

November 30, 2020

Honorable Kimberly D. Bose, Secretary  
Federal Energy Regulatory Commission  
888 First Street, N.E.  
Washington, D.C. 20426

**SUBJECT: West Canada Creek Project (FERC No. 2701-059)  
ILP Relicensing Studies Progress Report #3**

Dear Secretary Bose:

Erie Boulevard Hydropower, L.P. (Erie or Licensee), a Brookfield Renewable company, is the Licensee, owner and operator of the West Canada Creek Hydroelectric Project (P-2701) (Project). The West Canada Creek Project consists of two developments, Prospect and Trenton, and is located on West Canada Creek in Oneida and Herkimer counties, New York. The current Federal Energy Regulatory Commission (FERC or Commission) license for the West Canada Creek Project expires on February 28, 2023. Erie is pursuing a new license for the Project using the Commission's Integrated Licensing Process (ILP) pursuant to 18 C.F.R. Part 5 of the Commission's regulations.

Erie submitted a Proposed Study Plan (PSP) on August 13, 2018 and held a Study Plan meeting on September 11, 2018. Following receipt of comments, Erie submitted a Revised Study Plan (RSP) on December 11, 2018. On March 7, 2019, the Commission issued a Study Plan Determination (SPD) for the Project in accordance with 18 C.F.R. § 5.13(c). Pursuant to 18 C.F.R. § 5.15(b) and as identified in its RSP, Erie filed with FERC the first ILP Relicensing Studies Progress Report on July 29, 2019, and second on October 31, 2019, which summarized activities conducted since the Commission's issuance of the SPD during the 2019 season. Erie filed the Initial Study Report (ISR) on March 6, 2020.

Erie is filing this third progress report to provide an update of activities that have occurred subsequent to the filing of the ISR, during the 2020 field season. As provided in the ISR filing, Erie completed eight of the nine studies. The remaining study includes the Whitewater Boating Flow and Access Study, and a summary of the activities conducted during 2020 field season are provided in the following section. Erie will provide the results of the whitewater boating study analysis in the Updated Study Report (USR) to be filed on or before January 10, 2021.

In addition to the Whitewater Boating Study, a supplement to the Aesthetic Flow Assessment Study will be provided in the USR, to provide photographs of the leakage/flow conditions at the Key Observation Point locations. In addition, Erie will provide a desktop evaluation of existing available data regarding the timing and volume of flow events within the past 5 years in the forthcoming USR.

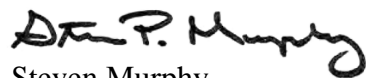
## **Whitewater Boating Flow and Access Study 2020 Activities**

- Erie conducted a consultation call on August 25, 2020, with American Whitewater to further review and discuss the assessment of the Prospect bypass reach and the downstream West Canada Creek reach for the Whitewater Boating Flow and Access Study. Attachment A provides a summary of the discussion. Key items discussed included logistics and study reach for the downstream West Canada Creek assessment, and logistics and target flow (approximately 600 cfs) for the Prospect bypass reach assessment.
- Erie conducted a consultation call on September 9, 2020, to provide an updated about the status of the Whitewater Boating Study with FERC staff, New York State Department of Environmental Conservation (NYSDEC) and American Whitewater. The U.S. Fish and Wildlife Service (USFWS) staff were invited but could not attend. Topics included: review of 2019 study efforts; and logistics, schedule, study area and target flows for the 2020 field efforts for both the Prospect bypass reach assessment and the downstream West Canada Creek assessment. Attachment B provides a summary of the discussion and the presentation provided during the call.
- Erie conducted a call on September 18, 2020, with FERC staff and American Whitewater due to American Whitewater's request to expand the study area of the Prospect bypass reach to include Prospect Falls. FERC provided a summary of the call discussion which was filed on e-Library on October 22, 2020.
- Erie conducted the Prospect bypass reach assessment on September 23, 2020, in coordination with American Whitewater. As discussed during the September 9, 2020 call, the Prospect bypass reach assessment included evaluation of a single flow release of approximately 600 cfs. In addition, Erie developed a participant survey form and implemented a land-based assessment of the Prospect Falls. Additional information regarding methodology and data results will be provided in the forthcoming USR filing.
- Erie conducted multiple planning and logistics calls and emails to coordinate with American Whitewater and participants for the downstream West Canada Creek whitewater boating controlled flow study. Due to drought conditions, water has not been available to provide the target flows for the study (target flows of approximately 800, 1,000, and 1,400 cfs). This led to the need to review conditions and reschedule the field study dates over multiple weeks, similar to last year. The first week of November, Hinckley Reservoir increased discharges which allowed sufficient flow for the whitewater boating study to be scheduled for later in the week, November 6 and 7, 2020. Given logistic considerations (COVID, flow travel time, shuttle time, and limited daylight), Erie scheduled the study to include two targeted flow releases: approximately 1,000 cfs and approximately 1,400 cfs, over two days (one flow each day).
- Erie consulted further with American Whitewater to review study modifications necessary to implement the study given the existing COVID and flow conditions. American Whitewater supported (see email correspondence provided in Attachment C) the following study scope variances:
  - Modification of the study area to include one expanded study reach (versus the two as stated in the ISR Study Progress Report) due to logistic and COVID considerations.

