffer line diversion structure AV-13, located at the inlet end of the buffer line. This orifice, which could be later modified or removed if needed, would control the peak rate of flow that can continue downstream towards Greenfield. Under high flow conditions, this restriction would force more flow into the buffer line. Once the buffer line fills or the buffer inlet capacity is exceeded, the remaining flow would discharge from the Avenue A CSO.

Model simulation results for the 1-year, 24-hour design storm event showed a 4.1% reduction in CSO volumes from 194,000 gallons to 186,000 gallons at Avenue A and Greenfield Road. The 3-month, 24-hour storm event showed a 41.0% reduction from 122,000 gallons in existing conditions to 72,000 gallons at Avenue A and Greenfield Road. This alternative also reduces surcharging in the sewer system downstream of the buffer line during rain events.

**Proposed Alternative 2 – Raise Buffer Inlet 0.5’, 30” Pipe between AV-12 to AV-13, 13.5” Diameter Flow Control Orifice (AV-12)**

This alternative considered the effects of installing a 13.5” diameter orifice similar to Alternative 1 with additional modifications including increasing the pipe size between AV-12 and AV-13 to 30” (from the existing 21”) and raising the inlet pipe to the buffer line by 6”, setting it equal to the crown of pipe on the outlet pipe in the diversion structure versus the existing invert offset of 18”.

Model simulation results for the 1-year, 24-hour design storm event showed an 18.6% reduction in CSO volumes from 194,000 gallons to 158,000 gallons at Avenue A and Greenfield Road. The 3-month, 24-hour storm event showed a 26.2% reduction from 122,000 gallons in existing conditions to 90,000 gallons at Avenue A and Greenfield Road.

This alternative slightly increases the level of surcharging in the sewer system downstream of the buffer line during rain events. For the 1-year, 24-hour event, at AVF-2, the model reported that the water surface elevation would reach the rim elevation of the structure under peak conditions; this is 0.4-feet higher than existing conditions. Despite this heavy surcharging, the model did not report any flooding to grade or SSOs for a 1-year, 24-hour event.

Table 2 Alternatives Analysis Results Summary (1-year, 24-hour event)

Alternative	Ave A CSO Volume (gallons)	Greenfield Road CSO Volume (gallons)	Total CSO Volume (gallons)	% CSO Reduction vs Existing	Comment
No Buffer Line	88,000	137,000	225,000	-16.0%	
Alt. 0 – Existing Conditions	80,000	114,000	194,000	-	Downstream system surcharges but does not flood to grade but is close to the rim at AVF-2 (0.4' to rim) Buffer Line at 75% Full
Alt. 1 – 13.5" Diameter Orifice	86,000	100,000	186,000	4.1%	Reduced peak HGL at AVF-2 slightly (0.5' to rim) Buffer Line at 100% Full
Alt. 2 – 13.5" Diameter Orifice, 30" Pipe AV-12 to AV-13, Raise buffer inlet pipe 6"	46,000	112,000	158,000	18.6%	Peak HGL at rim of AVF-2, but does not flood to grade. More effective than Alt 1. for 1-Year storm. Buffer Line at 100% Full

Table 3 Alternatives Analysis Results Summary (3-Month, 24-hour event)

Alternative	Ave A CSO Volume (gallons)	Greenfield Road CSO Volume (gallons)	Total CSO Volume (gallons)	% CSO Reduction vs Existing	Comment
No Buffer Line	48,000	83,000	131,000	-7.4%	
Alt. 0 – Existing Conditions	40,000	82,000	122,000	-	Buffer Line at 50% Full
Alt. 1 – 13.5" Diameter Orifice	24,000	48,000	72,000	41.0%	Buffer Line at 100% Full
Alt. 2 – 13.5" Diameter Orifice, 30" Pipe AV-12 to AV-13, Raise buffer inlet pipe 6"	24,000	66,000	90,000	26.2%	Less effective than Alt. 1 for 3-Month storm. Buffer Line at 100% Full

### Conclusion and Recommendations to Town

The results of the model updates and subsequent alternatives analysis show that the buffer line in the existing condition is a reasonably effective means of reducing CSOs when compared to no buffer line being present. Based on model results, the reduction in CSOs at Avenue A and Greenfield Road is 7.6% for the 3-month, 24-hour event and 13.8% for the 1-year, 24-hour event. The results showed that the buffer line is not filling fully during the modeled storm events (between 50% and 75% full) suggesting that modifications can be made to improve overall performance of the buffer line to further reduce CSO volumes and/or hydraulic grade line downstream of the buffer line.

