

**FEDERAL ENERGY REGULATORY COMMISSION
Washington, D. C. 20426**

OFFICE OF ENERGY PROJECTS

Project No. 1889 – Massachusetts, New
Hampshire, Vermont
Turners Falls Hydroelectric Project
Firstlight Hydro Generating Company

January 22, 2014

Mr. Gus G. Bakas
Director/Plant Manager
Firstlight Power Resources, LLC
99 Millers Falls Road
Northfield, MA 01360

Subject: Revised Form 80

Dear Mr. Bakas:

This letter is to remind you of your license obligation to gather recreation use data at your hydropower projects, for a 12-month period beginning no later than March 15, 2014, to be filed on the Licensed Hydropower Development Recreation Report, FERC Form No. 80 (Form 80) by April 1, 2015.¹ The Form 80 was revised after consultation with licensees, and several minor changes were made to clarify the document and to facilitate its completion. The information provided by licensees is used to document overall recreation use of project lands and waters at each project development, as well as recreation use at all publicly available recreation amenities (whether required by a project license or not) located within the project boundary of licensed projects. The data is then used to raise awareness of the positive impact of Commission-licensed hydropower projects on the provision of outdoor recreation opportunities, to inform decision making regarding the adequacy of recreation amenities in meeting the needs of visitors to hydropower projects, and to document recreation use for a specific development.

Firstlight Hydro Generating Company is the licensee for the Turners Falls Hydroelectric Project (FERC No. 1889) which, according to our records, consists of two developments (Turners Falls Cabot Station and Turners Falls No. 1 Station); therefore, you are expected to submit two completed Form 80 documents for this project. If you

¹ See 18 CFR § 8.11 (for all non-exempted projects which are operational as of January 1, 2014)

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believe that the number of developments identified above is incorrect, the names of the developments listed above are inconsistent with your license, or that multiple Form 80's should be submitted for your developments, please file documentation, for approval, which establishes the basis for modifying your Form 80 requirements.

You can access the Form 80 document at <http://www.ferc.gov/docs-filing/forms/form-80/form-80.asp>. Once the database is completed (expected by January 31, 2014) you will be able to locate your project, by FERC project number (i.e. FERC Project P-1889), and download a Form 80 for each development. The database will automatically complete the first 7 boxes on the form and assign a unique identifier to each form. The unique identifier is an electronic tag which will allow the database to recognize a completed form and download the data. If you file one or more completed Form 80s with incorrect identifiers (this would happen if you downloaded one Form 80 and then modified copies of that document for your other developments), you will be required to refile the correct documents. This process allows Commission staff to more easily manage the Form 80 dataset.

Detailed guidance is attached which documents recent changes to the Form 80 and provides instructions on how to complete it. You are reminded that recreation use data should be gathered for peak and non-peak times, day and night hours, and for all publicly available recreation use that occurs within the project boundary.

If you believe that one or more of your developments should be exempt from filing a Form 80 due to lack of recreation use, you may file an exemption request which establishes the basis for believing that the development has no or minor existing or potential for recreational use (defined as fewer than 100 recreation days of use during the previous calendar year). Projects that have at least one completed Form 80 filed with the Commission may submit an exemption request by October 1, 2014. Previously exempted projects, which were relicensed since 2008, are not automatically exempt thus you will need to file an initial Form 80 under the new license and then file an exemption request if warranted.

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If you have any questions regarding data gathering for or the completion of the Form 80, please contact me at (202) 502-6156 or mark.ivy@ferc.gov.

Sincerely,

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

Mark I. Ivy, PhD.
Outdoor Recreation Planner
Division of Hydropower
Administration and Compliance

Instructions for Completing the
Licensed Hydropower Development Recreation Report, FERC Form No. 80

Some modifications were made to the terminology used in the Form 80. Most noticeably, the term “Recreation Resources” was replaced with “Recreation Amenities” to allow for more specificity and clarity when discussing the scope of recreation opportunities provided by licensees at licensed projects.

Recreation facilities is a broad term which encompasses both the recreation amenities and any accompanying infrastructure to support those amenities. Recreation amenities refers to those amenities identified on the Form 80 in column a of Schedule 2. A detailed discussion of the modifications made to the Form 80 as well as additional information which may be helpful in completing the document follows.

FORM 80 Schedule 1

Items 1 – 7. These items will auto-populate when you download the Form 80 for each development from the FERC website.