- Per American Whitewater's request, the study reach was modified to include the reach from put-in location at approximately NYSDEC Middleville access (NYSDEC 9 as identified in the Recreation Study) to take-out location at Kast Bridge near the NYSDOT roadside pull-off.
  - American Whitewater agreed to conduct two controlled flow events, one at target flow of approximately 1,000 cfs and one at target flow of approximately 1,400 cfs, and assuming no major unforeseen issues, agreed that these two target flows will be sufficient for study purposes.
  - Due to weather and flow conditions and extending the reach per American Whitewater's request, the study was conducted over a two-day period, providing a single target flow each day.
  - American Whitewater agreed to and conducted outreach to obtain study participants (i.e., Expert Panel). The ISR Study Progress Report states that "The Expert Panel will be no more than 10 people, targeting about 5 to 6 people per reach for logistical purposes." Based on the American Whitewater's outreach results, American Whitewater agreed that participants within this range targeting above 5, but no more than 10 participants, would provide adequate resources for the evaluation of the study flows.
  - American Whitewater mentioned considerations to have the same participants involved in both flow assessments over the two-day period. Due to potential limitations of participant availability and many logistical complexities in scheduling the study, American Whitewater agreed that the participants conducting the evaluation can vary between the two controlled flows and study dates.
- Erie conducted in-field controlled flow study on November 6, 2020 (6 participants), and November 7, 2020 (11 participants), of the downstream West Canada Creek reach from NYSDEC Middleville access to Kast Bridge. Additional information regarding methodology and data results will be provided in the forthcoming USR filing.

If you have any questions or require any additional information, please contact me at (315) 598-6130 or via email at [steven.murphy@brookfieldrenewable.com](mailto:steven.murphy@brookfieldrenewable.com).

Sincerely,



Steven Murphy  
Director, Licensing  
Brookfield Renewable

cc: Distribution List  
Jon Elmer, Brookfield  
Pat Storms, Brookfield  
Rick Heysler, Brookfield

**WEST CANADA CREEK PROJECT (P-2701)**

**STUDY PROGRESS REPORT 3**

**ATTACHMENT A**

**Summary of Consultation Call Conducted August 25, 2020**

## Karen Klosowski

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**From:** Karen Klosowski  
**Sent:** Friday, August 28, 2020 3:52 PM  
**To:** Bob Nasdor (bob@americanwhitewater.org)  
**Cc:** Murphy, Steven P; Storms, Patrick  
**Subject:** WCC WW Boating Study 08/27/2020 Call Summary  
**Attachments:** WCC WW 08272020 Consult Call Memo.pdf

Bob

Attached is summary of our call yesterday. Thanks again for taking time for the call and for your input.

I will send via separate email attachments of drone video footage of Prospect bypass reach for you to share with participants as we discussed.

Karen Klosowski  
Senior Regulatory Coordinator



Office: 315-409-7198

Mobile: 315-283-5066

[www.KleinschmidtGroup.com](http://www.KleinschmidtGroup.com)

[Karen.Klosowski@KleinschmidtGroup.com](mailto:Karen.Klosowski@KleinschmidtGroup.com)

**MEETING/CALL SUMMARY**  
**WEST CANADA CREEK PROJECT (P-2701)**  
**WHITEWATER BOATING STUDY CONSULTATION**  
**Conference Call**

**ATTENDEES:** Bob Nasdor, American Whitewater (AW)  
Steve Murphy, Brookfield  
Pat Storms, Brookfield  
Karen Klosowski, Kleinschmidt

**DATE:** August 27, 2020

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Erie conducted call with American Whitewater to review logistics and planning for the Whitewater Boating Study. The participants reviewed items discussed during the previous consultation call with AW (July 29, 2020). The call focused on planning efforts for the downstream reach (lower West Canada Creek downstream of Trenton tailrace) and the Prospect bypass reach whitewater boating flow assessment. Key items discussed are summarized below.

