UNITED STATES OF AMERICA
BEFORE THE
FEDERAL ENERGY REGULATORY COMMISSION

Turner's Falls Hydroelectric Project **FirstLight Power Resources**	**FERC Project No. 1889**

AMERICAN WHITEWATER, APPALACHIAN MOUNTAIN CLUB, NEW ENGLAND FLOW, CRAB APPLE WHITEWATER, AND ZOAR OUTDOOR COMMENTS ON RELICENSING STUDY 3.6.3 WHITEWATER BOATING EVALUATION FOR THE TURNERS FALLS HYDROELECTRIC PROJECT (NO. 1889)

American Whitewater, Appalachian Mountain Club, New England FLOW, Crab Apple Whitewater and Zoar Outdoor submit these comments to FERC in response to Relicensing Study 3.6.3 Whitewater Boating Evaluation filed by FirstLight Power Resources on September 14, 2015. The Licensee conducted this study in response to requests filed by FERC, our numerous organizations and resource agencies requesting that the licensee 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 is a national non-profit 501(c)(3) river conservation and recreation organization founded in 1954 whose mission is to protect and restore our nation's whitewater resources and to enhance opportunities to enjoy them safely. Our members are primarily conservation-oriented kayakers and canoeists, many of whom live and/or engage in recreational boating in Massachusetts. Since 1876, the Appalachian Mountain Club has promoted the protection, enjoyment, and understanding of the mountains, forests, waters, and trails of the Appalachian region. It is the largest conservation and recreation organization in the Northeast with more than 90,000 members. Since 1988 New England FLOW (FLOW) has promoted the protection, enjoyment, and understanding of the mountains, forests, waters, and trails of the New England region. FLOW is the largest coalition of whitewater boaters in the Northeast. Our organizations have been deeply involved with hydropower relicensing for more than 25 years and have participated in the design and implementation of numerous controlled-flow whitewater boating studies throughout the northeast.

Crab Apple Whitewater, Inc. is a family-owned whitewater outfitter based on the Kennebec River in Maine and on the Deerfield River in Massachusetts. Opened in 1983, three generations help run guided raft trips on Class I-IV rapids as well as providing inflatable kayak rentals on mild whitewater. As the largest whitewater outfitter in New England, Crab Apple carries 20,000 - 25,000 passengers per season and has carried over 400,000 people since 1983. Zoar Outdoor was founded in 1989 in Charlemont,

Massachusetts as an outdoor center located on the Deerfield River. Zoar Outdoor provides whitewater rafting and kayak rentals and trips on the Deerfield River and elsewhere in the northeast. In addition, Zoar Outdoor offers zip line canopy tours, lodging and camping, and rock climbing programs in the Charlemont area. Zoar Outdoor employs up to 130 people seasonally and 10 people year round and takes 25,000 people on various adventures each year.

American Whitewater, New England FLOW, Appalachian Mountain Club, Crab Apple Whitewater and Zoar Outdoor actively participated in the design and implementation of the Whitewater Boating Evaluation through the selection of study participants, development of survey instruments, and coordination of logistics for the study. On July 19-21, 2014, 42 boaters participated during the 3-day evaluation of flows ranging from 2,500 to 13,000 cfs. We commend the Licensee for the manner in which it conducted the on-water evaluation, providing participants with transportation, meals, camping, and assistance with removing boats from the water at the difficult take-out on Poplar Street.

At the conclusion of each boating flow, participants completed a flow evaluation survey. While not every participant evaluated every test flow due to either scheduling or skill level, participants were asked to complete a comparative evaluation form at the conclusion of the study to identify minimum boatable and optimal flow levels. While responses varied by craft and skill level, participants generally preferred flows ranging from 5,000 to 8,000 cfs, regarded the reach favorably, and expressed an interest in returning. Notwithstanding the positive evaluation of this reach by study participants, the Licensee mischaracterizes the study results in a disingenuous attempt to argue that there is little boating interest in the 2.7-mile natural river channel, which has been largely dewatered by the Licensee's operations. We submit these comments in an effort to provide FERC with a more complete understanding of the results of the Whitewater Boating Evaluation so that it can develop appropriate license conditions that are protective of power and non-power values alike.

