

TOWN OF NORTHFIELD

Conservation Commission

69 Main Street, Northfield, Massachusetts 01360

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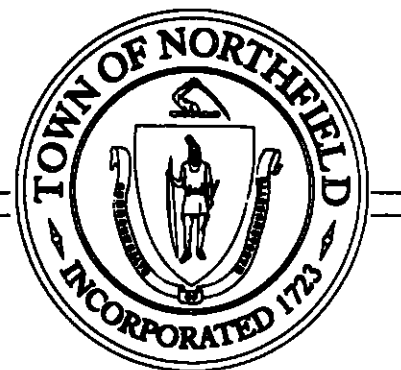
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February 22, 2013

To: U.S. Federal Energy Regulatory Commission

From: Northfield Conservation Commission

69 Main St.

Northfield, MA 01360

Re: application for re-licensing of the Northfield Mountain Pumped Storage Project (P-2485-063), the Vernon Project (P-1904-073) and the Turners Falls Project (P-1889-081)

Submitted by Joan Deely on behalf of the Northfield Conservation Commission

The Northfield Conservation Commission serves the Town of Northfield, MA. Ours is the only community in the entire watershed that is bisected by the Connecticut River, which flows past prime farmland on both sides.

Consequently, the health and function of the river, and its impact on our lands, are of great importance to us.

The public-access boat ramp in Northfield is often inaccessible to boats due to extreme fluctuations in water levels on the river. This is a critical point of entry for emergency responders from the Northfield Dive Team, which plays an important role in the safety of recreational boaters and citizens alike.

Our daily lives are impacted by the three project referenced above.

We are keenly interested in identifying and implementing solutions that protect prime farmland, structures, and other natural resources, not only in Northfield, but in all the communities along the Turners Falls Pool.

Since the new licenses for the three projects will be valid for 30 to 50 years, we all have a "once in a lifetime" opportunity to participate in the process to identify, evaluate and mitigate the environmental impacts of these projects.

It is vital for the residents and municipalities of Franklin County to be actively represented and engaged in the relicensing process to ensure that the health and vitality of the river is sustained; to protect the region's treasured prime farmland, riparian and aquatic habitat for rare and endangered species; to ensure the safety of those using the river for recreation; and to make sure that recreational areas and facilities are maintained. We hope that FERC will hold the owner of the hydroelectric projects to high standards and expectations.

We have been and continue to be concerned with the frequent and significant water level fluctuations associated with the operation of the Northfield Mountain Pumped Storage and Turners Falls projects, which result in streambank erosion and impacts to water quality, threatened and endangered species, fisheries, wetlands, and riparian and littoral habitat. In particular, we believe that the Northfield Mountain Pumped Storage project and its operational use of the Connecticut River have been a long-term “experiment” that has resulted in significant adverse environmental impacts.

Our regional economy benefits from the number and variety of recreational resources associated with the projects. We appreciate the applicant’s efforts to maintain and enhance the projects’ recreational opportunities over the years. We encourage the applicant to continue their stewardship and to proactively engage with local towns and regional groups to expand and enhance the recreational opportunities, which in turn will help to strengthen the economy of Franklin County. Tourism is important to the economy of Franklin County, which is one of the poorest counties in the state.

We now have an opportunity to seriously consider the benefits of taking the river “off-line” and creating a closed-loop lower reservoir that would address most of the environmental impacts and specific resource concerns raised by Federal and state agencies and stakeholders.

We believe that the magnitude of river alteration caused by these projects, along with the complexity of issues involved and controversies about the best approaches to maintain power generation while not decimating aquatic communities and other natural resources, fully warrants an Environmental Impact Statement (EIS) under NEPA. We endorse FERC’s approach to developing a single EIS for the five Connecticut River hydroelectric facilities to evaluate their individual and cumulative impacts on the river ecosystem. Now is the best opportunity in the near and long term to look at all these facilities holistically.

We have expressed our concerns about the methodology, findings and conclusions of the 2008 Full River Reconnaissance to FirstLight and FERC. We want to reiterate our concerns here, and state that accurate data and a reproducible methodology are essential for documenting the type and stage of erosion in the pool, and for evaluating whether the pace of erosion control work is keeping up with the rate of erosion. We request that the relicensing record reflect our continuing objections to the findings of the 2008 FRR, and specifically, our objections to including statements in the PAD that reference the 2008 FRR, and all of the text on page 4-12 of the section *4.2.4.2 Shoreline and Streambank Characterization*.

Concerns of the Northfield Conservation Commission include the following:

- The original purpose of the hydro-electric plant was to generate electricity. The project seems to have deviated from its original purpose, which begs the question: What is the rationale for the Pumped Storage Project now?

- We support the idea of a study that explores the effects of deregulation, and would be interested in contributing to it.
- Regarding the stated intent to add more water to the storage area, we want to see objective, detailed studies of the projected impacts on the river, on water quality, on river ecology, and on streambank erosion. If the increase in storage capacity results in increased profits how will the utility pass along that benefit to affected communities and offset anticipated environmental impacts?
- We encourage FirstLight to seriously research a closed loop system for pumped storage facility.
- We acknowledge that mitigation of streambank erosion on both sides of the river in Northfield has been on-going, although often at a glacial pace that doesn't keep pace with the constant need for mitigation. We urge the utility to commit more resources and expertise to this work, rather than continue unproductive wrangling over the causes of the damage.

Thank you for this opportunity to address the Commission with our concerns.

Sincerely,

Bill Llewelyn

Bill Llewelyn, Chair
Northfield Conservation Commission

Cc: Franklin County Regional Council of Governments

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