New England *FLOW*~~~~~~~~~~~~~~~~~~~~~~~~

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UNITED STATES OF AMERICA
FEDERAL ENERGY REGULATORY COMMISSION

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

NEW ENGLAND FLOW'S
COMMENTS ON UPDATED PROPOSED STUDY PLANS
FOR THE TURNERS FALLS HYDROELECTRIC PROJECT, FERC PROJECT NO.1889-081, AND THE NORTHFIELD MOUNTAIN PUMPED STORAGE PROJECT, FERC PROJECT NO. 2485-063.

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 many of whom live within three hours of the Connecticut River and would enjoy this section as a daylong or longer trip or as a whitewater opportunity.

Representatives of New England FLOW attended face-to-face sessions held by FirstLight at its Northfield Mountain facility to discuss the proposed study plans. We reference our comments made at those meetings.

FirstLight should be complimented for selecting qualified consultants to administer these studies. The consultants acknowledged our suggestions at the face-to-face meetings and displayed a good knowledge of the river. Our comments below are intended to help them gather more and better data from their surveys and research.

Summary of comments:

In this filing, we emphasize that FirstLight should also survey non-users of the river, who may have been pushed away by a lack of recreation facilities or by facilities that are not suited to their forms of recreation. We suggest that more sophisticated and contemporary survey techniques be used by the applicant, including more qualitative forms such as focus groups. We also make what we consider important comments about the non-existent portage trail around the Turners Falls Dam, educational benefits at Northfield Mountain, the whitewater boating study in the bypass reach, and about the failure of FirstLight to do a contingent valuation study.

Comments on specific studies:

3.6.1 Recreation Use/User Contact Survey.
3.6.4, Assessment of Day Use and Overnight Facilities Associated with Non-motorized Boats.
3.6.7, Recreation Study and Northfield Mountain, including Assessment of Sufficiency of Trails for Shared Use.

At the face-to-face session, it was suggested by several people that surveys should ask why people do NOT use the Connecticut River. Surveying an audience that does NOT use the river might reveal deficiencies in the applicant's recreation plan and facilities.

TRC Senior Consultant Sarah Verville, who advises FirstLight, commented that mail surveys are expensive and "don't give good information." That's not accurate. Mail surveys don't have to involve hundreds of thousands of mailings. Data obtained by mail surveys is just as accurate as the kinds of surveys FirstLight has proposed.

This is a case where the applicant may have a conflict of interest in proposing and designing a user survey. If the survey indicates that people in the area find the recreation facilities provided by the applicant are inadequate, then FERC may require them to spend money to improve the facilities. The conflict is exposed when the applicant proposes to avoid negative information, as is the case here.

Barton Cove, the facility just upriver from the Turners Falls Dam, can serve as an example. The put-in at Barton Cove has a two-lane concrete boat ramp, a short metal dock during the summer, and parking for trailers. If you go to this put-in, the trailers in the parking lot reveal who uses the facility—power boaters who haul their craft around on trailers. If you just survey them, they are likely to be fairly satisfied with the facility. But who is not there? Car-top boaters, self-propelled boaters—such as canoeists, kayakers, sailors, and rowers who find that concrete boat ramps damage their equipment—among others. If you check out the ramps at the boat houses on the Charles River in Boston, you would notice they are made of wood, which does not damage the wooden or fiberglass hulls of rowing shells and small sail boats.

The user surveys proposed would provide data from people who already decided this particular facility meets their needs—or else they wouldn't be there. It reifies the position of the power company that what they provide is adequate. Surveying people who find the facilities don't meet their needs is more in line with the purposes that we believe FERC has in mind here.

The point here, we believe, is to establish whether or not FirstLight is meeting its obligations to the public in terms of recreation facilities. They should survey the public that avoids using their facilities along with those who use them.

FirstLight's consultants described a fairly narrow survey plan that is reminiscent of older, less accurate survey methods, before there was an Internet or more contemporary surveying techniques. The costs of surveying non-users need not be large. It was suggested that FirstLight could tap into the mailing lists of NGOs participating in the relicensing process, such as the AMC that has thousands of members in the area and has a recreation plan for the Connecticut River Blueway. American Whitewater and FlOW also represent memberships whose only bias is an appreciation for the outdoors, which in this case would be a positive benefit. It was also suggested that FirstLight do selected mailings, and they engage in a broader range of survey techniques that produce greater accuracy, such as focus group interviews. Ken Hogan of FERC commented that it is common in FERC processes to look at NGOs and municipalities that have recreation plans or development plans in the region.

We recommend user surveys for these three studies be reconsidered from the beginning, expanded to reach a larger audience including non-users, and that more sophisticated survey techniques be included. There is no point in having FirstLight spend the projected $215,000 for surveys in studies 3.6.1, 3.6.4, and 3.6.7 when a simple academic evaluation of the techniques would indicate the money was wasted. It makes more sense for FERC to simply order the task done in a proper manner. The goal being to develop better outcomes from the information received (We note here for the record that TransCanada plans to survey non-users for similar studies it is conducting. That point was made by Ms. Verville and John Howard of GDF/Suez and FirstLight at the TransCanada study meeting on June 6, 2013, in White River Junction, Vermont.)

Since we consider the current study to be fatally flawed in several respects, we have not evaluated the proposed survey instruments that would be handed out at random sites to users. We look forward to providing feedback on surveys that are more property designed.