General Comments

According to the study plan approved by FERC, the study objectives are as follows:

1. Assess the effects of a range of Turners Falls bypass reach flows on whitewater recreation opportunities;
2. Determine what watercraft-types would be appropriate to utilize any potential whitewater flows in the bypass reach;
3. Determine the range of flows (minimum through optimal) needed to support various whitewater boating opportunities by watercraft;
4. Determine whether current or future demand exists for whitewater boating in the bypass reach;
5. Determine the number of days per month (and during what months) the acceptable and optimum flows for whitewater boating would be available under the Turners Falls Project's current and proposed mode of operation;

6. Determine any competing recreational uses or other resource needs, such as needs for fisheries and aquatic resources, that may be adversely affected by whitewater boating;
7. Identify the need for and define adequate access points, if needed, that provide trails and car-top parking at Great Falls Discovery Center, Station No. 1 and Cabot Station, and egress at the end of the 2.7 mile bypass reach at the confluence of the Deerfield River;
8. Conduct an assessment of existing regional whitewater boating opportunities.

While the Licensee's study adequately accomplishes objectives 1, 2, and 3 as described in the study report, objectives 4, 5, 6, 7, and 8 are incomplete and require revision. With regard to the remaining objectives, we have identified the following deficiencies:

- Objective 4: Demand for whitewater boating at Turners Falls

  The Licensee mischaracterizes participants' responses to survey questions assessing the demand for whitewater boating in the frequently dewatered natural river channel at Turners Falls. According to the survey responses compiled by the Licensee, nearly 100 percent of participants expressed an interest in returning if sufficient flows were provided, indicating that they would definitely, probably, or possibly return. Demand for whitewater boating at Turners Falls stems from a variety of factors, some of which are within the Licensee's control, including:

  - Sufficient Flows: Interest in returning increased with flow;
  - Convenience: Turners Falls is approximately two hours shorter driving time round-trip than Fife Brook from Boston, Worcester, Springfield and Hartford;
  - Variety: Of the comparative rivers studied, only Fife Brook has scheduled releases between Memorial Day and Labor Day;
  - Adequate Access: Providing better access would increase demand, as the Licensee provides inadequate access at both Rock Dam and Poplar Street, and the put-in is difficult to access by commercial rafts; and,
  - Accurate Information: Demand for boating at Turners Falls would increase if accurate flow information were available, as flows in the natural river channel are unpredictable and difficult to calculate by the public.

  Rather than objectively analyzing the study data, the Licensee mischaracterizes participant responses in an attempt to support its predrawn conclusion that there is a lack of boater demand.

- Objective 5: Availability of sufficient whitewater boating flows at Turners Falls

  The Licensee studied the frequency of whitewater boating flows under the current mode of operation and found that in 2014, between April and November, there were 45 days in which sufficient flows are available for a minimum acceptable whitewater boating experience and 40 days for an optimal boating experience. Most of these

dates occur in the early spring and late fall. Sufficient flows for a minimum acceptable or optimal boating experience were available on only 4 days between Memorial Day and Labor Day according to the Licensee's analysis. The Licensee makes no attempt to study the availability of flows under any alternate mode of operation, making the study incomplete. Essentially, the Licensee has studied the frequency of boating available only during ***uncontrolled spillage***, making no attempt to study alternative modes of operation until other studies related to flow-related resources, project operations, and flows are completed. The Licensee should be required to revise this study and provide additional opportunity for public comment once those studies are completed.

- Objective 6: Competing Recreational Uses and Resource Needs

  The Licensee concludes that whitewater releases will have negative impacts on aquatic resources (such as sturgeon spawning) and other recreational uses (with emphasis on motorized boating). However, the Licensee failed to conduct a study or provide any data regarding the impact of whitewater releases on these uses and resource needs. With regard to competing uses and resource needs, including sturgeon spawning and motorized boating in the impoundment, the Licensee's project operations, which have dewatered the river and caused major fluctuations in the reservoir pool elevation, are responsible for any adverse impacts. Whitewater releases into the natural river channel are fully consistent with other resource needs. The Licensee either should be required to conduct proper studies and provide data to support their assertions, or remove their unsupported claims.

