

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

FirstLight Power Resources Turners Falls Project No. 1889-081

Northfield Mountain Pumped Storage
Project No. 2485-063

**APPALACHIAN MOUNTAIN CLUB, VERMONT RIVER
CONSERVANCY, AND THE FRIENDS OF THE CONNECTICUT
RIVER PADDLERS' TRAIL'S
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 1876, the Appalachian Mountain Club (AMC) has promoted the protection, enjoyment, and understanding of the mountains, forests, waters, and trails of the Appalachian region. The AMC is the largest conservation and recreation organization in the Northeast with more than 90,000 members, 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.

The Vermont River Conservancy protects public access, wildlife habitat, clean waters, scenic natural beauty and ecological integrity by conserving undeveloped land along rivers, lakes and wetlands of Vermont.

The Friends of the Connecticut River Paddlers' Trail is dedicated to building and stewarding primitive campsites, access points, and portage trails along the Connecticut River. The organization manages over 30 campsites and 70 access points that reach from the Connecticut River's headwaters south to the Massachusetts border. Efforts are underway to expand the paddlers' trail into Massachusetts and Connecticut.

Representatives of the Appalachian Mountain Club attended face-to-face sessions held by FirstLight at its Northfield Mountain facility to discuss the revised study plans. We reference our comments made at those meetings and previous written comments on the study plans.

Summary of comments:

We feel the scope of proposed recreation studies is inadequate. The suite of recreation studies proposed by FirstLight will not provide the information requested by FERC, state and federal agencies, and NGOs. We need a broader range of studies to determine what is lacking in FirstLight's recreation facilities as part of the discussion of a new license. We suggest that FirstLight engage in a broader range of survey techniques that produce more qualitative results and greater accuracy, such as focus group interviews and surveys of non-users. Such surveys are far more informative than FirstLight's plan to research only their recreation sites.

In many cases, the quality of the proposed recreation studies is vastly different from the biological studies. The recreation studies involve the most difficult biological entity to study: human beings. Unless the studies are broad ranging and complete, it's not worth spending the money on them. A simple academic critique of the proposed studies would likely cause them to be done over. FirstLight might as well start off with a good plan rather than risk having to spend more money later.

Below we address the specific proposed studies. Our comments on some studies also apply to others. We reference our comments made in earlier filings and in the Aug. 8 meeting at Northfield Mountain.

3.6.1 Recreation Use/User Contact Survey

FERC requested that FirstLight conduct a study to determine the existing use and **demand** at the projects and an **assessment of the need to enhance recreation opportunities** and access at the Projects. FERC proposed that the data be collected using on-site visitor intercept surveys at formal and informal public recreation areas at the Project reservoirs, tailraces, and riverine areas, including the Turners Falls bypassed reach; and **mail and/or internet surveys targeting unique stakeholder groups that may not be practically accessed through on-site surveys (e.g. adjacent residential landowners, residents of the counties in which the projects are located, rock climbers, whitewater boaters).**

FERC's requests have not been met by applicant's proposed studies. "Demand" should include the concept of "unmet demand" along the Connecticut River. Applicant has some responsibility to provide public

recreational opportunities as part of its license. If they are not meeting those obligations, these study proposals should reveal the shortfall. Therefore, unmet demand needs to be measured.

Applicant has not proposed to survey stakeholder groups through mail and/or internet surveys, with the exception of adjacent residents along the river. They have not proposed to survey rock climbers, whitewater boaters, flatwater boaters, hikers, or other obvious stakeholders. Most of these groups have stakeholder groups such as the AMC that would be willing to provide access to their mailing/internet contact lists.

The primary reason FirstLight cites for declining to study what FERC and stakeholders requested is that it would require “significant effort.” We feel that is an inadequate reason, and an inadequate response to important study requests.

Another excuse used by FirstLight in declining these studies is that there are 97,844 households in the three-county area and that it would be tremendously expensive to survey all of them. This is an inadequate excuse that reveals the innocence of FirstLight’s consultant in survey techniques. Surveys do not contact *all* the households, but rather a random sample—just as FirstLight will not survey *all* the users of their recreation sites, but instead the sample that their surveyors encounter. Their excuses for avoiding internet surveys are similarly primitive and ignore modern surveying technologies.

For comparison, we quote from TransCanada’s *Recreation Facility Inventory, Use & Needs Assessment* study for the upper river dams: “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.” Please note that 2,400 is a sample of the total residents.

In short, FirstLight has refused to study what FERC requested. Nor does their revised proposal meet the requirements for assessing the need to enhance recreational opportunities. They seek to provide information only on people who currently use the existing facilities, which is inadequate for the purposes of establishing new license requirements.

