



March 24, 2021

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

*RE: American Whitewater and Appalachian Mountain Club  
Comments in Reply to Great River Hydro's Response to AIR for the  
Wilder (P-1892), Bellows Falls (P-1855), and Vernon (P-1904) Hydroelectric Projects*

Dear Secretary Bose:

American Whitewater (AW) and Appalachian Mountain Club (AMC) submit the following comments based on our analysis of data provided by Great River Hydro (licensee) in response to the commission staff's February 12, 2021 Additional Information Request for the Wilder, Bellows Falls, and Vernon Hydroelectric Projects (FERC Nos. P-1855-045, P-1892-026, P-1904-073). Our organizations previously submitted additional information requests and comments of deficiency in response to the licensee's Amended Final License Application (Accession No. 20210113-5145) in which we analyzed the impact of the licensee's newly proposed change from full peaking to partial peaking mode of operation at each of its projects being relicensed on the Connecticut River.

In our response to the AFLA (Accession No. 20210113-5145), lacking any impoundment, generation, or flow data from the licensee, we conducted an analysis of upstream USGS flow data to estimate inflow under the flow regime proposed in the AFLA in comparison to current project outflow in an average water year during boating hours in the recreational boating season. Based on this analysis, we concluded that: 1) the proposed flow regime would have a substantially negative impact on whitewater boating opportunity at Sumner Falls below the Wilder Project by reducing the frequency of optimal whitewater boating flows, 2) the proposed flow regime would negatively impact through paddlers on the Connecticut River Paddlers Trail during low-flow periods, and, 3) the proposed flow regime would continue to have a negative impact on whitewater boating in the Bellows Falls bypassed reach due to the dewatering of the natural river channel as a result of the flow diversion for power generation, as well as the lack of suitable access, and the continued presence of the deadbeat low-head dam in the bypassed reach.

In response to the Commission staff's February 12, 2021 Additional Information Request, the licensee provided project outflow and impoundment data for 2009, 2015, 2016, and 2017. The newly supplied data confirms our prior analysis concluding that the licensee's proposed flow regime will have a substantial negative impact whitewater boating opportunity at Sumner Falls

below the Wilder project and have a negative impact on through paddlers on the Connecticut River between Wilder and Bellows Falls during low-flow periods in comparison to historic operations. In addition, the proposed flow regime will continue to have a negative impact on whitewater boating opportunity in the Bellows Falls bypassed reach. The licensee has proposed no PM&E measures to mitigate for these project impacts.

### Whitewater Boating at Sumner Falls

Data compiled by the licensee for each of the requested water years confirms our previous assertion regarding the negative impact that the proposed flow regime will have on whitewater boating opportunity at Sumner Falls located 10 miles below the Wilder project. The requested water years, 2009 (above average), 2015 (average), 2016 (low), and 2017 (above average) show that the frequency of optimal whitewater boating flows above 5,000 cubic feet per second (cfs) and above 10,000 cfs was consistently reduced across all water year types in comparison to historic operation.

Our analysis compared historic generation outflows from Wilder based on current peaking operations in comparison to IEO and IEO/Flex models from 8 a.m. to 4 p.m. (accounting for two hours water travel time from Wilder to Sumner Falls) during the peak boating months of April through October. During a low water year (2016), the AFLA proposed flow regime, if implemented, would have reduced optimal flows above 5,000 cfs in every month between April and October, eliminating optimal flows above 5,000 cfs entirely in July and September and nearly all similar opportunities in other months. While the overall reduction in whitewater boating opportunities above 5,000 cfs was reduced 42 percent under the proposed flow regime, whitewater boating opportunities above 5,000 cfs were reduced by more than 80 percent after May. Although optimal flows above 10,000 cfs were less frequent in 2016, 100 percent of those opportunities were eliminated after the spring freshet under the proposed flow regime. Flows above 2,500 cfs remained mostly unchanged in 2016 except during the low-flow period in September. Flows of 2,500 cfs do not provide an optimal or acceptable whitewater boating flow and were not evaluated during controlled-flow whitewater boating study.

During 2015, an average water year, boating flows above 5,000 cfs were reduced by 18 percent overall under the proposed flow regime. During the warmer summer months, however, optimal boating flows were reduced by about 50 percent, a reduction that continued through the end of the boating season in October. Boatable flows above 10,000 cfs saw a 35 percent reduction in this average water year.