**Downstream West Canada Creek Whitewater Boating Controlled Flow Assessment**

- Due to COVID- related logistics, participants discussed and agreed to revise the study area for the downstream reach to assess the lower reach (above Kast Bridge); this is area of primary focus for AW. This area includes approximately 7-9 hour travel time.
- Limited precipitation/dry conditions continue and sufficient water/flow not available. Anticipate that these conditions may continue until mid-late September.
- At this time still planning for 3 controlled flows, based on availability of flows (water). Target is for higher than then 600 cfs for low flow, possibly 800, 1000, and 1,400 cfs. Erie to review potential for flow availability, and further discussion of target flow following further assessment. Discussed flow ranges for tubers and fishermen. Kleinschmidt to review data from recreation survey and West Canada Creek Tubing ranges.
- Schedule for 3 controlled flow events would require a 2-day field event. Targeted for two days during October 1- 4, 2020 as target dates, and back-up dates of October 8-11, 2020 depending on participant availability.
- Bob Nasdor (AW) has reached out and identified interested boaters (approx. 6) for the controlled flow event. Bob to follow-up and confirm participants.
- Logistics will require participants to bike from take-out to put-in area following first flow event. Erie/Kleinschmidt to provide pick-up trucks for transport of boats.
- Erie reviewed COVID protocols, including that any participants must follow New York State guidelines pertaining to quarantine requirements if participants are traveling from other states as identified at <https://coronavirus.health.ny.gov/covid-19-travel-advisory>. AW/Kleinschmidt to follow-up to inform boaters about safety and protocols and forms related to field assessment/boating and COVID factors.

- Kleinschmidt to provide survey forms to AW for additional review and then will finalize.

### **Prospect Bypass Single Flow Whitewater Boating Assessment**

- Discussed number of participants. AW to confirm, but targeting small group (@ 3 people) for safety considerations.
- Targeting Sept 23, 2020, for one day event. AW to confirm participants and availability.
- In stream assessment to include single controlled flow event at 600 cfs, likely for an approximately 2 hour period.
- Erie to coordinate to have Steve/Pat in boat in Trenton impoundment during event.
- Per boating assessment to include review of drone footage (600 cfs and lower flow as available) for the bypass reach for review by participants. Participants will provide input as to whether additional scouting needed (i.e., via in-stream assessment at low flow).
- Erie reviewed COVID protocols, including that any participants must follow New York State guidelines pertaining to quarantine requirements if participants are traveling from other states as identified at <https://coronavirus.health.ny.gov/covid-19-travel-advisory>. AW/Kleinschmidt to follow-up to inform boaters about safety and protocols and forms related to field assessment/boating and COVID factors.
- Discussed setting up follow-up call with larger group to review study plan revisions. Call targeted for September 9, 2020. Outreach to participants to include FERC staff - Emily Carter and Allyson Conner, and recreation study consultation group key contacts - U.S. Fish and Wildlife Service (USFWS) - John Wiley, and New York State Department of Environmental Conservation (NYSDEC) - Todd Phillips.

### **Action Items**

#### AW

- Confirm participants and availability dates for both in-field events.
- Provide drone footage to participants once received from Kleinschmidt.
- Review and provide input on survey forms.

#### Kleinschmidt/Erie

- Review and monitor drought conditions and project inflows for controlled flow event.
- Provide drone footage of Prospect bypass reach to AW.
- Review existing tubing and fishing flow-related preferences data from recreation study and West Canada Creek Tubing outfitter website.
- Provide survey forms (including any updated with the revised approach) to AW for review.
- Provide safety forms and COVID procedures to participants prior to event.
- Schedule follow-up call with recreation consultation group.

**WEST CANADA CREEK PROJECT (P-2701)**

**STUDY PROGRESS REPORT 3**

**ATTACHMENT B**

**Summary of Consultation Call Conducted September 9, 2020**



**MEETING/CALL SUMMARY**  
**WEST CANADA CREEK PROJECT (P-2701)**  
**WHITEWATER BOATING STUDY CONSULTATION**  
**Conference Call**

**ATTENDEES:** Allyson Conner, Federal Energy Regulatory Commission (FERC)  
Emily Carter, FERC  
Bob Nasdor, American Whitewater (AW)  
Todd Phillips, New York State Department of Environmental  
Conservation (NYSDEC)  
Dick McDonald, NYSDEC  
Jana Lantry, NYSDEC  
Steve Murphy, Brookfield  
Pat Storms, Brookfield  
Karen Klosowski, Kleinschmidt  
Kayla Hopkins, Kleinschmidt

**DATE:** September 9, 2020

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Erie Boulevard Hydropower, L.P. (Erie) conducted call with the Federal Energy Regulatory Commission (FERC) and resource agencies to review the Whitewater Boating Study efforts in 2019 and 2020. The participants reviewed the overall relicensing schedule, consultation efforts, desktop efforts, study progress report, and planned field assessments for the Prospect bypass reach and downstream West Canada Creek (area downstream of Trenton tailrace to Kast Bridge). Key items discussed are summarized below (see Attachment A for call presentation).

Ms. Karen Klosowski presented the relicensing schedule for the remaining relicensing items up to the final license application:

Relicensing Schedule

- DLA due October 1, 2020
- Comments on the DLA are due December 30, 2020
- USR due January 10, 2021
- USR Meeting January 25, 2021
- USR meeting summary due February 9, 2021
- FLA due February 28, 2021

Ms. Klosowski explained that during 2019, Erie consulted with American Whitewater (AW) and the recreation working group regarding the study methods and study reaches for downstream West Canada Creek controlled flow study and Prospect bypass reach access assessment. Controlled flow study dates were scheduled for September and October of 2019; however due to field conditions having high flows (both from Hinckley and downstream tributaries), participant availability, travel times of both flows and boat transportation, colder weather, shorter daylight periods and associated safety considerations of the participants, assessments were postponed to 2020.

