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Kimberly Bose, Secretary
Federal Energy Regulatory Commission
888 First Street, NE
Washington, DC 20426

National Park Service Comments on Updated Proposed Study Plans for FirstLight Power Resources Turners Falls Hydroelectric Project No. 1889-081 and Northfield Mountain Pumped Storage Project No. 2485-063

The NPS appreciates the opportunity to have participated in several face to face meetings between the applicant and their consultants, FERC and numerous stakeholders in order to address comments received on the PSP and to refine the proposed studies based on that input. The following comments are filed in order to assist the applicant in their data collection and analysis.

General Comments

The Connecticut River and its 7.2 million-acre watershed includes National Forests, National Historic Sites, National Wildlife Refuges, National Scenic Byways, Partnership Wild and Scenic Rivers, National Recreation Trails, National Natural Landmarks, Important Bird Areas, and segments of the New England National Scenic Trail; the Appalachian National Scenic Trail; the East Coast Greenway Trail; the Northern Forest Canoe Trail; Revolutionary Route National Historic Trail, a Ramsar wetland site, and an American Heritage River, and approximately two million acres of public and private conservation land.

These projects are located on the nation's first National Blueway, so designated by DOI Secretary Salazar on May 24, 2012. Secretary Salazar noted that "The Connecticut River Watershed is a model for how

communities can integrate their land and water stewardship efforts with an emphasis on ‘source-to-sea’ watershed conservation [as we] seek to fulfill President Obama’s vision for healthy and accessible rivers that are the lifeblood of our communities and power our economies.” Among the stated goals are to advance a whole river and [utilize] a water-based approach to conservation, outdoor recreation, education and sustainable economic opportunities in the watersheds in which we live, work and play.” As such, these relicensings present a once in a generation opportunity to address and correct deficiencies in recreational opportunities. Therefore, it is critical that in attempting to reach users and equally important, those who for whatever reason do not use the river, the survey’s content and method for reaching current and potential recreational users must be adequate.

3.6.1. Recreation Use/User Contact Survey

Numerous RAs and NGO noted that this study would be considerably improved if it were to capture non-users, including those who may have used project related facilities in the past and no longer do so and those potential users who for various reasons, do not utilize project area facilities. Several methods for capturing those users and their input were identified. In brief, the NPS believes it would be simple, cost effective and produce useful data if the applicant were to avail themselves of the MA, VT and NH members of organizations such as the Appalachian Mountain Club (AMC), whose members would logically have an interest in recreating on the Connecticut River. The AMC has graciously offered to work with the applicant to transmit updated survey questionnaires to their membership in the project area. AMC has also developed a recreation plan for the Connecticut River Blueway, referenced above. A similar offer has been extended by the CT River Watershed Council and should be taken advantage of. This will provide far better data than the proposed limited on site survey questions. The study as proposed may have been adequate before the internet, but given the availability of computerized NGO mailing lists and municipal databases, to not collect this data will result in incomplete information for FERC to base their licensing and study related decisions. FirstLight’s rejection on page 3-276 of utilizing electronic means to reach users and potential users is unwarranted. What is likely to occur is that the applicant will obtain meaningful data indicating additional facilities are needed and existing facilities need improvements. By limiting the scope and means of their survey, they will inevitably come to the conclusion that the scope of additional mitigation measures should also be limited. By not asking

important questions, important data will be missed. There is no clear rationale offered for why the applicant will not avail itself of the resources being offered by the NGO community to facilitate and improve this critical survey.

Numerous deficiencies were identified in the proposed user surveys:

There are no questions related to river level fluctuations and adequacy of access to the river at various times under different operational scenarios. It is well known that under certain operational modes, river access is severely if not completely curtailed. Abutters should be included in any comprehensive survey as they have direct knowledge of operational impacts.

The number of spaces for regular car spaces should be differentiated from trailer spaces. For example, the state boat ramp at Barton Cove has no parking spaces for regular cars that bring canoes and kayaks on top of their vehicle; all spaces are for trailers only.

There is no space for noting the condition of parking spaces, camp sites, docks, or boat launch facilities.

The “Standardized Survey Form” (Figure 3.6.2-2 in the updated PSP) that is part of Study 3.6.2 does not appear to gather data about the dates that a particular day or overnight facility is open to the public. The Draft Recreation User Survey (Figure 3.6.1-1 in the updated PSP) has no questions about user satisfaction for times of year that facilities are not open, only the users experience on the day of the survey. Barton Cove campground closes after Labor Day weekend; however, the survey questions do not address whether there is a demand for camping beyond Labor Day.

Weather conditions such as temperature and precipitation should be added to the survey to provide data for the reviewer as to why an area may have been crowded or relatively unused on for example, a weekend holiday.

Question 8 should include fishway viewing, and birding/wildlife viewing, rowing, swimming from a boat, swimming from shore, and multi-day float trips. Types of activities should be grouped for easier viewing and choosing, along with a place for respondents to write “other.”

More information should be collected from the responder such as age, gender, whether they are part of a private group or formal program, such as an educational trip.

