



United States Department of the Interior

NATIONAL PARK SERVICE

Pacific West Region
333 Bush Street
San Francisco, CA



5/19/2019

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

Electronic Filing

Re: National Park Service's (NPS's) comments on the pre-application document (PAD) and study requests for the Barber Dam Hydroelectric Project (P-4881)

Dear Ms. Bose:

The NPS Hydropower Assistance Program, Pacific West Region, offers the following comments and study request in response to the Federal Energy Regulatory Commission's (FERC's) Request for Comments on the PAD for the Barber Dam Hydroelectric Project (P-4881) filed on November 30, 2018.

The NPS has authority to consult with the FERC and applicants concerning a project's effects on outdoor recreation resources under the Federal Power Act (18 CFR 4.38(a), 5.41(f)(4)-(6), and 16.8(a)); the Outdoor Recreation Act (Pub Law 88-29), and the NPS Organic Act (39 Stat. 535). It is the policy of the NPS to represent the national interest regarding recreation, and to assure that hydroelectric projects subject to re-licensing recognize the full potential for meeting present and future public outdoor recreation demands, while maintaining and enhancing a quality environmental setting for those projects. Investigating opportunities to improve the recreation experience is consistent with NPS policy and FERC guidelines to identify future potential recreation needs.

Summary of PAD Comments and Study Request

The NPS has reviewed the PAD, paying specific attention to discussions of recreation use and opportunities in the Project Area. The NPS was unable to gain a clear understanding of recreation use within and adjacent to the Project Boundary due to the lack of a map in the PAD that clearly identifies the Project Boundary. The NPS has found the recreation discussion in the PAD incomplete and asks for additional details on recreation use of Project facilities and how that use is connected to recreation in the surrounding Project Area. Consequently, the NPS is submitting a request for a recreation use and needs study.

Project Boundary

On page 60 of the PAD, the Applicants define the Project Boundary as encompassing the immediate area of the dam, powerhouse, and tailrace area downstream of the dam, and approximately 1 mile upstream into the Barber Pool Conservation Area (BPCA). On Page 11 of the PAD, the Applicants state that they are currently revising the Project Boundary to incorporate additional land rights recently or soon to be acquired for dam safety purposes. While Figure 3-1 on page 8 of the PAD maps the general location of the Project and Figure 3-2 on page 9 identifies the location of Project facilities, the PAD does not contain a map clearly marking the Project Boundary. A detailed Project Boundary map is essential for stakeholders and the public to identify Project impacts on the various resources in the Project Area, as well as for investigating any possible protection, mitigation, and enhancement measures. The NPS thus asks the Applicants to prepare a detailed map of the Project Boundary and include the location of important recreation facilities and access points in the Project Area in proximity to the Project Boundary, including boat put-in and take-out points, wildlife viewing areas, parks and greenways (both existing and proposed, such as the Alta Harris Park), and the Idaho Shakespeare Festival grounds.

Recreation

The PAD identifies that the canoe/kayak takeout and stairway located at river right (north) of the powerhouse and intake and a graveled portage footpath trail that traverses up and over the embankment dam and then skirts outside the fenced area from the north abutment to downstream of the tailrace area is a project facility. Although no map delineating the Project Boundary is provided in the PAD, it does state that the Project Boundary extends 1 mile upstream into the BPCA. The PAD also states that the portage trail is popular with local walkers and fishermen to access the river downstream of the Project, but that the canoe portage gets little use, most of which occurs on weekends.

The NPS finds the above discussion of current use of Project recreation facilities incomplete. The statement that the canoe portage gets little use is based on the observations of power plant operations staff, which is not reliable data. In addition, other than mentioning that walkers and fishermen also recreate within the Project Boundary, no other details are provided on the users or types of use that occurs at the Project facilities, or how they access the area. Are the boaters using the portage stairs upstream of the powerhouse and dam putting in to float the Barber Pool, or are they floating through and putting back in below the tailraces? If they are floating through, where did they put in and take out of the river? How much time do recreationists spend within the Project Boundary, including floating in Barber Pool? Where do visitors park to access the Project recreation facilities. These and similar questions need to be answered to fully understand recreation opportunities and needs associated with Project facilities, as well as to draft recommendations for protection and enhancement measures.