FirstLight cites another FERC requirement in the RSP: “FERC regulations require that the license application include a statement of the existing recreation measures or facilities to be continued or maintained **and the new measures or facilities proposed by the applicant for the purpose of creating, preserving, or enhancing recreational opportunities** at the Projects and in their vicinities...” The studies proposed do not meet that requirement in terms of new measures and facilities. They have declined to specify their current expenses at Northfield Mountain, for example, so it’s hard to determine what would “enhance” those recreational opportunities.

We have requested in earlier filings that non-users be surveyed to discover what’s missing at FirstLight’s facilities. We refer you to those comments.

At the Aug. 8, 2013, meeting held at Northfield Mountain, stakeholders reviewed the survey documents and studies *as proposed*. While we find those studies inadequate, we nevertheless tried in good faith to provide feedback and to help TRC revise their survey instruments. We will not repeat those comments here. In general, TRC seemed to take our comments as helpful.

However, the revised Figure 3.6.1-2: Northfield Mountain Trail User Survey seems to have an omission that we overlooked at the Aug. 8 meeting. In question 13, it should ask users if the hours of operation, the opening and closing times, and the seasons of operation are adequate on a disagree/agree scale. The initial comments to FERC listed this issue as one of the complaints that users have.

The survey instrument does an inadequate job assessing the amount of facilities operated by FirstLight. We suggest adding the following question:

What are your impressions of the number of the recreational opportunities in this stretch of the river?

Too Few	Adequate	Ample	Do Not Know
1	3	5	x

- Camping
- Boat Launches
- Picnicking/Fishing
- Hiking

Comments:

Question 3: We suggest collecting data on adults and children (under 18) to better understand user demographics.

Question 9 regarding economic impacts is inadequate, as it does not define a geographic scope for expenditures, does not define a time period for visitation, and has much too coarse a scale for expenditures (i.e. under 100, 100-500, 500-1000, 1000+). Clarifying questions are also needed to ensure expenses made outside of the local economy of interest are not collected. We suggest using the following question instead:

Please estimate how much money your **entire group** will spend on this trip **within 25 miles of this facility**, in the categories below. If your trip is not yet complete, include **what you expect to pay before returning home**.

\$_____ Lodging \$_____ Restaurants \$_____ Groceries
 \$_____ Transportation \$_____ Access Fees \$_____ Guide/Outfitters
 \$_____ Other Retail (Equipment, souvenirs) \$_____ Entertainment
 \$_____ Other: *Please specify:* _____

In addition, we suggest adding the following question:
 Length of trip in region: _____ Days

Question 11: The question is vague in that it doesn't ask for a time period for responses (*i.e.* in a typical year? In the last five years?).

We also suggest reducing the number of categories here, (for example walking, dog walking, and hiking), and working to ensure that there is not overlap between the categories (*i.e.* walking/hiking and

camping/backpacking). We suggest grouping recreational activities by type, rather than alphabetically.

Question 15: We suggest adding “river access” and toilets as specific amenities.

3.6.2 Recreation Facilities Inventory and Assessment

The applicant continues to list recreation facilities that are not owned or managed by FirstLight, such as Unity Park, the Canalside Trail Bike Path, the state boat launch, the Bennett Meadow Wildlife area, Pauchaug Boat Launch, Pauchaug WMA, and the Governor Hunt Boat Launch/Picnic Area. This makes it appear that the applicant’s recreation facilities are more extensive than they are. In addition, applicant mentions the Turners Falls Canoe Portage as if such a thing actually exists, which it does not. In terms of contributing information to a relicensing effort, the existence of facilities run by outsiders cannot be guaranteed for the life of a new license.

Nor is there a list of *proposed* recreation sites. They might rectify this problem by identifying the “informal” recreation sites on a map to accompany the survey. Then they could ask if people use those or other informal sites. Because of the lack of access sites for canoes, for example, many canoeists use several informal sites such as both sides of the river below the Sunderland bridge.

Applicant states: “The user surveys and additional recreational studies proposed in the RSP are designed to provide further information about a user’s recreational experience at the Project, including whether recreation facilities are adequate for serving recreation demand.” This study does not address those issues, especially whether facilities are adequate for existing demand, because the survey is not capable of determining that.

FERC should carefully review the overall plans of FirstLight for studies to make certain that they meet the requirements FERC has set out for this phase of the ILP relicensing procedure.