3.6.2 Recreation Facilities Inventory and Assessment:

Most of this work was done previously. The information that has appeared so far in the PAD is inadequate because it lists, as part of the inventory, facilities that are not owned or operated by FirstLight. The applicant seems to be taking credit for facilities developed and maintained by others, and are not in their control over the proposed period of the license. We recommend this inventory assessment focus on the facilities that are owned and maintained by FirstLight, especially put-ins, take-outs, trails, developed and primitive campsites, and facilities for non-motorized boats.

The Trust for Public Land has developed a map of potential campsites for non-motorized boaters on the Connecticut River in Massachusetts. The map was created as part of the effort to expand the Connecticut River Paddlers' Trail into Massachusetts and Connecticut. The map generally follows the Paddlers' Trail standard of one campsite per five river miles, which is the recommended frequency. FirstLight facilities are clearly inadequate by this standard and far worse than the frequency of campsites operated by TransCanada in Vermont and New Hampshire. The map should be included by FirstLight in its study of "informal sites" that could be used to support more recreation on the river. (To access that map, contact Clem Clay, Connecticut River Program Director, at The Trust for Public Land in Amherst, Mass.; Clem.Clay@tpl.org.)

3.6.3 Whitewater Boating Evaluation:

The mechanisms of a controlled-flow whitewater evaluation are widely known and have been used on many rivers. We believe the keys to successful evaluations include working together with NGOs to obtain the right mix of paddlers in the right mix of craft, having controlled flows that provide a good range of conditions, and using good evaluation survey forms with the boaters. Members of the AMC, New England FLOW, and American Whitewater have participated in several successful controlled-flow studies during FERC relicensings on other New England rivers for over 20 years. We look forward to working with FirstLight's consultants as they get closer to the study.

Since we know very little about this whitewater reach below the Turners Falls Dam, we expect to study some measured flows during the IFIM study, and during natural spill events. This information might help us determine the appropriate volume for evaluation flows.

It is imperative that flows are measured accurately, rather than being estimated. Any sloppiness can create problems after the license is issued. We understand that sometimes it is difficult with large hydropower gates to exactly measure flows. Again, we look forward to working closely with the consultant to achieve good information.

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

During the scoping sessions and following meetings we have complained repeatedly about the lack of a walking trail for portaging around the Turners Falls Dam. FERC also directed that a study address "the feasibility of incorporating a self-service portage (i.e., a path that does not require shuttle service)." We believe the portage trail project belongs in this study.

3.6.7 Recreation Study at Northfield Mountain, including Assessment of Sufficiency of Trails for Shared Use:

At the Northfield Mountain meeting on June 11, questions were raised about maintaining, and improving, the level of educational benefits provided for the public at Northfield Mountain. Ken Hogan of FERC has responded to that question.

Whether or not FERC requires any particular educational benefit, we want to suggest that educational programs are important to schools and other educational institutions in the region and should be included in this study. We wonder if site visits for educational purposes have been tracked and it would be beneficial to know if the level of activity at Northfield Mountain has diminished in recent years.

Note on a study not done. FirstLight has declined requests to do a contingent valuation study of whitewater in the Turners Falls bypass reach. Representatives of FirstLight responded that contingent valuation studies are not accurate.

The important point is that contingent valuation studies seek to put two competing social "goods" on an equal footing. They do this by assessing "value"— that is, the value of an activity for society and what may be lost if the activity is prevented from occurring. Value is different from revenues, in the business sense. A tobacco company may make a lot of money, but that does not necessarily give it a value in society.

In contingent valuation studies at hydropower dams, we have one activity that can easily express itself in dollars—hydroelectric generation. Such generation comes from the public's river water run through turbines. Competing activities may draw water away from those turbines, and reduce company revenues. How are we to compare the value of a sturgeon in the Connecticut River below the Turners Falls Dam, or the value of thousands of shad that migrate upriver and

frequently fail to get through such hydropower dams? How can we value the recreation generated by putting river water back into the natural stream bed for whitewater recreation? How do we compare the beauty of a natural river with the lost revenues when a bypass reach takes some water from the turbines? Comparing such activities as fish, recreation, and beauty using revenues and dollars earned works against the fish, the boaters, and the public. Contingent valuation was a technique designed to compare those activities on an equal footing.

We don't do that anymore with fisheries, but at one time it was done. Rather than dealing with dollar revenues, the term "value" was used. Contingent valuation places a value on different activities based on the social goods produced. The sturgeon and shad in the river have a social value. Recreation in the natural stream bed has a value. Beauty has a value. Flipping a switch and having the lights turn on has a social value. Contingent valuation studies are how these things are put in the same framework so they can be compared.

We understand that FirstLight may wish to avoid such comparisons. There's a chance that they feel the outcome would not favor them because social value is diminished when a company charges a profit to provide electricity. But that's the nature of the world.

We cannot force FirstLight to do a contingent valuation study, or FERC to order one, but this metric is clearly relevant in determining value. .Lacking a study of comparative social values, we do not want to hear FirstLight arguing during the mitigation phase of relicensing they cannot provide one thing or another because it would cost them too much money. That argument goes out the window with the rejection of contingent valuation studies.

Conclusion:

New England FLOW respectively 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 10th day of July, 2013

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Document Content(s)