



FirstLight Power Resources

Turners Falls Project No. 1889-081
Northfield Mountain
Pump Storage Project No. 2485-063

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-licensings 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 Turners Falls section of the Connecticut River has had the potential ability to offer whitewater paddling opportunities of sufficient quality during irregular spillage events.

In addition to kayaking, this reach has potential for rafting, guided kayaking, canoeing, instruction, and general paddling use.

Issue #1: Impacts of the Connecticut River flow diversion on recreational paddling at the Turners Falls bypass reach.

The Turners Falls project 2.7-mile diversion reduces instream flows substantially, leaving only minimum flows or those flows required for fish passage by the U. S. Fish & Wildlife Service, National Marine Fisheries Service, or the Massachusetts Department of Fish & Wildlife.

Some of the whitewater opportunities eliminated by the project could be provided in a moderate, stable, and predictable operational mode and occur during warm weather. The current operation of the project, and lack of access, virtually eliminates valuable summer paddling opportunities.

Issue # 2: Public Access for whitewater boating, rafting, and canoeing in the bypass reach is inadequate.

Directly below the Turners Falls Dam at Station #1, there is currently no formal public access or parking owned by the Licensee for whitewater boaters.

For access to the whitewater flows below the Cabot Station, parking for boaters is likewise problematic, with limited parking. The takeout for both runs (Station # 1 and Cabot) is at the confluence of the Deerfield River.

Issue # 3: Camping and sanitary facilities available for multiple-day kayaking or canoe trips.

While the applicant has itemized and described the different recreational opportunities available throughout the reach from Turners Falls Dam to the Vernon Dam, they have not provided a qualitative analysis of these facilities..

Issue #4: Economic analysis.

The diversion of flow around the Turners Falls Dam has significant negative recreational impacts and related socio-economic impacts. By changing the operational scenario of the Turners Falls Project, the potential exists to create new tourism products for a region that is primed to capitalize on it.

Issue #5: Loss of Whitewater Recreation at Great Falls and Upstream

The Turners Falls Dam sits atop Great Falls and drowns whitewater rapids that once created a beautiful and historical site. Construction of the dam eliminated significant whitewater opportunities both above and below the dam.

Study Requests

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

1. Controlled Whitewater Flow Study in the bypass reach below Turners Falls Dam.

We currently do not know the relationship between specific low and moderate flows and the paddling experiences they provide. Without this information we cannot fully define the project impacts, nor propose and consider provision of releases that provide targeted recreational experiences

2. Public Access for whitewater boating, rafting, and canoeing is inadequate.

The goal of this study is to identify and define adequate access points that provide trails and car-top parking at Station #1 and Cabot Station, and egress at the end of the 2.7-mile run at the confluence of the Deerfield River.

3: 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.

4: We request an economic analysis for site recreation potential.

The goal of the recreational economic analysis is to examine the regional economic benefits of various flow alternatives that can be provided by restoring flows to the Turners Falls bypass reach.

Since the present economic values cannot be determined because there is currently no recreational activity in the bypass reach, we request the study be compiled using the “*contingent valuation*” method that measures individuals “*willingness to pay.*”

5. Compensation for Impacts on the Connecticut River and Loss of Whitewater Recreation at and above Turners Falls Dam

The goal of this study request is to assess the presence, quality, access needs, flow information needs, and preferred flow ranges for regional whitewater boating resources that would provide adequate compensation for the loss of whitewater recreation at the Turners Falls Dam.

Thus, the information obtained could be used by the Licensee to obtain a combination of alternatives in the form of off-site mitigation and by cooperating with other state and federal agencies could develop compensatory whitewater opportunities.

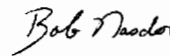
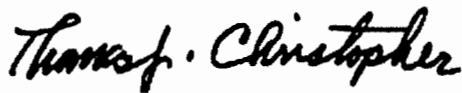
Rivers in the region that would be candidates for such off-site mitigation would be the West and Winhall Rivers in Vermont, the Millers and Deerfield Rivers in Massachusetts, and the Ashuelot River and Otter Brook in New Hampshire.

Conclusion:

We respectfully request the hydrological, recreational, economic studies, and off-site mitigation that will support the dialog and analysis regarding the restoration of flows and associated recreational values to the Turners Fall project.

In addition, in these comments we offer our comments on the PAD, to better inform this relicensing process. Thank you for considering these comments.

Respectfully submitted this 28th day of January 2013_____



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