

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

FirstLight Power Resources

Turners Falls Project No. 1889-081
Northfield Mountain
Pump Storage Project No. 2485-063

NEW ENGLAND FLOW, AMERICAN WHITEWATER, AND THE APPALACHIAN
MOUNTAIN CLUB'S COMMENTS AND STUDY REQUESTS
IN RESPONSE TO THE NOTICE OF INTENT TO FILE LICENSE APPLICATION, FILING
OF PRE-APPLICATION DOCUMENT (PAD), COMMENCEMENT OF PRE-FILING
PROCESS, AND SCOPING: REQUEST FOR COMMENTS ON THE PAD AND SCOPING
DOCUMENT, AND IDENTIFICATION OF ISSUES AND ASSOCIATED STUDY
REQUESTS REGARDING THE TURNERS FALLS HYDROELECTRIC PROJECT, FERC
PROJECT NO.1889-081 AND THE NORTHFIELD MOUNTAIN PUMP STORAGE
PROJECT, FERC PROJECT NO. 2485-063.

New England FLOW is a regional non-profit organization whose affiliations have represented whitewater boaters, canoeists, rafters, and other river users on multiple project re-licensings throughout New England for over 25 years. American Whitewater is a national non-profit organization dedicated to protecting and restoring our nation's whitewater resources and enhancing opportunities to enjoy them safely. Since 1876, the Appalachian Mountain Club (AMC) has promoted the protection, enjoyment, and understanding of the mountains, forests, waters, and trails of the Appalachian region, and is the largest conservation and recreation organization in the Northeast with more than 90,000 members. All three groups are steering committee members of the Hydropower Reform Coalition based in Washington, D. C. Our members who are primarily conservation-oriented kayakers, canoeists, and rafters would enjoy this section of the Connecticut River as a weekend trip.

The Turners Falls section of the Connecticut River has the potential ability to offer whitewater paddling opportunities of sufficient quality during irregular spillage events. At moderate spillage flows, the bypass run is used by boaters to surf waves and perform a wide array of acrobatic tricks called "freestyle" paddling. All manufacturers of whitewater kayaks design boats for this purpose.

In addition to kayaking, this reach has potential for rafting, guided kayaking, canoeing, instruction, and general paddling use. Collectively, the recreational use of the resources at this project has the potential to add economic value to the region given its central New England location and its proximity to the University of Massachusetts, Holyoke and Greenfield Community Colleges, and the Northfield-Mt. Hermon School. Millions of people live within a three-hour drive of the Turners Falls facility.

Issue #1: Impacts of the Connecticut River flow diversion on recreational paddling at the Turners Falls bypass reach.

The Turners Falls project's 2.7-mile diversion reduces instream flows substantially, leaving only minimum flows or those flows required for fish passage by the U. S. Fish & Wildlife Service, National Marine Fisheries Service, or the Massachusetts Department of Fish & Wildlife. Natural boatable flows under current operations are high, flashy, unpredictable, and are only available during periods of seasonal spillage to reduce flooding. Some of the whitewater opportunities eliminated by the project could be provided in a moderate, stable, and predictable operational mode and occur during warm weather. The current operation of the project, and lack of access, virtually eliminates valuable summer paddling opportunities.



Lost Rapids Below the Dam Under Turners Falls Bridge

The analysis presented is based on the anecdotal experience provided by local and regional boaters who have used this reach when it becomes available. The recreation-flow relationship needs to be substantiated through both operational analyses and recreational analyses. The correct context to conduct this inquiry is through the use of a “controlled-flow analysis,” a stepwise methodology described by Whittaker et al., in *“Flows and Recreation: A guide to studies for river professionals”* (2005), as we formally request below.

In the PAD, the Licensee proposes no flow enhancement to mitigate the project's effects on whitewater recreational use.

In addition to recreation and aesthetics, we recognize that flow-related decisions also affect economic factors related to power generation and other environmental variables, particularly fish passage. We look forward to exploring how all flow-related values relate to one another through participation in this relicensing process.

