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The Honorable Kimberly D. Bose, Secretary
Federal Energy Regulatory Commission
88 First Street, NE
Washington, DC 20426

RE: P-1889 and P-2485, protecting the federally-endangered Shortnose Sturgeon (*Acipenser brevirostrum*), and the unconscionable assault on living diversity in the Connecticut River

Dear Secretary Bose,

With all due respect, I must demand that FERC and all other relevant parties act now to ensure that the requirements laid out in the Clean Water Act, the Rivers and Harbors Act, and all state and federal wetlands protection laws and regulations be fully complied with in their entirety, including safe passage for migratory fish as legally mandated by the Supreme Court decision in *Holyoke Company v. Lyman* in 1872. The appalling history of ignoring these requirements over the last fifty years cannot be allowed to continue and must be remedied as soon as humanly possible.

In the case of the state-and-federally-endangered Shortnose Sturgeon, this requires mandating guaranteed minimal flows as required to facilitate spawning and early development at the Rock Dam in Montague, which is the only known natural spawning site in the Connecticut River drainage. This large and charismatic relic of the ancient past is, of course, only one victim of a much wider assault on living diversity by the intertwined projects P-1889 and P-2485. Other noteworthy victims include migratory fishes: the anadromous Sea Lamprey, Blueback Herring, and American Shad and the catadromous American Eel. Here threats include the impediment of dams with inadequate fish ladders and the risk of being ground to bits in the turbines of the pumped storage project in Northfield that is so powerful that it actually reverses the flow of the mighty Connecticut. And the list of victims is barely begun. We must also include the nonmigratory fishes, some of which are critical for the reproduction of threatened or endangered mussels. Add to these the thousands of other species that make the river or its tributaries their home or otherwise depend on its water for their survival. These and all the other organisms impacted by these projects must be considered as we seek to define limits on how our river can be exploited for private profit.

The two projects require different solutions if we are to recover from a half century of neglect. Cabot Station (P-1889) and the associated Power Canal and Turners Falls dam, need strong and binding restrictions that guarantee that the living diversity of the river can survive and thrive. A sensible approach would be a temporary license of perhaps 10 years that could be extended only if specific conditions are met. In particular, FirstLight must demonstrate significant, well-documented, and independently-verified growth of sturgeon and migratory fish populations as well as meeting any other indices of biological health as may be deemed appropriate in order to ensure a healthy river ecosystem.

When it comes to the Northfield Mountain Project (P-2485), however, only a shutdown will suffice. The wholesale destruction of a vibrant living river this project entails cannot be sanctioned by a government that has the best interests of its citizens at heart. Ecocide is a crime that no state should endorse. It is simply unconscionable that the great fish grinder on the mountain would be granted another fifty years of operation sucking the life out of our river to make a few unearned bucks by arbitraging the difference between peak and off-peak electricity rates. If this project is to have any future at all, it can only be as a last-resort-backup system to be deployed only in the event of an extreme emergency involving massive outages and widespread human suffering.

Although FERC holds the power of licensing, multiple other agencies must share responsibility for the decades of neglect, and I am copying these remarks to some of them in order to emphasize how critically important it is that they stand up to do their duty at this moment of extreme peril for the great Connecticut and its essential role as the ecological lifeblood of our entire region. And all the more so because we face a global biodiversity crisis with extinction rates comparable to those of the great extinction events of the geological past. The very survival of civilization is at stake!

Thank You,

J. William Stubblefield

CC via email:

Mr. Peter Brandien, ISO-New England

Mr. Sean Mcdermott, National Marine Fisheries Service

Ms. Julie Crocker, National Marine Fisheries Service

Mr. Timothy L. Timmermann, EPA New England Region 1

Ms. Wendi Weber, US Fish and Wildlife Region 5

Mr. Brian Harrington, Mass. DEP

Mr. David Cameron, Mass. DEP

Mr. Jesse Leddick, Mass. DFW

Mr. Steven Mattocks, Mass. DFW

Greenfield Recorder

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