



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

Re: Northfield Mountain Pumped Storage Project No. 2485-063
Turners Falls Project No. 1889-081
Comments on the Revised Study Plan

Dear Secretary Bose:

On behalf of the Massachusetts Department of Conservation and Recreation, I am pleased to submit the following comments relative to the relicensing for the Northfield Mountain 2485 and Turners Falls 1889 projects.

The Massachusetts Department of Conservation and Recreation (DCR) is the state resource agency charged with the protection, promotion and enhancement of the state's common wealth of natural, cultural and recreational resources.

These projects proposed use of the public's hydrologic and terrestrial resources for the purpose of commercial power generation has significant impacts on the hydrologic, aquatic, riparian, terrestrial, cultural, water-based recreational, and land-based recreational resources locally, regionally and at a state-wide level.

The DCR owns or manages specific interests within and adjacent to the project area that are potentially impacted by the future license and operation of these projects:

- The Connecticut River Greenway
- The Connecticut River Water Trail
- The Canalside Bikepath
- The Great Falls Discovery Center
- Parcels of land bordering the Turners Falls / Northfield Mountain pool
- Parcels of land along the river below the Turners Falls Dam
- The New England National Scenic Trail (NET)
- Erving State Forest

COMMONWEALTH OF MASSACHUSETTS · EXECUTIVE OFFICE OF ENERGY & ENVIRONMENTAL AFFAIRS

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Timothy P. Murray
Lt. Governor

Richard K. Sullivan Jr., Secretary
Executive Office of Energy & Environmental Affairs

Edward M. Lambert Jr., Commissioner
Department of Conservation & Recreation

The DCR also has interest in protecting, promoting and enhancing the additional following interests:

- Aquatic resources within the Connecticut River and its tributaries
- Riparian and terrestrial habitats along the Connecticut River
- Scenic and aesthetic values along the Connecticut River, and from high ground in the region
- Non-motorized and motorized water-based recreational opportunities including canoeing, kayaking, white-water paddling, motor boating, and shoreline camping
- Non-motorized and motorized land-based recreational opportunities, including hiking, cross-country skiing, mountain biking, rock climbing, equestrian riding, camping, snowmobiling and OHV riding
- Above and below-ground historic and pre-historic cultural sites and resources

The DCR has reviewed the Revised Study Plan and would like to express the following concerns and comments:

Section 3.1 Geology and Soils:

As both a state resource agency and land owner along the Connecticut River within the project boundary, the DCR concurs with the comments of the Connecticut River Watershed Council and others regarding:

- 3.1.1 2013 Full River Reconnaissance Study
- 3.1.2 Northfield Mountain/Turners Falls Operations Impact on Sediment Transport

Section 3.6 Recreation and Land Use:

Despite multiple comments from various stakeholders, the licensee has refused to develop study methodologies in this section that will allow them, FERC or stakeholders to sufficiently address the primary issues identified either in the PAD or the Scoping Document 1. Specifically, the studies proposed under this section will not be able to assess the “projected future use of recreation facilities,” or more importantly, the “Adequacy of existing recreation and public use facilities in meeting existing and future regional public use and river access needs” (Scoping Document 1).

The studies as designed reflect a minimal desire to simply capture levels of existing recreation at formal recreation sites, and will not allow the licensee to understand or adequately address local or recreational demand or potential demand for recreation that is not currently available or that has been negatively impacted by the projects.

The Revised Study Plan's cost estimates and reasons for not conducting a regional recreational demand survey appear to demonstrate a lack of understand social science research tools and methods. As noted in the comment from the National Park Service, residents of the region could be randomly sampled through either mail or phone survey tools at a fraction of the cost suggested and such sample surveys would generate statistically valuable results. Finally, review of state-wide documents, such as the SCORP, as suggested in the RSP will be inadequate to assess local and regional recreational demand or potential demand.

As a result, FERC and the licensee will have to accept stakeholder assertions of recreational demand and potential demand as the re-licensing process moves forward.

The DCR further concurs with the comments of the National Park Service relative to:

- 3.6.1 Recreation Use/User Survey
- 3.6.4 Assessment of Day Use and Overnight Facilities Associated with Non-motorized Boats
- 3.6.5 Land User Inventory
- 3.6.6 Assessment of Project Operations on Recreation and Land Use
- 3.6.7 Recreation Study at Northfield Mountain, including Assessment of Sufficiency of Trails for Shared Use

Please feel free to contact me with any additional questions.

Sincerely,



Paul Jahnige,
Director, DCR Greenways and Trails Program

Document Content(s)

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