

ORIGINAL

The River Residents Association

Dedicated to preserving a life worth living on a river worth loving

Montague ~ Gill ~ Northfield

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25 February 2013

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

RE: Connecticut River concerns -

- EXTREME WATER LEVEL FLUCTUATIONS
- CAMPSITE LICENSE TERMS

Turners Falls Project No. 1889-081

Northfield Mountain Pumped Storage Project No. 2485-063

Dear Commission,

I represent the people of the River Residents Association, as well as being a member. I own a cottage within the Project Lands, on the Horse Race section of the Connecticut River in Montague Massachusetts.

The Association is comprised of people who own camps, cottages, and homes along the river. There are 24 "licensed" sites on project lands, and, there are also private land owners, and members of private clubs that recreate on the Connecticut River within the Turners Falls/Northfield MA section of the river.

We are concerned for the future of this beautiful natural resource, as well as our existence along the rivers banks. We take exception to it being called the "lower reservoir" of the Northfield Mountain Pumped Storage project.

As many of us live on the river, we see things changing, sometimes on a daily basis.

Our major concern is the negative effects we see occurring from extreme erratic water level fluctuations.

The following are observations by people who live and recreate along the river. Many of us have spent decades here.

2013 FEB 28 A 11:00
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Observations included but not limited to -

- erosion along the shores
- loss of recreation areas that allowed boat access, now have no shoreline, only steep banks to climb
- lack of adequate tenting facilities
- silt and sediment buildup
- sand bars that come and go
- algae growth in Barton Cove
- damage to personal property at “low tides” – torque damage to docks, boats stranded rocks/stuck in mud
- wetland/cattail/marsh habitat changing/vanishing
- land mass loss to islands
- sand bank habitat and swallows gone
- beaches appear and disappear within hours
- backwaters/shallows/coves depths diminishing
- less heron, osprey and kingfisher sightings
- less dragonflies seen
- changes in fishing bounty
- Fish egg nests exposed at “low tides” drying out and dying
- Waterfowl breeding grounds unexpectedly become submerged and eggs rot or offspring drown

We believe everyone here wants to work together to ask the right questions and find effective solutions. We feel we, the river residents, are an integral part of this process.

Is there a way to create moderation, or eliminate altogether, dramatic water level fluctuations? Can it be, should it be, regulated differently? For the record, the Association strongly favors research into a “closed loop” system. It would be a true man-made reservoir that would no longer involve the river for the generation of electricity.

We have prepared a visual exhibit. We hope it will enlighten, and underscore some of the concerning observations we have stated.

Our other concern is about our continued existence as residents along the river. Most of us in this association are “Camp” owners with a “License” agreement allowing us to occupy the land.

Our existing structures are a historical use that began back in the early 1920’s and the previous licensees for these projects issued permits to manage their use. However, prior to 2008, the previous licensors did not seek Commission approval of these uses and occupancies of project property. Someone dropped the ball along the way. We owe great thanks to Mr. John Howard of the Northfield Mountain Pumped Storage facility for noticing this oversight. He realized there was no mention of the existing residential and private structures and took action to correct this. An application was filed in October

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2008, requesting Commission authorization to issue revocable 5-year licenses, as well as, life-use licenses (permits) for us on lands at the Northfield Mountain and Turners Falls

Hydroelectric Projects (FERC Project Nos. 2485-050 and 1889-069). The Commission granted an ORDER MODIFYING AND APPROVING NON-PROJECT USE OF PROJECT LANDS AND WATERS. It was issued October 28, 2009.

As licensees, we are mandated to do certain things, inspected once every year and be “in compliance” with the terms FirstLight Hydro Generating Company sets forth. As you can imagine, it’s unsettling to not know if all our love, sweat and money spent on our river homes will be for naught at the end of a 5-year license. The power company reaps many rewards using the river to generate power. For nearly 100 years our families have lived and recreated on this stretch of the river. My grandchildren are the 5th generation to grow up at our cottage, learning to swim in this river, fostering a love and respect for the natural world provided by this incredible watershed. We see ourselves as assets to this majestic waterway, and yet we have no reassurance that we’ll have any future past 5 years. It’s a very one sided situation and tenuous position to be in.