The NPS acknowledges that the section of Boise River within the Project Boundary experiences “little use” compared to the section just downstream of the dam known as the “town stretch,” which runs between Barber Park to Ann Morrison Park and receives over 100,000 floaters every year. However, the upstream stretch of river, which includes the area within the Project Boundary, provides a completely different river experience, characterized as a “wildlife-rich

escape from the busy urban river downstream.¹” The NPS is thus asking the Applicants to conduct a recreation use and needs study within the Project Area that will allow stakeholders to make informed recommendations to protect and enhance this unique recreation opportunity while, at the same time, protecting the fragile ecological values of the BPCA.

Recreation Use and Needs Study Request

The following study request addresses each of the seven study criteria as required under 18 CFR §5.9.

Criteria 1: Study Description and Objectives (§5.9(b)(1)):

This purpose of this study is to evaluate recreation visitor use and needs in the Project Area, with a focus on recreation activities within the Project Boundary. The objectives of this study are to 1) estimate the current use of Project facilities, 2) inventory existing recreation opportunities and facilities in the Project vicinity, 3) describe visitor perceptions on recreation use and needs for the future, and 4) determine the compatibility of recreation with the conservation goals of the BPCA.

Criteria 2: Resource Management Goals (§5.9(b)(2)):

The NPS has authority to consult with the FERC and applicants concerning a proposed project’s effects on outdoor recreation resources under the Federal Power Act (18 CFR §§ 4.38(a), 5.41(f)(4)-(6), and 16.8(a)); the Outdoor Recreation Act (PL 88-29) and the NPS Organic Act (16 USC et seq.). It is thus the policy of the NPS to represent the national interest regarding recreation and to assure that hydroelectric projects subject to licensing recognize the full potential for meeting present and future public outdoor recreation demands, while maintaining and enhancing a quality environmental setting for those projects.

FERC guidelines and Sections 4(e) and 10(a) of the Federal Power Act provide direction to give equal consideration to other non-hydropower resources. In making its license decision, FERC must equally consider the environmental, recreational, fish and wildlife, and other non-developmental values of the project, as well as power and developmental benefits. Any license issued shall be best adapted to a comprehensive plan for improving or developing a waterway or waterways for all beneficial public uses.

Criteria 3: Resource Agency Status of Requestor and Relevant Public Interest (§5.9(b)(3))

The NPS is a resource agency.

Criteria 4: Existing Information and Need for Additional Information (§5.9(b)(4))

The PAD provides limited information on recreation features (i.e., greenbelts and parks), facilities (open grassy areas, picnic shelters, restrooms), and activities (boating, fishing hiking, wading, swimming, rafting, attending events and festivals, etc.) in the general Project Area. There are several sources of information that can assist the Applicant to strengthen the area recreation description, including Idaho’s 2018 - 2022 *Statewide Comprehensive Outdoor Recreation Plan* (SCORP), *Barber Pool Conservation Area Master Plan* (2002), *Blueprint Boise Comprehensive Plan* (2011, updated 2018), and *Boise River Resource Management and Master*

¹ <https://www.boiseriverenhancement.org/barber-pool-completely-different-river-experience/>

Plan (2014). The SCORP is a FERC recognized comprehensive plan and needs to be evaluated for consistency with the project under section 10(a)(2) of the Federal Power Act.

The PAD provides limited information on existing recreation facilities in the Project Boundary (canoe portage and trail) and only alludes to the types of users of these facilities (local walkers, fishermen, and users of the canoe portage). The PAD lacks details on the condition of the facilities, amount of use, quality of experiences, and potential facility and access needs. The only estimate on the amount of Project facility use was based on the casual observation of power plant operation staff. A recreation study on the visitor use and preferences related to the Project recreation facilities is essential to identify needs and improvements to the visitor experience, as well as to find means to ensure that recreation use is compatible with the ecological needs of the BPCA.

