

Relicensing Study 3.6.3

WHITEWATER BOATING EVALUATION

Initial Study Report Summary

Northfield Mountain Pumped Storage Project (No. 2485)
and Turners Falls Hydroelectric Project (No. 1889)

Prepared for:



Prepared by:



SEPTEMBER 2014

1.1 Study Summary and Consultation Record to Date

The Federal Energy Regulatory Commission (FERC), New England Flow (NE FLOW), Appalachian Mountain Club (AMC), American Whitewater (AWWA), National Park Service (NPS), Vermont River Conservancy (VRC) and Friends of the Connecticut River Paddlers' Trail (FCRP) submitted requests for a controlled flow whitewater boating analysis of the Turners Falls bypass reach. All the requests were similar and requested FirstLight to use accepted whitewater boating evaluation practices to assess the presence, quality, and preferred flow ranges for river based boating resources in the Turners Falls bypass reach. FERC also requested that competing recreational uses and resource needs that may be adversely impacted by any scheduled releases be identified. NE FLOW, AMC, AWWA, NPS, VRC and FCRP also requested that access needs for put-in and take-out along the bypass reach be identified and a flow information and distribution system be assessed. FirstLight proposed to develop and conduct a controlled whitewater boating analysis of the Turners Falls bypass using accepted comparative evaluation practices and consulted with the stakeholders to develop a comparison flow study methodology, determine the number of flows and magnitudes to be evaluated, schedule the timing of the evaluation, and to enlist a group of experienced boaters to participate in the evaluation.

In FERC's September 13, 2013 Study Plan Determination Letter (SPDL), it requested the following *"FirstLight should develop detailed study protocol, logistics, and schedules in consultation with interested stakeholders before it conducts the study. Therefore, within 90 days of the date of the issuance of this determination, we recommend FirstLight submit a detailed study plan for the controlled whitewater boating assessment of the Turners Falls bypassed reach (Task 2 of the revised study plan), including methods to identify and evaluate access to the Turners Falls bypassed reach (Task 3 of the revised study plan). FirstLight should develop the study plan in consultation with the NPS, American Whitewater, Appalachian Mountain Club, Vermont River Conservancy, the Watershed Council, the Friends of the Connecticut River Paddlers' Trail, MADFW, FWS, and NMFS. The plan filed for Commission staff approval should include documentation of consultation, copies of comments and recommendations on the completed study plan after it has been prepared and provided for consultation, and a description of how comments are accommodated by the study plan. FirstLight should allow a minimum of 30 days for agencies and other entities to comment before filing the plan with the Commission. If FirstLight does not adopt a recommendation, the filing should include the reasons, based on site-specific information"*.

Based on FERC comments in the September 13, 2013 SPDL, FirstLight revised the study plan to provide detailed study protocol, logistics, and schedule, a method to evaluate bypass access, incorporate revisions to the evaluation forms, and consultation with pertinent stakeholders in development of the revised study plan.

As required by FERC, FirstLight originally had an on-site consultation meeting slated for October 7, 2013, but was cancelled because of the government shutdown. During the week of September 30 through October 4, 2013 the Turners Falls power canal was drained for maintenance and thus water was passed at the Turners Falls Dam. Various whitewater groups paddled the bypass reach during the canal outage, and bypass flow data for this time period was provided to AMC.

FirstLight held a conference call on October 10, 2013 (during the government shutdown) with AWWA, AMC, NE FLOW, and a commercial whitewater rafting company whose operations are based on the Deerfield River. The following issues were discussed: study timing, staging/access locations, composition of the boating team, photograph/videotape documentation locations, safety, shuttles and the need for post whitewater run discussions.

On November 1, 2013 (after the government shutdown), a conference call was held with AWWA, AMC, NE FLOW, National Marine Fisheries Service (NMFS), Massachusetts Division of Fisheries and Wildlife (MADFW), NPS, and Connecticut River Watershed Council (CRWC), to again discuss the 2014 whitewater study methodology. United States Fish and Wildlife Service (USFWS), Massachusetts Department of Conservation and Recreation (MADCR), VRC and FCRP were notified of the conference call but did not participate.

As required by FERC in its SPDL, FirstLight provided a Modified Revised Study Plan (Modified RSP) to CRWC, NMFS, MADFW, USFWS, NE FLOW, MADCR, AWWA, FCRP, AMC, VRC and NPS on November 22, 2013. CRWC, NMFS, NE FLOW, AWWA, and AMC provided comments on the Modified RSP. FirstLight addressed stakeholder comments and filed a Modified RSP along with the consultation record with FERC on January 13, 2014.

On April 25, 2014 FERC approved the Modified RSP with staff recommended modifications.

FirstLight consulted with NE FLOW, AWWA and AMC on March 10 and April 22, 2014 requesting assistance with identifying boaters to participate in the flow study. NE FLOW provided FirstLight updates on boater participants between May 4 and July 16, 2014. FirstLight held a consultation meeting and site visit on July 1, 2014 with AWWA, AMC and NE FLOW to review the Modified RSP and FERC recommendations, and to finalize study plan logistics and details.

1.2 Study Progress Summary

Task 1: Develop Boating Evaluation Protocol, Logistics and Schedule

The boating evaluation protocols, logistics and schedule were finalized based on FERC recommendations to the Modified RSP and discussions from the July 1, 2014 consultation meeting.

Task 2: On-Water Boating Evaluation

Prior to the evaluation, FirstLight inspected the bypass area for rebar and removed it, to the extent possible. The on-water boating evaluation was conducted on July 19, 20, and 21, 2014. Over the course of the three day study, 45 participants with various levels of boating experience ran a combination of the six flows in a variety of watercraft.

Task 3: Identify and Evaluate Access to the Turner Falls Bypass Reach

FirstLight has conducted real estate record research for land ownership along the Turners Falls bypass reach. FirstLight conducted site visits to potential bypass access points, including two specifically identified by NE FLOW in their comments on the Modified RSP, as part of field work associated with other studies in late summer of 2014.

Task 4: Data Review and Analysis

FirstLight has begun the review and analysis of data collected from the July 19, 20, and 21, 2014 boating evaluation.

Task 5: Report Development

Report development will occur during the 4th quarter of 2014 with a final report completed in the 1st quarter of 2015.

1.3 Variances from Study Plan and Schedule

Under Task 1, “Photograph/Videotape Coverage Locations”, of the Modified RSP, FirstLight proposed a site near the Turners Falls Road Bridge as a location. Based on discussions with the boater stakeholders at the July 1, 2014 consultation meeting, this site was eliminated and replaced with photo and video coverage from the Gill-Montague Bridge near Turners Falls Dam.

1.4 Remaining Activities

Remaining activities for this study include potential additional field work associated with reviewing potential bypass access sites, completion of boating evaluation data review and analysis, and report writing. The final report will be completed in the 1st quarter of 2015.