

JAMES P. McGOVERN  
2ND DISTRICT, MASSACHUSETTS

COMMITTEE ON RULES

COMMITTEE ON AGRICULTURE

SENIOR DEMOCRATIC WHIP

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# Congress of the United States House of Representatives

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August 30, 2013

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FEDERAL ENERGY  
REGULATORY COMMISSION  
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EXTERNAL AFFAIRS  
2013 SEP 6  
2013 SEP - 6 P 1:33

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

Re: Northfield Mountain Pumped Storage Project, FERC No. 2485-063  
Turners Falls Project, FERC No. 1889-081  
Comments on the Revised Study Plan (RSP) submitted by FirstLight August 14, 2013.

Dear Secretary Bose:

I am writing in reference to the Revised Study Plan (RSP) submitted by FirstLight on August 14, 2013, for the Northfield Mountain Pumped Storage Project (FERC No. 2485-063) and the Turners Falls Project (FERC No. 1889-081).

It is my understanding that a number of stakeholders, including the Franklin Regional Council of Governments (FRCOG), the National Park Service (NPS), and the Appalachian Mountain Club (AMC), have submitted comments expressing their concerns with proposed RSP.

Both AMS and NPS have overlapping concerns on the following sections:

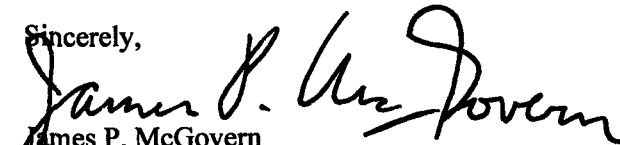
- 3.6.1 Recreation use/User Survey
- 3.6.4 Assessment of Day Use and Overnight Facilities Associated with Non-motorized Boats
- 3.6.6 Assessment of Effects of Project Operation on Recreation and Land Use
- 3.6.7 Recreation Study at Northfield Mountain, including Assessment of Sufficiency of Trails for Shared Use

The FRCOG continues to express their concern that the study plans do not meet the standard of technically defensible and rigorous scientific investigations with clearly stated goals, objectives and deliverables.

Attached please find their comments as submitted.

This relicensing process offers a rare opportunity for stakeholders to express their concerns regarding the operation of a hydroelectric facility in their community. Your full and fair consideration of the concerns expressed in the attached letters is sincerely appreciated.

Sincerely,

  
James P. McGovern  
Member of Congress

2013-00084

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SECRETARY OF THE  
COMMISSION  
2013 SEP - 6 A 8:59  
FEDERAL ENERGY  
REGULATORY COMMISSION



# Franklin Regional Council of Governments

August 28, 2013

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

Re: Northfield Mountain Pumped Storage Project, FERC No. 2485-063  
Turners Falls Project, FERC No. 1889-081  
Comments on the Revised Study Plan (RSP) submitted by FirstLight August 14, 2013.  
Section 3.1 Geology and Soils  
Section 3.1.1 *2013 Full River Reconnaissance Study*  
Section 3.1.2 *Northfield Mountain/Turners Falls Operations Impact on Existing Erosion and Potential Bank Instability*  
Appendix D – Quality Assurance Project Plan (QAPP)  
Section 4.0 Studies not Included in the RSP  
4.1 Geology and Soils, 4.1.1 Study of Shoreline Erosion Caused by Northfield Mountain Pumped Storage Operations

Dear Secretary Bose:

The Franklin Regional Council of Governments (FRCOG) appreciates the opportunity to submit comments on the above-referenced documents. Although the Revised Study Plan contains the fourth version of the study plans for Section 3.1 Geology and Soils, these study plans still do not meet the standard of technically defensible and rigorous scientific investigations with clearly stated goals, objectives and deliverables. We continue to have no confidence that the data collected as part of these studies can be used in a meaningful way to evaluate the potential impacts project operations have on the natural resources of Franklin County.

