

Cheryl Joy Lipton, Chester, VT.
May 22, 2024

Debbie-Anne Reese, Secretary
Federal Energy Regulatory Commission
888 First Street, NE
Room 1A
Washington, D.C. 20426

Re:

Wilder Dam, P-1892-030
Bellows Falls Dam, P-1855-050
Vernon Dam, P-1904-078
Northfield Mountain Pumped Storage Project, P-2485-071
Turners Falls Dam, P-1889-085
Cheryl Joy Lipton's comments on FirstLight LLC's Application for a New License

Dear Secretary Reese:

I am extremely concerned about the relicensing of the dams and pumping facilities of the Connecticut River in Vermont and Massachusetts. I am an ecologist in Chester, Vermont, in the Williams River Watershed of the Connecticut River Watershed. The health of our rivers is a personal issue for all of us. Healthy rivers should have their own right to exist as well, not just in the service of people. This issue impacts me because I need to live in a world where there are healthy natural wild places, where I can go and see wild animals living free, and where what I and others of my species do does not cause destruction of the natural world.

My main concerns are to restore the natural processes of the river in order to support native flora and fauna. The extreme losses in biodiversity at this time are continuing to increase. This is a concern equal to or even greater than climate change. Loss of biodiversity is directly caused by actions like the disruption of the natural water flow of the river by these dams and pumping stations. The river ecosystem is integral to many things, including our own health, and should be returned as much as possible to its natural state, to natural flow, and also to restoring the floodplain forests that are missing in many areas along the river. Below, I list some, but not all of the issues at this time.

The most effective, highest quality fish passages should be implemented as quickly as possible around all of the dams if the dams are going to continue to exist in the river. This should happen immediately, not implemented slowly in upgrades over the course of many years.

The levels of water in the river should only fluctuate gradually and should be allowed only at times when it will not negatively impact wildlife such as turtle egg nests, insect life cycles, and healthy plant populations preventing bank erosion.

The river should be kept at a minimum flow of 1400 cfs.

The proposed barrier net is only sufficient for animals large enough, and not sufficient to prevent the death of eggs and smaller animals such as juvenile American eel. The pumping should not occur when it will be impacting the health and populations of all species, not only certain ones that are large enough. The pumping should be changed to eliminate impact on the river biota. An option of stopping pumping during migrations and spawning should be investigated. These changes should be implemented immediately.

I reiterate the concerns of the Connecticut River Conservancy: Safe, timely, and effective upstream and downstream fish passage, Operational changes at the dams to minimize both upstream and downstream surface water fluctuations to reduce bank erosion and impacts to rare and threatened species, Healthy aquatic habitat for river flora and fauna, Seasonally appropriate minimum flows in the river channel, Ecologically compatible and accessible recreational facilities, Protection and interpretation of historic and archeological resources, and Equal consideration of Indigenous People's traditional cultural properties.

I add that this license should last for only 15 to 20 years at most, no longer, and then be revisited.

Sincerely,
Cheryl Joy Lipton
Chester, VT

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