The results of the alternatives analysis suggests that the addition of an orifice plate to the primary outflow pipe on the buffer line diversion structure (AV-13) is the most effective and low-cost solution for improving buffer line performance, particularly for smaller design storm events such as the 3-month, 24-hour event. The addition of further improvements, such as increasing the pipe size between Avenue A CSO and the buffer line diversion structure, would provide greater benefit for the 1-year, 24-hour storm event. However, increasing the pipe size between Avenue A CSO and the buffer line diversion structure did not result in improved performance for the 3-month, 24-hour event. Due to the increased complexity of construction and the associated cost, this alternative is not recommended currently.

It is recommended that the Town move forward with the design and installation of an orifice plate as proposed in Alternative 1. Additionally, it is also recommended that flow monitoring devices be installed within the buffer line to monitor system performance and confirm that the buffer line is filling up as predicted by the model. This alternative provides the Town the opportunity to improve the performance of the system without a high capital cost and high level of commitment while collecting further information to inform future decisions in the event that greater capacity or buffer line performance warranted.

The proposed steps involved in orifice implementation include:

- Development of a design detail containing dimensions and notes.
- Fabrication of orifice plate per the detail by a 3<sup>rd</sup> party fabrication shop. The Town could solicit bids and/or pricing from local or regional locations to obtain the best potential price.
- Installation of orifice plate per the requirements of the detail. Based on the complexity of the proposed installation, the Town could elect to complete the installation themselves providing in-kind services.

Based on the cost estimate contained within the Town's CSO LTCP Update, the installation of an orifice plate was estimated at \$25,000. However, we believe that the above noted improvements would likely cost under \$25,000 especially if in-kind services are used.

Finally, the proposed orifice plate improvement project would remain effective after completion of upstream Inflow/Infiltration (I/I) removal projects. Based on the results of this analysis, it appears the buffer line was designed/sized to help control rain events with return intervals of less than 3-months. The orifice plate will help capture these smaller events with increased efficiency. As I/I removal and/or separation projects are completed upstream, the buffer line will be able to serve rain events of increasing return intervals. Additionally, the proposed orifice plate can be modified, removed, and/or replaced in the future should smaller or larger openings be deemed necessary.

April 26, 2024

Mr. Walter Ramsey, Assistant Town Administrator  
Town of Montague  
1 Avenue A  
Montague, MA 01376

**SUBJECT: Town of Montague, MA – Proposal for Professional Engineering Services  
Sewer Manhole Rehabilitation Project**

Dear Steve,

Wright-Pierce conducted sewer manhole inspections in 2022 within the village of Turners Falls to gather detailed information on the components of each manhole. Based on the observations, Wright-Pierce recommended the rehabilitation of 51 priority 1 sewer manholes to address structural defects and potential sources of infiltration and inflow (I/I) to the Town's collection system.

The Town of Montague has requested that Wright-Pierce submit a proposed scope and fee to provide design, bidding, and construction administration services to implement the recommended priority 1 Turners Falls manhole rehabilitation. The Town of Montague has also asked to include five additional manholes within the villages of Turners Falls and Millers Falls. Our proposed scope and budget for engineering services are presented below.

