



TransCanada Hydro Northeast, Inc.

Bellows Falls Project No. P-1855-045

## 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 Bellows Falls bypass reach, the original riverbed of the Connecticut River, has the ability to offer paddling opportunities of sufficient quality through spillage events. This site would be a very good location to develop a whitewater park, and at moderate flows the run could be used by canoeists and kayakers for surfing waves and for acrobatic tricks called "freestyle" paddling.

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

The Bellows Falls project is a .7-mile diversion that reduces in-stream flows completely except for some leakage. Any natural boatable flows under flood spillage are inaccessible, high, flashy, unpredictable, and are only available during periods of seasonal high spillage due to flooding. Near the bottom of the reach, a low-head weir was installed that might make paddling hazardous.

### **Issue # 2: Public Access for whitewater boating, rafting, and canoeing is inadequate.**

Directly below the Bellows Falls Dam there is currently no formal public access or parking for whitewater boaters or canoeists. In order to put in for access to the whitewater rapids in the bypass reach, boaters would need to descend a steep slope studded with large boulders from a heavily traveled roadway

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

In the PAD, the Licensee has itemized 3 camping facilities and 11 access points (not all of which are maintained by TransCanada) in the reach from the Bellows Falls Dam to the Wilder Dam; however 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 #4: Economic analysis.**

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

In this case, because of the significant economic potential of a whitewater park to increase recreation with increased flows, we believe FERC should also weigh the predicted economic values associated with the recreational use when looking at various alternatives.

### **Issue #5: Alternatives for off-site mitigation.**

Bellows Falls Dam sits atop a whitewater falls, after which it is named, and its reservoir drowns other whitewater drops as the river approaches the dam. Alternatives in the form of off-site mitigation could create compensatory whitewater opportunities.

## **Study Requests**

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

### **1. We Request a Controlled Whitewater Flow Study in the bypass reach below the Bellows Falls Dam.**

The goal of a whitewater flow study is to assess the presence, quality, access needs, flow information needs, and preferred flow ranges for river-based boating resources in a stepwise manner.

Thus, the information to be obtained for the whitewater park study is a combination of user-generated flow preferences and other engineering information on current and proposed operations (e.g. discharges), geographic information and basic recreational information.

Results of this study may produce evidence supporting mitigating license requirements for a whitewater park and scheduled releases in the bypass reach.

**2. We request a study to provide public Access for whitewater boating, rafting, and canoeing.**

The goal of this study is to identify and define adequate access points that provide trails and parking, at the beginning and end of the bypass reach.

As we explained above, the Bellows Falls bypass reach offers the public an opportunity to enjoy a high quality whitewater boating resource with the development of a whitewater park.

There is an inconsistent body of knowledge regarding access needs in this reach, and the PAD does not identify access points for any type of whitewater use.

Access would be necessary if a whitewater park were used as a mitigating license requirement.

**3: We request a study to evaluate 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. The study should examine the adequacy of such facilities over the 30-year life of the license.

In the PAD, the Licensee identifies 11 sites within Project boundaries as access points to the Connecticut River, such as boat ramps or car-top access. However, none of these sites are designated for camping nor do they have sanitary facilities.

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

We believe using the “contingent valuation method” of study to determine economic information based on recreational use will provide useful information that will eventually help establish the value for developing a whitewater park.

Economic stimulus is clearly in the public interest. Many examples of whitewater parks support robust recreation economies, including those that have been constructed in Charles City, Elkader, and Iowa City, Iowa, as well as South Bend, Indiana; Springfield, Ohio; Yorkville, Illinois; and Petoskey, Michigan.

**5. We request a study to define compensation for impacts on the Connecticut River and loss of whitewater recreation below Bellows Falls Dam**

The goal of this study 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 Bellows 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 to 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.

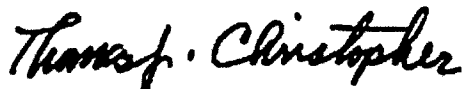
The National Blueway concept takes a watershed viewpoint and addresses the river from its source to the sea. The National Blueways System has as its goal "to advance a whole river and watershed-wide approach to conservation, outdoor recreation, education, and sustainable economic opportunities in the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

### **Conclusion:**

We respectfully request hydrological, recreational, access, economic, and off-site mitigation studies that will support the dialog and analysis regarding the restoration of flows and associated recreational values to the bypass reach of the Bellows Fall project, and provide compensation for the loss of drowned whitewater habitat. All such studies should take into consideration a projection of the public's need for water-based recreation for the 30-year life of the proposed license.

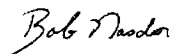
In addition, in these comments we offer our written comments on the PAD, to better inform this relicensing process. Thank you for considering these comments.

Respectfully submitted this 28<sup>th</sup> day of January 2013



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