Above average water years (2009 & 2017) likewise saw significant reductions in whitewater boating opportunities with 28 and 16 percent reductions, respectively, in boatable flows above 5,000 cfs. Following the spring runoff, flows above 5,000 cfs decreased by 45 and 28 percent, respectively. At flows above 10,000 cfs, optimal whitewater boating opportunity decreased by 12 and 28 percent, respectively, with flows at this level being almost eliminated entirely during the summer months.

### Connecticut River Paddlers Trail

Through paddling on the Connecticut River Paddlers Trail was also affected by changes to the existing flow regime. At flows above 2,500 cfs, most water year types saw an increase in recreational boating opportunity when natural flows were higher and a corresponding decrease in through paddling opportunities during the low-flow period most notably at the end of August through September in most water year types.

The substantial loss of through paddling opportunities during low-flow periods is the expected result of the proposed flow regime as typical inflows during these periods are too low to float and through paddling depends on enhanced flow from generation under the current mode of operation. Thus, while there is evidence of a modest increase in flows above 2,500 cfs during higher flow periods, there was a substantially greater decrease during the lowest flow period during 2009 (72%), 2015 (83%), and 2016 (71%). While the proposed flows regime did not substantially affect the annual number of through paddling days, the change will substantially eliminate these opportunities during low flow periods.

### Bellows Falls Bypassed Reach

Under both current and proposed flow regimens, whitewater boating opportunities in the Bellows Falls natural river channel bypassed reach have been nearly eliminated by the licensee's flow diversion for power generation resulting in the dewatering of the bypassed reach except when inflows exceed the hydraulic and storage capacities of the project. The whitewater boating study and anecdotal accounts of whitewater boaters at other times demonstrates the value of the whitewater boating resource if sufficient flow and access is provided. The obsolete and dangerous low-head dam in the lower portion of the bypassed reach is an impediment to recreational use of the bypassed reach and must be removed by the licensee.

The newly proposed flow regime will have little impact on the availability of the Bellows Falls bypassed reach for whitewater boating recreation as flows will continue to be diverted, the reach will continue to be dewatered most of the time and no minimum flow provided, and obstacles due to the lack of access and low-head dam will remain.

### Conclusion

Data provided by the licensee appears to confirm the rationale for the AIR offered by AW and AMC, such that the proposed flow regime in the AFLA will have noteworthy impacts on whitewater and through paddling opportunities. We anticipate that a National Environmental Policy Act document will accurately capture the impacts that have been identified herein, and will seek to avoid, minimize and mitigate for these impacts.

AW and AMC reiterate the following unfilled requests that were included in our response to the AFLA in Accession No. 20210113-5145 and urge FERC to require the licensee to conduct:

- An analysis of the flow regime proposed in the AFLA in relation to findings and recommendations of the Whitewater Boating Flow Assessment at Sumner Falls and

Bellows Falls (Study 31), identifying impacts to the flows utilized by and preferred for whitewater recreation.

- Project protection, mitigation, and enhancement (PM&E) elements that would appropriately mitigate project related impacts on river, riparian and upland recreational uses. PM&E elements not included in the AFLA but recommended by the stakeholders on the DLA (Accession No. 20170301-5205) included developing new primitive campsites for through paddlers; developing and enhancing public access points; improving portage trails; developing public education; providing scheduled whitewater flows in the Bellows Falls bypass and below the Wilder Dam; and, to remove the low-head dam in the Bellows Falls bypassed reach.