In the survey form, Figure 3.6.2-2: Standardized Survey Form, we recommend an addition that may not have been suggested at the Aug. 8 meeting. Under Boat Launch Facilities, we recommend that the list be

extended to include surfaces that are friendlier to fiberglass, wood, or other cartop and non-motorized boats; such surfaces being sand, dirt or wood. “Gravel” is the closest option on this list, a surface that is as unfriendly as concrete.

The study scope and objectives are inadequate as they only address existing facilities, rather than assessing opportunities for additional facilities, such as new boat launches, primitive camping areas, or portage trails.

We suggest the objectives be expanded to include these objectives. We suggest FirstLight complete outreach to area recreation groups to develop a more comprehensive list of suggestions for additional facilities.

3.6.3 Whitewater Boating Evaluation

Considerable discussion developed at the Aug. 8 meeting concerning this study. This is a basic controlled-flow study as has been done at many FERC relicensing sites over the past 20 years. We feel there was some miscommunication involved.

We appreciate that FirstLight will consult with stakeholders as the study is developed and conducted. As FirstLight says in the RSP: “FirstLight will 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.” Whitewater stakeholder representatives are planning to attend the IFIM flows scheduled for September in an effort to get some idea of what happens at different controlled flow levels. Again, we thank FirstLight for inviting us to those events.

We currently have *no idea* what flows would be successful in the bypass reach, which is a major difference between this reach and many others studied in FERC relicensings. We feel the bypass reach should be evaluated with flows ranging from minimum flow to full generation. That would require more than four test releases. The study should also identify public access obstacles in the bypass reach.

In this RSP, 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, we discovered a different interpretation was being used from what we had requested. AMC requested: “Because the quality and flow needs of the resource are unknown, we request 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.” Our reasoning was that spring flows could save the power company money by providing a portion of the needed water from spillage. But we do not necessarily believe such releases are only possible during the spring, nor did we request spring releases for any reason other than making it easier on the power company. Without *augmentation*, however, spring releases seem unworkable.

At the Aug. 8 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. Without augmentation, the spring flows would be difficult to regulate, would provide inadequate notification time to assemble a study crew, and would not reliably add to our knowledge. (Notification to a rather large group of paddlers might be only a day or two, which is inadequate. These volunteers have jobs and other obligations.) We recommend that all six proposed flows, and more if possible, 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 visual scouting during the IFIM flows may not provide enough information.

One further note concerning Ken Hogan’s comments on Aug. 8. As we understand it, the fisheries agency asked only that they be notified if we had spring study releases. They did not oppose those spring releases, whether augmented or not, nor did they claim any harm would come to spawning sturgeon. Spring natural spill events far exceed any controlled flow releases, and the fisheries agencies made no arguments that the sturgeon need protection from spring flows. This is an important point. Again, we want to state that the whitewater flows in the bypass reach have no conflict with the fishery. Having said that, however, we request that the two flows proposed for the spring be moved to the summer so we can completely skirt this issue.

In the study plan, FirstLight says: “FirstLight 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.” As we mentioned above, the *Recreation Use/User Contact Survey* methodology is totally inadequate for determining whitewater boating demand. FirstLight has refused to measure unmet demand and has refused to survey non-users of the river, so their study plan on this point is unrealistic.

At the Aug. 8 meeting, we reviewed the forms to be used in the controlled-flow studies. We’d like to make a few additional comments not made at that time.

First, we do not particularly care for the evaluation forms proposed for use in this study. We much prefer the forms proposed by TransCanada for the flow studies at Sumner Falls. Please see the TransCanada revised study proposal for the form labeled ATTACHMENT 31-A: BOATER SURVEY Sumner Falls (Hartland Rapids) Boating Study.

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. Question 1 says: “How would you describe yourself as a boater (what type of boater are you?)” We recommend that it say: “How would you describe yourself as a boater (what type of boater are you and how experienced are you? Please describe the difficulty of water you have paddled, and feel free to name rivers.)” TransCanada’s wording is much better than ours.

In the SINGLE FLOW EVALUATION FORM, we feel question 4 is worded in such a way as to make interpretation impossible. It says: “Please evaluate this flow *for your craft and skill level* for each of the following characteristics.” Here’s the problem. If I’m an expert kayaker, and this flow produces a Class II river, how am I to evaluate it? I could say this flow is totally unacceptable for my skill level, meaning it’s not at an expert level. 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 (more preferable) 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?” Again, if I’m an expert kayaker, a Class II level of difficulty might not be of interest to me,

so I might not return. But that doesn't influence this reach's interest and value as Class II whitewater.

The description of the classes of whitewater contains a description that was repaired on an earlier form: Class V is defined as "Extremely long." Class V drops do not need to be long, as demonstrated by any number of named drops on the East Coast, including Iron Ring on the Gauley River.

