



# MASSACHUSETTS Rivers Alliance

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June 26, 2018

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

Re: Bear Swamp Pumped Storage Project No. 2669

Dear Secretary Bose,

On behalf of the Massachusetts Rivers Alliance, I am pleased to submit these comments to the Federal Energy Regulatory Commission regarding the proposal to increase hydropeaking releases at the Bear Pump Storage Project No. 2669.

The Massachusetts Rivers Alliance is a 501(c)3 statewide advocacy organization comprised of 71 member organizations from across the Commonwealth. Our mission is to protect and restore rivers and streams in Massachusetts. Founded in 2007, we work to strengthen statewide river policies in four areas: improving water quality, stream flow, wildlife habitat, and investments in green infrastructure.

We are writing this letter to oppose a request for increased hydropeaking on the Deerfield River made in a January 30, 2018 FERC submission by American Whitewater, Appalachian Mountain Club, New England Flow, and other whitewater interests. In that submission, the aforementioned parties advocated for increasing hydropeaking flows by 58% (from 700 cfs to upwards of 1100cfs) of the mandated recreation releases under certain circumstances as detailed in the filing.

We respectfully oppose this proposal to increase hydropeaking releases for the sole benefit of creating a better whitewater paddling experience as detailed in this FERC filing. Hydropeaking releases have well-documented environmental impacts, including the degradation of native fish nesting habitat and the loss of aquatic insect life, which provides sustenance for entire ecosystems. Several organizations in Massachusetts, including Trout Unlimited and the state's Division of Fisheries and Wildlife, are currently researching the effect of the *current* peak flows on the Deerfield River's ecological resources. These studies are in preliminary stages, and we expect that their results will provide important information to guide the management of this river.

In the meantime, we ask that the Commission reject the proposal for increased hydropeaking and instead consider decreasing the hydropeaking releases to protect the local aquatic life that this region depends on.

Thank you for your time and consideration. Please do not hesitate to contact me should you have any questions.

Sincerely,

A handwritten signature in black ink, reading "Gabby Queenan". The signature is written in a cursive, flowing style with a large initial 'G' and a long, sweeping tail.

Gabby Queenan  
Policy Director