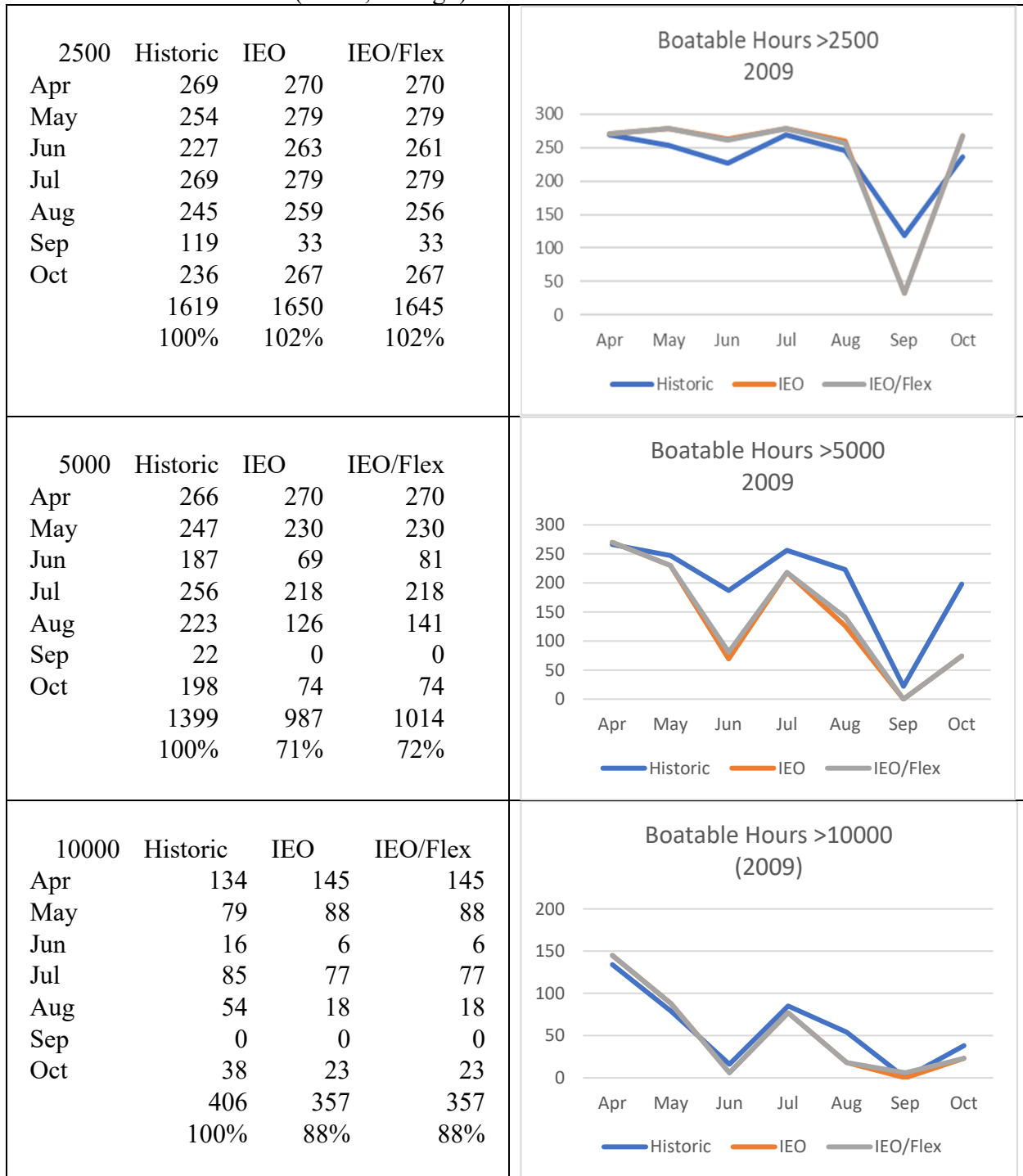
Respectfully submitted this 24th day of March, 2021.

