

Ashuelot River Local Advisory Committee

Washington Lempster Marlow Gilsum Sullivan Surry Keene Swanzey Winchester Hinsdale

May 21, 2024

Debbie-Anne A. Reese, Acting Secretary
Federal Energy Regulatory Commission
888 First Street, NE
Washington, DC 20426

RE: Comments on the Amended Final License Application
First Light Power FERC P- 1889 Turners Falls Hydroelectric Project
FERC P- 2485 Northfield Mountain Pumped Storage Project
Great River Hydro FERC P-1904 Vernon, FERC p-1855 Bellows Falls, FERC P-1892
Wilder

Dear Secretary Reese:

The Ashuelot River Local Advisory Committee (ARLAC) convened in 1994 with the acceptance of the Ashuelot River into the NH Rivers Management and Protection Program. Appointed by the NH Rivers Management Advisory Committee, ARLAC represents the ten corridor towns of the Ashuelot River and acts in an advisory capacity to the NH Department of Environmental Services. ARLAC has implemented a river monitoring program since 2001 with the assistance of the NH Volunteer River Assessment Program. We have established within the river corridor a management plan that proposes the protection of plentiful clean water, thriving riparian and aquatic habitat for wild plants and animals, and providing balance for continued development of land use and water uses, recreation, and other public needs.

As a major tributary to the Connecticut River our interest in Connecticut River management is a high priority. What occurs on the Connecticut will ultimately impact the health and productivity of the Ashuelot River. With this perspective we comment on the Amended Final License Application (AFLA) by First Light Power (FLP) and Great River Hydro (GRH).

Support of State and Federal programs that eliminate physical barriers to migratory fish passage is a management goal outlined in the Ashuelot River Corridor Management Plan. ARLAC has been supportive of efforts to eliminate barriers on the Ashuelot to restore passage for American shad, American eel, and sea lamprey. We support and encourage implementation of US Fish and Wildlife Service's Preliminary Prescription For Fishways (FERC Accession No. 20240516-5099 and 20240516-5130) believing these measures will best provide migratory fish restoration on both rivers. Timely implementation of fish passage measures on the Connecticut is imperative for migratory fish restoration on the Ashuelot.

Both FLP and GRH need erosion control plans that address bank erosion and water quality impacts, stabilize banks, and compensate landowners for loss of land; setting conditions that reduce soil loss, improve riparian habitat on the banks of the river, and protect archaeological resources. The establishment of long-term monitoring and assessment of how sediment will

move in the river due to operational changes over the next license is critical to the use and health of the river system. Proposed operational flow changes may benefit the river's biological community providing a hydrological regime that more closely resembles natural pre-impoundment conditions. However, we are not clear what impact these changes will have on water quality, sediment transport and riverbank erosion. Ongoing monitoring and mitigation of erosion is a crucial component as bank failures will likely continue and possibly worsen with climate change.

In addition, ARLAC is well aware of the impact invasive species have on the river and its corridor and we ask that FLP and GRH include a plan for prevention and monitoring of aquatic invasive species within their projects on the Connecticut River. The Ashuelot River flows into the Connecticut midway between these two company's projects so any invasives found within their jurisdiction have the potential to reach and invade the Ashuelot River. We request regular monitoring with appropriate treatment if found, with signage and education to prevent their spread. All would be in coordination with the US Fish and Wildlife Service and the Northeast Aquatic Nuisance Species Panel (NEANS) to enable a regional approach and comparable data across the watershed.

Recreational components are not adequately addressed in the AFLA needing improvements for access, portages, and ADA-compliant recreation amenities, as well as adequate flows for paddlers along the 175 miles of river. We refer to the recommendations as submitted by other stakeholders such as American Whitewater, Appalachian Mountain Club, and the Connecticut River Conservancy among others. We ask that a minimum flow be mandated at all projects that enables boating and recreation, while protecting the habitats of macroinvertebrates and fish.

We support the creation of a Mitigation Enhancement Fund to be funded by both companies to compensate for future impacts and support restoration and enhancement projects. These can be related to fish and wildlife habitat, bank and water quality impacts, invasive species management, recreational needs, and Native American resource management and interpretation.

We advocate for the shortest possible licensing term of 30 years rather than 50. This current licensing process has taken 12 years essentially adding those years to create a 62 year permitted license term. Given the rapid increase in frequency and size of large storm events with periods of drought that impact our rivers, it is imperative that the community have the ability to address these impacts and alter the operation of all projects on the river in a timely manner. Also it is critical to be able to address any unforeseen concerns that may develop from the operation of the projects or due to outdated protocols. We ask for assurance that empowerment of State and Federal agencies will be protected to require any measures that ensure the protection of species and river health, if it is found that any project's operations harm the ecosystem during the license term.

Respectfully submitted,

Barbara Skuly, Chairman
Ashuelot River LAC

Ec: T. Sales, NHRMPP

Document Content(s)

Ct River Hydro license comments.doc.....1