

ORIGINAL

# The River Residents Association

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

Montague ~ Gill ~ Northfield

Box 405 Montague MA 01351

707 548 4817

bleenanew@gmail.com

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,

Robert & Linda Emond  
Camp 7E - West Camp Road  
Montague, MA 01351

I am a member of The River Residents Association. 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.

#P 1889-081  
#P 2485-063

SECTION 10 OF THE  
CONNECTION  
2013-05-A-012

## **Page 2 of 4 – River Residents Association**

**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**

## Page 3 of 4 – River Residents Association

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 5<sup>th</sup> 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,**

**The River Residents Association  
Montague ~ Gill ~ Northfield  
Massachusetts**

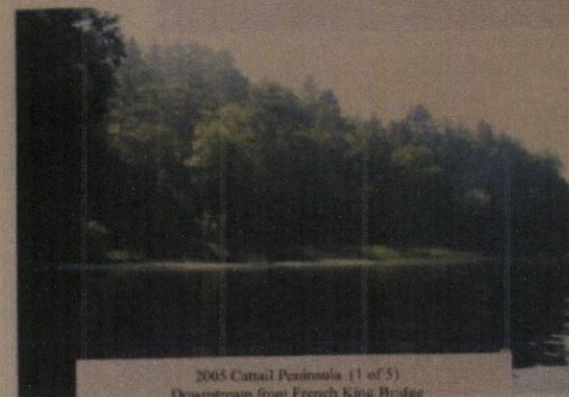




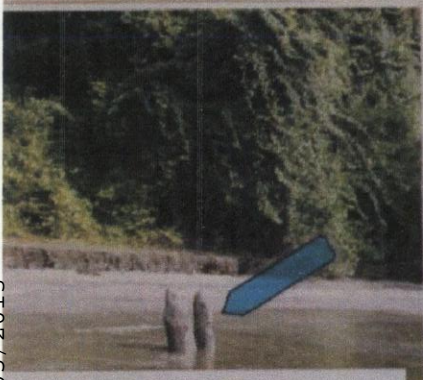
Summer 2011  
Captain Kids Island beach area  
the floating milk bottle stump marker  
Northfield MA



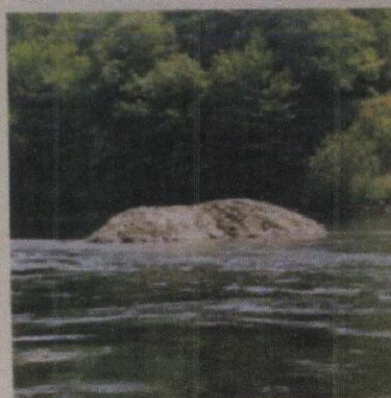
Summer 2008  
Shoreline at cow pastures south of Captain Kids Island  
Gill MA



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



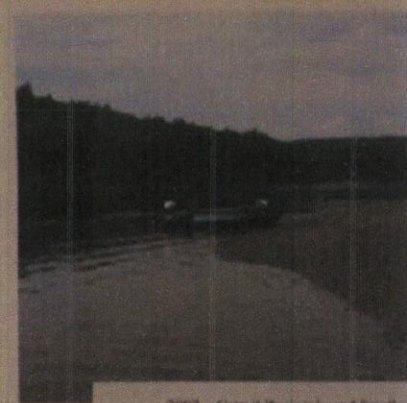
Summer 2011  
Captain Kids Island beach area  
Stump referenced below  
Northfield MA