- Objective 7: Access to the natural river channel

  The Licensee's study of the adequacy of access to the natural river channel examined the suitability of current access point at the fishway put-in, Station 1, Cabot Woods Fishing Access (i.e., Rock Dam), and the Poplar Street take-out. Study participants, however, were only asked to evaluate the fishway and Poplar Street access points. With regard to Rock Dam, the study dismisses this obvious access point as unsuitable for whitewater boating. Given that there was a prior access trail at this location that was previously removed by the Licensee, this location should also be studied, as it would provide park-and-play access to the Rock Dam feature as well as access for emergency personnel. The focus of the Licensee's access study should not be limited to assessing the suitability of access locations under current conditions, but rather whether suitable access could be provided with appropriate improvements by the Licensee.

- Objective 8: Regional whitewater boating opportunities

  In comparing regional whitewater boating opportunities with the Turners Falls natural river channel, the Licensee conflates scheduled releases with unscheduled opportunistic flows and makes the self-serving conclusions that 1) there are ample other whitewater boating opportunities, and 2) there is little demand for whitewater

boating in the Turners Falls natural river channel. In terms of scheduled releases in the area, only the Fife Brook section of the Deerfield River is comparable to Turners Falls, where there are 106 scheduled releases on a Class II/III whitewater river, including releases throughout the summer months. While there are several scheduled weekend releases in the early spring and fall on the Millers, Farmington and Westfield Rivers, there are no scheduled releases on any regional river other than the Deerfield between Memorial Day and Labor Day. The Licensee makes no attempt to survey boaters utilizing the Deerfield on their interest in experiencing a less crowded, geographically closer river, or attempt to quantify the usage on the Fife Brook section that currently provides recreational opportunities to an estimated 50,000 visitors annually. The Licensee should revise its study after surveying boaters on the Deerfield River to determine their interest in boating at Turners Falls once scheduled and adequate flows, adequate access, and accurate and predictable flow information are provided.

Specific Comments

4.1 Description of Boating Features in the Turners Falls Bypass Reach

The Licensee acknowledges that the natural river channel contains a variety of whitewater boating features. The top of the reach contains a series of rock ledges that create a whitewater play area with rapids ranging from Class II-IV, depending on flow. Above the Station 1 powerhouse, there is another Class II/III feature. The most significant feature in the natural river channel is located at Rawson Island, approximately 4,000 feet downstream of Station 1. To the right of the island are a series of Class II/III rapids. To the left is a significant Class III/IV feature known as Rock Dam with a drop that is boatable by intermediate level kayakers and canoeists as well as rafters. Based on the responses from all of the study participants, the natural river channel at Turners Falls is indisputably boatable at all flows studied.

4.2 Assessment of Whitewater Boating Opportunities in the Bypass Reach

The Licensee acknowledges that all six test flows are suitable for whitewater boating in the natural river channel with boating opportunities for a variety of craft (K1, C1, C2, OC1, cataraft/shredder, raft, SUP) and skill levels. All flow levels evaluated were considered either acceptable or totally acceptable by all participants regardless of watercraft, with the exception of rafts at the lowest flow (2,500 cfs). Flows in the range of 5,000 to 8,000 cfs received the highest ratings across all watercraft, and participants were near unanimous in supporting variable flows beneficial for boaters with an array of skill-levels, ranging from novice to intermediate, and watercraft, ranging from SUP to rafts. The Licensee acknowledges that overall, the results indicate that at the flows tested, the natural river channel provides a range of whitewater opportunities ranging from Class I to Class IV, with higher flows in the range of 5,000 cfs and above providing more challenging boating opportunities. At the lower end of the flows tested, flows in

the range of 2,500 to 3,500 cfs provide acceptable minimum boatable flows for all groups except rafters. These lower flows are particularly beneficial for instruction, open boaters, and SUP. Overall, the study unequivocally demonstrates that "[b]ased on the boater perceptions and their responses from the evaluation forms, the evaluation results demonstrate that the Turners Falls bypass reach can provide variable whitewater boating opportunities (whitewater classification, numbers and locations of play areas/features, a range of boater skill level needed to boat the bypass reach, whitewater experiences, suitability for various watercraft types) depending on flows."