## Proposed Scope of Work

### Task 1 – Design

Scope of work under this task will include:

1. Wright-Pierce will perform project administration tasks including communicating with the Town, tracking budget and schedule, and preparing and submitting monthly invoices.
2. Wright-Pierce will prepare for and attend a kick-off meeting, with the Town's and Wright-Pierce's project team members. At the kick-off meeting, Wright-Pierce will establish schedules for deliverables and communication protocols.
3. Wright-Pierce will develop a 75 percent submittal that includes bid document/specifications with GIS-based drawings and an opinion of probable construction cost. The front-end specifications will be based on EJCDC 2018 edition. Technical specifications will be prepared using the CSI 16 Division format. The location of the manholes will be shown on GIS-based 11"x17" figures.
  - a. The Bid/Contract documents will be prepared in accordance with MGL Chapter 30, 39M governing public works projects in the Commonwealth of Massachusetts.
  - b. Wright-Pierce will submit an electronic copy (PDF) of the bid document/specifications to the Town and meet with the Town to discuss review comments.

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Mr. Walter Ramsey, Assistant Town Administrator

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4. Wright-Pierce will address the Town's comments on the 75 percent bid document/specifications within 10 business days of receiving the Town's comments. Wright-Pierce will prepare and submit two hard copies and an electronic version of the 100 percent bid documents/specifications and an opinion of probable construction cost.

### **Task 3 – Bidding Assistance**

Scope of work under this task will include:

1. Coordinate bidding through the Wright-Pierce bidding platform. The Town shall be responsible for all advertising costs.
2. Prepare for and attend one in-person pre-bid conference.
3. Respond to bidders' questions.
4. Prepare and distribute up to two addenda to the bid documents.
5. Attend in-person bid opening for the construction contract.
6. Review all bids and prepare bid tabulation.
7. Review the qualifications of the apparent low bidder(s) and compliance with other contract requirements. Report on the results of the reviews and issue a bid summary to the Town.
8. The length of the Bidding Phase is assumed to be approximately 60 days. The length of the Bid Period from Advertisement to Bid Opening is assumed to be approximately 21 days.

### **Task C – Construction Administration**

Wright-Pierce proposes to provide the following construction phase engineering services:

1. Prepare for and attend up to four in-person project meetings including pre-construction meeting and prepare minutes of the meetings.
2. Make periodic site visits to observe the progress of the work and prepare reports of the visits with submittals to the Town.
3. Review shop drawings, schedules, and other samples and submittals for compliance with contract documents, as necessary.
4. Coordinate and review field and shop test reports and attend field testing, as necessary.
5. Respond to contractor's requests for information (RFIs).
6. Review and negotiate contractor's requested changes in the scope of work, price and/or completion time and prepare change orders.
7. Review Contractors' payment requests and estimate amounts to be paid by the Town.
8. Coordinate and supervise the work of Resident Project Representative.
9. Prepare punch lists of incomplete or unacceptable work.
10. Conduct a Substantial Completion inspection and prepare certificate.
11. Provide the Town with ERSI ArcMap GIS format for the utility rehabilitation work-based contractor's "as-built" plans.

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Mr. Walter Ramsey, Assistant Town Administrator

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#### **Task 4 – Resident Project Representative Services**

Wright-Pierce will provide a full-time Resident Project Representative (RPR) whose duties, responsibilities, and limitations shall be as specified in the Standard General Conditions and Supplementary Conditions of the Construction Contracts. Resident Project Representative services are based on a construction duration of nine weeks at an average of 45 hours per week depending on the contractor's activity. The anticipated construction period is 90 calendar days for substantial completion.

#### **Items Not Included in Proposed Scope of Services at this time**

1. Requirements for meeting M/WBE goals for engineering services.
2. Development of permit applications and payment of applicable fees.
3. Topographical and utility location survey; wetland delineation; and subsurface investigation (i.e., borings, probes, etc.) of the project area.

#### **Proposed Fee**

We propose to provide the scope of services described above based on a time charge basis with a not-to-exceed fee of \$146,200, including labor and reimbursable expenses, for Tasks 1 through 4. Should additional services be required, we will not exceed this fee without written authorization.



