

**UNITED STATES OF AMERICA
FEDERAL ENERGY REGULATORY COMMISSION**

TransCanada Hydro Northeast, Inc. Wilder Hydroelectric Project No.
1892-026
Bellows Falls Project No.
1855-045
Vernon Hydroelectric Project No.
1904-073

**APPALACHIAN MOUNTAIN CLUB, VERMONT RIVER
CONSERVANCY, AND THE FRIENDS OF THE CONNECTICUT RIVER
PADDLERS' TRAIL'S
COMMENTS ON UPDATED PROPOSED STUDY PLANS
FOR THE WILDER HYDROELECTRIC PROJECT, FERC PROJECT NO.
1892-026, THE BELLOWS FALLS PROJECT, FERC NO. 1855-045, AND
THE VERNON HYDROELECTRIC PROJECT, FERC. NO. 1904-073.**

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 these sections 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 trail into Massachusetts and Connecticut.

Representatives of the Appalachian Mountain Club attended face-to-face sessions held by TransCanada on June 6 and 7, 2013, at White River Junction to discuss the proposed study plans. We reference our comments made at those meetings.

First of all, we want to compliment TransCanada for selecting qualified consultants to administer these studies. The consultants acknowledged our suggestions at the face-to-face meetings, were cooperative, and displayed a good knowledge of the river. Our comments below are intended to help them gather more and better data from their surveys and research.

Summary of comments:

In this filing, we emphasize that TransCanada, along with its survey of area residents and visitors, should expand their survey of non-users of the river. The survey should assess visitors' impressions of existing facilities, as well as learning why others may have been pushed away by a lack of recreation facilities, by facilities that are not suited to their forms of recreation, or because of undesirable river conditions, and so forth. In addition they should employ more qualitative forms of research such as focus groups. We suggest that the applicant consider a wider range of facilities and options in its inventory and assessment of recreation facilities. We make what we consider important comments about the portage trail around the Bellows Falls Dam, the whitewater boating study in the Sumner Falls reach and the Bellows Falls bypass reach, and about the failure of TransCanada to conduct a contingent valuation study.

Comments on specific studies:

Study #30, Recreation Facility Inventory and Use & Needs Assessment

We feel a wider range of facilities and options should be considered for the inventory assessment. As one example, when a concrete boat ramp is present at a put-in most inventories simply indicate a ramp. Concrete boat ramps, however, are generally most useful for people towing motorboats on trailers. Such ramps damage wood, fiberglass, and other kinds of car-top or self-propelled boats such as canoes, kayaks, small sailboats, and rowing shells. Put-ins that provide only ramps contribute to user conflicts as paddlers inevitably block the ramp while loading and unloading their boats, especially when carrying gear for multi-day trips.

The presence of a concrete boat ramp suggests the site favors motorboats. If, however, there is a sandy or wooden boat ramp, or a separate dock installed for paddle craft, then owners of self-propelled watercraft

would find the site useful. If you ever have a chance to drive along the Charles River in Boston during the summer, you'll notice that the boat ramps from the grand boathouses on the Charles are made of wood. Such distinctions about access points could be helpful in this inventory.

At the meeting in White River Junction, we suggested surveying a wider group of users and especially of non-users of the TransCanada facilities. Expanding its survey of non-users can be helpful in identifying areas where TransCanada might strengthen its recreational facilities and offerings to serve a larger public. While some of this is planned, we encourage TransCanada to expand this survey of non-users.

Such surveys can be more cost effective and cover a wider audience by using mailing lists of NGOs, such as the AMC, which has thousands of members in the area and has a recreation plan for the Connecticut River Blueway. The AMC membership is so large that the only bias in the group is an interest in the outdoors and recreation, which would be a benefit in this kind of survey. Rather than securing lists of people who may have no interest in the river, it would be more efficient and informative to use NGO lists, where by definition the group has some interest. Ken Hogan of FERC commented to FirstLight that it is common in FERC processes to look at NGOs and municipalities that have recreation plans or development plans in the region.

We suggest that TransCanada engage in a broader range of survey techniques that produce more qualitative results and greater accuracy, such as focus group interviews. Such surveys are far more informative than paper surveys randomly handed out at recreation sites, but they do take a bit of time.

We are concerned about projecting future uses of the river using national models. Predictions of the future are always speculative, and using "standard sources" emphasizes regression to the mean rather than providing any useful information. We agree with Adam Beeco from FERC that more updated literature on doing future research is needed for this study.

We have questions about the standards employed to assess the sites already on the river. How is overcrowding measured, or even determined? Exactly what facilities would one expect to find at different kinds of campgrounds? We recommend looking at the extensive work done by the Connecticut River Paddlers' Trail to define what constitutes adequate campground frequency and equipment.

This is as good a time as any to mention the portage trail around the Bellows Falls Project. It is abysmal. The improvement of the portage may come under any number of studies, including #30, #31, #32, and #33. As

Adam Beeco of FERC commented, a shorter, safer portage plan is needed at the Bellows Falls Project. The portage at the Wilder Dam is nearly as bad, and an alternate route on the other side of the river has been suggested. The portage at the Vernon Dam also has issues. These portages should be addressed somewhere in these studies.

Study #31, Whitewater Boating Flow Assessment.