4.3 Demand for Whitewater Boating in the Bypass Reach

After conceding that the natural river reach contains rapids ranging from Class I to Class IV that are suitable for whitewater boating at flows ranging from 2,500 cfs to 13,000 cfs, the Licensee then claims that there is no demand for whitewater boating at Turners Falls, arguing:

> *On the whole, the evaluation of whitewater boating demand for the Turners Falls bypass reach suggests that there are numerous whitewater boating opportunities in the region that are available as a result of scheduled releases, or seasonally during periods of high flows, that provide as good or better whitewater opportunities for boaters of all skill levels. These opportunities appear to be sufficient to meet current demand, based on the boaters' ratings of the comparability of these other rivers to the Turners Falls bypass reach. In addition, while the evaluation of the test flows in the Turners Falls bypass reach demonstrates that at certain flows, the Turners Falls bypass reach can provide a quality whitewater boating opportunity for a range of watercraft types and skill levels, when asked, boaters indicated, overall, that the Turners Falls bypass reach generally does not provide a preferable whitewater boating opportunity in comparison to other regional whitewater boating opportunities.*

These self-serving statements by the Licensee are neither supported by the facts nor based on a meaningful attempt to evaluate the demand for whitewater boating at Turners Falls.

With regard to scheduled whitewater boating releases in the region, the options are quite limited. Corps of Engineers releases on regional rivers including the Millers, Westfield, Otter Brook, and Ashuelot Rivers are comparatively low-volume releases that occur in the early spring. The fall drawdown on the Farmington River provides an end-of-season boating opportunity for many paddlers as well. Other than these limited early spring/fall releases, the only scheduled releases on a comparable whitewater river in the region occur on the Deerfield River in Florida, MA. Only the Deerfield provides whitewater releases between Memorial Day and Labor Day when demand is at its highest, but even there, releases are scheduled on approximately 50% of the days during this period.

At lower flows, Turners Falls is similar to the Deerfield in that it provides novice and beginner boaters with the opportunity to develop their skills on a river containing Class II rapids, eddies, and small play features. Rock Dam, like Zoar Gap on the Deerfield, can be avoided, if desired, by less experienced boaters taking the right channel or by portage around Rock Dam. At higher flows, Turners Falls has a big water feel and contains more challenging features suitable for intermediate boaters with more difficult rapids than those found at Fife Brook.

Under the terms of the 1994 Settlement Agreement, New England Power (now Brookfield) is required to release 700 cfs from the Fife Brook Dam during 106 days between April through October. While there is no reliable usage count on the Deerfield, we estimate that there are approximately 50,000 boaters annually at Fife Brook consisting of approximately 20,000 commercial rafting customers and tens of thousands private kayakers, canoeists, and tubers. Many thousands of potential rafting customers are turned away each year on the Deerfield due to limits on the number of commercial rafting customers allowed. While the volume of boaters on the Deerfield has had positive economic benefits for the Charlemont area, the limited alternative boating opportunities has stressed the river and the community at times.

While the Licensee has declared that there is little demand for additional whitewater boating at Turners Falls, they have not undertaken any effort to quantify the usage at Fife Brook or to survey boaters there to determine their interest in boating at Turners Falls if sufficient flows are provided between Memorial Day and Labor Day at the peak of the boating season. The fact that Turners Falls is nearly 2 hours less driving time round trip than Fife Brook for boaters travelling from all significant population centers in the region including Boston, Springfield, Worcester, and Hartford, makes Turners Falls more attractive than Fife Brook and may draw additional boaters to the region given the shorter driving time. Nearly 2 million people live within a 50-mile radius of Turners Falls, and more than 13 million people live within 100 miles (including Boston). The Licensee also ignores boater interest in variety, as boaters frequently seek to experience different rivers. During the summer months, Fife Brook is often the only boating option available.