2009  
French King Rock



2005 Cattail Peninsula (2 of 5)  
Gill MA

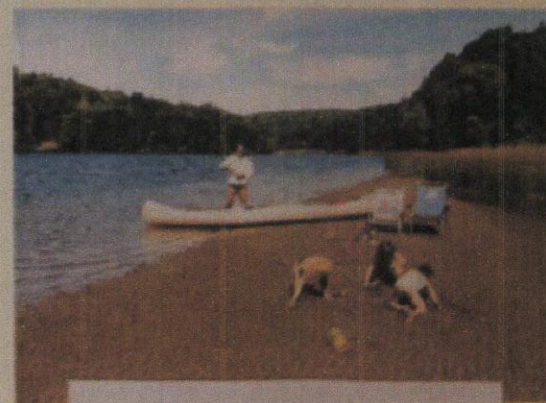


2007 - Cattail Peninsula and Sandbar  
Gill MA



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

Connecticut River Watershed  
Turners Falls/Northfield pool  
Submitted to FERC at Scoping Meeting  
30 January 2013  
by  
The River Residents Association  
Box 405  
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2007 - Cattail Peninsula and sandbar (4 of 5)  
Downstream from French King Bridge  
Gill MA

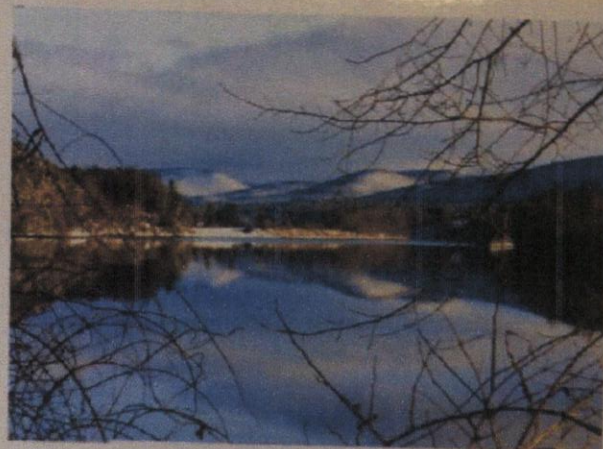


2011 - Cattail Peninsula - no more sandbar  
Downstream from French King Bridge  
Gill MA

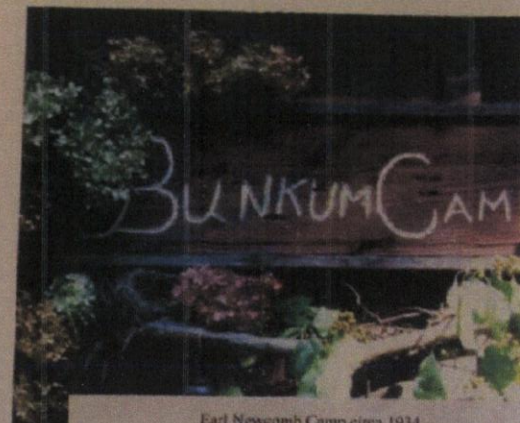




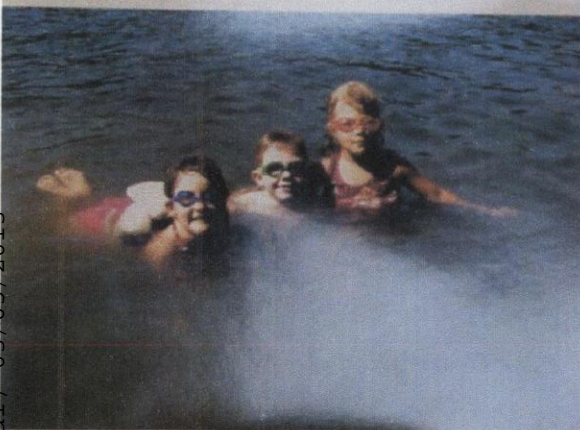
This river  
Is Our  
Legacy!  
From  
Our  
Grandparents  
To  
Our  
Parents  
To us  
And on  
Into the  
Future  
To Our  
Grandchild  
And their  
Children's  
Children...