Bank erosion is the overarching environmental problem associated with the presence and operation of the Project, one that affects all the other resources listed in the Revised Study Plan – Water Resources; Fish and Aquatic Resources; Terrestrial Resources; Wetlands, Riparian and Littoral Habitat; Recreation and Land Use; Cultural Resources; and Developmental Resources. Once again, we urge FERC to require FirstLight to develop clear and scientifically defensible studies that will provide valid and useful data about the impacts of project operations on riverbank stability and erosion in the Turners Falls Pool.

We have several specific comments on the Revised Study Plan (RSP) that we've included in the attached table. We are not providing additional comments on Appendix D – Quality Assurance Project Plan (QAPP) since this document accompanies Section 3.1.1 2013 Full River Reconnaissance (FRR) Study, which continues to be inadequate for relicensing and compliance purposes. The 2013 FRR should be removed from the relicensing process because, as written in the RSP, the data gathered from this study will not provide scientifically defensible information nor will it provide sound data for the other studies that rely upon it. The Connecticut River Streambank Erosion Committee (CRSEC) initially agreed that it would be efficient to include the 2013 FRR in the relicensing process, but we stressed that 1) the 2013 FRR methodology and the Quality Assurance Project Plan (QAPP) still needed significant improvements and the CRSEC wanted to be involved in the process to refine these documents, and 2) tasks would need to be added to the 2013 FRR to gather data to inform relicensing. The 2013 FRR has not been significantly improved from its 2008 predecessor. The 2013 FRR should be confined to the compliance arena, and FirstLight should be directed to work with the CRSEC to develop an appropriate methodology and QAPP.

We are hopeful that FERC will require FirstLight to significantly modify the study plan presented in RSP Section 3.1.2 Northfield Mountain/Turners Falls Operations Impact on Existing Erosion and Potential Bank Instability to reflect standard fluvial geomorphologic practices and scientifically defensible methodologies. Without sound data, appropriate protection, mitigation and enhancement (PME) measures for the Connecticut River cannot be developed.

We again request that FirstLight be required to evaluate the feasibility of alternatives to address erosion, including a study of the "closed loop" option. We look forward to continuing our active engagement in the relicensing of the Connecticut River hydroelectric projects.

Sincerely,



Ann Banash, Chair  
FRCOG Executive Committee



Jerry Lund, Chair  
Franklin Regional Planning Board Executive Committee



Tom Miner, Chair  
Connecticut River Streambank Erosion Committee

cc: Franklin County Legislative Delegation  
US Fish & Wildlife Service  
Massachusetts Department of Environmental Protection

**Massachusetts Department of Conservation and Recreation  
Congressman James McGovern  
Town of Gill, MA  
Town of Northfield, MA  
Town of Montague, MA  
Franklin Conservation District  
Connecticut River Watershed Council**

**Attachment: Table of Franklin Regional Council of Governments' Comments on FirstLight's August 14, 2013  
Revised Study Plan**

Franklin Regional Council of Governments' Comments on FirstLight's August 14, 2013 Revised Study Plan  
August 28, 2013