We act as caretakers, we are self appointed “Stewards.” We are the eyes and ears of the woods and waters. We investigate smoke sightings in the woods and have aborted forest fires, provide shelter and rides to people in canoes caught in storms, tow boaters out of gas or with broken engines and props, rescue anglers and others who fall over board and can’t swim, rescue kayakers who flip during cold water months, pick up countless amounts of trash after the “weekend warriors,” assist novice boaters and escort weary paddlers, rescue women in labor off the water to get to hospital, and sadly, even help search for bodies.

As proprietors of our footprints, we take seriously the investment in our lifestyle on the Connecticut River, both financially and emotionally. The majority of us have remodeled and made improvements to our properties. We have taken great pride in bettering our environments. We have given gladly and are gifted by the beauty, serenity and solitude the river offers. We delight in her recreational diversity. We celebrate family and friends, generation after generation. And, we continue on year after year in blind faith, that our 5-year licenses will be renewed. Does this seem equitable?

We realize we make the assumption that you, the Federal Energy Regulatory Commission and FirstLight Hydro Generating Company, want us to remain on project lands. It would be nice to know how you actually view us. What laws, if any, protect our interests?

We’d like a clearer understanding of how the licenses are administered. We’ve been under the impression that FERC governs over the use of the lands. However, according to the language in the “Order” approving use of project lands dated October 2009, it appears that FirstLight Hydro Generation Company makes the decisions governing us, the licensor’s. Does FERC have any say in our interests? Is there a liaison within the FERC organization that can work with our Association in helping us better understand our rights

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and responsibilities? How can we alter the current arrangement to meet our present and future needs?

We respectfully ask for consideration in lengthening the license term commensurate to the number of years approved for FirstLight Hydro Generation Company's new license to operate beginning in 2018. What is the procedure to effectuate this?

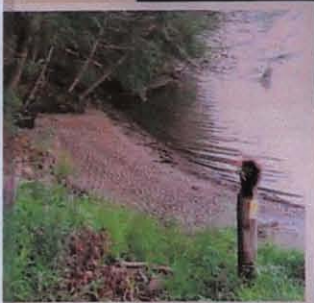
We endeavor to continue to assist and promote an ongoing cooperative relationship with all parties interest in mind. We are dedicated to a life worth living on a river worth loving. We thank you for your time and respectfully submit this inquiry and photographs to the Commission.

Sincerely,

A handwritten signature in cursive script, reading "Leena Newcomb". The signature is written in black ink and is positioned above the printed name and address.

Leena Newcomb
The River Residents Association
Montague ~ Gill ~ Northfield
Massachusetts

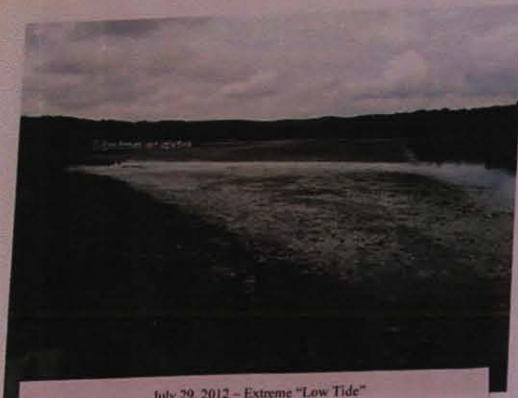
Connecticut River Watershed
Turners Falls/Northfield pool
Submitted to FERC at Scoping Meeting
30 January 2013
by
The River Residents Association
Box 405
Montague MA 01351



Summer 2011 - Average Summer Water Levels #7E



Summer 2011 - Dramatic "Low Tide" - upstream from TF Rod & Gun Club
Montague MA - Cottage #7E waterfront



July 29, 2012 - Extreme "Low Tide"
Barton Cove, Gill MA
MA State Public Boat Ramp, Franklin County Boat Club
Barton Cove Camping & Recreation Area



