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New England FLOW~~~~~

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UNITED STATES OF AMERICA  
FEDERAL ENERGY REGULATORY COMMISSION

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

NEW ENGLAND FLOW  
COMMENTS ON REVISED 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. 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.

Representatives of New England FLOW attended face-to-face sessions held by FirstLight at its Northfield Mountain facility to resolve outstanding issues of the proposed study plans on August 8, 2013. We reference our comments made at those meetings.

The consultants acknowledged our suggestions at the face-to-face meetings however there is still disagreement on a number of points we believe would provide better information to enhance the recreational potential at the Turners Falls Dam and Northfield Mountain Pump Storage, as well as providing "equal consideration" to the power values of these projects.

#### FLOW Comments

1.      3.6.1 Recreation and Land Use: We believe there are elements of the proposed recreation studies inadequate to fully quantify the resource values that are important to recreational boaters. FirstLight refuses to conduct a "non-user" survey, but instead will rely on data collected in the Massachusetts, Vermont, and New Hampshire SCORPS and other regional or local recreation plans.

In the study plan, FirstLight has indicated they will assess whether current or future demand exists for whitewater boating in the bypassed reach using data from the controlled flow analysis, the Recreation Use/User Contact Survey (Study No. 3.6.1), and review and assessment of existing regional whitewater boating opportunities, and regional projections for changes for paddle boating."

They have also suggested any whitewater boating use occurring at the projects would be captured through their recreational user form. Since there is only sporadic, occasional whitewater boating use under the current operating scenario, it is most likely that any survey conducted would end up with a zero unless there was a scheduled release that is well-known regionally or throughout the boating community. This is clearly not any indication of the recreational boating potential of the project. We request FERC include a non-user survey in their order.

2. 3.6.3 Whitewater Boating Evaluation: The "controlled-flow study" suggested by the applicant is an instrument that has been used in many of the relicensing projects over the past 20 years and one which boaters have experience in using. We also appreciate that FirstLight will consult with stakeholders as the study is developed and conducted. Whitewater stakeholder representatives are planning to attend the IFIM flows scheduled for this fall in an effort to get some idea of what happens at different controlled flow levels.

FirstLight has agreed to consult with stakeholders to develop a comparison flow study methodology, determine the number of flows and volumes to be evaluated, schedule the timing of the evaluation, and to enlist a group of experienced boaters to participate in the evaluation."

We are relying on observations during the IFIM studies to develop a baseline of information that could be indicative of what flows make sense for a variety of recreational users, will protect habitat important to fisheries and hopefully, are somewhat sensitive to the cost of lost generation. There is clearly a difference between this reach and many others studied in other New England FERC relicensings. We feel the bypass reach should be evaluated with flows ranging from minimum flow to full generation, and that may require more than six test releases.

At this time six releases are proposed, two in the spring using natural runoff and four in the summer using controlled releases from the dam. At the Aug. 8 meeting there was disagreement regarding how the interpretation would be used from what was requested. We had requested 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 water from spillage.

At the Aug. 8th meeting, Ken Hogan of FERC said there would be no augmentation of spillage during those springtime controlled-flow studies. He cited comments from the federal fisheries agencies concerning sturgeon. We can appreciate the concern to protect fisheries and agree, however, without augmentation, the spring flows would be difficult to regulate. The opportunity of high spring flows resulting from spillage may be a grand idea but have no relevance to providing a schedule of releases that can be used by a cross-section of recreational boaters throughout the season.

Scheduling boaters with a skill set capable of enjoying higher spring flows is also problematic with only a day or two's notice. We recommend that all six proposed flows and more if necessary, be scheduled during the summertime when the dam is not spilling. We think that six is the minimum number of releases and that more would be beneficial. The reason: we don't know what adequate and useable flows are in this reach, and although visual scouting during the IFIM flows will be helpful, they may not provide enough information.

As we mentioned above, the Recreation Use/User Contact Survey methodology is totally inadequate for determining whitewater boating demand. FirstLight is unwilling to measure unmet demand and has refused to survey non-users of the river, so their plan on this point is unrealistic. A controlled-flow study is not intended to assess current or future demand for non-boaters who would never visit the project simply because existing flows are unknown and could be boated.

3. Boating Evaluation Forms: We appreciate the changes in the forms that we called attention to at the August 8th meeting in the PRE-RUN BOATER INFORMATION FORM. Changes have been made to make it easier to characterize boaters, but we recommend a couple more changes. In Question 1 rather than describing "what kind of boater are you" it would be more practical to ask: "What class boater are you and what class water do you usually run"?

In the SINGLE FLOW EVALUATION FORM, we feel question 4 is worded in such a way as to make interpretation somewhat confusing and perhaps difficult. We think the question should evaluate the quality of the whitewater experience at the level of difficulty produced by the flow in question. In other words, for a Class II stretch of river, how would each boater evaluate this Class II flow?

Question 5 has a similar problem. It asks: "Are you likely to return for future boating in the Turners Falls bypass at this flow?" For an expert kayaker on a Class II flow it would be more appropriate to ask, would a Class II boater return to boat this river reach again". This analysis supports the interest and value as Class II whitewater.

As a final comment we would note that a boater's skill level might be far above or far below the conditions produced by a flow. The flows should be evaluated on their own conditions, not on the preferences of the paddlers. Experienced boaters will be able to understand the differences in these questions.

4. Controlled-Flow Study Logistics: While there have been productive discussions regarding the design of the study, we recognize there is still work to do with FirstLight on how they proposed to manage the logistics. The original study plan included the use of 24 participants and we agree this number would produce good data for future analysis. However there has been no plan put forward on how this many boaters will be managed in the field relative to time on the river, portage time, instructional time for surveys, lunch and/or rest. We believe that FirstLight, at a minimum, should provide an outline on how they will manage these details.

These studies are very important to the boating community but we must recognize that as volunteers, boaters may also have other commitments during their own work week or family responsibilities. Because we may not be using the same test boaters at all release levels, having an outline would help FLOW in attracting volunteers and managing them throughout the testing period. It would also limit the impact to FirstLight's generating capacity by having the study completed as quickly as possible.

Conclusion:

We will continue to work with FirstLight to develop a study plan that will provide meaningful information to determine the value of flows for boaters with a variety of skill levels.

We respectfully request that FERC accept these comments and direct the licensee to adjust its study plans to address the concerns raised. Thank you for considering these comments.

Respectfully submitted this 26th day of August, 2013,

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