Issue # 2: Public Access for whitewater boating, rafting, and canoeing is inadequate.

Directly below the Turners Falls Dam at Station #1, there is currently no formal public access or parking owned by the Licensee for whitewater boaters. In order to access the whitewater rapids directly below the Turners Falls Dam, boaters must use the parking available at the Great Falls Discovery Center. Adjacent to the Center is a footpath that boaters can traverse down to the river; however, the Licensee does not own this lot. For access to the whitewater flows below the Cabot Station, parking for boaters is likewise problematic, with limited parking. The takeout for both runs (Station # 1 and Cabot) is at the confluence of the Deerfield River. The access road to this site is not adequate for ordinary 2-wheel drive vehicles and should be upgraded. The steep riverbanks make egress at the end of the run difficult, and although able-bodied kayakers can struggle up the path, the terrain severely limits rafting use, or use by anyone carrying a heavy canoe.

The Licensee identifies in the PAD a shuttle service around the dam for canoeists or boaters, but it provides no value to whitewater enthusiasts who wish to access the rapids immediately below the dam. Boaters are picked up at Barton Cove and shuttled to a put-in off Poplar Street in Montague City, eliminating any potential whitewater run. This portage is unacceptable for flatwater boaters and no use at all to whitewater boaters.

In the PAD, the Licensee proposes no new river access areas.

Issue # 3: Adequacy of camping and sanitary facilities available for multiple-day kayaking or canoe trips (Recreation Use and Needs).

In the PAD, the Licensee cites the Massachusetts SCORP (2006-2011), which indicated a need for “water-based” activities, and one of the goals of the New Hampshire SCORP identified the need for a variety of recreational opportunities. The Vermont SCORP (2005-2009) reveals the need for access to all types of outdoor recreation. While the applicant has itemized and described the different recreational opportunities available throughout the reach from Turners Falls Dam to the Vernon Dam, they have not provided a qualitative analysis of these facilities.

Information provided by canoe clubs and other river recreational interests cite changing demographics and an increase in sea kayaking as reasons for the high interest in flatwater paddling and multiple-day canoe trips.

In the PAD, the Licensee identifies two sites, Barton Cove Campground and Munn’s Ferry Campground, as the only two sites with facilities amenable to multi-day trips. However it does not quantify the number of campsites available or the quality of the facilities within each location. Barton Cove Campground does not have a suitable landing site. Nor does the PAD address the adequacy of such facilities for increased use over the next 30 years of a license.

In the PAD, the Licensee proposes no new camping sites or upgrades to existing sites.

Issue #4: Economic impacts.

The diversion of flow around the Turners Falls Dam has significant negative recreational impacts and related socio-economic impacts. By changing the operational scenario of the Turners Falls Project, the potential exists to create new tourism products for a region that is primed to capitalize on it. Retail activity, and food and lodging opportunities will be geared toward non-commercial paddlers, and thousands of people who currently travel to the region each year for rafting, kayaking and other outdoor adventure activities will discover added value to the region.

In making a public interest decision, FERC must weigh the value of water in the river against the value of water in the bypass reach, and then reach a comprehensive plan for the development of the river that strikes the appropriate balance and is best adapted to the river. In many dam relicensing proceedings, the values of flow restoration are largely recreational and ecological, and thus hard to evaluate in dollars. In this case, because of its potential to increase recreation with scheduled flows, we believe FERC should also weigh the predicted economic value associated with the recreational use when looking at various alternatives.

Issue #5: Mitigation for Loss of Whitewater Recreation at Great Falls and Upstream

The Turners Falls Dam sits atop Great Falls and drowns whitewater rapids upstream under a reservoir that extends all the way to the Vernon Dam. Construction of the dam eliminated significant whitewater opportunities both above and below the dam. It would be possible to compensate for this loss through either on-site or off-site mitigation such as at Bellows Falls.