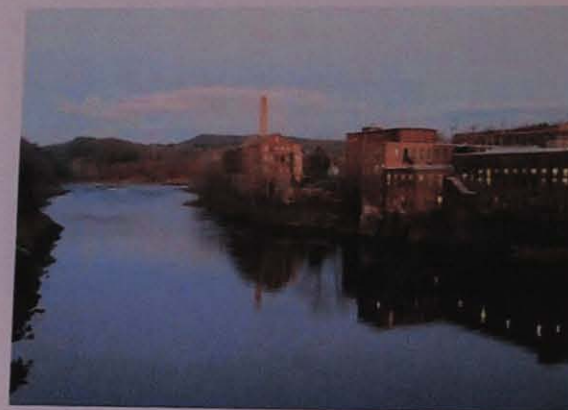
The ByPass Channel - "THE DEAD REACH"
Looking south from the Greenfield/Montague Bridge by the canal
November 2012



The ByPass Channel - "THE DEAD REACH"
Looking south from the Greenfield/Montague Bridge by the canal
October 2012



July 29, 2012 - Extreme "Low Tide" - Barton Cove, Gill MA
Very limited boating access, alarmingly limited Emergency Rescue access.
T.V. Channel 22 News aired from Turners Falls Rod & Gun Club due to
extreme low water and poor access from all launching sites from
Gill/Montague MA Dam up river to Vernon VT Dam



The ByPass Channel - "THE DEAD REACH"
Below the Montague/Gill Dam
Old paper mill buildings, Turners Falls Village MA
Looking north from the Montague/Greenfield Bridge by the canal
November 2012



The ByPass Channel - "THE DEAD REACH"
Looking north from the Greenfield/Montague Bridge by the canal
October 2012



January 2012 - Extreme "Low Tide"
Franklin County Boat Club, Barton's Cove, Gill MA



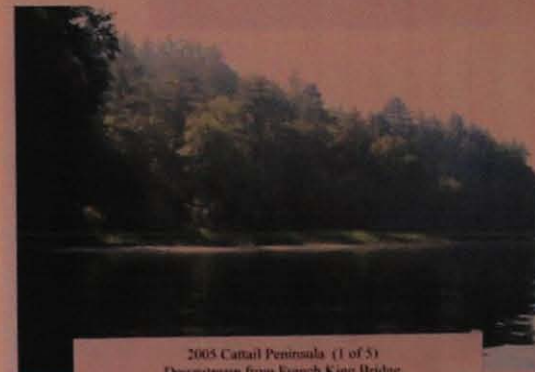
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Summer 2011
Captain Kids Island beach area
Note the floating milk bottle stump marker
Northfield MA



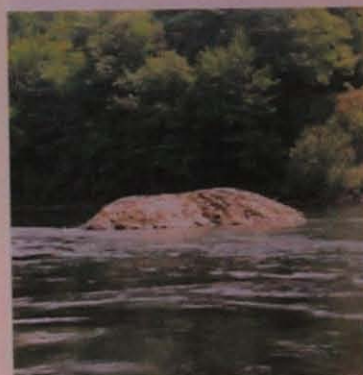
Summer 2008
Shoreline at cow pastures south of Captain Kids Island
Gill MA



2005 Cattail Peninsula (1 of 5)
Downstream from French King Bridge
Gill MA



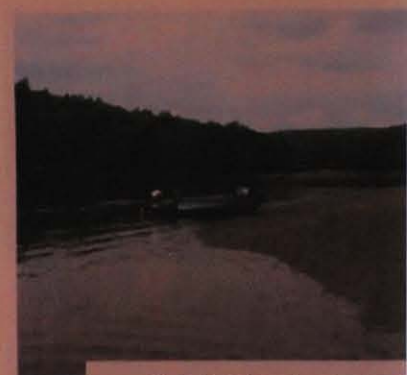
Summer 2011
Captain Kids Island beach area
Stump referenced below
Northfield MA