The mechanisms of controlled-flow whitewater evaluations at sites such as Sumner Falls and Bellows Falls are widely known and have been used by TransCanada on other rivers. We believe that the keys to successful evaluations include working together with NGOs to obtain the right mix of paddlers in the right mix of craft, having controlled flows that provide a good range of conditions, and using good evaluation survey forms with the boaters. Members of the AMC, New England FLOW, and American Whitewater have participated in several successful controlled-flow studies during FERC relicensings on other New England rivers for more than 20 years.. We look forward to working with TransCanada's consultants as they get closer to the study.

Sumner Falls has been used as a play spot by kayakers for years. The appropriate range of flows is known, and the surfing waves that form even have names. This should be a straight-forward project. Timing may be an issue, as well as achieving some of the higher flows that are greatly valued at the site.

Bellows Falls is a different situation because we know very little about this whitewater reach. We can scout it at various flows, but we won't really know until the boaters hit the water. We appreciate that opportunities have been built into the study for scouting and appraisal by expert boaters before the controlled-flow study begins. That should help us determine the appropriate size for evaluation flows. Even those predictions may need to be modified after the initial runs.

It is important that flows in the bypass reach be accurately measured. TransCanada does not have much experience in providing precisely controlled flows from its dam above the Bellows Falls bypass reach. Concerning the gates available to release water at the Bellows Falls bypass reach, TransCanada said (p. 226): "The minimum gate opening for these gates is 1 foot to prevent river debris from damaging the submerged seals or getting lodged and preventing the closure of the gate. Considering the overall 3-foot range of operation of the impoundment, a 1-foot opening discharges 3,000 to 3,300 cfs into the bypassed reach." We have no idea

what a decent flow would be in the bypass reach. A flow of 3,000 cfs or higher might well be appropriate.

The flows provided for evaluation should be measured exactly, rather than being estimated. Any sloppiness in this area can create problems after the license is issued. We understand that sometimes it is difficult with large hydropower gates to exactly measure flows. Again, we look forward to working closely with the consultant to learn which flows can safely provide maximum opportunities for whitewater recreation.

In conversations at White River Junction with the consultants who will be running this study, we felt they had a good handle on the situation. One unresolved issue is what to do about the low-head fish barrier dam near the bottom of the bypass reach. The AMC favors removing the dam. TransCanada has refused requests to remove the dam prior to this study. The consultants say they had been studying the dam under different natural flow conditions and they believe it is runnable. We'll want to take a close look at it and the boaters in the test runs will make their own decisions about that.

Since TransCanada and other stakeholders have several legitimate issues with that low-head fish barrier dam, we proposed in White River Junction that a subgroup of these stakeholders look into positive benefits such as removal, ownership, modification, future uses, and so forth. In published comments after the meeting, TransCanada said, "There may be many considerations for the dam positive and negative relative to other resources and we feel we can assess flows without removal." But the creation of a subgroup was not addressed. Given the multiple benefits of dam removal, we consider this position particularly short-sighted. We recommend the creation of such a group that can work cooperatively with TransCanada to better understand the issues and the option of removal.

We look forward to reviewing the evaluation forms, and to doing the preliminary examinations and site visits that will be possible prior to conducting the controlled-flow study.

Study #33, Historical and Cultural Objects.

This study does not address our request to preserve photos and historical documents in possession of TransCanada related to the construction of the dams. These are historical materials in possession of the applicant that need to be inventoried, and plans devised for their preservation.

Note on a study not done. TransCanada has declined requests to do a contingent valuation study of whitewater in the Bellows Falls bypass reach.

Contingent valuation studies seek to put two competing social “goods” on an equal footing. They do this by assessing “value,” that is, the value of an activity for society and what may be lost if the activity is prevented from occurring. Value is different from revenues, in the business sense. A tobacco company may make a lot of money, but that does not necessarily give it a value in society.

In contingent valuation studies at hydropower dams, we have one activity that can easily express itself in dollars—hydroelectric generation. Such generation comes from the public’s river water run through turbines. Other activities may compete for that water and reduce company revenues. How are we to compare the value of a shad in the Connecticut River above any of the TransCanada dams? How can we value the recreation generated by putting river water back into the natural stream bed for whitewater recreation? How do we compare the scenic beauty of a natural river with the lost revenues when a bypass reach takes some water from the turbines? Comparing such activities as fish, recreation, and beauty with company revenues works against the fish, the boaters, and the public. Contingent valuation was a technique produced to compare those activities on an equal footing.

We don’t do that anymore with fisheries or scenic values, but at one time it was done. Rather than dealing with dollar revenues, the term “value” was used. Contingent valuation places a value on different activities based on the social goods produced. A shad in the river has a social value. Recreation in the natural stream bed has a value. Beauty has a value. Flipping a switch and having the lights turn on has a social value. Contingent valuation studies are how these things are put in the same framework so they can be compared.

We understand that TransCanada may wish to avoid such comparisons. For one thing, the social value of hydropower is diminished when a company charges a profit to provide electricity.

We cannot force TransCanada to do a contingent valuation study, or FERC to order one, but this metric is clearly relevant in determining value. Lacking a study of comparative social values, we do not want to hear TransCanada arguing during the mitigation phase of relicensing that they cannot provide one thing or another because it would cost them too much money. That argument goes out the window along with the rejection of contingent valuation studies.

Conclusion

The Appalachian Mountain Club respectfully requests that FERC accept these comments and direct the licensee to revise its proposed study plans to address the concerns raised. Thank you for considering these comments.

Respectfully submitted this 10th day of July, 2013,

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Document Content(s)

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