

UNITED STATES OF AMERICA
FEDERAL ENERGY REGULATORY COMMISSION

FirstLight Power Resources Turners Falls Project No. 1889
Northfield Mountain Pumped Storage Project No. 2485

AMERICAN WHITEWATER COMMENTS ON UPDATED PROPOSED
STUDY PLAN FOR THE TURNERS FALLS HYDROELECTRIC PROJECT (NO. 1889)
AND NORTHFIELD MOUNTAIN PUMPED STORAGE PROJECT (NO. 2485)
FILED BY FIRSTLIGHT POWER RESOURCES ON JUNE 21, 2013

American Whitewater submits these comments to FERC in response to the Updated Proposed Study Plan for the Turners Falls Hydroelectric Project and Northfield Mountain Pumped Storage Project operated by FirstLight Power Resources. Our organization has previously submitted comments and study requests asking the licensee to study the impact of its hydroelectric operations on the recreational opportunities available to non-motorized boaters -- whitewater boaters, multi-day through paddlers and flatwater paddlers -- in the project area.

American Whitewater has been engaged in the hydropower relicensing process for over 25 years and has worked with FERC and numerous licensees to study the impact of hydroelectric projects on recreational boating opportunities throughout New England. We have assisted with recreational facility and use assessments and controlled whitewater boating flow studies during the relicensing process on rivers throughout the region including the Deerfield, Kennebec, Rapid, Magalloway and Penobscot Rivers.

Based on our experience with the hydropower relicensing process in New England and elsewhere, we submit these comments to address the deficiencies in the licensee's proposed study plans and respectfully request that FERC direct the licensee to amend its proposed study plans to address these deficiencies, as follows:

General Comments

- 1. The licensee's proposed study plans will not adequately assess the demand for non-motorized boating in the project area.**

The licensee plans to study the demand for non-motorized boating (flatwater, multi-day trips, whitewater boating) in the project area, yet proposes no methodology for assessing the demand. Interviewing existing recreational users in the project area about their interest in whitewater boating in the natural bypassed reach below Turners Falls Dam will yield no meaningful data on the extent to which the public would benefit from restoring whitewater flows there. Existing recreational users in the project area are a self-selected group who utilize the facilities in the

project area because they believe that the existing facilities are sufficiently adequate to meet their recreational needs. While some whitewater boaters may have an interest in other forms of recreation, their primary interest is in whitewater boating, which is not available in the project area due to the lack of sufficient water flows in the natural bypassed reach. Instead, whitewater boaters may likely be found on the Deerfield River or elsewhere where they can pursue their interest in whitewater boating. They will not be found fishing at Barton Cove or hiking on Northfield Mountain. Collecting data from fishermen, hikers, campers, and flatwater canoeists on their interest in whitewater boating would not inform the licensee or FERC about whitewater boating demand.

In order to perform a defensible study on the demand for whitewater boating in the project area, the licensee must develop a methodology that will provide meaningful data. This methodology should include surveying boaters on the Deerfield River, collecting data from area outfitters, using internet-based surveys, and working with organizations such as American Whitewater, New England Flow, and the Appalachian Mountain Club to survey their members' interest in paddling at Turners Falls once sufficient water has been restored to the natural bypassed reach to permit whitewater boating.

Likewise, the licensee's plan to study the demand for multi-day canoe and kayak trips on the Connecticut River will yield no meaningful data on the public's interest in paddling downriver on the Connecticut. Virtually all through paddlers are currently deterred from exploring this section of the Connecticut River due to the lack of a portage trail at Turners Falls and the lack of adequate boat launch and camping facilities. Instead, these boaters are limited to paddling sections of the Connecticut River north of the Massachusetts border, in other areas where there are adequate facilities, or are unable to pursue their recreational interests. The licensee proposes no methodology for assessing this demand other than interviewing existing recreational users in the project area, whose interests in multi-day canoe and kayak trips may be even less than those of the general public. Existing recreational users in the project area are a self-selected group who utilize the facilities in the project area because they believe that the existing facilities are sufficiently adequate to meet their recreational needs.