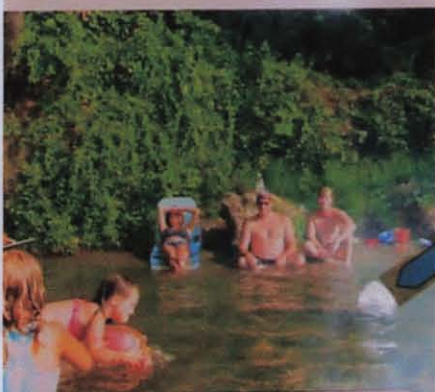
2009
French King Rock



2005 Cattail Peninsula (2 of 5)
Gill MA

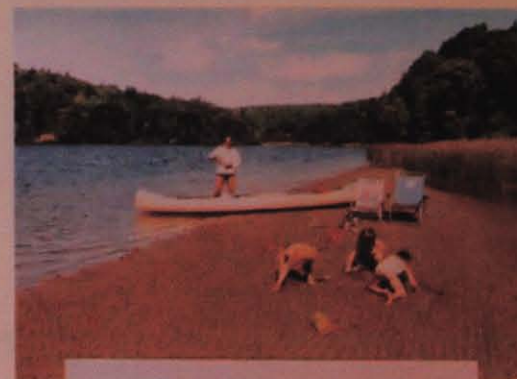


2007 - Cattail Peninsula and Sandbar (3 of 5)
Gill MA

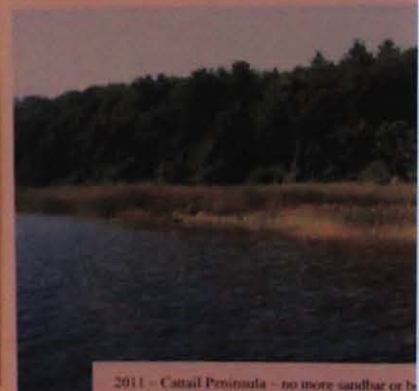


Summer 2012
Captain Kids Island Beach area
as 8 ft of beach depth when we tied our boats up to picnic.
d, we had to keep moving our chairs backwards away from the
rising water.
Northfield MA

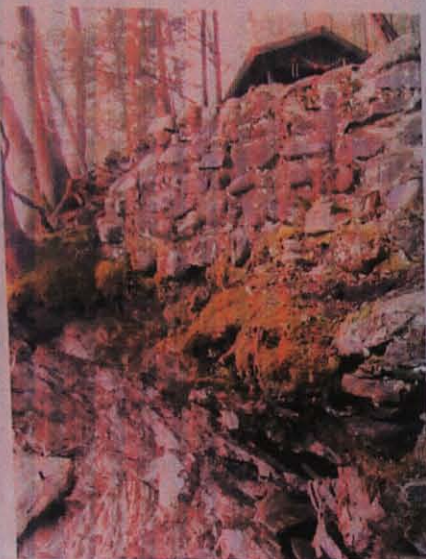
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2007 - Cattail Peninsula and sandbar (4 of 5)
Downstream from French King Bridge
Gill MA



2011 - Cattail Peninsula - no more sandbar or bar
Downstream from French King Bridge
Gill MA



Fall 2012 - Erosion at Stone Wall - no vegetation

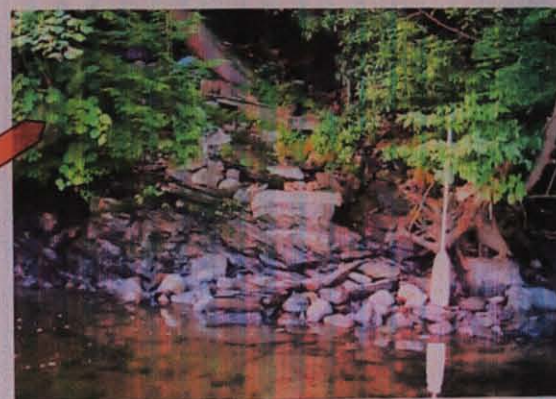


Summer 2005 - Waterfront on the "Horse Race"
Root Stump with vegetation - Stone Wall obscured by trees - Site # 14E



Summer 2010 - Cottage Waterfront
Root Stump (submerged) with hemlock tree
Site # 14E

2010: Northfield Mountain is not operational from May to end of November. A planned outage into a debris, as sediment picked up the wires when they drained the upper reservoir. The 20 dumped sediment from late May to early August to try to free up their wires until an ERO case. A debris river prevented them from dumping further.