Items 8-10. In the past some licensees reported the surface area, shoreline miles, and public shoreline for an entire project rather than providing information for each development. Please remember that each development should have a separate Form 80. If a project has multiple reservoirs within a single development, report a combined number for the entire development. Some licensees were uncomfortable reporting shoreline as being “safely accessible to the general public” due to liability concerns; thus item 10 was re-labeled to focus on public access.

Item 11. Licensees are asked to identify the data collection methods used to gather information for completing the Form 80. Please provide an estimate for each data collection method employed by your agency and submit a copy of your methods (detailed enough so that they could be replicated in the future) as a separate filing. If you used the same methods for multiple developments or multiple projects, only submit the methods once and list all of the projects and developments for which the methods were utilized.

Item 12. Annual recreation cost and revenue data is collected as an indicator of the investment that licensees make in the development and operation of recreation amenities. Licensees are given the flexibility to either report the cost and revenue from 2014 or the average costs and revenues from 2009 through 2014. While the Commission does not object to licensees charging reasonable fees to users in order to defray the cost of operation and maintenance, recreation amenities should not be revenue generators. (See 18 CFR § 2.7)

Item 13. The length of the recreation season allows licensees to indicate if a development has multiple use seasons and if so, the length of those seasons. Please use the season which experiences the highest recreation use when calculating peak weekend use for items 14 & 15.

Item 14. When calculating the number of visits to a development, include use at any publically available recreation area located within the project boundary, regardless of the managing authority. Any non-project uses which provide public access, such as a park or trail managed by a local agency, should also be included in the recreation use assessment (all private non-project uses, such as an adjacent homeowner's dock, should be excluded). Peak weekend averages should be calculated using the highest use season for each development, and each peak weekend should include three days of visitation (such as Friday through Sunday or Saturday through Monday). If the peak use season includes three peak weekends, then provide an average of the visitation across those three weekends.

Item 15. While nighttime use is typically considered camping, licensees should also document other nighttime use of recreation amenities including fishing, star gazing, or other allowed activities (see Item 14 for more detailed information regarding calculating use).

You are reminded that when you sign the document you are taking responsibility for the quality of the data reported in the Form 80. Please make sure that you understand the methods used to collect the data and the analysis that was performed to generate the recorded information.

FORM 80 Schedule 2

The title of Schedule 2 was modified to clarify that only recreation amenities that are publicly available and located within the project boundary should be tracked on this form. Additionally the instructions were expanded to provide further clarification.

Recreation Amenity Type (column a): The column was changed from "Recreation Resource Type" to "Recreation Amenity Type," a number of the recreation amenity categories were modified, and some new categories were developed. See below for a discussion of each category in the order in which they appeared on the previous version of the Form 80. The new recreation amenity categories are discussed last.

Access Areas – this category was renamed “Access Points” and moved to the end of the list to encourage licensees to make an effort to categorize their recreation resources into the other recreation amenity types as appropriate. This type was also broadened to include access to project lands as well as to allow for limited infrastructure.

Boat Launch Areas – this category now includes the number of boat launch lanes (record number in column e).

Boat Launch Lanes – this category was incorporated into “Boat Launch Areas.”

Marinas – clarification was added that only publicly available marinas with more than 10 slips should be recorded on the Form 80.

White Water Boating – this category now focuses on Put-ins and Take-outs that were designed for whitewater boating.

Canoe Portages – since a variety of watercraft can use a portage, the name was shortened to “Portages,” and the length of the trail connecting the take-out to the put-in should be recorded (in column e). Each portage reported on the Form 80 should consist of a take-out, a connecting trail, and a put-in.

Tailwater Fishing Facilities – the name was shortened to “Tailwater Fishing,” and a new category was added, “Reservoir Fishing,” to capture non-tailwater fishing structures.

Fishing Piers – this category has been removed to enhance clarity. See Tailwater Fishing Facilities above.

Parks – this category has been removed since it was not capturing unique information. The amenities located within each park should be captured in other categories.

Playground Areas – this category has been removed, and playgrounds are now recorded in the “Active Recreation Areas” category.

Trails – the definition has been modified to enhance clarity.

Swimming Areas – the name has been changed to “Swim Areas,” and the

definition has been shortened.

Picnic Areas – the definition has been shortened, and the number of picnic sites (not individual tables) should be specified in column e.

Wildlife Areas – this category has been removed, and the information can be recorded under “Overlooks/Vistas.”