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



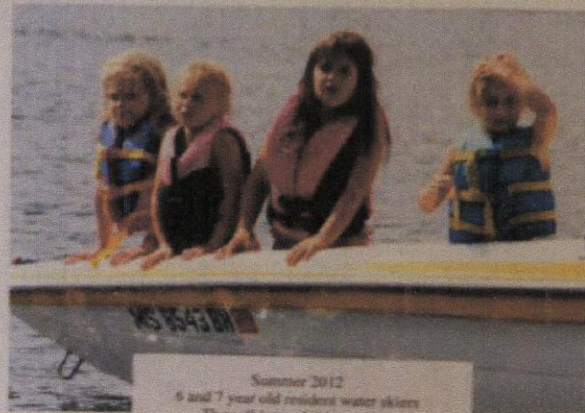
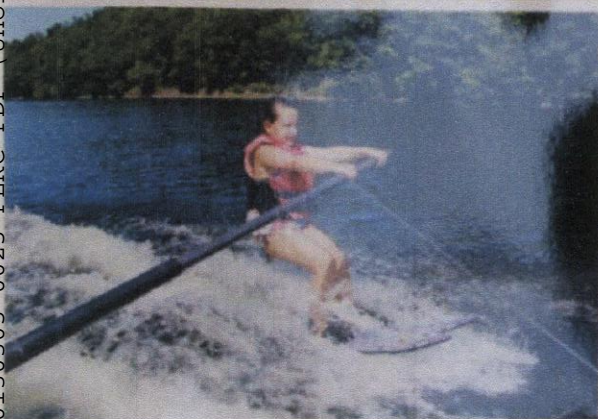
Earl Newcomb Camp circa 1934  
This handmade sign has hung at the property  
in honor of Earl's 1<sup>st</sup> wife, Bernadine "Bunny" (Cotton) Newcomb  
Deceased 1953



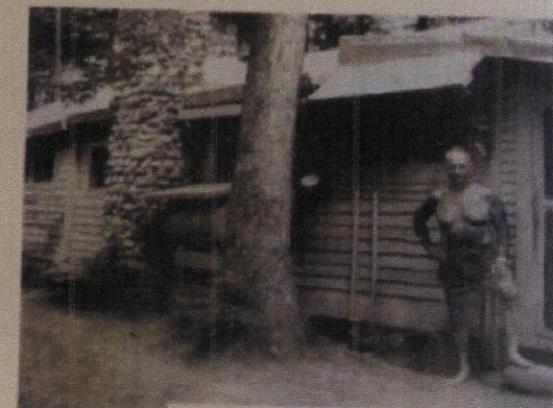
Winter 2009 - Mute Swans  
Cyghet, the Cob and his Pen  
Montague MA

ON THE RIVER  
WITHIN THE SANCTUARY OF BUN  
IN THE SOLITUDE OF THE LAUR  
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



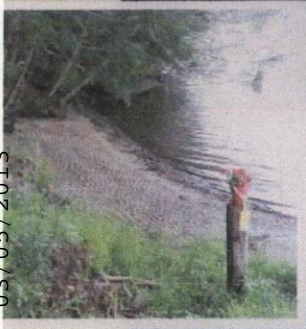
Summer 2012  
6 and 7 year old resident water skiers  
They all learned this summer



1978 - Earl Newcomb Camp #140  
circa 1934



Connecticut River Watershed  
Turners Falls/Northfield pool  
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Summer 2011 - Average Summer Water Levels #7E