Ms. Klosowski referred to the Initial Study Report which provides a whitewater boating progress report including the methodology for Phase 2 for the Prospect and Phase 3 for downstream West Canada Creek controlled flow study; summary of regional whitewater boating opportunities; and general characterization of recreation access and use downstream.

To-date in 2020, Erie has conducted additional consultation with AW to review approaches to the Prospect bypass reach and downstream West Canada Creek access and controlled flow assessment, COVID considerations, participant availability, and study methodology including target flows and study area. Ms. Klosowski explained that based on discussions with AW there will be a single controlled flow reconnaissance assessment planned for Prospect bypass reach and a multiple (up to three target flows) controlled flow assessments planned for downstream West Canada Creek.

Mr. Bob Nasdor asked Erie when they expect to have a study report completed for the whitewater boating assessment, following it up by stating that the USR is due January 10, 2020, leaving a short time to include the whitewater assessment and an even shorter time to comment on the whitewater assessment if the report only included in the FLA. Erie responded that until the assessment is conducted it is hard to say when they can get a report out for review. However, Erie will work to get a report out as soon as possible, and potentially prior to the USR if possible.

Ms. Klosowski explained that the Prospect Bypass Reach assessment will be between Military Bridge and Prospect tailrace. This area is a safety concern for access, ownership and steep shoreline areas. Erie conducted additional consultation with AW and reviewed drone video of the reach at low (leakage) flows and at 600 cfs. A single controlled release will target 600 cfs, likely for an approximately 2-hour period, for September 23, 2020. Ms. Klosowski stated that it has been very dry this year (opposite from last year) and operations for Hinkley Reservoir releases are below what they are typically this time of the year. Approximately 3 expert boater participants will conduct an on-water assessment, where they will complete pre- and post-flow evaluation forms and focus group questions including potential whitewater boating features, potential limitations to navigation and safe paddling, potential ingress and egress locations and safety considerations. Mr. Nasdor included that in addition to Erie's safety planning and COVID safety procedures, Erie will be incorporating (as appropriate) AW provided protocols (based on input from Whitter and Shelby).

Erie plans to conduct multiple controlled flow assessments for the downstream West Canada Creek controlled flow assessment. Based on availability of flows, Erie will target possible flows of 800, 1,000, and 1,400 cfs. The assessment will target two field days during October 1-4, 2020 and back-up dates of October 8-11, 2020. Erie will monitor flow releases from upstream Hinckley Reservoir (Jarvis Hydroelectric Project) to assess availability of flows for controlled flow field evaluation. Currently releases are not within range needed for flow event (approximately 250 cfs releases currently). Approximately 6 participants will boat this section.

Mr. Nasdor explained that the FERC Study Determination Plan focused on two reaches, and looked at flows of 600, 1,000, 1,400 cfs, however based on information from local boaters 600 cfs is not boatable in the upper reach of the downstream West Canada Creek, the upper reach is more used for whitewater tubing. During coordination for 2019, Erie looked into a shuttle bus for participants and boats, now with COVID safety considerations, Erie is not able to shuttle participants. Erie will help shuttle the boats and the participants will bike to and from the boating locations. Based on the local boater information and consultation with AW, Erie will only be

focusing on the lower reach of the downstream West Canada Creek for controlled flow assessment. This is a variance from the study plan; however, AW does not think the upper reach is necessary for evaluation due to local boaters and COVID considerations.

Participants will provide input regarding, potential whitewater boating features, potential limitations to navigation and safe paddling, potential ingress and egress locations, and safety considerations. Erie to implement safety planning and COVID safety procedures. Due to changes in reaches and flows, the forms attached to the ISR progress report will be changed.

Mr. Nasdor clarified that the downstream assessment is a level 3 multiple flow analysis vs. Prospect which is a level 2 single analysis. The downstream assessment will use level 3 boaters, whereas Prospect bypass assessment will use expert boaters based on the unknown condition of the reach.

Ms. Allyson Conner questioned about identification of egress locations in Prospect bypass. Mr. Steve Murphy explained that the egress is still in question and will be part of the reconnaissance effort. Currently, the Trenton facility is having construction work, and will still be in affect at the time of the planned assessment dates, so if needed, boaters will be assisted with egress from Trenton impoundment. This assessment will review and look at a safe ingress and egress locations. Mr. Murphy stated that there has been drone footage in the Prospect bypass, however there is no type of shoreline to walk.