In order to perform a defensible study on the demand for multi-day canoe and kayak trips in the project area, the licensee must develop a methodology that will provide meaningful data. The Connecticut River and Watershed was designed as the nation's first National Blueway in 2012, and the licensee needs to coordinate its study with TransCanada to determine the public's interest in through paddling on the Connecticut River. The National Blueways System has as its goal "to advance a whole river and watershed-wide approach to conservation, outdoor recreation, education, and sustainable economic opportunities in the watersheds in which we live, work, and play."

2. The licensee's proposed study plans will not assess the extent to which the inadequacy of its recreational facilities diminishes the recreational opportunities in the project area.

While the licensee proposes to conduct an inventory and assessment of the recreational facilities in the project area, it does not propose to survey non-users to determine whether the lack of adequate facilities deters or prevents them from pursuing their recreation interests in the project area. With regard to whitewater boating, the absence of sufficient flows except during high water spillage events, the lack of adequate access points and parking, and the presence of rebar or other hazards, has deterred or prevented virtually all boating in the natural bypassed reach below the Turners Falls Dam. The licensee needs to include in its facility inventory and assessment, a discussion of the facilities, or lack thereof, for whitewater boating.

Likewise, the licensee needs to include in its facilities inventory and assessment a discussion of the adequacy of its facilities for through paddlers in the project area. The lack of any portage trail, and the lack of adequate camping and boat launch facilities, should be included in the licensee's study, as these inadequacies serve as a strong deterrent to those who would otherwise choose to enjoy this section of the Connecticut River. Instead, the licensee proposes to study only the adequacy of its recreational facilities for those who find the facilities sufficiently adequate to meet their needs. In order to determine what additional facilities may be needed, the licensee will need to tailor its survey to address the needs of those who may be unable to paddle the Connecticut River due to the absence or inadequacy of the facilities to meet their particular needs.

3. The licensee has not sufficiently involved the boating community in the design and implementation of proposed recreation studies.

The licensee has not involved the boating community in the design and implementation of studies to collect data on the demand for whitewater boating in the natural bypassed reach or the adequacy of facilities to support whitewater boating. Without the active involvement of organizations representing whitewater boaters, the licensee is in danger of underestimating demand for boating below the Turners Falls Dam and failing to adequately identify the obstacles to boating this section of the river. While the licensee has developed survey instruments as part of its user and facilities surveys, they have not sufficiently involved the boating community in the development of these instruments. Furthermore, while the licensee plans to collect data from current recreational users, it has no plans to collect data from non-users. For example, the licensee does not propose to collect data from boaters on the Deerfield River where many boaters who are currently unable to paddle on the Connecticut River might otherwise be found. Had the licensee more fully included the boating community in the design and implementation of these surveys, it would have been able to collect more meaningful data than it will otherwise be able to collect. The licensee should work with groups such as American Whitewater, New England

FLOW, the Appalachian Mountain Club and the Connecticut River Watershed Council to design surveys that will solicit the views of its members on the reason for non-use of project facilities. This will better inform the study process.

Specific Comments

3.6.1 Recreation Use/User Contact Survey

While the licensee acknowledges that FERC proposed that the data be collected from “unique stakeholder groups that may not be practically accessed through on-site surveys (e.g. adjacent residential landowners, residents of the counties in which the projects are located, rock climbers, whitewater boaters).” The licensee does not, however, propose to collect data from any whitewater boaters due to the fact that there are no whitewater boaters utilizing the natural bypassed reach. The licensee has no plans to survey users at other locations such as the Deerfield River, no plans to collect data from whitewater outfitters serving the Deerfield and other area rivers, no plans to work with organizations such as American Whitewater, New England FLOW or the Appalachian Mountain Club to survey their members, no plans to develop an internet-based survey, and no plans to conduct any focus groups to determine the extent of interest in boating in the project area.