Questions 8 and 9 share a problem in wording. Question 8 says, "Relative to **this** flow, would you consider the **minimum** acceptable flow (defined as the lowest flow you would return to boat) to be higher, lower, or about the same as this flow?" In question 5, the form asks if the boater is likely to return. If the boater answers No on question 5, then how would he or she respond to this question? We feel the question should be more impersonal and not depend upon whether or not this particular boater would return. For example: "Relative to **this** flow and this difficulty level, would you consider the **minimum** acceptable flow to be higher, lower, or about the same as this flow?" And the same for question 9.

In question 11, we repeat what was said at the Aug. 8 meeting. The term "hits" is not used in whitewater boating. We recommend you do not use it in this form.

In the COMPARATIVE FLOW EVALUATION FORM, question 5 has similar problems to those above. It asks, "Evaluate the following flows *for your craft and skill level.*" It would be better to evaluate the flows for your craft, given the difficulty of the whitewater produced by that flow. That is, for a raft, or an open canoe, or a kayak, or whatever, how would you evaluate this (Class II or Class III) flow? Again, someone'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. These are experienced test boaters and they can understand the differences in the questions.

General comment: We are looking forward to working with FirstLight and its consultants on the controlled-flow studies. Several aspects of those studies will remain uncertain for a while, such as the number of boaters involved, the dates of the studies, and the size of the flows. We hope FERC is agreeable to allowing FirstLight and stakeholders to design and operate

this study when more of that information can be known. But, in general, a couple things require attention beforehand:

- The put-in on river left near the Turners Falls Dam needs some work. After a long carry from the parking lot at the Discovery Center, boaters will approach the river. At that approach, the terrain becomes rocky and difficult. Not impossible, but difficult. Someone could easily fall or twist an ankle. We think an approach to the river should be prepared for these studies. Just smooth it out close to the water so no one gets hurt trying to reach the river. (Don't use concrete! Sand would be good.)
- The take-out has even more serious problems. FirstLight should collaborate with whitewater stakeholders about what needs to be done there to make the take-out safe and efficient for this study.
- The whitewater NGOs will observe levels during the IFIM flow studies in September. We are so uncertain about the opportunities and difficulties in the bypass reach that nothing can be predicted. For example, there's reason to believe that low flows may be much more technically difficult than higher flows, which is not always the case. The experience of test boaters may need to be adjusted based on our *estimates* of difficulty during the IFIM flows. We may not be using the same test boaters at all release levels. (Please see the TransCanada evaluation form for its questions about technical difficulty.)
- We estimate that, given the conditions, test boaters will probably be able to make two runs a day at different flow levels. This will allow time to fill out forms, shuttle, and carefully run the bypass reach. At that rate, six flows would require three days, and eight would require four days.

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

FirstLight offers the following reasons for not conducting a survey of non-users of the Connecticut River in the Project area:

“FirstLight has proposed to conduct a study of recreation use at the Northfield Mountain Project but does not propose to conduct a survey of non-users or displaced users. 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.”

We want to respond to those reasons. It is not difficult to identify non-users of the river. You simply ask people. No one has suggested a “regional blanket mail survey,” but FirstLight keeps referring to that and citing the costs of mass mailings. Earlier in this RSP they cited the cost of contacting everyone in the three-county area. That is either disingenuous or incredibly naïve. Surveying is based on sampling, as they argue for their user surveys. The same is true of mail surveys. Rates of return are part of the technology of sampling. We recommend they hire an experienced consultant who knows how to design a quality survey. (TransCanada, for example, is mailing 2,400 surveys that ask questions about non-users. That’s not too difficult in our opinion.)

Secondly, we suggest that FirstLight take notice of the requests for information from FERC. Let us cite a couple: FERC requested that FirstLight conduct a study to determine the existing use and **demand** at the projects and an **assessment of the need to enhance recreation opportunities** and access at the Projects. FERC proposed that the data be collected using on-site visitor intercept surveys at formal and informal public recreation areas at the Project reservoirs, tailraces, and riverine areas, including the Turners Falls bypassed reach; and **mail and/or internet surveys targeting unique stakeholder groups that may not be practically accessed through on-site surveys (e.g. adjacent residential landowners, residents of the counties in which the projects are located, rock climbers, whitewater boaters).**

FirstLight has proposed a mail survey of the adjacent residential landowners. But they have not followed FERC’s request to survey nearby residents (obviously a randomly-selected sample, not everyone), nor the

memberships of stakeholder groups. FirstLight cites bias in such stakeholder groups, yet on the other hand they can't figure out how to reach non-users. If the membership of a rock-climbing group doesn't use Northfield Mountain, then FirstLight should make an effort to find out why. The Appalachian Mountain Club mailing lists are so large (more than 90,000 members) that the only general bias would be an interest in the outdoors, which should be exactly what FirstLight wants. Those members are reachable by email or the internet. FirstLight should make more of an effort to satisfy FERC's requests in this particular study of day use and overnight use by non-motorized boaters, specifically by seeking to reach non-users who will not show up in their other studies.

