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11 September 2015

Matthew Beaton  
Secretary of Energy and Environmental Affairs  
Attn: MEPA Office, Holly Johnson EEA # 15407  
100 Cambridge St, Suite 900  
Boston, MA 02114

RE: NRG Canal Electric Unit 3 and Canal Community Solar Waiver request

Dear Secretary Beaton and Ms. Johnson,

The Jones River Watershed Association (JRWA) is a non-profit organization based in Kingston, MA. The mission of the organization is “to protect, enhance and restore the quality of the natural resources in Southeastern Massachusetts, in particular the Jones River and Cape Cod Bay, for present and future generations, while cultivating effective stewardship of our regional environment through science, advocacy, and education.” JRWA has its headquarters in the Jones River estuary, and operates our Cape Cod Bay Watch Program to advocate for the protection of the species and habitat health of the bay. Jones River is the largest river drainage to Cape Cod Bay (CCB), and the health of the bay and river are intertwined.

JRWA is keenly aware of climate change and the impending impacts that it brings. We encourage renewable energy systems especially when they have no or expressly limited impacts on sensitive ecosystems and habitats. JRWA has no objection to the issuance of a waiver for the community solar aspect of the Canal project, and consider that the local permitting and regulatory authorities can manage any questions and secure any needed considerations.

We expect that the Canal Unit 3 will provide a Draft and, at least, a Final EIR; and we would expect to be able to review and comment on those documents, including any supplemental information. We are especially interested in water consumption, discharges, and impacts on the marine environment as well as regional air quality as it relates to burning of fossil fuels, in this case.

We understand that Canal 3 is designed to operate as a peak energy facility and may run as much as half of the year, with ULSD fuel oil being used half of that time, depending on the availability of natural gas via the Algonquin pipeline. We continue to have questions regarding the operation of Canal Electric and its relationship to the operations of Pilgrim Nuclear, and especially the relationship between Units 1, 2 and the new Unit 3. That is, when Pilgrim is off-line, or decommissioned, how will the operations of the Canal facility be effected? Is it possible that Canal 1, 2, and 3 would operate beyond the current practices and expectations? This relationship (to Pilgrim and the changing demands for distributed power) should be explicitly addressed in the EIR. JRWA is concerned that further downgrading at Pilgrim will take the facility off-line and could result in increased use at Canal 1& 2 and negatively impact CCB.

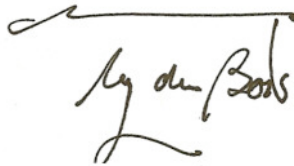
At the site meeting on August 31<sup>st</sup>, we understood the presenters to say that Units 1 and 2 are operating at very limited capacity and no longer require on-going intake from the waters of the Cape Cod Canal during down time. This should be discussed at length in the EIR, given the history and capacity of the intake structure for Canal 1 & 2 to significantly harm marine life and the quality of CCB waters. How will the Bay's water continue to be used? Is the best technology in use? We believe that the development of Canal Unit 3 can be a mitigating factor for the harm caused by Canal 1 & 2 intake and discharges, and that a reduction in the negative impacts should be a part of the project and a requirement of the permits.

Canal Unit 3 is proposing to use an on-site well that will require a WMA permit for use of about 100,000/gallons a day, averaged over a year. It was stated that this well currently is registered to use 1.4MGD, but for a different use. It is important to clarify the use of the well, not in terms of averages, but in terms of most likely scenarios. What season, how long, how much daily demand? Will use of the well be competing with other near-by users? Will well pumping and drawdown impacts be discussed in the EIR? Are there alternatives or complimentary developments of the water supply feasible that would also relieve some of the impacts of Units 1 & 2, such as development of a pond for collection and treatment of stormwater, augmented by well use to fill the pond as the withdrawal point for a water source?

JRWA is very interested in the impact rising sea levels will have on the coast, nearby groundwater levels, and regional infrastructure. We understand that NRG Canal Electric will be performing a sea level rise analysis that we hope will be made available as part of the Draft EIR. It is crucial that we all understand and make adjustments for the impending changes from sea levels, storms and surge. We look forward to reviewing this document at the earliest possible time.

Thank you for the opportunity to comment, and consideration of our concerns.

Very truly,

A handwritten signature in black ink, appearing to read "Lynda Bous". The signature is written in a cursive style with a long horizontal line above the name.

Executive Director