Lost Rapids in the Bypass Reach Below the Dam

In 2012, Secretary of the Interior Ken Salazar designated the Connecticut River and Watershed as the nation's first National Blueway. The National Blueway System (NBS) goals include

providing outdoor recreation. NBS takes a watershed and source-to-the sea view of the river in seeking to advance “conservation, outdoor recreation, education, and sustainable economic opportunities” in the watershed. The National Blueway designation includes all the tributaries in the 7.2 million acre Connecticut River watershed and has the support of several federal agencies, including the U.S. Army Corps of Engineers, the Silvio Conte Refuge, U.S. Fish and Wildlife Service, the National Park Service, and the States of Connecticut, Vermont, New Hampshire, and the Commonwealth of Massachusetts, which have prioritized conservation, recreation, and restoration.

Study Requests

We hereby request several studies per 18 CFR 5.9(b).

1. Controlled Whitewater Flow Study in the bypass reach below Turners Falls Dam.

(1) Describe the goals and objectives of each study proposal and the information to be obtained.

The goal of a whitewater flow study is to assess the presence, quality, access needs, flow information needs, and preferred flow ranges for river-based boating resources in a stepwise manner. The information to be obtained can be generally characterized as quantitative and qualitative descriptions of:

- The range of optimal and acceptable flows for whitewater paddling;
- The frequency, timing, duration and predictability of optimal and acceptable paddling flows under current conditions in the bypass reach, and how proposed alternative operations could be used;
- The access needs of whitewater boaters and the current and potential river access option for whitewater and other paddling;
- The flow information needs of whitewater boating and the current and potential flow information distribution system;
- The location, challenge, and other recreational attributes associated with specific rapids and other river features.

Thus, the information to be obtained for the whitewater paddling study is a combination of user-generated flow preferences and other data from test runs, information on current and proposed operations (e.g. discharges), geographic information, and basic recreational information.

(2) If applicable, explain the relevant resource management goals of the agencies or Indian tribes with jurisdiction over the resource to be studied.

The requester is not a resource agency.

(3) If the requester is not a resource agency, explain any relevant public interest considerations in regard to the proposed study.

The Turners Falls bypass reach offers the public a high-quality whitewater boating resource when flow conditions are suitable. Conducting the necessary studies and implementing measures to ensure public access to outdoor recreation is in the public interest. It is widely accepted that outdoor recreation has significant benefits to participants including health, well being, and quality-of-life. Outdoor recreation also has proven economic benefits for communities located near recreational resources.

Restoration of whitewater recreational opportunities in the Connecticut River has the potential to offer the region economic benefits. FERC has concluded that *“to fully evaluate the project’s effect on whitewater recreation opportunities and to balance potential enhancement opportunities with their cost, a controlled-flow whitewater boating study is relevant to Commission’s public interest determination.”* This is equally true regarding the Turners Falls Project on the Connecticut River.

The Commonwealth of Massachusetts owns and operates several river access areas on the Connecticut River in the vicinity of the Project, and thus has a clearly expressed interest in the public’s ability to navigate the state’s rivers. In addition to this interest, the Connecticut River and Watershed has been designated at America’s first *“Heritage River”* and *“National Blueway.”*

(4) Describe existing information concerning the subject of the study proposal, and need for additional information.

While many flow studies as described above have been conducted during FERC relicensings on New England’s rivers (e.g., Deerfield, Kennebec, Rapid, Green) that have a long history of whitewater paddling use, this section of the Connecticut River is largely unknown to whitewater boaters. Rapids are un-named, the range of difficulty is unknown, and current access opportunities are difficult. The potential high quality of this scenic 2.7-mile long whitewater run should be explored.

Current and historic project operations, however, have resulted in significant information gaps and virtually eliminate all stable low and moderate flows from this reach. The result has been flows too low to paddle, or flashy, spiking high flows. Intermediate paddlers, commercial paddlers, and general river-runners know relatively little about this river at low or moderate flows. It should also be determined if there is adequate potential to improve river access in a way that offers a high quality car-top put-in and takeout that allows for use of the entire bypass reach.

(5) Explain any nexus between Project operations and effects (direct, indirect, and/or cumulative) on the resource to be studied, and how the study results would inform the development of license requirements.