Visitor Centers – the definition has been modified to eliminate the overlap between this category and “Interpretive Displays” and now focuses on structures.

Interpretive Displays - the definition has been modified to eliminate the overlap between this category and “Visitors Centers” and now focuses on outdoor signage.

Overlooks – this category has been re-named “Overlooks/Vistas” and broadened to include a wider variety of viewing opportunities.

Hunting Areas – the definition was slightly modified.

Golf Courses – this category has been removed, and these amenities can now be recorded in the “Active Recreation Areas” category.

Cottage/Cabin Sites – this category was renamed “Cottage Sites” to differentiate between all-weather homes and the small three season cabins commonly found interspersed within campgrounds.

Camping Areas/Campgrounds – This category has been renamed “Campgrounds,” and the definition has been expanded to include tents, RV sites, yurts, and cabins.

Tent/Trailer/RV Sites – This category has been renamed “Campsites,” and the definition has been expanded to include tents, RV sites, yurts, and cabins.

Organizational Camps - this category has been removed, and the information can be recorded under “Group Camps.”

Group Camps – the definition has been expanded to include organizational camps.

Winter Sports – the name has been changed to “Winter Areas.”

Other – This category remains an option. Please specify any recreation resources that do not fit in the other categories on the Form 80.

Reservoir Fishing – this category replaces “Fishing Piers” to better distinguish between tailwater and reservoir amenities.

Active Recreation Areas – this category replaces “Playground Areas” and “Golf Courses” and allows the licensee to document use at a wider variety of recreation amenities.

Overlooks/Vistas – this category combines “Overlooks” with other resource viewing opportunities. Additionally, many licensees found little distinction between “Wildlife Areas” and “Hunting Areas.” This new category includes wildlife watching opportunities.

Dispersed Camping Areas – this category was added since the number of licensees providing dispersed camping opportunities has increased, and it allows licensees to document this type of recreation use which is very different from campground use.

Informal Use Areas – A number of licensees indicated that some undeveloped sites were well used, and there was a likelihood that these sites would need to be developed in the near future in order to protect resources and manage use. This category was developed to provide a place to document such sites. These sites can be differentiated from “Access Points” in that typically little management or oversight is required at an access point.

Number of Recreation Amenities - User Free (column b): This column should include all publicly available recreation amenities of each type that are located within the project boundary and are open to use without paying a fee, regardless of the managing entity.

Number of Recreation Amenities - User Fee (column c): This column should include all publicly available recreation amenities of each type that are located within the project boundary and are open to use after paying a fee, regardless of the managing agency.

Number of Recreation Amenities - FERC Approved (column d): This column should only include those recreation amenities that the licensee is required to provide by the Commission, regardless of whether fees are charged for use (See the Form 80 Glossary

for further details).²

Total Units (column e): This column was modified from “Total Miles/Acres” so that it could also be used to record a wider variety of data, such as the number of boat lanes available at boat ramps, the length of portage trails (which can often be relatively short), and the number of picnic or camp sites available at a development or project.

Capacity Utilization (column f): This column was changed from “Resource Capacity (%)” to “Capacity Utilization (%)” to clarify that the amount of use an amenity receives should be recorded as a percentage of its capacity. In some cases there will be more than one of a given recreation amenity type at a development (i.e. three boat ramps), thus it is up to the licensee to explain how the capacity utilization at each site was combined to generate the percentage reported on the Form 80. In the case where a development has three boat ramps, the individual capacity utilizations could be 50%, 100%, and 150%. A licensee may then enter 100% as the average capacity utilization for all three boat ramps on the Form 80. While accurate, this number obscures the fact that one boat ramp is over-used, one is under-utilized, and the third is operating at capacity. Licensees are advised to keep track of this individual data should the Commission have questions regarding use at specific sites.

Glossary of FERC Form 80 Terms

The glossary has been reorganized so that the terms are in alphabetical order, and several new terms have been defined to assist licensees in accurately completing the Form 80. The definitions for “FERC Approved” recreation amenities and “Peak Use Weekends” have been expanded, and definitions have been added for “Non-Peak Weekend,” “Total Units,” and “Trails.” Additionally, for “Data Collection Methods” licensees are requested to provide a brief explanation of how estimates were generated, if that alternative was selected in Item 11 of Schedule 1.

² Commission staff are developing guidance to assist licensees in determining which recreation amenities located within the project boundary are FERC approved. Once completed this guidance will be available at <http://www.ferc.gov>.

Document Content(s)

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