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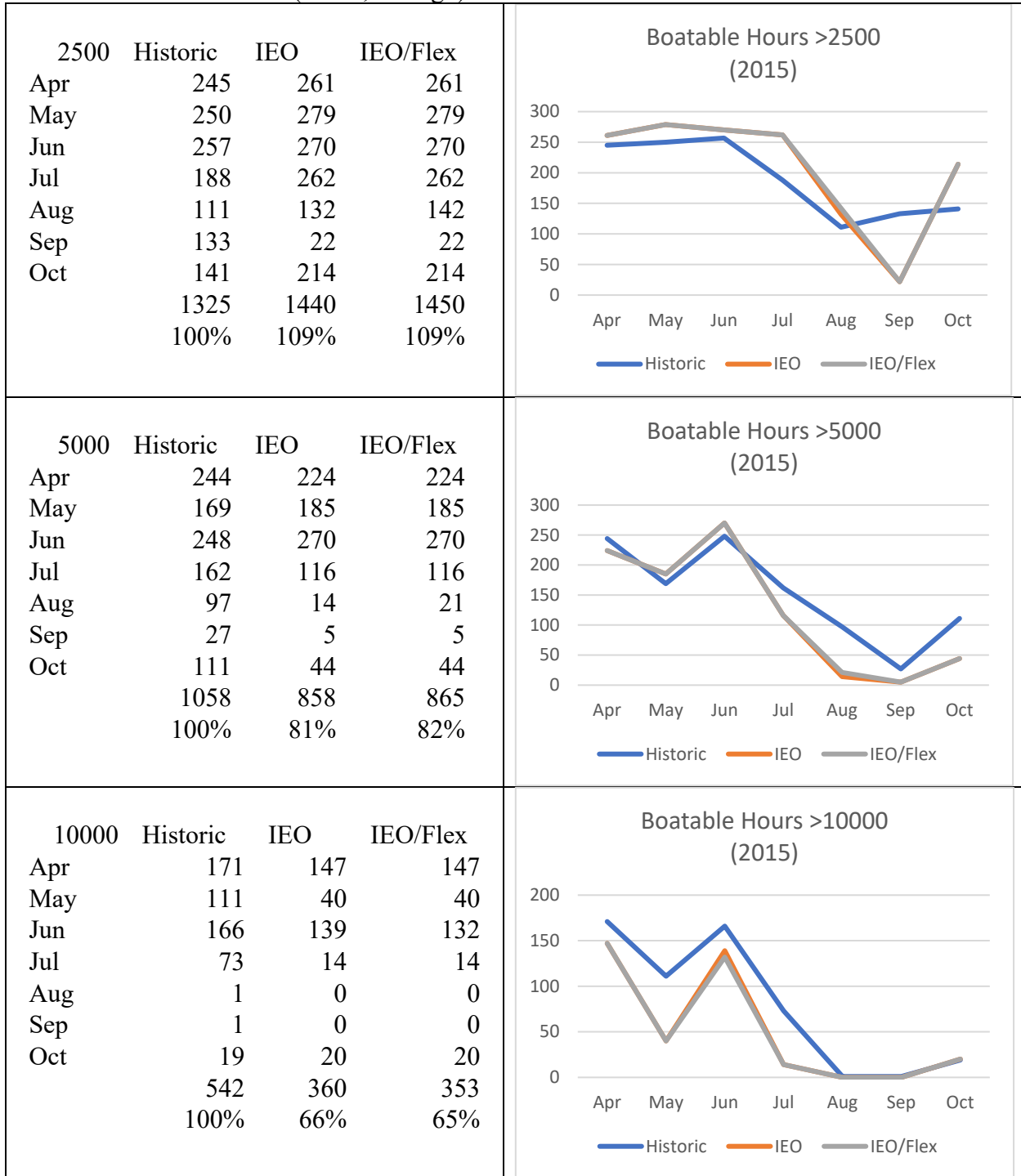
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Appendix

2009 Water Year Rank: 15 (1-low, 20-high)



2015 Water Year Rank: 10 (1-low, 20-high)



2016 Water Year Rank: 1 (1-low, 20-high)

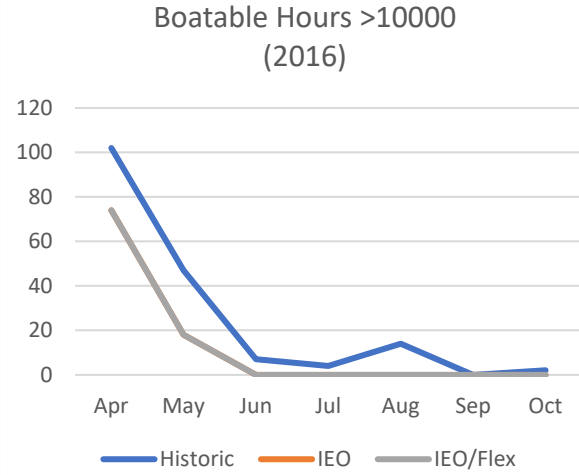
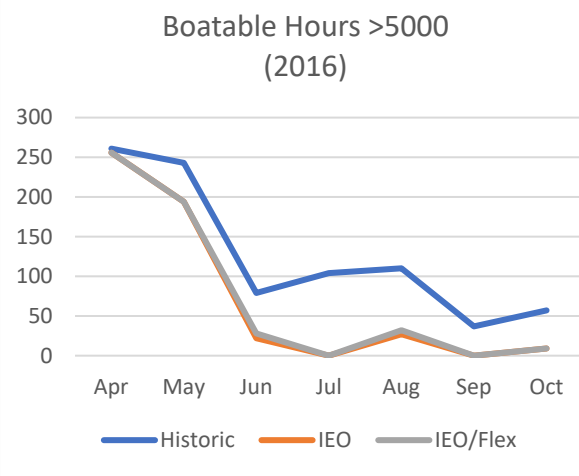
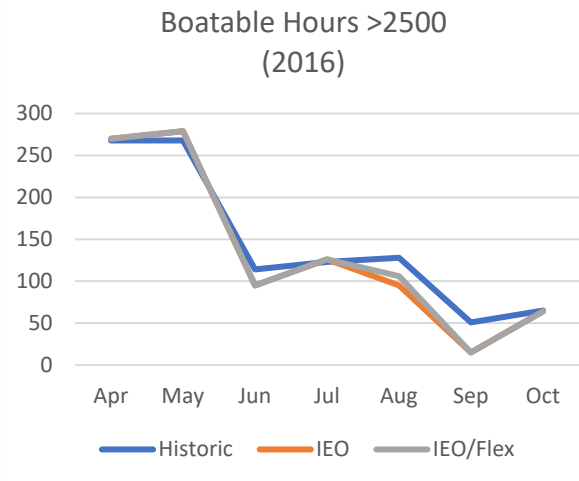
2500	Historic	IEO	IEO/Flex
Apr	268	270	270
May	268	279	279
Jun	114	95	95
Jul	123	126	126
Aug	128	95	106
Sep	51	15	15
Oct	65	64	64
	1017	944	955
	100%	93%	94%

