



CONNECTICUT RIVER WATERSHED COUNCIL
The River Connects Us

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June 17, 2013

Kimberly D. Bose, Secretary
Federal Energy Regulatory Commission
888 First Street, N.E., Room 1A
Washington, DC 20426

Re: Support for the Extension of time request by the US Fish and Wildlife Service
to Comment on Proposed Study Plans

Dear Secretary Bose:

The Connecticut River Watershed Council is filing this letter in support of the US Fish and Wildlife Service request for an extension of time from the current scheduled deadline of July 15 until July 30, 2013 to provide final comments on the Draft Proposed Study Plans (PSP) being developed for the Turners Falls (FERC No. 1899), Northfield Mountain Pumped Storage (FERC No. 2485), Vernon (FERC No. 1904), Bellows Falls (FERC No. 1855), and Wilder (FERC No. 1892) projects.

Although both applicants filed their plans on time, the review of the proposed plans begun in April included 15 stakeholder meetings. Because of those meetings, substantial changes to the initial study proposals are likely and a much greater level of detail will be added to all the PSPs. The redrafting of the PSPs is underway now but the new drafts have not been released and all the changes will need to be reviewed again, comments written and submitted under the current schedule by the July 15 deadline, a difficult deadline to meet without any interruptions.

But, simultaneous with the PSP development and review, Firstlight has been developing a final detailed Instream Flow Study Plan (IFSP) that will be conducted this summer/fall. Firstlight is also requesting comments on their revised IFSP and has coordinated with the interested parties to schedule the initial fieldwork for the study for the week of July 7.

CRWC believes it is necessary to participate in the field reconnaissance portion of the Instream Flow Study at the Turners Falls Project. Firstlight anticipates the field reconnaissance will take at least three full days to complete leaving even less time to develop thorough comments on the PSPs. The IFSP review and fieldwork will limit the time CRWC staff can dedicate to the PSP reviews.

Consequently, we support the USF&W Service request for a delay in the date for filing comments to July, 30 for comments on the PSPs.

Sincerely

David Deen River Steward

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