While the study examined some of the factors that influence a boater's decision of where to boat, such as the availability of whitewater boating features, the report omits any discussion of the factors that are within the Licensee's control. These factors include schedule, access and information. Under current conditions, flows in the natural river channel constantly change due to hydropeaking by TransCanada at Vernon and generation by the Licensee. Boaters cannot plan in advance to boat at Turners Falls without knowledge of whether flows of 5,000-8,000 cfs will be spilled into the river on any particular day. There is no flow phone or website providing this information as in the case of the Deerfield River and there is no schedule of releases. In addition, the inadequacy of the takeout was cited by numerous study participants as one of the more negative aspects of

the run. With improved access, better information, sufficient and reliable flows, and scheduled releases, demand for whitewater boating at Turners Falls would certainly increase.

Contrary to the conclusions drawn from the data by the Licensee, there is strong demand for whitewater boating at Turners Falls based on the responses from most study participants. Comparing Turners Falls to other similar whitewater boating opportunities, a substantial majority of respondents said the Turners Falls reach was average, better than average, excellent, or among the very best:

- 80% rated the river similar to or better than rivers within a 1-hour drive;
- 79% rated the river similar to or better than other rivers in Massachusetts;
- 66% rated the river similar to or better than other rivers in the northeast;
- 50% rated the river is similar to or better than other rivers in the country.[1]

While the study claims that boaters have limited interest in returning to Turners Falls, the data shows otherwise. The vast majority of boaters expressed interest in returning, with responses ranging from possibly, probably or definitely would return at various flows, as follows: 2,500 cfs (58%); 3,500 cfs (77%); 5,000 cfs (100%); 8,000 cfs (95%); 10,000 cfs (97%); and, 13,000 cfs (91%). Contradicting the Licensee's conclusions, the data shows strong demand for boating at Turners Falls.

4.4 Bypass Reach Access

The study evaluated access to the natural river channel at the fishway near the Turners Falls Dam, Station 1, Cabot Woods, and Poplar Street. Participants were asked to evaluate the fishway put-in and the Poplar Street take-out. With regard to the fishway put-in that was used during the study, study participants favorably evaluated this access point to the natural river channel from the parking area upstream of the dam on river left or from the Great Falls Discovery Center. This access point could also be used as a portage by through paddlers on the Connecticut River using a new takeout above the dam on river left and then carrying to the fishway put-in along the bike trail. Modest improvements to this

[1] While the study report repeatedly cites the supposedly short length of the reach and urban/industrial setting as factors that were unappealing to participants and could influence a boater's decision to utilize the bypass reach, the level of concern presented by the Licensee in the report is not reflected in the comments or surveys. The surveys only contain a single comment referencing the supposed "urban" character of the reach in which a participant stated that "River aesthetics improve downstream of the urban area." It should also be noted that the length of the reach is similar to several other popular boating locations in the region. Although the majority of the comments were positive overall, the comments do reflect varying degrees of interest in this reach. Some of the more negative comments are attributable to rafters evaluating the lower flows.

access point or the construction of a river trail would improve access at this location.[2] While this access point is acceptable for most non-commercial users, access for commercial rafts and other large craft is very challenging due to the distance from parking areas to the put-in, and the Licensee should study improvements.

Participants' assessment of the fishway put-in stands in stark contrast to their assessment of the Poplar Street take-out. About 91 percent of participants rated the Poplar Street take-out as moderate or difficult. For boaters in rafts, catarafts, open boats, and for those with physical disabilities, the Poplar Street takeout can be an insurmountable obstacle. The current condition of this access point was so inadequate that the Licensee needed to use a winch to assist boaters in extracting their craft during the whitewater boating study. The location is also inadequate as a portage for through boaters on the Connecticut River. The Licensee unquestionably needs to make improvements to this access point.

With regard to access to Rock Dam, the Licensee did not survey participants about this access point. Instead, the study declares that "the Cabot Woods Fishing Access is not suitable for access to the bypass reach for whitewater boaters due to steep slopes and in-water safety concerns." More accurately, access to Rock Dam from the Cabot Woods Fishing Access is extremely difficult for boaters to navigate in its current condition. There are the remnants of a stairway leading down to the river (the stairway footings remain), although the Licensee removed portions of the stairway to discourage use, making access to Rock Dam more difficult. The Licensee will need to restore the stairway and make improvements to this access to provide safe boating access to Rock Dam and to enable emergency personnel to access the site if needed.