Revised Study Plan Section	Summary of FRCOG's Requested Study Plan Modification(s)	FirstLight's Response to Requested Modification(s)	FRCOG's Response to Modification Presented in RSP and Additional Requested Modifications/Recommendations	Applicable Study Plan Criteria <sup>1</sup>
Section 3.1.1 2013 Fall River Reconnaissance (FRR) Study	<p>2013 FRR study plan is not adequate for compliance or relicensing purposes.</p>	<p>The methodology for the 2013 FRR continues to reflect and reference previous FRR methods, data and conclusions. On page 3-20, Task 6, FirstLight states that the 2013 FRR data will be used for "...comparisons of riverbanks[ic] conditions with past FRRs." and that "The purpose of these comparisons is to evaluate the temporal trends in riverbank erosion and to determine if equilibrium of erosion and stabilization is developing."</p>	<p>We strenuously object to efforts by FirstLight to evaluate temporal trends in erosion using data from previous FRRs. We have meticulously documented our objections to the methodology used by FirstLight for previous FRR in correspondence to FERC. We reaffirm our objections to the findings and conclusions of the 2008 FRR and the references to that study and the use of the 2008 FRR methodology in the 2013 FRR. We assert that the 2013 FRR study plan is still not adequate for compliance or relicensing purposes.</p> <p>See our comments on page 3 of our July 15, 2013 letter.</p>	<p><b>18 CFR §5.9(b)(1) Goals and Objectives:</b> The goals of FRCOG's study requests and FRCOG's requested modifications to FirstLight's proposed study plans are to determine the environmental impacts from the presence and operation of the licensed facilities on river bank stability, shoreline habitat, agricultural farmland, wetland resources, bed substrate, and water quality in the Turners Falls impoundment. We've listed objectives and specific project tasks in our comments herein and in previous correspondence dated March 1, 2013 and July 15, 2013.</p> <p><b>18 CFR §5.9(b)(2) Relevant Resource Management Goals and Public Interest Considerations:</b> The FRCOG's resource management goals and public interest considerations are to ensure that the Connecticut River, which is designated as a Class B river for its entire length in Massachusetts, meets its designated uses of habitat for fish, other aquatic life and wildlife, and for primary and secondary contact recreation. Class B waters must also have consistently good aesthetic value and meet minimum criteria for numerous water quality indicators to achieve compliance with the standards set forth in the regulations. The other resource management goals and public interest considerations are to protect prime farmland soils, which are eroding, and riparian habitat. Eco-based tourism and agricultural operations are important to the economy of Franklin County so maintaining the water quality of the river and protecting scenic landscapes and productive farmland along the river from erosion are extremely important.</p> <p><b>18 CFR §5.9(b)(4) Existing Information and Need for Additional Information:</b> There is a need for additional information to identify and fill existing data gaps. Field Geology Services' 2007 investigation provided several good recommendations for future work in section 9.3 of its report which, if implemented, could provide for: a) an improved understanding of the causes of erosion; b) more accurate</p>
	<p>The 2013 FRR methodology does not identify scientifically defensible criteria for determining the type, stage and spatial extent of erosion.</p> <p>Build upon the recommendations in Field, 2007 and eliminate the use of subjective, qualitative terms like "little/none", "some" or "extensive."</p>	<p>Table 3.1.1-2 of RSP lists the Stage(s) of Erosion as: potential future erosion; active erosion; eroded; and stable.</p> <p>The spatial extent of erosion is identified in Table 3.1.1-2 as the Extent of Erosion and is classified as: none/little; some; some to extensive; and extensive.</p> <p>Table 3.1.1-2 includes a new category of Indicators of Potential Erosion that includes terms used by Field, 2007 to describe types of erosion.</p>	<p>The RSP still uses qualitative, subjective terminology to describe both the spatial extent of erosion and the temporal or stage of erosion. These terms and definitions are not based on a replicable scientific methodology. No citation is given for use of these terms as representative of standard fluvial geomorphological practices.</p> <p>See FRCOG comments in July 15, 2013 letter, pages 4-5 and Attachments.</p>	

<sup>1</sup> To eliminate redundancies, we have addressed the study plan criteria that are relevant to our comments once, since the list of study plan criteria are essentially the same for all of our comments. We do not have the technical expertise to address 18 CFR §5.9(b)(7) but feel that the costs for the work we describe would fall within the range of costs FirstLight has already estimated for their proposed study plans described in section 3.1 of the RSP. Other than the study to evaluate the feasibility of a closed loop system, we are not asking for additional studies, just revisions to the studies described in section 3.1 of the RSP.

Franklin Regional Council of Governments' Comments on FirstLight's August 14, 2013 Revised Study Plan  
August 28, 2013

