



## United States Department of the Interior

**NATIONAL PARK SERVICE**  
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Kimberly Bose, Secretary  
Federal Energy Regulatory Commission  
888 First Street, NE  
Washington, DC 20426

NPS Comments on Updated Proposed Study Plans for TransCanada Hydro Northeast, Inc. Wilder Hydroelectric Project No. 1892-026, Bellows Falls Hydroelectric Project No. 1855-045 and Vernon Hydroelectric Project No. 1904-073.

The NPS appreciates the opportunity to have participated in several face to face meetings between the applicant and their consultants, FERC and numerous stakeholders in order to address comments received on the PSP and to refine the proposed studies based on that input. The following comments are filed in order to assist the applicant in their data collection and analysis.

### **General Comments**

The Connecticut River and its 7.2 million-acre watershed includes National Forests, National Historic Sites, National Wildlife Refuges, National Scenic Byways, Partnership Wild and Scenic Rivers, National Recreation Trails, National Natural Landmarks, Important Bird Areas, and segments of the New England National Scenic Trail; the Appalachian National Scenic Trail; the East Coast Greenway Trail; the Northern Forest Canoe Trail; Revolutionary Route National Historic Trail, a Ramsar wetland site, and an American Heritage River, and approximately two million acres of public and private conservation land.

These projects are located on the nation's first National Blueway, so designated by DOI Secretary Salazar on May 24, 2012. Secretary Salazar noted that "The Connecticut River Watershed is a model for how communities can integrate their land and water stewardship efforts with an

emphasis on ‘source-to-sea’ watershed conservation [as we] seek to fulfill President Obama’s vision for healthy and accessible rivers that are the lifeblood of our communities and power our economies.” Among the stated goals are to advance a whole river and [utilize] a water-based approach to conservation, outdoor recreation, education and sustainable economic opportunities in the watersheds in which we live, work and play.” As such, these relicensings present a once in a generation opportunity to address and correct deficiencies in recreational opportunities. Therefore, it is critical that in attempting to reach users and equally important, those who for whatever reason do not use the river, the survey’s content and method for reaching current and potential recreational users must be adequate.

### **Land Protection**

A comprehensive identification of licensee owned lands adjacent to the project boundary should be included in the application. GIS data can be overlain to show the project boundary, lands adjacent to it and areas which if developed could adversely impact river resources, from development and impact on aesthetic values to upland land use practices that may adversely impact water quality and sedimentation. In some cases, these adjacent lands could be appropriate for providing additional recreational access to the river, new trails or connections to existing trails. Permanent protection of these lands would also confer aesthetic benefits to those using the river by providing views from the river of undeveloped lands. Regarding lands within the project boundary, those not integral to project operations should be permanently preserved and in many cases consist of prime agricultural lands. Even those lands currently under Agricultural Preservation Restrictions are only temporarily protected. Permanent protection ensures the long term viability of these important resources. Numerous non-governmental organizations and federal, state and local entities have identified valuable and important land protection locations and opportunities along the Connecticut River. This information should be identified and used collectively to determine appropriate opportunities for land protection in the context of these relicensing proceedings.

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

Numerous RAs and NGO noted that this study would be considerably improved if it were to capture non-users, including those who may have used

project related facilities in the past and no longer do so and those potential users who for various reasons, do not utilize project area facilities. Several methods for capturing those users and their input were identified. In brief, the NPS believes it would be simple, cost effective and produce useful data if the applicant were to avail themselves of the MA, VT and NH members of organizations such as the Appalachian Mountain Club (AMC), whose members would logically have an interest in recreating on the Connecticut River. The AMC has graciously offered to work with the applicant to transmit updated survey questionnaires to their membership in the project area. AMC has also developed a recreation plan for the Connecticut River Blueway, referenced above.

Extensive work has been done by the Friends of the CT River Paddlers Trail relative to river access campsites in terms of appropriate frequency (how far apart on the river) as well as maintenance and facility needs. Efforts are underway to expand the trail into Massachusetts and Connecticut. This data should be incorporated into the study in order to identify obstacles to multi-day paddling trips, which also include the lack of adequate or existing portages around project dams.

Additional information and resources were identified in the PSP meetings and should be utilized to refine the study. These include City of Hanover owned conservation lands abutting the impoundment just south of the Hanover town line, numerous developed trails with no river access, a proposed public access south of the Westborough River which is awaiting the completion of a bridge project on long term hold, Two Rivers Park Natural Area (Mascoma River confluence below Wilder) includes developed trails, and sites approved for recreational activity, but as yet unbuilt. This park includes a mandate for public access and is part of West Lebanon's Master Plan process which included 38 public meetings. The area includes over ½ mile of riverfront. They In addition, an area developer who attended the meetings noted that he has offered to allow access on a 15 acre part of his site as well as adjacent lands suitable for trails.

The revised study should include a comprehensive assessment of the condition of each site, along with how various ratings (good, fair or poor) are defined and applied. As noted during the meetings, there are situations where the presence of a boat ramp may actually limit access for certain kinds of users. Concrete ramps may be unsuitable for hand carried boats, where sites with a small floating dock can allow these users to access the river. Simply identifying a boat ramp does not provide adequate information for the types of users and potential deficiencies.

The revised study should extend the time it is to be conducted beyond Sept 30, allowing it to capture users in the fall and winter seasons which may well account for significant use. The survey also does not account for use by minors; however, by utilizing AMC data, for instance, those users will be identified through family membership data. The revised study should also include a method to reach school groups. Although the towns may or may not have that data, queries should be put to area schools to ID which of them go on field trips and equally important, why they may not visit river based recreational facilities nearby. Additionally, the study data collection phase should extend to two years to allow for vagaries in weather and economic conditions which change from year to year. A single field season may provide good data, but a second year is certainly preferable. The field surveys should also extend to ½ hour before sunrise and ½ hour after sunset. The current proposal to start them ½ hour after sunrise and end ½ hour before sunset will miss many if not most anglers who tend to put in before sunrise and/or may take out after sunset.

The adequacy of the portages at each dam must also be addressed in order to cure existing deficiencies in the opportunities for multi-day paddling trips. Bellows Falls is currently the most problematic of the three, but all need to be adequately addressed.

### **Study #33, Historical and Cultural Objects.**

The applicant currently possesses historic photos and documents related to the dam's construction. These resources should be adequately documented and preserved in association with local historical societies and/or town archivists.

The NPS appreciates the opportunity to work with the applicant to revise their proposed studies in order to provide the FERC with adequate information on which to base their licensing related decisions. Therefore, the NPS requests that the FERC direct the licensee to revise its proposed study plans to address the concerns raised above.

Questions or comments on this submittal should be addressed to Kevin Mendik at [kevin\\_mendik@nps.gov](mailto:kevin_mendik@nps.gov) or by phone at 617-223-5299.

Respectfully submitted,

A handwritten signature in blue ink, appearing to read 'K. Mendik', is positioned in the upper left quadrant of the page.

**Kevin R. Mendik**  
NPS Hydro Program Manager  
Northeast Region

Document Content(s)

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