



United States Department of the Interior

NATIONAL PARK SERVICE
NORTHEAST REGION
15 State Street
Boston, Massachusetts 02109-3572

IN REPLY REFER TO:

August 23, 2013

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Kimberly Bose, Secretary
Federal Energy Regulatory Commission
888 First Street, NE
Washington, DC 20426

NPS Comments on Revised 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.

Dear Secretary Bose:

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, the Draft SP and currently on the Revised Study Plans dated 8-13-2013. Please refer to NPS comments regarding Initial Study Requests associated with the PAD and SD1 dated March 26, 2013 and NPS comments dated July 14, 2013 on the Updated Proposed Study Plans. Although TransCanada has been largely responsive to our earlier comments, the NPS offers these additional comments and recommendations

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. As such, these relicensings present a once in a generation opportunity to address and correct deficiencies in recreational opportunities.

Revised Study 30 Recreation Facility Inventory, Use, Needs and Assessment

It is critical that in attempting to reach users and equally important, those who for whatever reason do not use the river and other project recreational facilities, the survey's content and

method for reaching current and potential recreational users must be effective. Given the significance and geographic scope of these projects, it is imperative that an element of this study identify unmet needs and deficiencies of recreational facilities as identified by non-users. In order to reach those users, both the Connecticut River Watershed Council and the Appalachian Mountain Club have offered to reach out to their collective membership with targeted questions relative to their constituents use and more importantly, those who do not use project recreational facilities and why they either do not use them or why they no longer use them due to adverse conditions or other factors.

Although TransCanada is surveying 2,400 nearby residents through the development of a targeted mailing survey developed by a consultant with expertise in this area (in addition to on-site surveys), the applicant should also avail itself of the offer by regional NGOs to utilize their mailing lists in order to access more potential users and those who may not use the river due to inadequate facilities. Bringing in the opinions of non-users may identify deficiencies at project facilities which can be addressed. The AMC for example, holds a regional membership list that approaches 100,000 members of exactly the type and regional distribution that TransCanada should be reaching: those who use the outdoors and are inclined towards multi-day experiences.

There remain limited opportunities and facilities (campsites and access points across public and private lands) for multi-day paddling trips in the project area. Improvements to existing portage trails may address this issue somewhat; however, the use of a broad survey instrument such as that offered by the NGOs would provide additional useful data about who in the region is not using the facilities and why not. The applicant's list of "uncommon and potential users groups" should include self-propelled car top watercraft as well as and multi-day paddlers. Existing conditions including challenging portages, hard surface boat ramps, and inconsistent campground facilities may actually be discouraging potential recreational use in the project area. Utilizing the NGOs databases may allow for far better survey results.

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 or by phone at 617-223-5299.

Respectfully submitted,



Kevin R. Mendik
NPS Hydro Program Manager
Northeast Region

Document Content(s)

NPS RSP Cmnts TRP August 2013.DOCX.....1-2