Summer 2010 - Root Stump Erosion, hemlock tree barely holding on
On the "Horse Race" - Montague MA



Summer 2009 - "Low Tide" day - Site #14E
Stone wall visible with some vegetation



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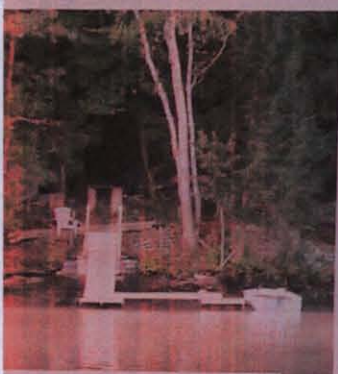
Summer 2012 - Root Stump Erosion, hemlock tree gone
On the "Horse Race" - Montague MA



August 2012 - Average Water Level
Site #14E Montague MA



July 2011 - Extreme "Low Tide" day MORNING
Silt deposits from 2010 when Nfld. Pumped Storage flushed their reservoir



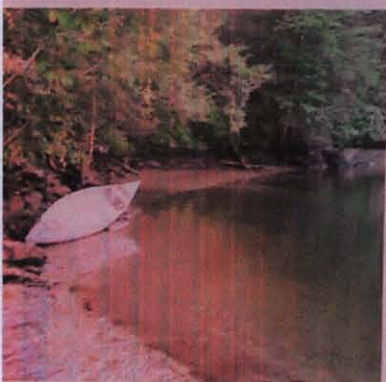
Summer 2008 - "Low Tide"
Site #14E Montague MA



July 2011 - Extreme "Low Tide" day AFTERNOON
Silt washes away as tide rises all day and boat traffic wakes increase



Site #14E - Montague MA



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This river
Is Our
Legacy!
From
Our
Grandparents
To
Our
Parents
To us
And on
Into the
Future
To Our
Grandchild
And their
Children's
Children...



January 2013
Looking north from shore in Gill
Southern tip of Captain Kids Island on the right



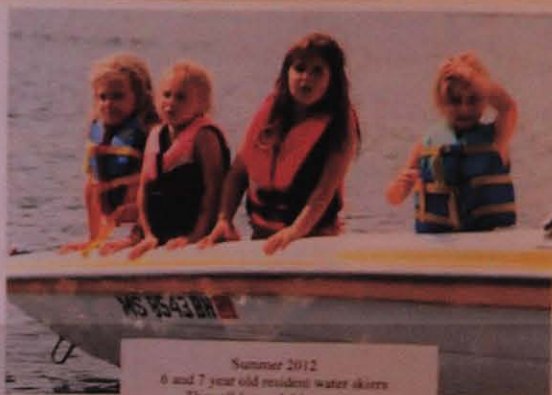
Earl Newcomb Camp circa 1934
This handmade sign has hung at the property
in honor of Earl's 1st wife, Bernadine "Bunny" (Cotton) Newcomb
Deceased 1953



Winter 2009 - Mute Swans
Cygnets, the Cob and his Pen
Montagut MA

ON THE RIVER
WITHIN THE SANCTUARY OF BUNKUM
IN THE SOLITUDE OF THE LAUREL
PEACE WAS FOUND
NEWK AND ELKIE
MARRIED 50 YEARS

On the back of cemetery stone
Earl Newcomb then married Eleanor "Elkie" (Cotton) Newcomb
who was Bunny's sister. After 50 years of marriage
Earl & Eleanor both died the summer of 2004



Summer 2012
6 and 7 year old resident water skiers
They all learned this summer



1978 - Earl Newcomb Camp #14E
circa 1934