4.5 Whitewater Boating Flow Analysis

The Licensee has analyzed the frequency of flows into the natural river channel under its current mode of operation. Spillage into the natural river channel occurs when flows on the Connecticut River exceed 18,000 cfs at Turners Falls, the hydraulic capacity of the canal. Since there is no USGS gage in the natural river channel, the Licensee calculated flows by subtracting the hydraulic capacity of the power canal and inflows from the Deerfield River from the flows reported on the Connecticut River gage at Montague. Spillage into the natural river channel can range from a few thousand cfs to more that 50,000 cfs after a major rainfall or spring melt.

Based on the Licensee's analysis of 2014, there were boatable flows in the natural river channel between April and November on 45 days at minimum boatable

[2] The study notes that the Turners Falls Station 1 could serve as an alternate access point, although participants were not asked to evaluate this access point.

flows of 2,500 cfs and 40 days at more optimal flows of 5,000 cfs.[3] The bulk of these residual natural flows after diversion for generation occur during the early spring and late fall. Between Memorial Day and Labor Day when boating demand is highest, there were only 4 days in 2014 in which there were boatable flows in the natural river channel under the current mode of operation.

Citing the need to await the results of other studies, the Licensee limited its flow analysis to the current mode of operation. Given the likelihood that the resource agencies will proscribe a minimum flow greater than the current minimum flow of nearly zero under the current license, the Licensee should expand its flow analysis to include alternate modes of operation. Specifically, the Licensee should study the operational impact of providing whitewater boating flows at all levels evaluated in this study with the assumption that minimum flows in the range of 0.2 (current Vernon minimum flow) to 0.5 mi^2 (current Bear Swamp minimum flow) will be proscribed under the new license. Alternatively, FERC should regard the Whitewater Boating Study as an interim report and require appropriate revision to reflect alternate modes of operation pending the completion of other relevant studies.

4.6 Potential Impacts to Other Resources

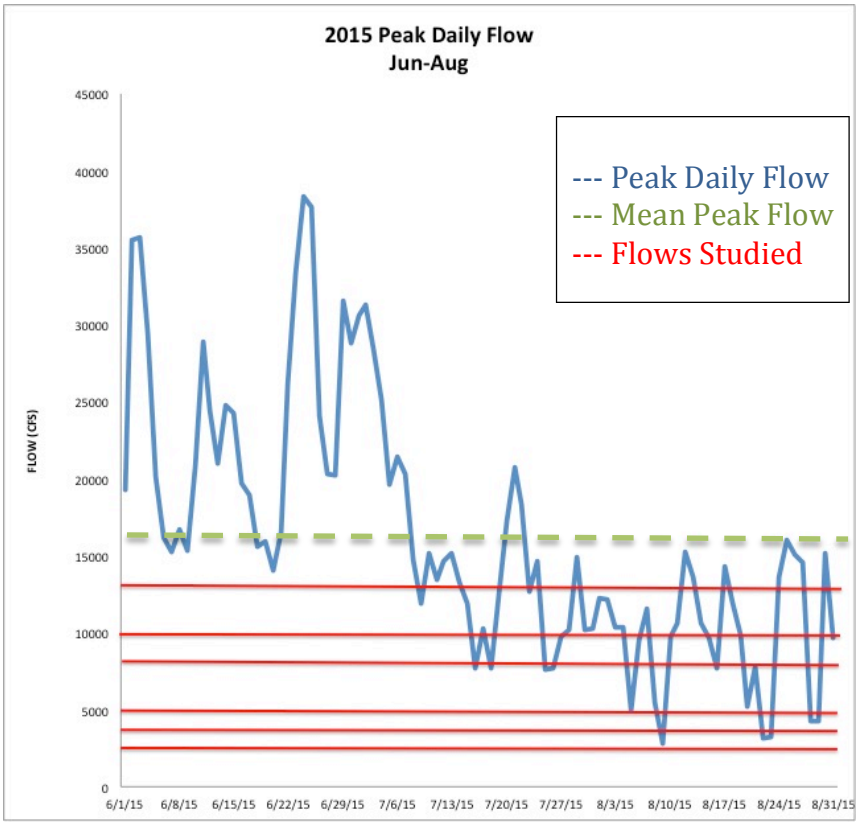
Although unsupported by any study data, the Licensee states that "it is expected that there could be concerns about potential impacts to aquatic resources in the bypass reach and to motorized boating on the Turners Falls Impoundment associated with providing high flow releases into the bypass during periods of the year when high flows would not normally occur in the river." After accounting for inflows from the Deerfield River, the USGS gage data for the Connecticut River at Montague contradicts the Licensee's assertion that boatable flows in the natural river channel in the range evaluated in the flow study would not normally occur in the river. (See chart on page 11).

