



New Hampshire Fish and Game Department

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Glenn Normandeau
Executive Director

August 28, 2013

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

RE: Integrated Licensing Process for the Relicensing of the Turners Falls (FERC No. 1889) and Northfield Mountain (FERC No. 2485) Projects - Impacts of Closure of Vermont Yankee Nuclear Power Plant on Results of Proposed Study Plans

Dear Secretary Bose:

As the agency responsible for protecting fish and wildlife resources in New Hampshire, the New Hampshire Fish and Game Department (NHFGD) monitors and attempts to reduce the impacts of hydroelectric facilities on fish and wildlife species and their habitats. The mission of the NHFGD is to conserve, manage and protect the state's fish, wildlife and marine resources and their habitats, and to provide the public with opportunities to use and appreciate these resources.

As you may be aware, it was announced on August 27, 2013 that the Vermont Yankee Nuclear Power Plant will be closing in the "4th quarter of 2014." Vermont Yankee is located just upstream of the Vernon Dam in Vernon, Vermont and has the potential to influence the aquatic communities in sections of the Connecticut River within the boundaries of projects owned by FirstLight (Northfield Mountain FERC Project No. 2485 and Turners Falls FERC Project No. 1889) through two primary mechanisms: the discharge of heated effluent into the Connecticut River and the impingement and entrainment of organisms at the system's cooling water intake structure.

Accordingly, the relevance of results obtained from some of the study plans proposed by FirstLight for the 2014 field season may not be valid moving forward. For example, results of studies examining migration and movement of adult and juvenile shad during 2014 (with Vermont Yankee thermal discharge) may be quite different from results obtained if these studies were conducted in 2015 (without Vermont Yankee thermal discharge). As another example, Vermont Yankee entrains and impinges a large number of fish each year; Vermont Yankee entrained an estimated 61.5 million larval fish during a 26-week period (April 2006 to September 2006) and impinged 38,604 fish over a 20-month sampling period (March 2005 through November 2006). Any fish assemblage study results would likely be influenced by the presence or absence of this impingement/entrainment, as it is likely some of these fish would have moved downstream of Vernon Dam if they had not been impinged/entrained.

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We are seeking Commission guidance regarding how to address this issue in the context of the Integrated Licensing Process timeline (which affords two years of study, beginning in 2014). Comments on FirstLight's Revised Study Plan (RSP) are due on August 29, 2013. The stakeholders only learned of Vermont Yankee's closing on August 27, 2013. This does not provide sufficient time to evaluate which proposed studies are most likely impacted, nor time to develop any recommended changes to the study timelines to address resource issues associated with Vermont Yankee's closing.

We respectfully suggest the Commission investigate a number of options to address this issue, such as: (1) allowing stakeholders an additional two or more weeks to provide supplemental comments on the RSP relative to the impact of Vermont Yankee's closing on the study plan timelines; (2) convening a stakeholder meeting to discuss how best to address the impact of Vermont Yankee's closing on study plan timelines and then incorporating the results of those discussions in the Commission's Study Plan Determination letter; or (3) requiring that those studies most likely to be impacted by Vermont Yankee's operation be conducted for two years, which would provide data both with and without the operation of Vermont Yankee.

In closing, the ecosystem "baseline" in sections of the Connecticut River within the boundaries of projects owned by FirstLight will likely change with the closure of Vermont Yankee, and as a result we have concerns with the long-term validity of results from some of the studies proposed for 2014.

Thank you for this opportunity to comment on this very important relicensing project. If you have any questions regarding these recommendations, please do not hesitate to contact either Fisheries Biologist, Matt Carpenter at 603-271-3511 or Gabe Gries at 603-352-9669.

Sincerely,



Glenn Normandeau
Executive Director

Literature cited:

Normandeau Associates, Inc. 2011. Impingement, entrainment, and nearfield ichthyoplankton studies performed at Vermont Yankee Nuclear Power Plant from 29 March 2005 through 28 November 2006. Analytical Bulletin 91.

Document Content(s)

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