As noted during the meetings, there are situations where the presence of a boat ramp may actually limit access for certain kinds of users. Concrete ramps may be unsuitable for hand carried boats, where sites with a small floating dock can allow these users to access the river. Simply identifying a boat ramp does not provide adequate information for the types of users and potential deficiencies.

The revised study should extend the time it is to be conducted beyond Sept 30, allowing it to capture users in the fall and winter seasons which may well account for significant use. The survey also does not account for use by minors; however, by utilizing AMC data, for instance, those users will be identified through family membership data. The revised study should also include a method to reach school groups. Although the towns may or may not have that data, queries should be put to area schools to ID which of them go on field trips and equally important, why they may not visit river based recreational facilities nearby. Additionally, the study data collection phase should extend to two years to allow for vagaries in weather and economic conditions which change from year to year. A single field season may provide good data, but a second year is certainly preferable. The field surveys should also extend to ½ hour before sunrise and ½ hour after sunset. The current proposal to start them ½ hour after sunrise and end ½ hour before sunset will miss many if not most anglers who tend to put in before sunrise and/or may take out after sunset.

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

Extensive work has been done by the Friends of the CT River Paddlers Trail relative to river access campsites in terms of appropriate frequency (how far apart on the river) as well as maintenance and facility needs. Efforts are underway to expand the trail into Massachusetts and Connecticut. This data should be incorporated into the study in order to identify obstacles to multi-day paddling trips, which also include the lack of adequate or existing portages around project dams.

FirstLight's land base should be used to identify what parcels could serve as new primitive campsites or, where necessary, river access locations deemed. The Trust for Public Land has developed a map of potential campsites for

non-motorized boaters on the Connecticut River in Massachusetts and was done in conjunction with the efforts 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 do not meet this standard. The map should be included by FirstLight in its study of "informal sites" that could be used to support more recreation on the river.

The revised study should include a comprehensive assessment of the condition of each site, along with how various ratings (good, fair or poor) are defined and applied. The adequacy of the portage at Turners Falls must also be addressed in order to cure existing deficiencies in the opportunities for multi-day paddling trips.

As noted during the meetings, there are situations where the presence of a boat ramp may actually limit access for certain kinds of users. Concrete ramps may be unsuitable for hand carried boats, where sites with a small floating dock can allow these users to access the river. Simply identifying a boat ramp does not provide adequate information for the types of users and potential deficiencies.

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3.6.5 Land Use Inventory

A comprehensive identification of licensee owned lands adjacent to the project boundary should be included in the application. The proposal by FirstLight to evaluate only lands within the project boundary and a 200 foot strip of abutting lands will not provide adequate data relative to areas which if developed, could adversely impact river resources, from development and impact on aesthetic values to upland land use practices that may adversely impact water quality and sedimentation. In some cases, these adjacent lands could be appropriate for providing additional recreational access to the river, new trails or connections to existing trails. Without this easily available data, the FERC will not have a complete picture of land use activities that impact project resources. Permanent protection of abutting licensee owned lands would also confer aesthetic benefits to those using the river by providing views from the river of undeveloped lands. Regarding lands within the project boundary, those not integral to project operations should be permanently preserved and in many cases consist of prime agricultural lands. Even those lands currently under Agricultural Preservation Restrictions are only temporarily protected. Permanent protection ensures the long term viability of these important resources. Numerous non-governmental organizations and federal, state and local entities have identified valuable and important land protection locations and opportunities along the Connecticut River. This information should be identified and used

collectively to determine appropriate opportunities for land protection in the context of these relicensing proceedings.

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

Maintaining and improving an appropriate level of educational benefits provided for the public at Northfield Mountain was raised at the June 11 meetings. Educational programs are clearly important to schools and other educational institutions in the region and should be assessed in this study. Our understanding is that such programs have been decreased in recent years. Public education programs offered at the visitor's center involves using the Recreation Use and User Contact Survey to identify opinions of current recreation/education users at Northfield Mountain. However, neither river nor trail users are addressed in this survey of educational program users. Records of attendance numbers at Northfield Mountain's educational and school programs, the number of programs offered, and attendance numbers should be provided for the past 10 years. The types of programs and staffing it takes to run them should also be described.

There is also no information relative to the report's contents, how the data will be presented or what if any, opportunities the RAs and NGOs will have to participate in the evaluation and conclusions provided by the data.

The NPS appreciates the opportunity to work with the applicant to revise their proposed studies in order to provide the FERC with adequate information on which to base their licensing related decisions. Therefore, the NPS requests that the FERC direct the licensee to revise its proposed study plans to address the concerns raised above.

Questions or comments on this submittal should be addressed to Kevin Mendik at kevin_mendik@nps.gov or by phone at 617-223-5299.

Respectfully submitted,

A handwritten signature in blue ink, appearing to read "Kevin Mendik", is written over a horizontal line.

Kevin R. Mendik
NPS Hydro Program Manager
Northeast Region

Document Content(s)

NPS PSP Revision Cmnts FirstLight July 2013.DOCX.....1-8