Mr. Murphy touched on daily flows. Currently Erie has a daily inflow of 250 cfs, which is coming from Hinckley. The forecast is not showing much for rainfall. Right now with the Trenton construction Erie is holding a steady elevation, and at this point should be able to have the proposed 600 cfs for the Prospect assessment. However, it does not look like the flows for the downstream reach can be met at this time without additional significant rain fall. If there is rainfall and Hinckley can release, this could get into the situation similar to last year where Erie can control water coming from Trenton, but Erie cannot control what is coming in from tributaries. There is concern that there will not be enough water or there is going to be too much water for the controlled flows downstream. Mr. Nasdor did state that boaters do have flexibility on dates if needed to go over a couple days. Ms. Klosowski stated that Erie would monitor rainfall and Hinckley inflow and continue to work with AW to schedule and hopefully implement both the Prospect bypass and downstream West Canada Creek instream whitewater boating flow assessments.

### **Action Items**

- October 1-4 target dates for assessments (alternate dates October 8-11)
- If dates get changed due to not enough flow or high flows, an update will be sent out to agencies.
- Results of controlled flow assessment are anticipated to be provided in Updated Study Report due January 10, 2021



## West Canada Creek Hydroelectric Project (FERC No. 2701) Whitewater Boating Study Additional Consultation

September 2020

## Call Agenda

- Introductions
- Review of Overall Relicensing Schedule
- Review of Whitewater Boating Study Efforts in 2019
  - Consultation
  - Desktop efforts
  - Study Progress Report
- Whitewater Boating Study Efforts in 2020
  - Consultation
  - Planned Field Assessment
    - Prospect Bypass Reach
    - Downstream West Canada Creek
  - Study Report

# West Canada Creek Project Relicensing Schedule

Responsible Party	Pre-Filing Milestone	Date
FERC	Issue Director's Study Plan Determination	3/7/2019
Erie	First Study Season	Spring- Fall 2019
Erie	File Initial Study Report	1/10/2020
All Stakeholders	Initial Study Report Meeting	1/25/2020
Erie	File Initial Study Report Meeting Summary	2/9/2020
Erie	Second Study Season	Spring- Fall 2020
Erie	File Preliminary Licensing Proposal (or Draft License Application)	10/1//20
All Stakeholders	File Comments on Preliminary Licensing Proposal (or Draft License Application)	12/30/2020
Erie	File Updated Study Report	1/10/2021
All Stakeholders	Updated Study Report Meeting	1/25/2021
Erie	File Updated Study Report Meeting Summary	2/9/2021
Erie	File Final License Application	2/28/2021
Erie	Issue Public Notice of Final License Application Filing	3/15/2021



## Study and Consultation Efforts in 2019

- Consultation with AW and Recreation Working Group regarding study methodology and study reaches for downstream West Canada Creek controlled flow study and Prospect bypass reach access assessment.
- Downstream controlled flow study for 2 reaches scheduled for several dates in September and October 2019.
  - Each date was postponed due to field conditions that were not conducive and participant availability.
  - Travel times and downstream tributary inflows were significant obstacles in 2019 scheduling attempts to complete the downstream flow assessment.
- Due to anticipated higher flows, colder weather, shorter daylight periods and associated safety considerations of the participants, study was postponed until the 2020 study season.
- ISR Whitewater Boating Progress Report provided:
  - Methodology for Phase 2 for Prospect and Phase 3 for downstream West Canada Creek controlled flow study.
  - Summary of regional whitewater boating opportunities.
  - General characterization of recreation access and use downstream.

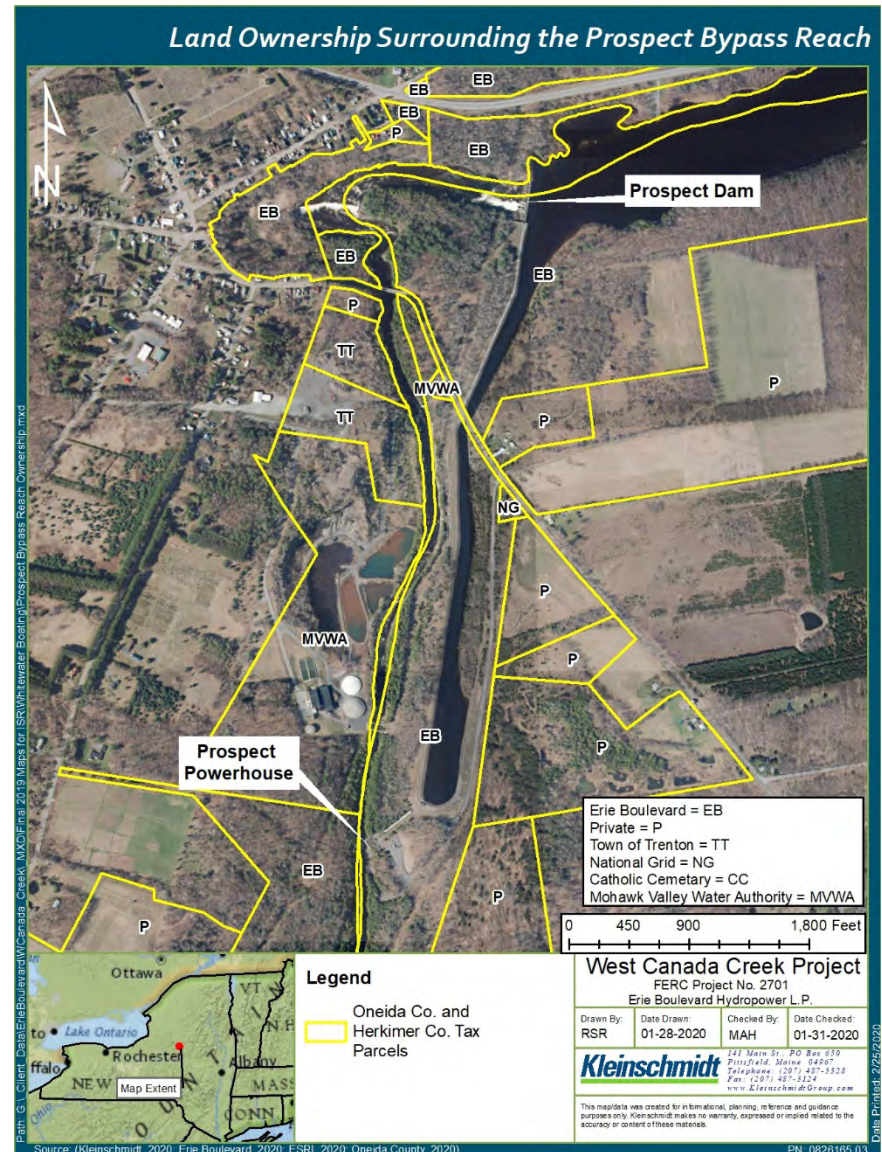
## Additional Consultation and 2020 Study Efforts