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Mr. Walter Ramsey, Assistant Town Administrator

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Task	Labor	Reimbursable Expenses	Fee
Task 1 – Design	\$29,700	\$700	\$30,400
Task 2 – Bidding	\$7,900	\$800	\$8,700
Task 3 – Construction Administration	\$49,300	\$1,100	\$50,400
Task 4 – RPR	\$48,600	\$8,100	\$56,700
<b>Total</b>	\$135,500	\$10,700	\$146,200

If the proposed scope and fee is acceptable, Wright-Pierce will prepare an Engineering Services Agreement for review by the Town. We appreciate being considered for this assignment and look forward to working with you and your staff.

Sincerely,

**WRIGHT-PIERCE**



Lisa M. Muscanell-DePaola, PE  
Project Manager

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Christopher N. Pierce, PE  
Vice President

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# SPACE PLANNING - CONCEPT

12/12/2022

**PHASE ONE WORK AREA  
OUTLINED IN BLUE  
~900SF**

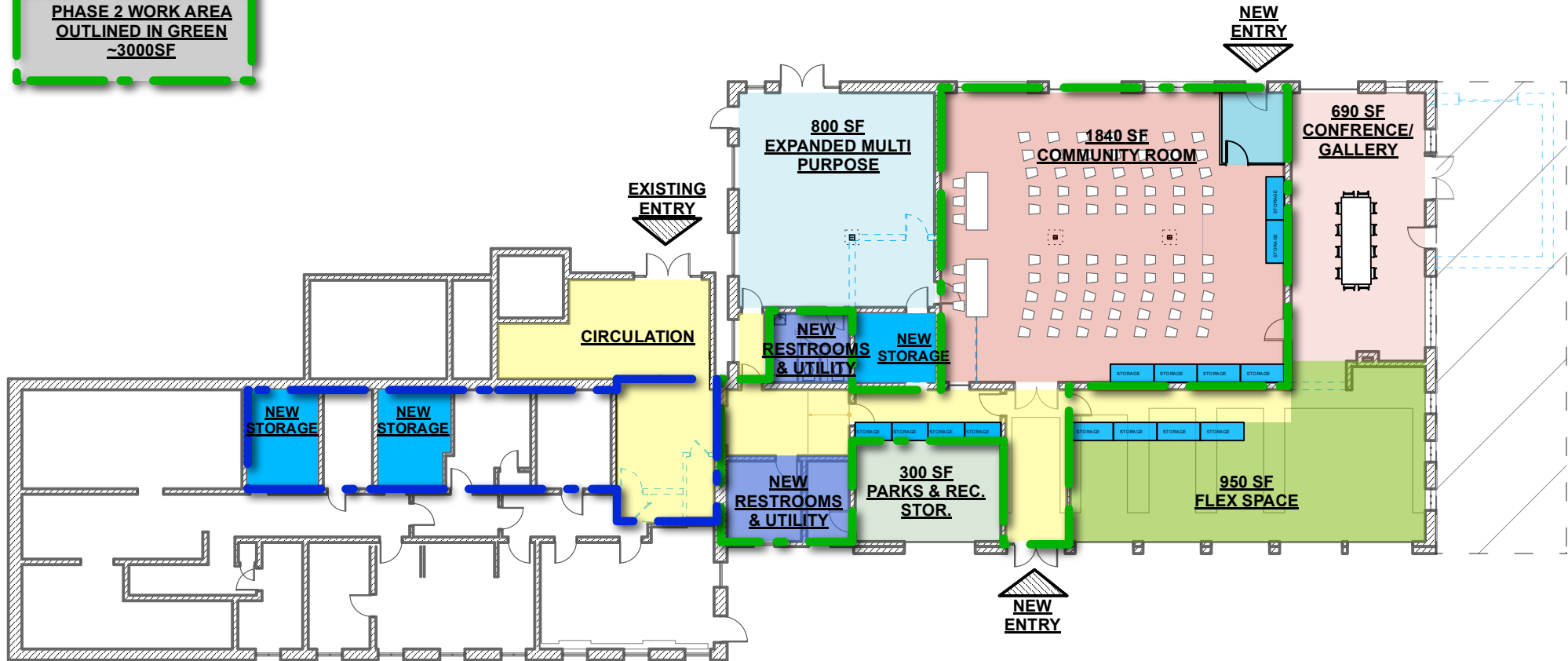
**PHASE 2 WORK AREA  
OUTLINED IN GREEN  
~3000SF**

