Ashuelot River Local Advisory Committee

Washington Lempster Marlow Gilsum Sullivan Surry Keene Swanzey Winchester Hinsdale

Feb. 24, 2013

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

Re: Northfield Mountain Pumped Storage Project, FERC Project No. 2485
Turners Falls Hydroelectric Project, FERC Project No. 1889

Dear Secretary Bose:

The Ashuelot River Local Advisory Committee (ARLAC) was established in 1994, one year after the Ashuelot River was enrolled into the New Hampshire Rivers Management and Protection Program. Members are nominated by Ashuelot River corridor municipal officials and appointed by the Commissioner of the NH Department of Environmental Services. ARLAC's mandate is to review and comment on projects within the corridor that have potential impacts on the river. We also have created, with acceptance by corridor towns, a Corridor Management Plan established in 2001 and updated in 2006. It is in this capacity that we wish to comment on the Pre-Application Document (PAD) submitted by First Light for the Northfield Mountain and Turners Falls Hydroelectric projects.

ARLAC has been supportive of the migratory fish programs implemented by NH Fish and Game as well as the Connecticut River Atlantic Salmon Commission. We support the installation of mechanisms that provide for upstream and downstream passage of diadramous fish in the Ashuelot, and have concern for the ability of these species to make their way from the Ashuelot watershed spawning habitat to the ocean, and their return from the ocean to the Ashuelot to spawn. Dams severely limit access to spawning habitat, and the proper operation of fish ladders is imperative to successful migration patterns of American eel, Sea lamprey, American shad, and Blueback herring. Dams also impact the natural movement of resident species. Along with supporting the proprosed studies (noted in section 5.1.4) on the efficacy of the existing fish passage systems as listed in the PAD, consideration should be given to year-round operation of these facilities to enable both resident and migratory species to move freely throughout the river system.

Wide and frequent fluctuations in water levels not only increase sedimentation from erosion of the stream banks but can also dry out nesting areas, preventing successful fish breeding. Low water levels may also limit the ability of fish to reach tributaries for spawning, foraging, and shelter. Additionally, invasive plants are more tolerant than native species to fluctuating water levels; this leads to monocultures of invasive plants – which are of little benefit to native wildlife – in otherwise natural riparian habitat. With these issues in mind we support the proposed studies (noted in 5.2.5.1 & 5.1.6) of the effects of the Turners Falls Hydroelectric Project and Northfield Mountain Project operations on wetland, riparian and littoral zone habitat within and adjacent to their project boundary, with a baseline inventory of botanical resources to include the confluence with the Ashuelot River. Consideration of run-of-river mode for the Turners Falls Hydroelectric Project and perhaps a closed loop system of reservoirs for the Northfield Mountain project should be evaluated.

Respectfully submitted,
Barbara Skuly, Chairman

cc: J. Colburn, NH Rivers Management and Protection Program

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Document Content(s)