The Project controls flows in the Connecticut River by withdrawing more than 13,000 cfs. The operations eliminate 95% of the paddling days on average each year, including the virtual elimination of valuable and regionally needed summer paddling opportunities. The Connecticut

River can be a high-quality paddling resource, and since paddling is a flow dependent activity, the project directly affects paddling on the Connecticut River. The project nexus is direct. The results of a controlled flow study would help determine the need for license requirements for scheduled whitewater releases.

(6) Explain how any proposed study methodology (including any preferred data collection and analysis techniques, or objectively quantified information, and a schedule including appropriate field season(s) and the duration) is consistent with generally accepted practice in the scientific community or, as appropriate, considers relevant tribal values and knowledge.

The study we request on the Turners Falls reach of the Connecticut River should follow the standard methodology as described in Whittaker, referenced above. This methodology is designed to gather information to assess the presence, quality, and preferred flow ranges for river-based boating resources in a step-wise manner. The process steps are generally 1) desktop analyses, 2) on-land feasibility assessment, 3) on-water single flow assessment, and 4) on-water multiple flow assessment. We request the full implementation of this methodology.

Because the quality of the resource and flow needs are not known, we request that an on-water multiple flow assessment be conducted. This study will need to take place on various dates and at variable flow levels throughout a spring and summer. Spring dates are needed to capture moderate and high flows, which may be primarily stochastic, while late spring and summer dates afford the opportunity for scheduled lower flow releases. Higher flow data may be best gathered by an internet-based survey, while lower flow data may be best gathered on-site through controlled study opportunities. We will work with the Licensee to document the known information regarding the river. We will provide volunteers and technical support for the studies as appropriate. We hope to work collaboratively with the Licensee on this study. The whitewater boating study methodology we have requested has been used on dozens of other FERC regulated reaches.

(7) Describe considerations of level of effort and cost, as applicable, and why any proposed alternative studies would not be sufficient to meet the stated information needs.

We are willing to work with the Licensee on the whitewater paddling controlled-flow study to keep costs reasonable and the quality of information high. The information that is already known can jump-start the study process and avoid un-needed effort. What will be subsequently needed is the integration of this information and then an organized flow study during which several flows are paddled by boaters, with still image and video documentation, surveys of the boaters, a guided conversation among the boaters, and subsequently a written report. Given that this is a bypass reach with some access and relatively straightforward hydrology, and given the collaborative approach sought by the paddling community, including in-kind contributions of time and expertise, a consultant should be able to complete this study on behalf of the Licensee for a very reasonable cost.

The Licensee PAD proposes no whitewater feasibility analysis. This no-action step will reveal nothing about the project impacts on whitewater recreation or opportunities for protection, mitigation, or enhancement measures. We currently do not know the relationship between

specific low- and moderate-flows and the paddling experiences they provide. A desktop analysis cannot generate this information. Without this information we cannot fully define the project impacts, nor propose and consider provision of releases that provide targeted recreational experiences.

2. Public Access for whitewater boating, rafting, and canoeing is inadequate.

(1) Describe the goals and objectives of each study proposal and the information to be obtained.

The goal of this study is to identify and define adequate access points that provide trails and car-top parking at Station #1 and Cabot Station, and egress at the end of the 2.7-mile run at the confluence of the Deerfield River. The paddling community is interested in access points for the following areas:

- At Turners Falls Dam at Station #1
- At Turners Falls Dam at the Great Falls Discovery Center
- At Cabot Station
- At the confluence of Connecticut and Deerfield Rivers.

(2) If applicable, explain the relevant resource management goals of the agencies or Indian tribes with jurisdiction over the resource to be studied;

The requester is not a resource agency.

(3) If the requester is a not resource agency, explain any relevant public interest considerations in regard to the proposed study.

The public has an interest in healthy rivers and streams that support the full suite of beneficial uses and other goals of the Clean Water Act. Access to streams and rivers with adequate base flows and sufficient variability to support high-quality whitewater recreational use will support other businesses within the regional economy.

Several federal agencies may have management goals under the National Blueway System, including the Department of Interior and the National Park Service.