- Erie consulted with AW to review approaches to
  - Prospect bypass reach access and controlled flow assessment,
  - COVID considerations,
  - participant availability, and
  - study methodology – including target flows and study area.
- Planned 2020 Controlled Flow Field Assessment
  - Single controlled flow assessment planned for Prospect bypass reach.
  - Multiple controlled flow assessment planned for downstream West Canada Creek.



## Prospect Bypass Reach

- Reach between Military Bridge and Prospect Tailrace
  - This portion of the reach is approximately 0.8 mile in length
  - Almost 100% of the eastern shoreline is steep cliff and provides no access
  - Approximately 70% percent of the western shoreline is steep/cliff, remaining predominantly has loose rock; difficult access to stream channel.
- Erie conducted additional consultation with AW
  - reviewed drone video of reach at low (leakage) flows and at 600 cfs.
  - regarding plans for 2020 study.



## Prospect Bypass Reach Controlled Flow Assessment

- Based on consultation with AW, Erie plans to conduct single controlled flow assessment.
  - Target flow for assessment is 600 cfs, likely for an approximately 2-hour period.
  - Targeted date for field assessment is September 23, 2020.
  - On-water assessment to include approximately 3 expert boater panel participants.
- Bob Nasdor (AW) to follow-up and confirm participants.
- Erie /AW to provide drone footage of bypass reach to participants to allow pre-field event review for safety planning.
- Participants to complete pre- and post-flow evaluation form and focus group questions.
- Participants to provide input regarding:
  - potential whitewater boating features,
  - potential limitations to navigation and safe paddling,
  - potential ingress and egress locations, and
  - safety considerations.
- Erie to implement safety planning and COVID safety procedures.

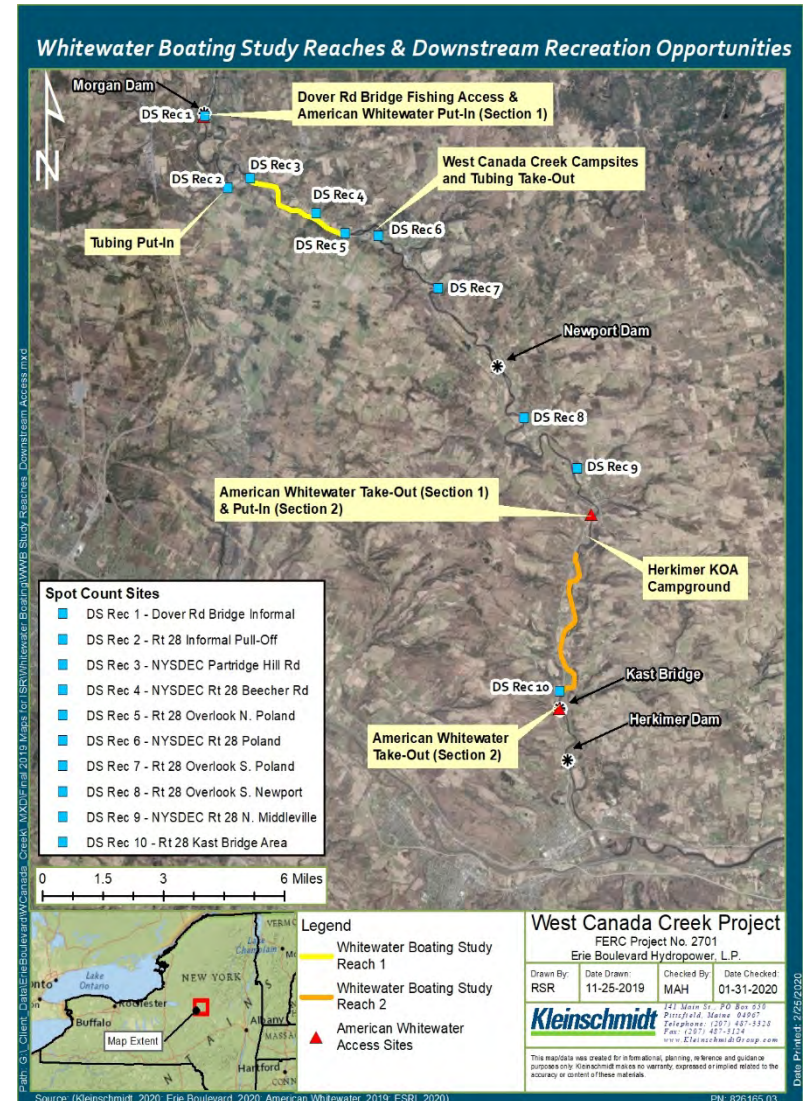
## Downstream West Canada Creek Controlled Flow Assessment