## PHASE ONE

DEMO EXISTING NON ACCESSIBLE RESTROOMS  
DEMO EXISTING ELECTRICAL ROOM  
DEMO BRICK INFILL OF ARCH AT ENTRY/CIRCULATION  
NEW FLOORING, LIGHTING AND PAINT THROUGHOUT  
NO CHANGES TO HVAC

## PHASE TWO

DEMO & REPLACE EXISTING RESTROOM  
ADD NEW RESTROOM  
BUILD OUT COMMUNITY ROOM AND ACCESS FROM FIRST STREET  
NEW HVAC AS REQUIRED  
EXPAND MULTI PURPOSE ROOM  
NEW STORAGE FOR TOWN CLERK, SELECT BOARD, TREASURER AND ACCOUNTANT















# Office of the Town Administrator

Town of Montague

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Turners Falls, MA 01376

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FAX (413) 863-3231

May 21, 2024

Honorable Debbie-Anne A. Reese, Acting Secretary  
Federal Energy Regulatory Commission  
888 First Street, N.E.  
Washington, DC 20426

Re: Northfield Mountain Pumped Storage Project No. 2485-071  
Turners Falls Project No. 1889-085

## **Comments and Recommendations Submitted for Consideration by the Town of Montague**

Dear Acting Secretary Reese,

The Selectboard of the Town of Montague, through its Town Administrator, hereby submits comments and recommended license terms for the Turners Falls Hydroelectric Project (P-2889) and Northfield Mountain Pumped Storage Project (P-2485). The Town of Montague is a community of approximately 8,600 located astride the eastern banks of Connecticut River, which has served an extraordinary purpose in defining the life and prosperity of indigenous and modern residents on many levels. Turners Falls is the largest population center in the Town of Montague and is a designated Environmental Justice Area. The Town of Montague has standing relative to this license proceeding by virtue of a Motion to Intervene submitted on April 1, 2024.

The Town of Montague is a party to the Recreation Settlement Agreement filed with FERC on June 12, 2023. The Town fully supports the recreation provisions in the settlement agreement and requests that FERC accept the Recreation Management Plan (RMP). The RMP and Recreation Settlement Agreement satisfy the Town's recreational interests with regard to both projects, as their provisions will be a great asset to the Town and broader region. In accordance with Section 2.2 of the Recreation Settlement Agreement, although we were not a party to the Flows and Fish Passage (FFP) Settlement Agreement, the Town has agreed not to oppose any of the terms of the FFP Settlement Agreement.

The river's use and management under the terms of the current and future licenses of the Turners Falls Project and Northfield Mountain Pumped Storage Project is of tremendous economic, cultural, recreational, and environmental consequence. In this context and that of the agreements referenced above, the Town wishes to offer the following concerns and recommendations to FERC relative to other proposed terms of the license. These concerns are intended to better address ongoing erosion, sedimentation, and invasive species issues in the Turners Falls Impoundment; to offer more appropriate levels of protection to traditional cultural and other historically significant assets; and to make allowance for essential public works projects over the term of this license.

The Turners Falls Impoundment (TFI) is a product of river management for the purpose of power generation under past, existing, and proposed future licenses. The land it occupies is not as it once was, but it remains a cradle of stored history of indigenous life in this region. Likewise, although the TFI is not reflective of what the river perhaps should be, it represents what the river actually is today and

the quality of its water and its ability to support rich and diverse life is equally significant and protected under the law. It is greatly valued by the residents of this region for a multitude of reasons.

In this context, the Town is concerned that the present license application compromises the ecology of our river by extending a broader than necessary range of operating elevation levels in the TFI (from 176 to 185 feet) and inadequately addressing invasive species. Further, the Town is concerned that a robust Traditional Cultural Properties Study has not been completed and believes the Historic Properties Management Plan should be allowed an extended period of consideration, with redacted copies made available to protect sensitive resource areas while also allowing public consideration.