While the licensee proposes to conduct user counts and maintains that this data will provide it with information on the recreation use at the project, this data will provide no information on the non-use of the project by whitewater boaters who cannot access the project due to the inadequacy of the facilities or the manner in which the licensee operates the project. The licensee simply ignores the request by FERC that it collect data on unique stakeholder groups such as whitewater boaters.

The licensee has identified two goals for this study: 1) Determine the amount of recreation use and demand at the Turners Falls and Northfield Mountain recreation sites; and, 2) Interview the recreating public to determine user opinions and goals with regard to the recreation sites, including the perceived adequacy of recreation facilities and access at the Project. Yet nothing in the licensee’s study plan is designed to collect data on demand by non-users, including whitewater boaters and through paddlers. The licensee makes no attempt to identify the perceived adequacy of its facilities by these user groups.

Instead, the licensee proposes to collect data from the self-selected group of existing users on their interest in whitewater boating and canoeing/kayaking. In its Draft Recreation User Survey, Figure 3.6.1-1, and in its Draft Residential Abutters Survey, Figure 3.6.1-3, the licensee intends to determine the demand for whitewater kayaking in the natural bypassed reach and the demand for multi-day canoeing and kayaking. The licensee offers no explanation for how these surveys will inform the process of identifying the demand for these activities or the need for

improvements in its facilities. At best, these surveys will demonstrate that there is limited interest in whitewater boating and through paddling by those who enjoy motorized boating and or by those who abut the project area. It will not, however, show the extent of the demand for these activities by those who go elsewhere due to the inadequacy of the recreational facilities to support these activities in the project area, such as the lack of water in the natural bypassed reach or the lack of a portage trail.

3.6.2 Recreation Facilities Inventory and Assessment

While the licensee states that it is completing its Recreation Facilities Inventory Assessment, it does not state whether it assessed the presence and adequacy of facilities from the perspective of whitewater boaters and through paddlers. Without coordinating its study with organizations representing these groups, it cannot, for example, determine whether its concrete pad boat launch facility will meet the needs of paddlers in fiberglass touring boats. It cannot assess whether its shuttle service in lieu of a portage trail meets the needs of through paddlers. It cannot assess whether the access provided in the natural bypassed reach is adequate to enable whitewater playboaters to reach the broken dam area. The licensee has made no effort to coordinate its assessment of these facilities with stakeholder groups that have a great interest in utilizing the recreation facilities. As a result, the study will not provide a complete picture of what currently exists in the project boundary. Instead, the licensee assesses the adequacy of the recreation facilities solely from the perspective of existing users and makes no attempt to assess the sites from the perspective of the non-user who may have been deterred or prevented from utilizing the sites based on its current condition.

In addition, the licensee should extend the project boundary below Cabot Station to include all facilities above the confluence with the Deerfield River. The canoe shuttle service put-in lies outside of the project boundary, and the confluence of the Connecticut and Deerfield Rivers below the project boundary has an impact on the recreation opportunities in the natural bypassed reach. Accordingly, the licensee needs to expand the southern end of the project boundary to the confluence of the Deerfield River.

3.6.3 Whitewater Boating Evaluation

American Whitewater and New England FLOW support efforts by the licensee to study the potential for whitewater boating in the natural bypassed reach at Turners Falls and credit the licensee for utilizing the study techniques recommended by Whittaker et al., in *“Flows and Recreation: A guide to studies for river professionals”* (2005). We look forward to working with the licensee to refine its surveys and methodology in order to achieve the study objectives. Notwithstanding our general support for the licensee’s approach, our organizations have several concerns that should be addressed by the licensee.

The licensee proposes to study whether current or future demand exists for whitewater boating in the natural bypassed reach. The licensee, however, provides no methodology or explanation as to how it intends to accomplish this objective. It has no plans to survey boaters on the Deerfield River in Charlemont, it has no plans to do any outreach on social media or message boards, it has no plans to do internet-based surveys, it has no plans to contact whitewater outfitters in the region, and it has no plans to reach out to organizations such as American Whitewater, New England FLOW, and Appalachian Mountain Club to survey their members to determine their interest in kayaking in the natural bypassed reach. Furthermore, a determination of demand for whitewater boating is premature until the controlled flow study has been completed and optimal flows have been identified. Only after the on-water study has been completed and a determination has been made as to whether there are suitable flows for down river paddling, playboating, SUP or tubing, can the licensee undertake to determine the extent of the demand for these types of boating. As stated above, the licensee's proposal that it determine demand using its user contact survey of non-whitewater boaters is wholly inadequate.