Summer 2011 - Dramatic "Low Tide" - upstream from TF Rod & Gun Club

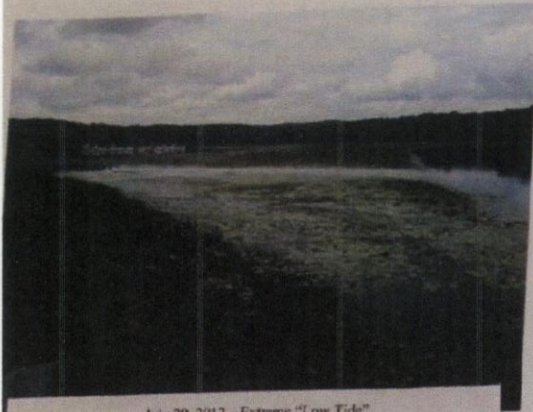


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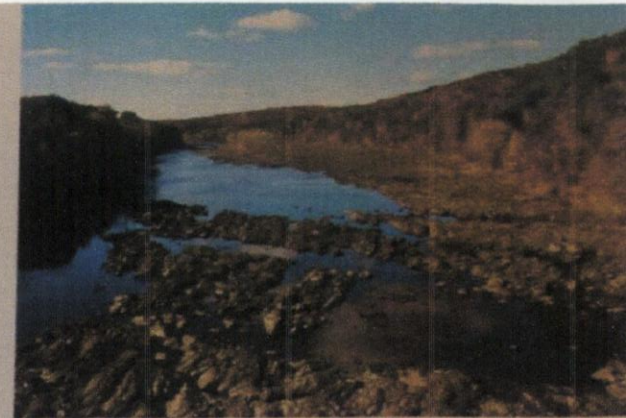




July 29, 2012 - Extreme "Low Tide"  
Barton Cove, Gill MA  
MA State Public Boat Ramp, Franklin County Boat Club  
Barton Cove Camping & Recreation Area



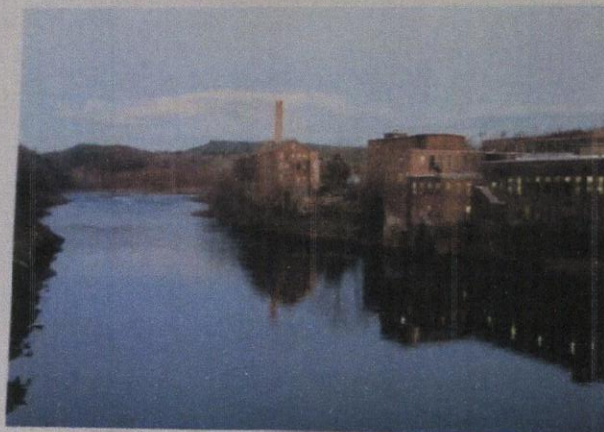
The ByPass Channel - "THE DEAD REACH"  
Looking south from the Greenfield/Montague Bridge by the canal  
November 2012



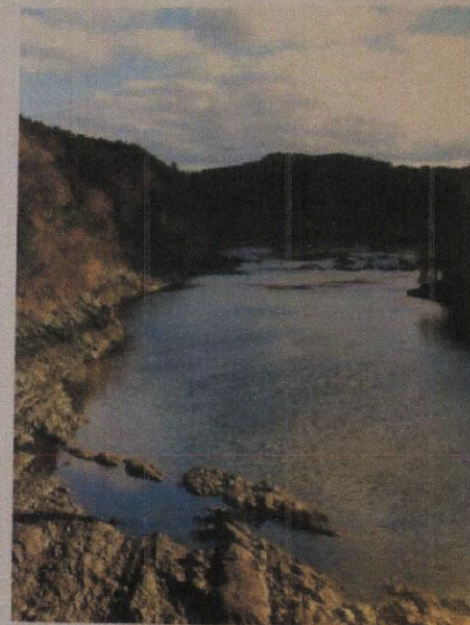
The ByPass Channel - "THE DEAD REACH"  
Looking south from the Greenfield/Montague Bridge by the canal  
October 2012