(4) Describe existing information concerning the subject of the study proposal, and the need for additional information.

There is an inconsistent body of knowledge regarding access needs in this reach, and we look forward to learning more. The PAD does not identify access points for any type of whitewater use.

(5) Explain any nexus between Project operations and effects (direct, indirect, and/or cumulative) on the resource to be studied, and how the study results would inform the development of license requirements

The project eliminates or does not provide access points for whitewater use. This study is vital to developing a mechanism for defining access points that can best be adapted for whitewater boating and other potential uses.

This study may result in license requirements or other mitigation for the Licensee regarding access to the Connecticut River.

(6) Explain how any proposed study methodology (including any preferred data collection and analysis techniques, or objectively quantified information, and a schedule including appropriate field season(s) and the duration) is consistent with generally accepted practice in the scientific community or, as appropriate, considers relevant tribal values and knowledge.

The flows that paddlers enjoy on virtually all undammed streams are natural components that provide recreation and multiple other functions. Hydropower project operations disrupt or eliminate access that would otherwise naturally provide these recreational values. We request sufficient analysis be conducted to understand the Project topography that would detail which sites would best provide adequate access for multiple uses. Use of Geographic Information System (GIS) may provide a general overview of potential access points within Project bounds and may be helpful.

Given the steep topography leading to the bypass reach, this work should be completed using accepted and certified surveying methods that “ground truth” GIS analysis. Scheduling of this work should be completed during the summer field season when low seasonal flow will allow surveying activities within the bypass reach.



Boater access ramp at the Kennebec River in Maine

(7) Describe considerations of level of effort and cost, as applicable, and why any proposed alternative studies would not be sufficient to meet the stated information needs.

The recommended GIS analysis is a relatively simple desktop analysis using software that is currently available and thus should require little effort or cost. Once potential access points are identified, the cost of a survey is nominal when presented in the context of other studies required by FERC or other stakeholders. No other studies would address the specificity required to identify, layout, and design adequate access for this project.

3: Camping and sanitary facilities available for multiple-day kayaking or canoe trips (Recreation Use and Needs).

(1) Describe the goals and objectives of each study proposal and the information to be obtained.

The goal of this study is to provide a quantitative and qualitative analysis of existing facilities to determine their capacity to manage the increasing number of paddlers who are making multiple-day trips on the Connecticut River. This study should also identify other points on the river that would be suitable for the establishment of additional facilities. And it should assess the adequacy of such facilities for a 30-50 year license period during which river use will increase dramatically.

(2) If applicable, explain the relevant resource management goals of the agencies or Indian tribes with jurisdiction over the resource to be studied;

The requester is a not resource agency.

(3) If the requester is a not resource agency, explain any relevant public interest considerations in regard to the proposed study.

The public has an interest in healthy rivers and streams that support the full suite of beneficial uses and other goals of the Clean Water Act. Access to streams and rivers with adequate base flows and sufficient variability will support high-quality recreational use. Information provided by canoe clubs and other river recreational interests cite changing demographics and the rise of sea kayaking as reasons for high interest in flatwater paddling and multiple-day canoe trips.

In the PAD, the Licensee cites the Massachusetts SCORP (2006-2011), which indicated a need for “water-based” activities, and one of the goals of the New Hampshire SCORP identified the need for a variety of recreational opportunities. The Vermont SCORP (2005-2009) reveals the need for access to all types of outdoor recreation.

In addition, the National Blueway System seeks to promote recreational uses wherever possible.

(4) Describe existing information concerning the subject of the study proposal, and the need for additional information.

The Licensee identifies two sites, Barton Cove Campground and Munn’s Ferry Campground, as the only two sites with facilities amenable to multi-day trips. One of the better publications available to gather this information is *The Connecticut River Boating Guide: Source to the Sea*, published by the Connecticut River Watershed Council, 3rd Edition, 2007. Those who have through-paddled the Connecticut River say that camping opportunities evaporate once they cross the Massachusetts border. They find islands closed to camping, and frequently end up sleeping on mudflats or illegally camping on isolated privately-owned sites.

