



United States Department of the Interior

NATIONAL PARK SERVICE
NORTHEAST REGION
15 State Street
Boston, Massachusetts 02109-3572

IN REPLY REFER TO:

August 23, 2013

Filed Electronically

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

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

Dear Secretary Bose:

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, the Draft SP and currently on the Revised Study Plans dated 8-14-2013. Please refer to NPS comments regarding Initial Study Requests associated with the PAD and SD1 dated March 26, 2013 and NPS comments dated July 14, 2013 on the Updated Proposed Study Plans. Most recently, the NPS participated in an August 8, 2013 meeting to discuss the recreational survey user forms proposed to be utilized by the applicant. The NPS has appended our July 14, 2013 comments, most of which remain unaddressed by the Revised Proposed Study Plans.

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. As such, these relicensings present a once in a generation opportunity to address and correct deficiencies in recreational opportunities.

3.6.1 Recreation Use/User Survey

It is critical that in attempting to reach users and equally important, those who for whatever reason do not use the river and other project recreational facilities, the survey's content and method for reaching current and potential recreational users must be effective.

Although numerous changes have been incorporated into the survey instruments based on comments discussed at the August 8, 2013 meeting at Northfield Mountain, the study as presently configured fails to adequately address NPS' previous comments and those of numerous stakeholders. Given the significance and geographic scope of these projects, it is imperative that an element of this study identify unmet needs and deficiencies of recreational facilities as identified by non-users. In order to reach those users, both the Connecticut River Watershed Council and the Appalachian Mountain Club, Berkshire Chapter have offered to reach out to their collective membership with targeted questions relative to their constituents use and more importantly, those who do not use project recreational facilities and why they either do not use them or why they no longer use them due to adverse conditions or other factors.

The failure by FirstLight to avail themselves of this offer and the information that will be developed is unclear. Given that this information may well shed light on correctible deficiencies at existing recreational facilities and provide input on the potential need for additional facilities, it seems to be a matter of the applicant not wanting to find out about a problem that may require expenditures to address.

FERC's request of FirstLight was to develop and conduct a recreational user survey that would both determine user demand and the need to enhance recreational opportunities and access at the project. The FERC noted that in addition to using on site visitor surveys, the applicant avail itself of mail and/or internet surveys which would target specific user groups (rock climbers, hikers) who would otherwise not be reached through on-site surveys because they are not using the project facilities and may well be missed by the limited on-site survey work. Demand includes unmet demand, but the study as proposed will not evaluate this critical element. Many of the user groups which will not be reached by the proposed survey have offered to provide access to their mailing lists for this purpose, but FirstLight has declined to do so.

FirstLight has stated that it would require significant effort to reach all these potential users; such an argument is simply inadequate. The applicant also notes that there are almost 100,000 households in the three county area served by the projects and it would be cost prohibitive to survey them all. There has been no request of the applicant to reach or even attempt to reach all area residents, simply that they reach a random sample that provides statistically significant results.

It is important to note that TransCanada is conducting a *Recreation Facility Inventory, Use & Needs Assessment* study for the upper river dams which are in the same phase of relicensing before the FERC includes the following:

“Approximately 2,400 residents of Caledonia, Orange, Windsor and Windham counties in Vermont and Grafton, Sullivan, and Cheshire counties in New Hampshire who reside at varying distances from the projects and who may recreate at project impoundments and downstream riverine reaches will be invited to participate in the recreation survey. Names and addresses will be purchased from a firm specializing in the sale of survey sample mailing addresses. These residents will be mailed an initial introductory letter, a follow-up hard copy of the questionnaire, and subsequent follow-up post cards to encourage responses.

Residents will be provided the option to respond using a mail survey or a web-based survey...Based on the study area population and estimated return rates, 2,400 individuals will be surveyed. This sample size assumes a 95 percent confidence level with a 5 percent confidence interval.” The 2,400 figure is a sample of the total residential population. By comparison, FirstLight is proposing to randomly survey only those users who are actually using a recreation facility on a day when a surveyor is present. This will not yield anywhere near 2,400 responses, nor will it reach those who should really be surveyed, the non-users.

