



MASSACHUSETTS FARM BUREAU FEDERATION, INC.

"The Voice of Agriculture"

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February 25th, 2013
Kimberly D. Bose, Secretary
Federal Energy Regulatory Commission
88 First Street, N.E.
Washington, DC 20426

RE: Northfield Mountain Pumped Storage Project, FERC Project No.2485,
Docket p-2485, sub docket 63

Dear Secretary Bose,

As president of the Massachusetts Farm Bureau Federation I represent approximately 6,000 members statewide. It is on behalf of these members that I write to you concerning issues with water withdrawals by farmers, and the permitting of First Light Power Generation for their operation on the Connecticut River in Massachusetts.

The issue boils down to the permit, and the authority given to the holder in allowing or disallowing other parties to withdraw water from the river. Under the provisions of the previously issued permits for this facility (held by a number of different entities), this has been a contentious issue with local farmers and was tied up in an ongoing legal exchange. Farmers are legitimately concerned that the license holder would prohibit them from withdrawing water during periods of drought, putting crops, livestock, and the farmer's livelihood at risk.

It would seem inherently unfair to that one private party would be granted decision-making power over another in determining which has access to public, natural resources. A better alternative would be to defer to existing state statutes and regulations in Massachusetts governing water withdrawal. The Massachusetts regulatory system relative to water withdrawals is objective and designed to balance the need for water withdrawal against environmental concerns and between parties competing for water access.

We ask that you do not include provisions in the above-mentioned permit which would allow the holder to govern water withdrawals. Instead, we ask that you defer to the regulatory system already in place and governed by the Commonwealth of Massachusetts.

On behalf of the agricultural community in Massachusetts, I appreciate your consideration.

Sincerely,

A. Richard Bonanno, Ph.D.
President