(5) Explain any nexus between Project operations and effects (direct, indirect, and/or cumulative) on the resource to be studied, and how the study results would inform the development of license requirements.

This study will be the defining mechanism for identifying additional sites that can best be adapted for increasing public access and multiple-day paddling trips on the Connecticut River. License requirements may include having the Licensee purchase additional property to provide camping, trail sites, portages or other facilities to assist the public.

(6) Explain how any proposed study methodology (including any preferred data collection and analysis techniques, or objectively quantified information, and a schedule including appropriate field season(s) and the duration) is consistent with generally accepted practice in the scientific community or, as appropriate, considers relevant tribal values and knowledge.

Our interest is in having sufficient information to understand what facilities exist, and what, if any, improvements are necessary to manage an increasing use of multiple-day kayak and canoe trips on the Connecticut River. This analysis should include recommendations for the acquisition and development of additional facilities to meet the interests and needs identified in the multi-state SCORP documents cited by the Licensee in the PAD, and adequate for a 30-50 year license.

(7) Describe considerations of level of effort and cost, as applicable, and why any proposed alternative studies would not be sufficient to meet the stated information needs.

There are several sites along the Connecticut River, private and public, that are used as access points or have camping facilities. However, there are vast differences in the ability or capacity of these sites to handle paddling groups of varying size and numbers or sanitation needs. Because there is no comprehensive guide or text that provides updated information, visual inspection of existing sites should take place. Any needed reconstruction or rehabilitation of existing facilities should be identified. This analysis can be completed during any spring, summer, or fall field season. Such field research needs to be matched with projections of use in the future and with standard requirements for access sites, campsites, portages, and sanitation facilities.

4: Economic impacts.

(1) Describe the goals and objectives of each study proposal and the information to be obtained.

The goal of the recreational economic impact study is to examine the regional economic benefits of various flow alternatives that can be provided by restoring flows to the Turners Falls bypass reach. This study should include a contingent valuation study that compares the economic values of recreation to power generation.

(2) If applicable, explain the relevant resource management goals of the agencies or Indian tribes with jurisdiction over the resource to be studied.

The requester is not a resource agency.

(3) If the requester is a not resource agency, explain any relevant public interest considerations in regard to the proposed study.

Economic stimulus is clearly in the public interest. Many New England hydropower projects support robust recreation economies. The Deerfield River (FERC No. 2334-0-0) currently injects over \$10 million annually into the community of Charlemont, Massachusetts, and is a superb example of supporting multiple businesses throughout the town. Other examples include the Kennebec River and the Penobscot River in Maine, the Black River in New York, and the Gauley River in West Virginia.

(4) Describe existing information concerning the subject of the study proposal, and the need for additional information.

We are unaware of existing information regarding the economic potential of the Turners Falls bypass reach and we look forward to learning more. However, Crane Associates of Burlington, Vermont, published a study in 2005: *“The Economic Impacts of Whitewater Boating on the West River, Jamaica, Vermont.”*

(5) Explain any nexus between Project operations and effects (direct, indirect, and/or cumulative) on the resource to be studied, and how the study results would inform the development of license requirements.

The project has eliminated most paddling opportunities throughout the year. Many of these days could provide kayaking, instructional paddling, canoeing, paddle-boarding, and rafting, all of which have ancillary economic benefits associated with any form of tourism.

Understanding the economic values that could be provided by restoring paddling recreation to the Turners Falls bypass reach will assist FERC and other stakeholder in balancing the trade-offs associated with lost generation. In the case of the Deerfield River, the value of whitewater recreation outweighed the value of power generation by a margin of 24:1.

(6) Explain how any proposed study methodology (including any preferred data collection and analysis techniques, or objectively quantified information, and a schedule including appropriate field season(s) and the duration) is consistent with generally accepted practice in the scientific community or, as appropriate, considers relevant tribal values and knowledge.