- Following consultation with AW plan to conduct multiple controlled flow assessment.
- At this time still planning for 3 controlled flows, based on availability of flows (water). Target is for higher than then 600 cfs for low flow, possibly 800, 1000, and 1,400 cfs.
- Schedule for 3 controlled flow events would require a 2-day field event. Targeted for two days during October 1- 4, 2020 as target dates, and back-up dates of October 8-11, 2020 depending on participant and flow availability.
- Erie monitoring flow releases from upstream Hinckley Reservoir (Jarvis Hydroelectric Project) to assess availability of flows for controlled flow field evaluation.
- Currently releases are not within range needed for flow event (approximately 250 cfs releases currently).
- Bob Nasdor (AW) has reached out and identified interested boaters (approx. 6) for the controlled flow event. AW to follow-up and confirm participants.



## Downstream West Canada Creek Controlled Flow Assessment

- Due to COVID- related logistics, plan is to revise the study area for the downstream reach to assess the lower reach (above Kast Bridge); this is area of primary focus for AW.
- Study reach is approximately 7-8 hour water flow travel time from Trenton tailrace.
- Study reach is approximately 4 river miles long.
- Logistics per COVID safety planning will require participants to bike from take-out to put-in area following first flow event.
- Erie to provide pick-up trucks for transport of boats.

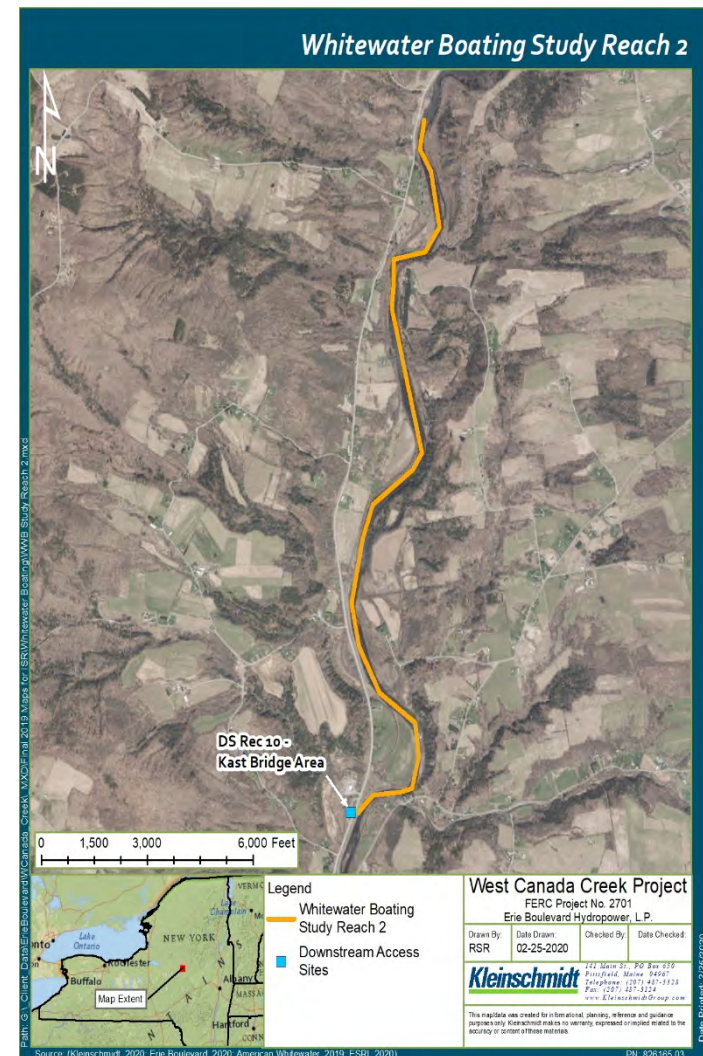


## Downstream West Canada Creek Controlled Flow Assessment

- Participants to complete evaluation form and associated focus group questions.
- Participants to provide input regarding:
  - potential whitewater boating features,
  - potential limitations to navigation and safe paddling,
  - potential ingress and egress locations, and
  - safety considerations.
- Erie to implement safety planning and COVID safety procedures.