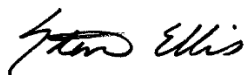
The Town will not seek to re-state the well-researched and reasoned technical findings presented by fellow stakeholders who have articulated concerns related to the above topics. We do, however, wish to highlight the Franklin Regional Council of Government's stated concerns and believe they are supported by credible technical analyses. Likewise, we see validity in MassWildlife's description of the impact of invasive species on the TFI, whose water quality is not sufficient to support the designated use of fish, other aquatic life, and wildlife due to impairment caused by invasives.

Above comments notwithstanding, the Town will elaborate on its concern regarding continuation of an allowable operating elevation range of 176' to 185' in the TFI, which makes accommodation for what would be considered extremely low water levels that have not been shown necessary to support past operations and which the applicant has suggested are not foreseeably necessary in the future. Such levels will have detrimental impacts on water quality, particularly but not limited to the Barton's Cove area, and will foster detrimental erosion and sedimentation of extant waterways and embankments.

The Town would argue that 179' is a sufficient low-end elevation threshold to operate under normal conditions, with clearly defined protocols to govern emergency conditions that might require lower levels. Absent this standard and procedure, the utility is empowered to take actions that would be detrimental to the TFI's water quality without good cause. It is FERC's obligation to manage such allowances in accordance with the balanced imperatives for water quality and power generation, both of which are also valued by the Town. The current proposal fails to achieve this balance.

As a final note, the Village of Turners Falls is a former industrial center with several blighted mills and bridges that are approaching the end of their useful life. Some are located in or adjacent to the FERC project area. Their removal or replacement will be necessary during the term of this license so as to protect the public, the Connecticut River and the Turners Falls Power Canal. The Town requests FirstLight and FERC's cooperation with ongoing efforts to remove or replace these structures and asks that this license specifically include a commitment to those entities' continued cooperation with needed projects, including a commitment to remove barriers to such projects wherever possible.

Respectfully,

A handwritten signature in black ink that reads "Steven Ellis". The signature is written in a cursive, flowing style.

Steven Ellis, MPA  
Town Administrator

CC: Montague Selectboard



# Office of the Town Administrator

Town of Montague

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May 29, 2024

Commissioner Bonnie Heiple  
MA Department of Environmental Protection  
100 Cambridge Street, Suite 900  
Boston, MA 02114

Re: Northfield Mountain Pumped Storage Project No. 2485-071  
Turners Falls Project No. 1889-085

**FirstLight Comments Submitted for Consideration by the Town of Montague**

Dear Commissioner Heiple,

The Selectboard of the Town of Montague, through its Town Administrator, hereby submits comments related to FirstLight Power's application to the Federal Energy Regulatory Commission (FERC) to relicense the Connecticut River hydroelectric facilities referenced as the Turners Falls Hydroelectric Project (P-2889) and Northfield Mountain Pumped Storage Project (P-2485).

The Town of Montague is a community of 8,600 located astride the eastern banks of the Connecticut River, which throughout history has served an extraordinary purpose in defining the life and prosperity of indigenous and modern residents. Turners Falls is the largest population center in the Town of Montague and is a designated Environmental Justice Area. The Town of Montague has standing with FERC relative to this license proceeding by virtue of a Motion to Intervene submitted on April 1, 2024.

The Town of Montague is a party to the Recreation Settlement Agreement filed with FERC on June 12, 2023. The Town fully supports the recreation provisions in the settlement agreement, but would note that in accordance with Section 2.2 of that agreement, although we were not a party to the Flows and Fish Passage (FFP) Settlement Agreement, the Town has agreed not to oppose any of the terms of the FFP Settlement Agreement. This will narrow the focus of concerns we express through this comment.

The river's use and management under the terms of the current and future licenses of the Turners Falls Project and Northfield Mountain Pumped Storage Project is of tremendous economic, cultural, recreational, and environmental consequence. In the context of the 401 Water Quality Certification Process, we will limit our comments to a focus on water quality, erosion, and invasive species issues in the Turners Falls Impoundment; to the protection to traditional cultural and other historically significant assets; and to allowances for the conduct of essential public works projects that may protect river health over the term of this license.