Since the present economic values cannot be determined because there is currently minimal recreational activity in the bypass reach, we request the study be compiled using the “contingent valuation” method that measures individual’s “willingness to pay.” These values can then be compared to the dollar values of power generation. The economic benefits can be extrapolated to develop an understanding of how those dollars will be multiplied throughout the community as benefits associated with paddling activities. Overall visitor spending will contribute to the

economy of the immediate and adjacent region. Such a contingent valuation study would appropriately be done following test runs on the bypass reach for the study described above.

(7) Describe considerations of level of effort and cost, as applicable, and why any proposed alternative studies would not be sufficient to meet the stated information needs.

Primary data should be collected through survey instruments circulated through known paddling clubs throughout New England during the winter months. Individual interviews should be taken on days when the nearby Deerfield River is having releases, and the survey should include kayakers, canoeists, and rafters of varying abilities. Customers of commercial outfitters should also participate in the survey as well as outfitters that provide tubing equipment for those individuals that enjoy just floating down the river. Paddlers who participate in test runs would have a firsthand knowledge of the values.

Contingent valuation studies provide reliable, comparable information that can be used to frame license requirements.

The Licensee has proposed no economic studies in the PAD.

5. Mitigation of Impacts on the Connecticut River and Loss of Whitewater Recreation at and above Turners Falls Dam

(1) Describe the goals and objectives of each study proposal and the information to be obtained.

The goal of this study is to assess the presence, quality, access needs, flow information needs, and preferred flow ranges for regional whitewater boating resources that would mitigate for the loss of whitewater recreation at the Turners Falls Dam.

(2) If applicable, explain the relevant resource management goals of the agencies or Indian tribes with jurisdiction over the resource to be studied.

The requester is not a resource agency.

(3) If the requester is not a resource agency, explain any relevant public interest considerations in regard to the proposed study.

The Turners Falls Dam removes the public's opportunity to enjoy a whitewater boating resource. Conducting studies and implementing the necessary measures to ensure the public has access to whitewater recreational resources is in the public interest.

Using off-site mitigation has historically been an acceptable practice in FERC licensing. This is evidenced in the Upper Androscoggin Settlement Agreement (FERC No. 11834-000) for the Rapid and Magalloway Rivers in Maine, as well as the Canada Falls Settlement Agreement (FERC No. 2634) for the South Branch of the Penobscot River in Maine.

On May 24, 2012, Secretary of the Interior Ken Salazar designated the Connecticut River and Watershed as the nation's first National Blueway. A Memorandum of Understanding signed in August by the Departments of Interior, Agriculture, and the Army has an objective of "providing opportunities for scientific research, environmental education and outdoor recreation and access within the National Blueway to the extent compatible with agency missions." The National Blueway concept takes a watershed viewpoint and addresses the river from its source to the sea. 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." The National Blueway designation includes all the tributaries in the watershed and involves several federal agencies. These agencies include the U.S. Army Corps of Engineers, the Silvio Conte Refuge, the U.S. Fish and Wildlife Service, the National Park Service, and the States of Connecticut, Vermont, New Hampshire, and the Commonwealth of Massachusetts, which have prioritized conservation, recreation, and restoration in the 7.2 million-acre Connecticut River Watershed.

Restoration of recreation opportunities in the watershed of the Connecticut River has the potential to offer the region significant economic benefits.

(4) Describe existing information concerning the subject of the study proposal, and need for additional information.

Current and historic project operations at the Turners Falls Dam provide no consistent or meaningful information for this type of mitigation. It should be determined what flows in the region are best suited for maximum recreational use.

(5) Explain any nexus between Project operations and effects (direct, indirect, and/or cumulative) on the resource to be studied, and how the study results would inform the development of license requirements.

The flows from Station #1 and Cabot Station at Turners Falls vary between base load and peaking. It becomes very difficult for whitewater boaters to have any consistent flows for whitewater recreation. The Project controls the entire flow in the Connecticut River and the Licensee apparently has limiting factors that generally prevent boatable conditions in the bypass reach and main stem channel except during flood conditions. The result also damages regionally needed summer paddling opportunities in the main stem below the bypass reach.