Also note that TransCanada is **purchasing** names and addresses from a specialty firm. In the case of FirstLight, several stakeholders are offering to **give** the applicant access to their lists or conduct the surveys of their members.

Regarding field work, FERC’s study request #6 dated March 1, 2013 noted that the proposed methodology #3 methods should include on-site visitor intercept surveys at formal and informal public recreation areas at the project reservoirs, tailtraces, and riverine areas, including the Turners Falls bypassed reach. The RSP on page 3-352 has been revised to state that the user contact survey will be administered to visitors at “all Project recreation facilities.” However, specific facilities are not listed, whether they include informal sites and the frequency a surveyor or team may be present. During the August 8 meeting, the topic of how the survey would be administered (orally or allow the user to fill out) was discussed. FERC staff strongly urged “handing over the survey to recreational users and asking them to fill it out themselves.” The NPS endorses this method because it allows users to more thoughtfully and completely fill out the survey if they are in control of the survey form. It also eliminates the surveyor editing or altering the respondent’s comments. The RSP does not specify which method will be used.

Task 1 of the RSP notes that the licensee will rely on local, regional and state recreation plans, recreation departments and committees from abutting towns, and the Environmental Police. How this information will be summarized and conclusions based upon it are not clear. During the August 8 meeting, the Recreation Director for the Town of Montague stated that access to swimming spots along the river was an unmet need for residents in the Turners Falls section of Montague. This is exactly the type of information that will not be brought out in the user survey as presently proposed. People desiring to swim may not use any river access facility). Residential abutters may provide this type of information, but they make up a small percentage of the known and unknown user base.

During the August 8 meeting, additional questions related to fluctuating river levels and their potential impact on recreational use (both by public facility users and abutters) were suggested, and the NPS recommends that FERC require these questions be added to the survey as they touch on a critical public use and access issue:

- How do river levels positively or negatively affect your experience?
- If you could ask project managers to do something different with reservoir levels, what would you ask them to do?
- The NPS recommends a table be developed like that of Question #19 in the Yuba River Development Project survey (see page 53 of the pdf file online at <http://www.ycwa-relicensing.com/FERCAproved%20Studies/Study%2008-01%20-%20Recreation%20Use%20and%20Visitor%20Survey.pdf>)

NPS' July 14, 2013 letter, also touched on additional questions set out by the CRWC in their July 15, 2013 letter and the NPS endorses those additions as follows:

- As a land abutter/camp owner what impacts on recreation have you experienced in regard to the fluctuation of the river level?
- What other impacts have you experienced that might not be associated with recreation?
- Are there specific days/times when the fluctuation of the river has completely denied your ability to recreate?
- Have you experienced any physical tangible loss because of fluctuation? (if so, what?...be specific)

Such questions would also help to provide better data relative to how recreation and land uses are impacted by project operations as per Study 3.6.6.

In addition Figure 3.6.1-2: Northfield Mountain Trail User Survey, Question 13, misses an important element which should be applied throughout the surveys: users should be asked if the hours of operation, the opening and closing times, and the seasons of operation are adequate on a disagree/agree scale. There should also be a place for respondents to include comments as to what they think would be adequate. This is another example of why it is important to reach beyond on-site users: potential users may not be on site because of limited hours.

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

FirstLight has rejected conducting a survey of non-users of the Connecticut River in the Project area, stating "It is difficult to identify with any degree of precision the scope of non-users and displaced users and target these groups for a survey. A regional blanket mail survey (to some portion of the populations) to reach these users requires a significant level of effort that is not justified by the typical low rate of return when considering the ratio of non-users and displaced users in relation to the population sampled. In sum, the survey may not provide a statistically valid sample size." For the same reasons expressed above in our comments on 3.6.1 above, FirstLight should be required to conduct a broader survey in order to reach such an important user group of a major Northeast river.