The Turners Falls Impoundment (TFI) is a product of river management for the purpose of power generation under past, existing, and proposed future licenses. The land it occupies is not as it once was, but it nonetheless remains a cradle for the stored history of indigenous life in this region.

Likewise, although the TFI is not reflective of what the river perhaps should be, it nonetheless represents what the river actually is, at the present time. We assert that the quality of its water and its ability to support rich and diverse aquatic life should receive full and equal protection under the law, consistent with protections to be afforded to sections of the river just upstream and downstream. We understand that the TFI is effectively being used as a “sacrifice zone” in this license application, to balance operational flows and levels both upriver and downriver. This approach devalues and underregulates the TFI, and could allow management practice inconsistent with the Clean Water Act.

In this context, the Town is concerned that the present license application compromises the ecology of our river by continuing to allow a broader than necessary range of operating elevation levels in the TFI (proposed to range from 176 to 185 feet) and inadequately addressing invasive species. Further, the Town is concerned that a robust Traditional Cultural Properties Study has not been completed and believes the Historic Properties Management Plan should be allowed an extended period of consideration, with redacted copies made available to protect sensitive resource areas while also allowing for broader public consideration. There is concern that continued allowance of conditions that provoke erosion may result in the loss of meaningful and irreplaceable cultural artifacts.

The Town will not seek to re-state the well-researched and reasoned technical findings presented by fellow stakeholders who have recently articulated concerns through filings to FERC that relate to the above topics. We do, however, wish to highlight the Franklin Regional Council of Government’s stated concerns relative to erosion in the TFI, which we find are supported by credible technical analyses and critiques of the applicability of B-STEM derived erosion modeling. Likewise, we see validity in MassWildlife’s description of the impact of invasive species on the TFI, whose water quality is not sufficient to support the designated use of fish, other aquatic life, and wildlife due to impairment caused by invasives.

To elaborate on the Town’s concern regarding continuation of an operating elevation range of 176’ to 185’ in the TFI, this range accommodates what would be extremely low water levels, which have not been shown necessary to support past utility operations and which the applicant itself has previously indicated are not foreseeably necessary in the future. Such levels will have detrimental impacts on water quality in the TFI, perhaps most notably in the Barton’s Cove area, and will encourage erosion and sedimentation of extant waterways and embankments.

The Town would argue that 179’ is a sufficient low-end elevation threshold to operate under the normal range of operating conditions, with clearly defined protocols to govern emergency conditions that might require lower levels. Absent this standard and procedure, the utility is empowered to take action that may be detrimental to the TFI’s water quality without good cause. It is regulators’ solemn obligation to manage such allowances in accordance with the balanced imperatives for water quality and power generation, both of which are also valued by the Town. The Town believes that the current application fails to achieve this balance.

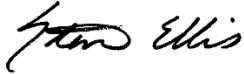
As a final note, the Village of Turners Falls is a former industrial center with several blighted mills and bridges that are approaching the end of their useful life. Some are located in or adjacent to the FERC project area. Their planned (non-emergency) removal or replacement will be necessary during the term of this license so as to protect the public, the Connecticut River, and the Turners Falls Power Canal. The Town requests FirstLight’s continued cooperation with ongoing Town efforts to remove or replace these structures in a planful manner, and asks that this license specifically include a



commitment to the license holder's continued cooperation with needed projects, including a commitment to minimize barriers and costs to such projects wherever possible.

Thank you for your agency's clear commitment to the integrity of the 401 Water Quality Certification process. Montague appreciates the opportunity for public input to the process and would be most pleased to assist the MA DEP in securing a location in the Turners Falls village center for your in-person public hearing in Fall 2024.

Respectfully,

A handwritten signature in black ink that reads "Steven Ellis". The signature is written in a cursive style with a large, stylized initial "S".

Steven Ellis, MPA  
Town Administrator

CC: Montague Selectboard  
Walter Ramsey, Assistant Town Administrator