The dam itself was built on the Great Falls and dewatered the bypass reach, and the reservoir drowned upstream rapids, which would be sufficient cause for off-site mitigation. FERC needs to balance the paddling resources and power generation under the "*Electric Consumers Protection Act*" (16 U.S.C. §797,803). The project nexus is direct.

Study results would and should develop the basis of license terms, including possible off-site mitigation, that could protect the public interest and provide the balance mandated under ECPA.



Lost Rapids Downstream From Station #1 and Cabot Station

(6) Explain how any proposed study methodology (including any preferred data collection and analysis techniques, or objectively quantified information, and a schedule including appropriate field season(s) and the duration) is consistent with generally accepted practice in the scientific community or, as appropriate, considers relevant tribal values and knowledge.

The first step would gather information to assess the presence and quality of options for off-site mitigation. The process steps are generally 1) desktop analyses of candidate rivers, 2) resource agency identification and feasibility assessment, and 3) inter-agency meetings with resource agencies, Licensee, and representatives of the boating community to explore opportunities for mitigation.

We will provide volunteers and technical support for the studies as appropriate. We hope to work collaboratively with the licensee and other agencies on this study.

(7) Describe considerations of level of effort and cost, as applicable, and why any proposed alternative studies would not be sufficient to meet the stated information needs.

We are willing to work with the Licensee on an off-site mitigation study to keep costs reasonable and the quality of information high. Any information that is already known through numerous guidebooks and publications can jump-start the study process and avoid un-needed effort. What will be subsequently needed is the integration of this information and then organized meetings to study alternatives, and subsequently a written report.

Given the collaborative approach sought by the paddling community, including in-kind contributions of time and expertise, the Licensee and agencies should be able to complete these studies for this unique approach to mitigation for a very reasonable cost.

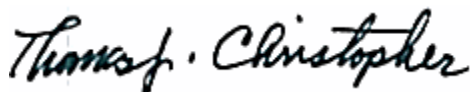
The Licensee PAD proposes no whitewater feasibility analysis.

Conclusion:

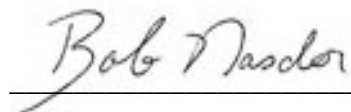
We respectfully request the hydrological, recreational, economic studies, and off-site mitigation that will support the dialog and analysis regarding the restoration of flows and associated recreational values to the Turners Fall project.

In addition, in these comments we offer our comments on the PAD, to better inform this relicensing process. Thank you for considering these comments.

Respectfully submitted this 28th day of February, 2013



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

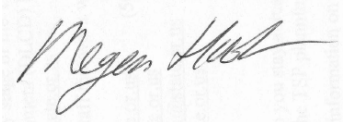
FirstLight Power Resources

Turners Falls Project No. 1889-081
Northfield Mountain
Pump Storage Project No. 2485-063

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 NEW ENGLAND FLOW, AMERICAN WHITEWATER, AND THE APPALACHIAN MOUNTAIN CLUB'S COMMENTS AND STUDY REQUESTS IN RESPONSE TO THE NOTICE OF INTENT TO FILE LICENSE APPLICATION, FILING OF PRE-APPLICATION DOCUMENT (PAD), COMMENCEMENT OF PRE-FILING PROCESS, AND SCOPING: REQUEST FOR COMMENTS ON THE PAD AND SCOPING DOCUMENT, AND IDENTIFICATION OF ISSUES AND ASSOCIATED STUDY REQUESTS REGARDING THE TURNERS FALLS HYDROELECTRIC PROJECT, FERC PROJECT NO.1889-081 AND THE NORTHFIELD MOUNTAIN PUMP STORAGE PROJECT, FERC PROJECT NO. 2485-063 to be served upon each person designated on the official service list compiled by the Secretary in this proceeding.

Dated this 28th day of February, 2013.

A handwritten signature in cursive script, appearing to read "Megan Hooker", is written over a faint, repeating background pattern of the words "FEDERAL ENERGY REGULATORY COMMISSION".

Megan Hooker
American Whitewater
Bend, Oregon

Document Content(s)

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