## Study Report

- Results of controlled flow assessment to be provided in Updated Study Report due January 10, 2021.





## West Canada Creek Project Relicensing Website

<http://www.westcanadacreekproject.com>

**Steven P. Murphy**

Director, U.S. Licensing

Brookfield

33 West 1st Street South, Fulton, New York 13069

Phone: (315) 598-6130

[steven.murphy@brookfieldrenewable.com](mailto:steven.murphy@brookfieldrenewable.com)

[www.brookfieldrenewable.com](http://www.brookfieldrenewable.com)

**WEST CANADA CREEK PROJECT (P-2701)**

**STUDY PROGRESS REPORT 3**

**ATTACHMENT C**

**Correspondence with American Whitewater  
Regarding Study Plan Variances**



## Karen Klosowski

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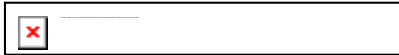
**From:** Bob Nasdor | AW <bob@americanwhitewater.org>  
**Sent:** Thursday, November 05, 2020 4:41 PM  
**To:** Steven Murphy  
**Cc:** Karen Klosowski  
**Subject:** Re: West Canada Creek Project Whitewater Boating Study Confirmation of Study Variances

Steve,

This captures our joint understanding of the whitewater boating study variances. We have all worked in good faith to proceed with the evaluation of whitewater boating in the Kast Bridge reach below the Trenton development and anticipate that these variances will still allow us to collect the information necessary so that FERC can complete its environmental review of the project.

Very truly yours,  
Bob Nasdor

Bob Nasdor  
Northeast Stewardship & Legal Director



American Whitewater  
65 Blueberry Hill Lane  
Sudbury, MA 01776  
[bob@americanwhitewater.org](mailto:bob@americanwhitewater.org)  
617-584-4566

Join American Whitewater!

On Thu, Nov 5, 2020 at 4:13 PM Murphy, Steven P <[Steven.Murphy@brookfieldrenewable.com](mailto:Steven.Murphy@brookfieldrenewable.com)> wrote:

Bob

Per our multiple calls and discussions, below is summary of the variances to the FERC-approved study plan and additional modifications put forth in the ISR Whitewater Boating Study Progress Report.

Specifically, based on our discussions, American Whitewater agrees with the following study scope variances:

- \* Modification of the study area to include one study reach (versus the two as stated in the ISR Study Progress Report) due to logistic and COVID considerations.
- \* Per American Whitewater's request provided this morning for modification of the study reach, the study reach will include the reach from put-in location at approximately NYSDEC Fishing Rock Road Access to Take-out Location at approximately area upstream of Kast Bridge near NYSDOT roadside pull-off (see map below).
- \* American Whitewater agrees to conduct two controlled flow events, one at target flow of 1000 cfs and one at target flow of 1400 cfs, and assuming no major unforeseen issues, agree that these two target flows will be sufficient for study purposes.
- \* Due to weather and flow conditions and extending the reach per American Whitewater's request, the study will be conducted over a two day period, providing a single target flow each day.
- \* American Whitewater has agreed to and conducted outreach to obtain study participants (i.e., Expert Panel). The



ISR Study Progress report states that "The Expert Panel will be no more than 10 people, targeting about 5 to 6 people per reach for logistical purposes." Based on the American Whitewater outreach results, American Whitewater agrees that participants within this range targeting above 5 but no more than 10 participants, will provide adequate resources for the evaluation of the study flows.

\* American Whitewater has mentioned considerations to have the same participants involved in both flow assessments over the two-day period. Due to potential limitations of participant availability and many logistical complexities in scheduling the study, American Whitewater agrees that the participants conducting the evaluation can vary between the two controlled flows and study dates.

Erie respectfully requests your confirmation of the variances prior to study implementation. Please confirm that you agree with these variances.

Thank you for your assistance with this challenging study logistics and planning.

Steven P. Murphy  
Director, U.S. Licensing

Brookfield  
33 West 1st Street South, Fulton, New York 13069  
T (315) 598-6130 C (315) 439-0096  
[steven.murphy@brookfieldrenewable.com](mailto:steven.murphy@brookfieldrenewable.com)<mailto:[steven.murphy@brookfieldrenewable.com](mailto:steven.murphy@brookfieldrenewable.com)>  
[www.brookfieldrenewable.com](http://www.brookfieldrenewable.com)<<http://www.brookfieldrenewable.com/>>  
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