

# New England *FLOW* ~~~~~

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TransCanada Hydro Northeast, Inc.

Vernon Hydroelectric Project No. 1904-073

## NEW ENGLAND FLOW AND AMERICAN WHITEWATER'S COMMENTS AND STUDY REQUESTS

New England FLOW is a regional non-profit organization whose affiliations have represented whitewater boaters, canoeists, rafters, and other river users on multiple project re-licensing throughout New England for over 25 years. American Whitewater is a national non-profit organization dedicated to protecting and restoring our nation's whitewater resources and enhancing opportunities to enjoy them safely.

The Vernon Dam Project of the Connecticut River eliminates any opportunity for whitewater paddling. There are no levels at this site to provide river play, surfing or currents for squirt boating. There are no flows to provide "freestyle paddling" and the river reach below the dam is devoid of any whitewater challenge.

Construction of the nearby downstream Turners Falls Dam (FERC Project No. 1889-081) within such close proximity to the Vernon Dam has resulted in a "river pool" whose primary function is to provide a water source for the Northfield Pump Storage Project (FERC No. 2485-063).

### **Issue #1: Compensation for Impacts of the Connecticut River and Loss of Whitewater Recreation below Vernon Dam**

The Vernon Dam project is a 900-foot wide dam that blocks flows completely, and any natural whitewater flows have been eliminated because of the dam.

Opportunities have been eliminated by the project and cannot be restored by the development of a release schedule that could provide flows of varying volume. The current operation of the project eliminates valuable seasonal whitewater paddling opportunities.

### **Issue # 2: Camping and sanitary facilities available for multiple-day kayaking or canoe trips.**

The applicant has itemized 3 camping facilities and 14 access points (not all of which are managed by TransCanada) in the reach from immediately below the Vernon Dam and north

throughout Project boundaries, But they have not provided a qualitative analysis of these facilities.

These sites are managed and/or maintained by multiple parties, and at a minimum there should be consistent standards for sanitation, safety, and control of litter or camping debris.

### **Issue #3: Economic analysis.**

The flow operations and management of the Vernon Dam have significant negative recreational impacts and related socio-economic impacts. No change of the operational scenario of the Vernon Dam Project will create relief from this loss.

In this case, because of the significant loss of benefits from whitewater recreational usage, we believe FERC should also weigh the predicted economic values associated with whitewater use by looking at various alternatives.

### **Study Requests**

We hereby request several studies per 18 CFR 5.9(b).

#### **1. Compensation for Impacts on the Connecticut River and Loss of Whitewater Recreation below Vernon Dam**

The Vernon Dam itself has eliminated whitewater opportunities for paddlers. The goal of this study is to assess the presence, quality, access needs, flow information needs, and preferred flow ranges for regional, off-site whitewater boating resources that would provide adequate compensation for the loss of whitewater recreation that lies beneath the Vernon Dam.

The National Blueway concept takes a watershed viewpoint and addresses the river from its source to the sea. The National Blueways System has as its goal “to advance a whole river and watershed-wide approach to conservation, outdoor recreation, education, and sustainable economic opportunities in the watersheds”.

Off-site mitigation would require participation by multiple state and federal agencies. Any agreement for this type of mitigation would require a balance of objectives that would not conflict with existing management goals. However, there may be opportunities to enhance existing goals or increase the range of current objectives.

#### **2: We request a study of camping and sanitary facilities available for multiple-day kayaking or canoe trips.**

The goal of this study is to provide a quantitative and qualitative analysis of existing facilities to determine their capacity to manage the increasing number of paddlers who are making multiple-day trips on the Connecticut River.

While the applicant has itemized 3 camping facilities and 14 access points available from immediately below the Vernon Dam north throughout Project boundaries, they have not provided a qualitative analysis of these facilities.

These sites are managed and/or maintained by multiple parties listed by the Licensee in the PAD. Current management agencies should be surveyed by the Licensee to gather historical management and operational data and then provide plans and upgrades to meet future recreational needs for the 30-year life of the proposed license.

### **3: We request an economic analysis study.**

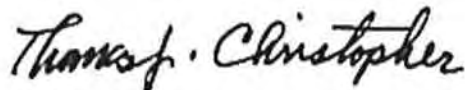
The goal of the recreational economic analysis in this study is to predict the regional economic values of off-site mitigation to provide alternative flow restoration on other regional resources.

Since the present economic values of the lost whitewater recreation are unknown because there is currently no whitewater recreational activity at Vernon Dam, we request the study be compiled using the “contingent valuation” method study which measures individuals’ “willingness to pay”.

### **Conclusion:**

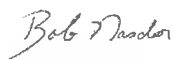
We respectively request the hydrological, recreational, and economic studies that will support the dialog and analysis regarding the restoration of flows and associated recreational values to the bypassed reach of the Vernon Dam project.

Respectfully submitted this \_\_28th\_\_ day of \_\_\_January, 2013\_\_\_\_\_



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