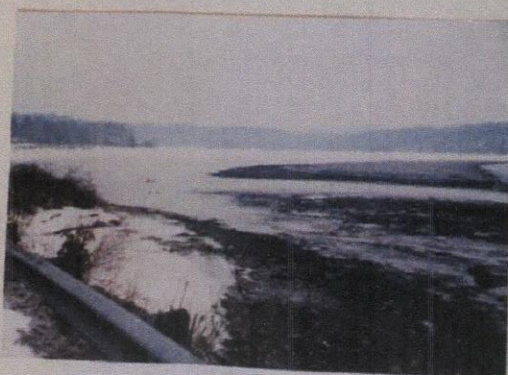
July 29, 2012 - Extreme "Low Tide" - Barton Cove, Gill MA  
Very limited boating access, alarmingly limited Emergency Rescue access.  
T.V. Channel 22 News aired from Turners Falls Rod & Gun Club due to  
extreme low water and poor access from all launching sites from  
Gill/Montague MA Dam up river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



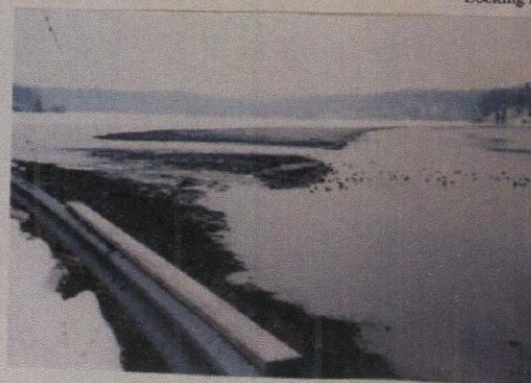
The ByPass Channel - "THE DEAD REACH"  
Below the Montague/Gill Dam  
Old paper mill buildings, Turners Falls Village MA  
Looking north from the Montague/Greenfield Bridge by the canal  
November 2102



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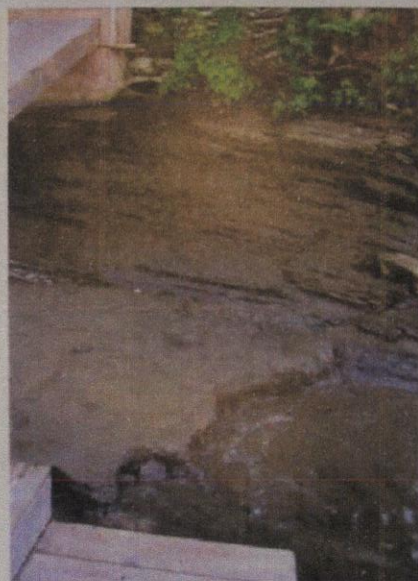
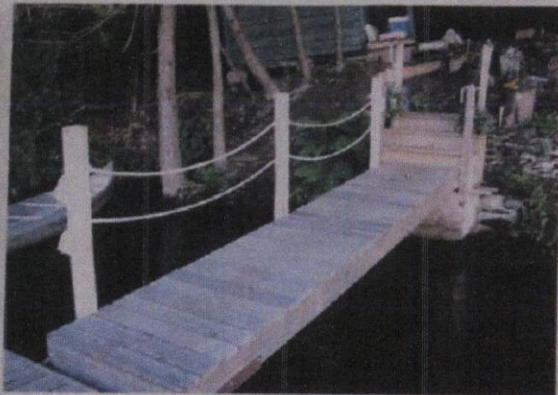
August 2012 - Average Water Level  
Site #14E Montague MA



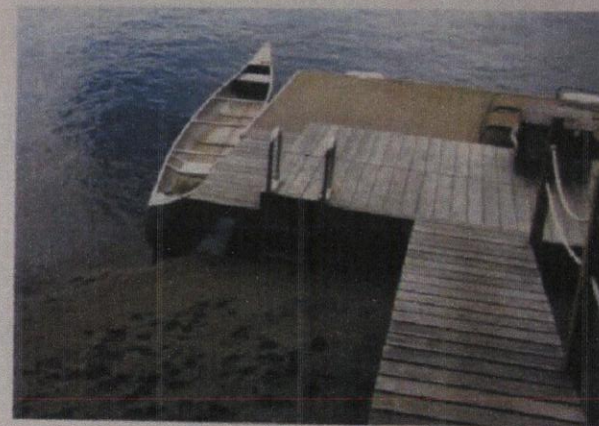
July 2011 - Extreme "Low Tide" day MORNING  
Silt deposits from 2010 when Nfld. Pumped Storage flushed their reservoir