5000	Historic	IEO	IEO/Flex
Apr	261	256	256
May	243	194	194
Jun	79	22	28
Jul	104	0	0
Aug	110	27	32
Sep	37	0	0
Oct	57	9	9
	891	508	519
	100%	57%	58%

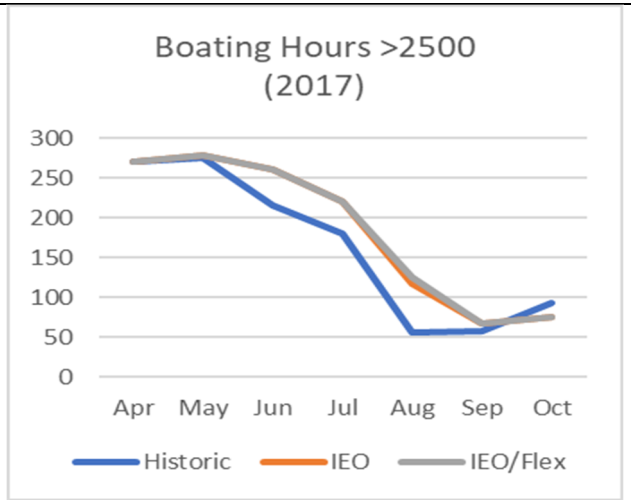
  

10000	Historic	IEO	IEO/Flex
Apr	102	74	74
May	47	18	18
Jun	7	0	0
Jul	4	0	0
Aug	14	0	0
Sep	0	0	0
Oct	2	0	0
	176	92	92
	100%	52%	52%

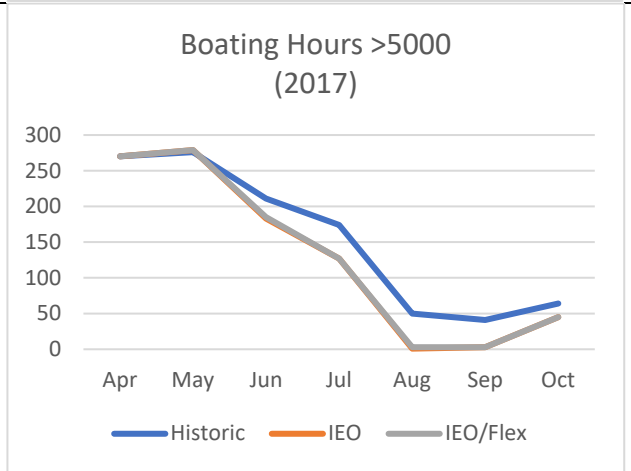


2017 Water Year Rank: 14 (1-low, 20-high)

2500	Historic	IEO	IEO/Flex
Apr	270	270	270
May	276	279	279
Jun	216	261	260
Jul	180	221	221
Aug	56	118	126
Sep	57	67	67
Oct	93	75	75
	1148	1291	1298
	100%	112%	113%



5000	Historic	IEO	IEO/Flex
Apr	270	270	270
May	276	279	279
Jun	211	183	185
Jul	174	127	127
Aug	50	1	3
Sep	41	3	3
Oct	64	45	45
	1086	908	912
	100%	84%	84%



10000	Historic	IEO	IEO/Flex
Apr	254	225	225
May	218	155	155
Jun	54	13	13
Jul	56	45	45
Aug	10	0	0
Sep	10	0	0
Oct	48	30	30
	650	468	468
	100%	72%	72%