We don't understand how FirstLight plans to answer some of the objectives of this study without such non-user surveys. For example, one objective is, "Determine if current facilities are *adequately spaced for non-motorized boating* day use trips." There are so few facilities for non-motorized boaters in the FirstLight and Northfield Mountain project area that this can only be determined by asking non-users. The same applies for determining if improvements are needed or if the seasons of use should be longer. Discouraged non-users will not show up in the user survey.

In the RSP, FirstLight once again lists facilities that they neither own nor operate, which makes their recreational plan look better than it really is. Frankly, the FirstLight facilities for non-motorized boaters are *vastly* inferior to TransCanada's on the northern reaches of the Connecticut, and TransCanada's also need improvement.

FirstLight said, "Data from the *Recreation Use/User Contact Survey* will be reviewed to assess the need for new or improved facilities to accommodate non-motorized boating use at the Projects." This is an example of the circular reasoning built into their RSP. Since the facilities for non-motorized boaters are so bad, few will be found in the user contact survey. That will suggest that few new or improved facilities are needed. If they contacted non-users, the outcome would be almost totally the opposite, which is one reason we feel that they refuse to contact non-users.

3.6.6 Assessment of Effects of Project Operation on Recreation and Land Use

FirstLight stated: “The CRWC asks that surveys be conducted at river access points and mailed to river abutters downstream of the Turners Falls canal to the Sunderland Bridge, such as the rowing program at Deerfield Academy and river users at the Sunderland boat ramp. FirstLight believes that the expanded scope will not result in a comparable increase in survey data that is relevant to the Projects.”

The AMC agrees with CRWC on this point. In fact, flows from the Turners Falls Dam impact recreation at least down to Northfield, where there is a large contingent of rowers including the University of Massachusetts men’s and women’s rowing teams. Many canoeists and kayakers put in at the Sunderland bridge, which is one of the few access points for non-motorized boats on this section of the Connecticut River.

When accessing impacts of project operations on recreation, FirstLight should study not just its Project area but the entire length of the river that is controlled by its water releases.

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

FirstLight said: “NPS/AMC et al request that the study of the Northfield Project recreation facilities include a survey that seeks to determine what discourages the public from using the facilities. FirstLight proposes to use the contact and mail surveys conducted as part of the *Recreation Use/User Contact Survey* (Study No. 3.6.1) to seek out what improvements may be needed.” That is inadequate, for reasons stated repeatedly above. How can you determine what discourages users if you only survey users that are not discouraged? The mail survey of abutting residents is not adequate for this purpose.

FirstLight said: “NPS requests that FirstLight evaluate its expenditures over the term of the current license in support of the facility, its promotion, and usage and extrapolate in current dollars, what would be necessary to bring the facility up to the quality and level of use that applicable FERC regulation prescribe. Past expenditure information is

available on the FERC Form 80 and has **not been included** as part of this study. As part of its license application, FirstLight will provide estimates for any proposed recreational improvements.” The AMC agrees with the NPS on this issue. The whole question here is whether or not FirstLight has cut back on its funding of recreation at Northfield Mountain during the course of its current license. Deflecting that question to information not contained in the PAD is deceptive. At the minimum, FirstLight should write a narrative explaining how funding for Northfield Mountain has gone up and down over the years—a narrative that stakeholders could compare to the unseen data at some point.

FirstLight said: “Ms. Krug asks for online user surveys to talk to mountain bike groups regarding the needs of mountain bicyclists and assess interest in opportunities at Northfield Mountain. Internet surveys are not appropriate for quantitative analysis because they are not representative of the general recreational user population and do not provide reliable results. FirstLight proposes to use the results of the surveys proposed in the *Recreation Use/User Contact Survey (Study No. 3.6.1)* to seek out what improvements may be needed.” Again, this is the non-user issue. The claim that a survey of mountain bike groups would not reach the appropriate groups is self-contradictory. Clearly, if you want to discover the needs of mountain bikers, as FirstLight says elsewhere, you need to ask mountain bikers. You don’t need to ask “the general recreational user population.” As FERC has suggested, FirstLight can survey the members of stakeholder groups, as Ms. Krug suggests. They should be required to do so.

Conclusion

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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