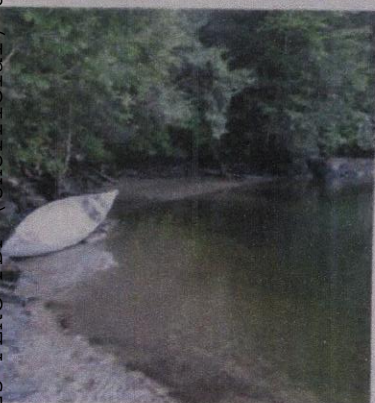
Summer 2008 - "Low Tide"  
Site #14E Montague MA



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

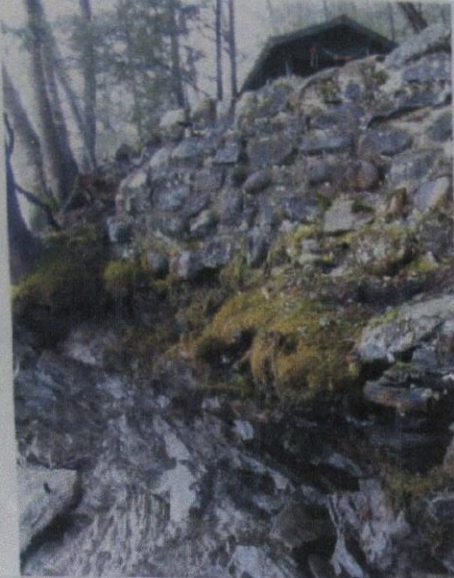


Site #14E - Montague MA



**Connecticut River Watershed**  
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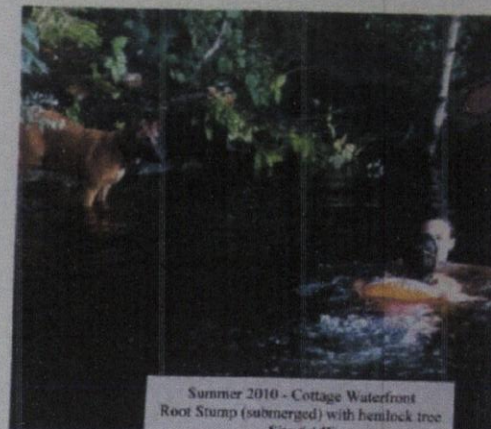




Fall 2012 - Erosion at Stone Wall - no vegetation



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

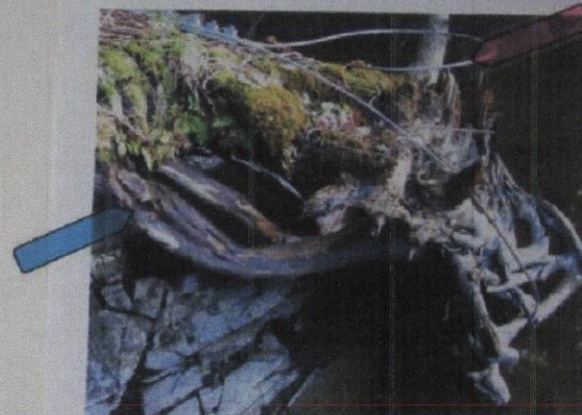


Summer 2010 - Cottage Waterfront  
Root Stump (submerged) with hemlock tree  
Site # 14E

2010: Northfield Mountain's root operations from May to end of November. A planned  
into a debate, as sediment gushed up the works when they drained the upper reservoir.  
dumped sediment from 12 to May to early August to try to free up their works until an EPA  
delist order prevented them from dumping further.



Summer 2009 - "Low Tide" day - Site #14E



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



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



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