Criteria 5: Nexus to Project (§5.9(b)(5))

A clear nexus exists between Project operations and recreational opportunities within and surrounding the BPCA. The Barber Pool would not exist without the Barber Dam, which indicates a direct link between Project operations and recreation within the BPCA, as well as upstream of the BPCA where boaters access the Boise River to float into the Barber Pool.

There is also a direct nexus between recreation at the canoe/kayak portage facility, which acts as a public access area at Barber Dam into BPCA and directly downstream of the dam. This Project recreation facility is likely not adequately meeting the current and projected use and needs, although it is uncertain what those use and needs are due to lack of reliable information. A recreation use and needs study will serve as the primary mechanism to inform Project effects on recreation and the development of license requirements under Section 10(a) and 4(e) of the Federal Power Act that require FERC to give equal consideration to all uses of the waterway, including recreation.

Criteria 6: Study Methodology (§5.9(b)(6))

The PAD did not propose any recreation studies. This proposed recreation use and needs study would include field work, surveys, focus group workshops, stakeholder outreach, and professional assessment.

1) Recreation visitor use and needs surveys

This study involves both assessing current demand for various recreation activities by counting use and assessing the quality of the visitor's experience through visitor surveys. This component of the study involves on-site visitor observations and surveys of recreationist accessing the Project facilities and other areas within the Project Area. Such surveys could be delivered face-to-face by an interviewer or self-administered with the survey instrument being made available at key access points, such as the top of the portage stairs or along the access trail. Surveys should also be delivered along access points in the upstream areas of the Project Area, such as near the Highway 21 Bridge. The survey questionnaire should be tailored to gather data on frequency and type of recreation use within and adjacent to the Project Boundary, areas accessed, satisfaction with recreation facilities and aesthetics of the area, and perceived needs.

2) Recreation inventory existing opportunities and facilities in the Project vicinity

Develop a regional recreation map that illustrates the recreation opportunities and facilities in the Project vicinity. The map should include put-in and take-out sites along the Boise River in the Project vicinity and show how the Barber Pool fits within the regional context. Conduct a condition assessment of the portage stairs and trail to evaluate the current condition and accessibility of the site in terms of universal design and compatibility with Americans for Disabilities Act.

3) Visitor and user group interviews, community focus groups, and visioning workshops

Since the Project Area is important locally, resident/community focus group and visioning workshops should be held to assess recreation use and opportunities that fit with the community's vision for recreation in the future. There are also several special-interest groups within the Boise area that are organized around the protection and enjoyment of the Boise River, including the BPCA (e.g., Friends of Barber Pool and Boise River Enhancement Network). Organizing focus groups and workshops with such special interest groups would gather an additional perspective of recreation needs and goals of the Project Area, including needs of protecting ecological resources and providing in non-intrusive recreation activities.

The applicants should outreach to stakeholders in the Boise area who have interest in recreation activities within the Project Area (e.g., the Shakespeare Festival, City of Boise/Boise Parks and Recreation, Idaho Foundation of Parks and Lands, Idaho State Parks and Recreation). The parameters of the visitor survey, user group interviews, and community visioning meetings should be developed in collaboration with stakeholders. The Applicants should share interim tools and products such as survey instruments, focus group questions, visitor observations schedules, and the draft compiled report with stakeholders for review and input.

Criteria 7: Level of Effort and Cost (\$5.9(b)(7))

The PAD did not propose any recreation studies. This proposed study would include surveys, focus group workshops, stakeholder outreach, and professional assessment. The level of effort for each of these components is not expected to be excessive, with the cost to be estimated when the study plan is completed.

Thank you for this opportunity to comment on the PAD for the Baber Dam Hydroelectric Project (P-4881) and making a study request on recreation use and needs. We look forward to continued involvement in the study process. If you have any questions, please contact me at susan_rosebrough@nps.gov or (206) 220-4121.

Sincerely,

Susan Rosebrough

Susan Rosebrough
Northwest Hydropower Coordinator
National Park Service, Pacific West Region