Revised Study Plan Section	Summary of FRCOG's Requested Study Plan Modification(s)	FirstLight's Response to Requested Modification(s)	FRCOG's Response to Modification Presented in RSP and Additional Requested Modifications/Recommendations	Applicable Study Plan Criteria
	<p>The 2013 FRR methodology does not identify scientifically defensible criteria for determining the <b>type, stage and spatial extent of erosion.</b></p> <p>Build upon the recommendations in Field, 2007 and eliminate the use of subjective, qualitative terms like "little/none", "some" or "extensive."</p> <p>The photographic log of the riverbanks compiled during the fluvial geomorphology study (Field, 2007) should be updated during the 2013 FRR.</p>	<p>Table 3.1.1-2 includes a new category of indicators of Potential Erosion that includes terms used by Field, 2007 to describe types of erosion.</p>	<p>If the goal is to identify the <b>potential for future bank erosion</b> as part of the 2013 FRR, then indicators of erosion potential, such as those listed as part of a commonly accepted methodology, such as the Bank Erosion Hazard Index (BEHI)<sup>7</sup> or other reliable method, should be used. This task of identifying the potential for future bank erosion should be described as a separate task in the 2013 FRR not lumped with the tasks associated with identifying the type, stage and extent of current erosion. The category of Indicators of Potential Erosion should be eliminated from the Erosion Classification section of Table 3.1.1-2.</p>	<p>monitoring of erosion; and c) more successful bank stabilization efforts. This document is a good point of reference.</p> <p>As we described in our March 1, 2013 letter to FERC, the Simons &amp; Associates' (2012) documents filed with FERC are qualitative and based on several unstated assumptions that may not be valid. Full River Reconnaissance efforts have been undertaken using varying methodologies, making for difficult comparisons from one report to the other.</p>
<p>Section 3.1.2 <i>Northfield Mountain Turners Falls Operations Impact on Existing Erosion and Potential Bank Instability</i></p>	<p>We are disappointed that this study does not specifically build upon the findings and recommendations in the Field (2007) report.</p>	<p>FirstLight's revised study plan is essentially the same as the previous three versions.</p>	<p>The photo log should be reproduced during fall 2013 leaf-off conditions as well as the summer of 2014 to more accurately evaluate bank conditions and show how vegetation can mask bank erosion. Leaf-off conditions will also enable comparisons to the 2004 digital image logs.</p>	<p><u>18 CFR §5.9(b)(5) Project Nexus:</u> The Turners Falls and Northfield Mountain Pumped Storage projects operate in a peaking mode, with allowable impoundment fluctuations of up to 9 feet, with the intent to continue these fluctuations. FirstLight has also proposed to increase the volume of flow from the Northfield Mountain Pumped Storage Project through the increased use of the upper reservoir, which is expected to result in additional water level fluctuations. Upstream hydroelectric facilities also operate in a peaking mode of operation. Periodically, the upper reservoir at Northfield Mountain and the power canal at the Turners Falls dam need to be dewatered for maintenance purposes. Historically, both procedures have resulted in the discharge of large quantities of sediment. Sediment from shoreline erosion and riverbank failure is one of the major contributors that negatively affect water quality and habitat by increasing the turbidity and sedimentation, and smothering aquatic habitat. Repetitive water level fluctuations and flow alterations caused by hydroelectric peaking operations are known to be a major contributor to shoreline erosion.</p>
<p>Task 4a: Install Proposed Water Level Monitors in the Turners Falls Impoundment</p>	<p>We requested that more water level monitors be installed at appropriate locations, including at the fixed recoverable transects and areas where the BSTEM analysis will be conducted.</p>	<p>FirstLight proposes to install one additional gage 6,500 feet upstream of the Northfield Tailrace.</p>	<p>See our comments on pages 6-7 of our July 15, 2013 letter. We reaffirm our opinion that more water level monitors should be installed. In addition, we support the Connecticut River Watershed Council's request for a water level monitor to be installed between the Turners Falls boat barrier line and the tailrace, upstream of the Narrows or French King Gorge.</p>	<p>The Massachusetts Year 2012 Integrated List of Waters shows two river segments, from the VT/NH state line to the Turners Falls dam (MA34-01 &amp; MA34-02) impaired and considered a "Water Requiring a TMDL" due to "Other flow regime alterations", "Alteration in stream-side or littoral vegetative covers" and "PCB in Fish Tissue". In addition, the segment below the Turners Falls dam to the</p>

