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I have a life-long connection to the Connecticut River having grown-up in Franklin County, MA and recently returning to the area in my retirement following a career of many decades in the environmental arena. My early life in western Massachusetts (the hillsides, mountains, rambling country roads, geology, AND the local river systems) inspired my career choice and continues to inspire me with natural beauty to this day. Working together to be good stewards of our gifted natural environment rings to the core of my being.

I am pleased to know of the Federal Power Act of 1935 and more importantly the addition of the 1986 clause requiring FERC to give “equal consideration” to five key components when making decisions and relicensing dams and such along the river length, including:

- Power and development
- Energy conservation
- Protection of fish and wildlife and their habitat
- Recreational opportunities
- Preservation of other aspects of environmental quality, e.g., water quality and historic preservation

With these key components in mind, I am compiling my comment today.

Northfield Mountain Pumped Storage Station Project (P-2485):

- Not closed-loop system – While in the electricity generation phase, the station releases large volumes of water at elevated temperatures directly into the Connecticut River. The volume released and subsequent daily fluctuations in river water level impacts the toe of the river bank, undercutting the river bank, and causing it to collapse into the river. First Light Power Services, LCC should be required to monitor impacts to the river banks and held accountable for repair of impacted riparian buffer zones and associated vegetation to minimize effects on water quality and recreational use of the river. First Light should also be required to monitor and minimize temperature impacts of released water on the river’s receiving body and aquatic life therein. Future consideration should continue to improve system operation and moving toward a more closed-loop system
- Screen netting on inflow – Addition of this feature is designed to add barriers to fish, eel, eggs, etc. being sucked into the pump facility. This was a much-needed add-on. First Light should be required to detail their operation and maintenance plans for this screen netting, as well as to be transparent in showing their data on checking and confirming the proper maintenance.
- Length of license – In this time of increasing climate change and growing technological ingenuity, a 30-50 year license seems extreme. At a minimum the relicensing should leave leeway for FERC to require related pivots to the license as a consequence of potential future climate change impacts and technological advancements.

Turners Falls Dam Hydroelectric Project (P-1889):

- Power canal – Rerouting river flow, into the canal to push through turbines to make hydropower, should be controlled in such a way to minimize the river bed from being exposed. This exposure is not conducive to sustaining aquatic life in the river, as rerouting alters stationary water depth and temperature and changes the ecology of the river impacting aquatic life itself as well as recreational use of the river for boating and fishing. Also, in the past, this rerouting has resulted in minimal water depth below the dam making it difficult or impossible for fish to migrate through the area to spawn at all or to spawn in the appropriate areas to support continued life.
- Fish passage – Some upgrades are included in the relicensing plans for improved fish passage. However, the plans suggest these upgrades won’t be implemented for another 10 years. As the technologies for the upgrades exist now, it is recommended that they be required to implemented within the next 5 years at a maximum.

Thank you for your time and consideration in reviewing, acknowledging, and incorporating appropriate changes to your licensing documents to address these concerns.