

UNITED STATES OF AMERICA  
FEDERAL ENERGY REGULATORY COMMISSION

TransCanada Hydro Northeast Inc. Wilder Project No. 1892  
TransCanada Hydro Northeast Inc. Bellows Falls Project No. 1855  
TransCanada Hydro Northeast Inc. Vernon Project No. 1904

AMERICAN WHITEWATER COMMENTS ON REVISED STUDY PLAN  
FOR THE WILDER PROJECT (NO. 1892), BELLOWS FALLS PROJECT (NO. 1855)  
AND VERNON PROJECT (NO. 1904) FILED BY TRANSCANADA  
HYDRO NORTHEAST INC. ON AUGUST 14, 2013

American Whitewater submits these comments to FERC in response to the Revised Study Plan for the Wilder, Bellows Falls and Vernon hydroelectric projects operated by TransCanada Hydro Northeast, Inc. Our organization has previously submitted comments and study requests asking the licensee to study the impact of its hydroelectric operations on the recreational opportunities available to non-motorized boaters – whitewater boaters, multi-day through paddlers and flatwater paddlers – in the project area. American Whitewater incorporates by reference its comments previously submitted to FERC, and requests that FERC consider American Whitewater's previously submitted comments along with the comments herein in evaluating the licensee's Revised Study Plan.

American Whitewater submits the following additional comments in response to TransCanada's Revised Study Plan:

1. Despite receiving numerous comments submitted by American Whitewater, New England FLOW, Appalachian Mountain Club, National Park Service, Connecticut River Watershed Council and others, the Licensee persists in its plan to study the demand for recreational activities in the project area without making any meaningful effort to study the reasons for non-use of its recreational facilities due to the inadequacy of those facilities. In failing to do targeted surveys of users who find the facilities so inadequate that they do not visit the project area, the licensee cannot obtain any meaningful data on the extent of the demand for additional recreational opportunities through the creation of new facilities or changes to its power generation operations. With regard to whitewater boating, the licensee's operations have disrupted the natural flow of the river at Bellows Falls and have dewatered this section of the river, eliminating all opportunities for whitewater boating in the project area. The licensee cannot assess the demand for whitewater boating in the natural bypassed reach without surveying those who may be interested in activities that are completely unavailable in the project area. Having failed to conduct an adequate study of the demand for recreational activities in the project area, the licensee cannot later cite to the lack of demand as a justification for avoiding its obligation to provide additional recreational opportunities to whitewater boaters and other recreational users, through

modifications to its generation practices, creation of new facilities, or other mitigation measures, based on a lack of demand.

2. The licensee has declined to include in its study plan any effort to investigate the ownership, purpose, and effectiveness of the low-head dam in the natural bypassed reach. We believe that the low-head dam was constructed by the licensee for the purpose of diverting fish from the natural bypassed reach, likely by Atlantic Salmon. Given the complete absence of any upstream salmon migration at Bellows Falls and the abandonment of the costly and unsuccessful Atlantic Salmon restoration efforts by the U.S. Fish and Wildlife Service and state resource agencies, the low-head dam likely serves no purpose and is an impediment to certain recreational opportunities. Given that numerous resource agencies and Non-Governmental Organizations (NGO) submitting comments have expressed an interest in restoring flows to the natural bypassed reach, the licensee should be required to conduct an investigation into the low-head dam.
3. The licensee opposes performing a whitewater park study as requested by American Whitewater, New England FLOW, and Appalachian Mountain Club on the basis that a whitewater park is mitigation. While we agree that there must be a determination whether the natural bypassed reach is boatable at any level, a whitewater park study is critical to determine what paddling opportunities exist in the natural bypassed reach and the compatibility of a whitewater park with other interests. The licensee should include in its planned whitewater flow study an examination of the natural bypassed reach to determine its suitability as a whitewater park and engage the services of qualified persons who are experienced in the design and construction of whitewater parks. Failing to do so will unnecessarily cause delay and will prevent the licensee from determining the compatibility of proposed uses in the natural bypassed reach.
4. The licensee has no plans to survey through paddlers on the adequacy of the boat launch and portage trail at Bellows Falls. Having failed to survey this and other potential user groups, the licensee will instead need to rely on comments submitted by organizations such as American Whitewater, New England Flow, Appalachian Mountain Club, National Park Service and the Connecticut River Watershed Council to provide this assessment and identify more suitable alternatives. The licensee cannot, however, claim that the alternatives proposed by these organizations do not reflect the views of the wider paddling community whom it has declined to survey.

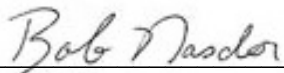
The licensee's unwillingness to undertake a meaningful study of the demand for whitewater boating at Bellows Falls and Sumner Falls fails to provide FERC with sufficient information on which to prepare its NEPA document, and places FERC in an untenable position of determining the conditions under which it will grant the licensee a hydropower license without an adequate basis for making that determination. The stakeholders, including American Whitewater and others, also need an adequate basis for engaging in negotiation with the licensee over mitigation. As such, we object to the

licensee's study request because it fails to adequately assess demand for whitewater boating, and fails to provide FERC with an adequate record to support a robust NEPA analysis.

**Conclusion**

American Whitewater respectfully requests that FERC accept these comments and direct the licensee to further revise its study plans to address the concerns raised. Thank you for considering these comments.

Respectfully submitted this 27<sup>th</sup> day of August, 2013.



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Bob Nasdor  
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65 Blueberry Hill Lane  
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**UNITED STATES OF AMERICA  
BEFORE THE  
FEDERAL ENERGY REGULATORY COMMISSION**

Transcanada Hydro Northeast, Inc.

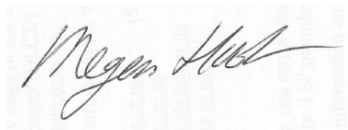
Wilder Hydroelectric Project  
Bellows Falls Hydroelectric Project  
Vernon Hydroelectric Project

Project Nos. 1892, 1855, and 1904

**CERTIFICATE OF SERVICE**

Pursuant to Rule 2010 of the Commission's Rules of Practice and Procedure, I hereby certify that I have this day caused the foregoing **American Whitewater Comment on Revised Study Plan for the Wilder Project (P-1892), Bellows Falls Project (P-1855) and Vernon Project (P-1904)**, to be served upon each person designated on the official service list compiled by the Secretary in this proceeding.

Dated this 27<sup>th</sup> day of August, 2013.



Megan Hooker  
American Whitewater