The AMC for example, holds a regional membership list that approaches 100,000 members of exactly the type and regional distribution that FirstLight should be reaching: those who use the outdoors and are inclined towards multi-day experiences. Non-users and the reasons why they don't participate in this type of activity in the project area will simply not be revealed in a limited on-site survey and localized abutter mail survey. Limited users will imply that no additional facilities or improvements are needed; the opposite result may well be gained from an appropriate survey. There is clearly a financial incentive for FirstLight not to determine that new or improved facilities are needed, thus their reluctance to broaden their proposal.

3.6.5 Land Use Inventory

The applicant has only proposed to evaluate land uses within 200 feet of the existing project boundary. This is an inadequate and arbitrary line that in most cases, will simply give them

general information on direct abutting land, but not the entire abutting parcel. There may be numerous instances of where an activity (agriculture to industrial uses) may be occurring on the abutting property at distances greater than 200 feet from the FirstLight property line. It is important to assess existing and potential land uses on all portions of abutting property in order to have a complete picture of potential impacts as well as to determine potential mitigation and opportunities for land conservation in the project area.

3.6.6 Assessment of Project Operations on Recreation and Land Use.

The NPS believes that river users downstream of the Turners Falls canal to the Sunderland Bridge are a separate group from those using the river in the impoundment. However, without user surveys being conducted downstream of Poplar St access, the results will not adequately assess project effects between Cabot and the Sunderland Bridge. Residential riverfront abutters between the confluence with the Deerfield and Connecticut Rivers reported in 2010 when Northfield Mountain was shut down between May and November that the paddling was ideal because the river was only fluctuating as natural inputs affected it. Given that the hydraulic study will be used for two other studies that look at project effects below the dam, Study No. 3.3.6 (shad spawning) and 3.6.6 (project effects on recreation), NPS believes valuable data could be collected by adding Northfield Mountain's operations to the production run matrix in Table 3.2.2-4.

Regulated flows Turners Falls impact recreation for a considerable stretch of river below the dam, including rowers from the Deerfield Academy and the University of Massachusetts teams. Paddlers often put in below the Sunderland Bridge, one of few access points for non-motorized users in the project area. Therefore, FirstLight should also be required to evaluate, through an appropriate survey instrument, the full length of the river that is affected by project operations.

Due to the limited facilities for non-motorized boaters in the FirstLight and Northfield Mountain project area, a determination of what improvements are needed, either to facilities and/or time of year they are opened can only be identified by asking non-users. By limiting the survey to actual users, the results will naturally point to few such users and justify no needed improvements. Were an adequate survey done to reach non-users, the likely result would be that more and/or improved facilities for those users are in fact needed.

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

In our July 14, 2013 letter, NPS asked FirstLight to determine what discourages users. Therefore, it is critical that any survey reach not just those users who are in fact using the facilities, but those who are not and to determine why not. The type of broader mail/internet/NGO membership survey referenced above will reach an appropriate audience (such as mountain bikers and rock climbers) and help to determine what improvements may be needed. NPS also asked for inclusion of the applicant's past expenditures relative to operation of the Northfield Mountain facilities, such as the level of trail maintenance and signage. A simple narrative would be valuable in this instance as it would help to explain variations in levels of use.

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

Appendix A



United States Department of the Interior

NATIONAL PARK SERVICE
NORTHEAST REGION
15 State Street
Boston, Massachusetts 02109-3572

IN REPLY REFER TO:

July 14, 2013

Filed Electronically

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.

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.

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.

3.6.5 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 'K. Mendik', is positioned above the typed name.

Kevin R. Mendik
NPS Hydro Program Manager
Northeast Region

Document Content(s)

NPS RSP Cmnts August 2013.DOCX.....1-14