<sup>7</sup> [http://www.wildlandhydrology.com/assets/Streambank\\_erosion\\_paper.pdf](http://www.wildlandhydrology.com/assets/Streambank_erosion_paper.pdf) [http://water.epa.gov/scitech/detail.cfm?http://www.nrcs.usda.gov/Internet/FSE\\_DOCUMENTS/nrcs12\\_2a2\\_025096.pdf](http://water.epa.gov/scitech/detail.cfm?http://www.nrcs.usda.gov/Internet/FSE_DOCUMENTS/nrcs12_2a2_025096.pdf)

Franklin Regional Council of Governments' Comments on FirstLight's August 14, 2013 Revised Study Plan  
August 28, 2013

Revised Study Plan Section	Summary of FRCOG's Requested Study Plan Modification(s)	FirstLight's Response to Requested Modification(s)	FRCOG's Response to Modification Presented in RSP and Additional Requested Modifications/Recommendations	Applicable Study Plan Criteria
Task 4a: Install Proposed Water Level Monitors in the Turners Falls Impoundment	Expand data collection to capture a full year.	FirstLight did not expand the data collection period.	The data collection should occur for a full year to provide information on seasonal variations including the spring freshet and low flow periods during the summer months.	confluence with the Deerfield River (MA34-03) is impaired by these causes as well as total suspended solids.  18 CFR §5.9(b)(6) Proposed Methodology: Please refer to the comments herein as well as those submitted in our correspondence to FERC dated March 1, 2013 and July 15, 2013.
Task 4 – Field Studies and Data Collection & Task 5 – Data Analysis	We requested that a well-documented data collection methodology be provided for these tasks. The 2013 FRP, as proposed, will not provide adequate and reliable data for Task 5 or Task 6.  There is no clear and well documented integrative methodology for these tasks.	FirstLight presented the fourth version of this study plan in the RSP.	This study continues to be fraught with serious flaws despite FirstLight having received extensive comments from stakeholders, including FRCOG, at the stakeholders' meetings on May 15, 2013 and June 14, 2013, and written comments submitted to FERC on July 15, 2013. This speaks volumes about the study's technical and organizational inadequacies. We urge FERC to require that FirstLight completely revise this study and engage a qualified fluvial geomorphologist to assist them in this effort.  We urge FERC to require that field data collection for the fixed recoverable transects requested by MassDEP be conducted in accordance with a DEP-approved QAPP. Field work should be conducted in coordination with state regulatory agencies to ensure that the data collected will meet the requirements of these agencies for resource protection. MassDEP and other state regulatory staff should conduct field visits to oversee data collection to confirm the methodology and data collection protocols as established by the QAPP.	
4.1 Geology and Soils, 4.1.1 Study of Shoreline Erosion Caused by Northfield Mountain Pumped Storage Operations	We requested that FirstLight include the Relevant Resource Management Goals (18 CRF Section 5.9(b)(2) listed by NMFS for this study request.	FirstLight did not include our requested modifications.	We recommend that FirstLight review TransCanada's Revised Study 1 – Historical Riverbank Position and Erosion Study; Revised Study 2 – Riverbank Transect Study; and Revised Study 3 – Riverbank Erosion Study for guidance on developing well-organized and scientifically defensible methodology.  Please see pages 7-9 of our July 15, 2013 letter and our March 1, 2013 letter.  FirstLight should be required to complete a Historical Riverbank Position and Erosion Study exactly like TransCanada's Revised Study 1 in order to provide information useful for resource protection and addressing cumulative impacts.  See also our March 1, 2013 letter. We requested that tasks in our Study of Shoreline Erosion Caused by Northfield Mountain Pumped Storage Operations study request be included in FirstLight's 3.1.2 Study Plan.	



## 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, tailraces, 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](mailto:kevin_mendik@nps.gov) or by phone at 617-223-5299.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Kevin Mendik', written in a cursive style.

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.

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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](mailto:kevin_mendik@nps.gov) or by phone at 617-223-5299.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Kevin R. Mendik', written in a cursive style.

Kevin R. Mendik  
NPS Hydro Program Manager  
Northeast Region

Document Content(s)

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

**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 assessing 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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