Flows on the Connecticut River at Turners Falls fluctuate based on natural inflows and hydropeaking at Vernon Dam and Northfield Mountain Pumped Storage. In this modified flow environment, inflows into Turners Falls fluctuate significantly on a daily, even hourly, basis. An examination of the Turners Falls inflows during the summer months (Jun, July, August) in 2015 shows that flows fluctuated from a low of 2,778 cfs to a high of 38,328 cfs with a mean peak flow of 16,227 cfs. But for the power generating activities of the Licensee, these flows would normally occur in the natural river channel at Turners Falls based on the modified flow regime upstream of the project.

A comparison of project inflows to the flows evaluated in the Whitewater Boating Evaluation demonstrates that minimum and optimal boating flows would normally occur in the natural river channel throughout the summer months absent

[3] While the study identifies April-November as the boating season, it provides boat rental and access at Barton Cove and Munns Ferry from Memorial Day to Columbus Day.

the power generating activities of the Licensee. Adverse impacts to aquatic resources would not result from the restoration of project inflows into the natural river channel, rather they are the result of the Licensee's diversion of inflows and dewatering of the river. With regard to shortnose sturgeon spawning and rearing, restoration of flows to the natural river channel would allow sturgeon to spawn at their natural spawning ground at Rock Dam rather than at the tailrace where flows from stochastic releases range from zero to more than 10,000 cfs. The restoration of variable flows in the natural river channel in excess of 2,500 cfs would be beneficial to sturgeon spawning and rearing as compared to the impact that the current mode of operation has on a federally endangered species.



With regard to motorized boating usage in the project reservoir upstream of the Turners Falls Dam, the study provides no data on the extent of the reservoir level fluctuation that would result from whitewater releases, as opposed to regular generational flows from the reservoir. Under the current license, reservoir levels can fluctuate up to 9 feet, far more than any minimal impact of a few inches that could theoretically result from whitewater releases. Furthermore, the Licensee has not studied the extent to which current or alternative modes of operations would impact motorized boat usage in the reservoir. We encourage the Licensee to undertake such an analysis and modify the study report accordingly. Based solely on inflows from 1250 cfs minimum flow from Vernon under the current license plus inflows from tributaries, we expect that fluctuations from whitewater

releases could be in the range of 2-5 inches during the driest month, and likely no pool lowering at other times, particularly if generation by TransCanada at Vernon was timed to coincide with scheduled releases, as in the case of the Deerfield River, or through utilization of the pumped storage to stabilize reservoir levels.

Conclusion

American Whitewater respectfully requests that FERC accept these comments and direct the licensee to further revise the Whitewater Boating Study to address the concerns raised by stakeholder groups. Thank you for considering these comments.

Respectfully submitted this 12th day of November, 2015.

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Turner's Falls Hydroelectric Project **FirstLight Power Resources**	**FERC Project No. 1889**

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, Appalachian Mountain Club, New England FLOW, Crab Apple Whitewater, and Zoar Outdoors' Comments on Relicensing Study 3.6.3 for the Turner's Falls Hydroelectric Project (P-1889)** to be served upon each person designated on the official service list compiled by the Secretary in this proceeding.

Dated this 12th day of November, 2015.

Megan Hooker
American Whitewater