Furthermore, demand is only one consideration in determining whether whitewater flows should be restored to the natural bypassed reach. Once a determination has been made that the natural bypassed reach is boatable at certain levels, FERC should require that the licensee provide scheduled releases in order to provide whitewater paddlers with the opportunity to enjoy this section of the river. Given that millions of people in Massachusetts, Connecticut, Vermont and New Hampshire live within several hours of Turners Falls, and the fact that tens of thousands of people kayak, canoe, raft, paddleboard and tube on the Deerfield and other surrounding rivers, demand for paddling in the natural bypassed reach at Turners Falls can be presumed if suitable flows are provided.

The licensee further states in its proposed study plans that it intends to determine the number of days per month that the acceptable and optimum flows for whitewater boating would be available under current and any proposed mode of operation. The current condition at Turners Falls is that the licensee diverts approximately 17,000 cfs into the power canal at Turners Falls for generation, spilling only minimum flows into the natural bypassed reach unless flows exceed its generating capacity. The licensee should also examine the extent to which it is able to forego generation or utilize its excess capacity in the upper reservoir at Northfield Mountain in order to provide additional flows to enable whitewater boating in the natural bypassed reach.

3.6.4 Assessment of Day Use and Overnight Facilities Associated with Non-motorized Boats

FirstLight proposes to conduct a study of recreation use at the Northfield Mountain Project but does not propose to conduct a survey of non-users or displaced users who are unable to pursue their recreation interests in the project area due to the inadequacy of the facilities. Without speaking with non-users and displaced users, the licensee cannot assess whether its facilities are

adequate to meet the needs of multi-day canoe paddlers and kayakers. While the licensee acknowledges that FERC regulations require the licensee to provide an estimate of existing and potential recreational use of the project area as well as measures for creating, preserving and enhancing recreational opportunities at the project, it does not provide a methodology for obtaining this information from these potential user groups.

As was made clear in the study plan meetings, the inadequacy of certain facilities is a deterrent to recreational use by some boaters. For example, the lack of a portage trail, and the inadequacy of the boat launch and camping facilities has an adverse impact on these river users, and without reaching out to these individuals and groups, the licensee will be unable to fully appreciate the concerns of these non-users and displaced users and will be unable to adequately assess the demand for paddling by these individuals.

The licensee should work closely with groups such as the Appalachian Mountain Club and the Connecticut River Watershed Council to identify and survey non-users and displaced users in order to identify the obstacles to their utilization of the river.

Conclusion

American Whitewater respectfully requests that FERC accept these comments and direct the licensee to revise its proposed study plans to address the concerns raised. Thank you for considering these comments.

Respectfully submitted this 12th day of July, 2013



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**UNITED STATES OF AMERICA
BEFORE THE
FEDERAL ENERGY REGULATORY COMMISSION**

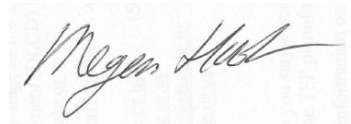
FirstLight Power Resources

**Turners Falls Project (P-1889)
Northfield Mountain Pumped Storage
Project (P-2485)**

CERTIFICATE OF SERVICE

Pursuant to Rule 2010 of the Commission's Rules of Practice and Procedure, I hereby certify that I have this day caused the foregoing **American Whitewater Comments on Updated Proposed Study Plan for the Turners Falls Hydroelectric Project (P-1889) and Northfield Mountain Pumped Storage Project (P-2485)** to be served upon each person designated on the official service list compiled by the Secretary in this proceeding.

Dated this 12th day of July, 2013.



Megan Hooker
American Whitewater