



www.americanwhitewater.org

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May 7, 2012

Tina Woodward
HDR Engineering, Inc.
Vis email: tina.woodward@hdrinc.com

Dear Ms. Woodward,

Thank you for reaching out to American Whitewater regarding the relicensing of the Hawks Nest Hydroelectric Project on West Virginia's New River. Below are our responses to the survey that accompanied your letter.

1. Kevin Colburn
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Yes – I would like to remain on the mailing list.

2. Yes, we are aware of existing valuable information
 - a. Recreation and land use, Socio-economic Resources, Aesthetic resources
 - b. Specific resource values:

The 5.3 mile reach of the New River that the Hawks Nest Project diverts water around is known by paddlers around the world as the “Dries of the New.” Conventional knowledge is that the Hawks Nest Project diverts up to approximately 10,000cfs around this section of river, leaving it too low to offer paddling opportunities except when river flows exceed the diversion capacity by at least 3,000 cfs.

This section of river offers paddling opportunities of sufficient quality to attract international visitation. At moderate flows the run offers a high quality whitewater descent comparable to the popular New River Gorge, and at higher flows massive waves are produced that attract paddlers from around the globe. Paddlers surf these waves and perform a wide array of acrobatic tricks utilizing the waves' remarkable size, speed and slope to gain momentum and lift. This element of boating, called freestyle paddling, is quite popular, with all major whitewater boat companies designing boats specifically for

this purpose. The New River Dries boast some of the biggest and best opportunities for freestyle kayaking in the United States and the world.

In addition to freestyle paddling, this reach has significant potential for commercial rafting, instruction, guided kayaking, and general non-commercial paddling use. In combination, these recreational uses could be expected to have significant economic value to the region.

Flows for this section are typically estimated using the USGS New River at Thurmond Gage. As a general guide based on existing (albeit scant) information, the following is a rough flow/recreation relationship:

New River Dries Recreational Flow Relationships (in cfs)		
Flow at Thurmond	Flow in Dries	Paddling Opportunity
<13,000	<3,000	Too low to enjoyably paddle
13,000 – 25,000	3,000 – 15,000	Desirable river running and downriver freestyle paddling
25,000 – 45,000	15,000 – 35,000	High quality destination freestyle paddling
>45000	>35,000	World class advanced destination freestyle paddling

Resources we recommend considering in describing the recreational paddling attributes of the New River Dries are:

- USGS Gage: 03185400 NEW RIVER AT THURMOND, WV:
http://waterdata.usgs.gov/wv/nwis/nwisman/?site_no=03185400&agency_cd=USGS
- American Whitewater New River Dries Page:
<http://www.americanwhitewater.org/content/River/detail/id/2419/>
- Kayak Session Magazine. Summer 2005. Dries of the New: Flying High on the Dries. Page 20-25. Scan Attached as Appendix 1.
- Video: <http://vimeo.com/28633112>
- Video: <http://www.youtube.com/watch?v=WpGWgZfQgYk>

c. See Above.

d. Contact for Additional Information:

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e. Yes, we are aware of issues.

The Hawks Nest Project diversion reportedly reduces instream flows by roughly 10,000 cfs. This diversion converts many days that would naturally offer paddling opportunities

into days that do not offer paddling opportunities. This binary impact likely occurs on a majority of days each year. The diversion also likely reduces the number of days that flows occur in each of the flow categories described in the table above, resulting in impacts to the quality (as well as quantity) of paddling opportunities associated with the reach.

These impacts are easily quantified using the daily average flow information available on the USGS website. The analysis presented above is based on anecdotal evidence and needs to be substantiated through both operational analyses and recreational analyses. The correct context to conduct this inquiry in is the stepwise methodology described by Whittaker et al.¹

The diversion of flow around the Dries of the New has significant recreational impacts and related socio-economic impacts.² In addition, the removal of significant flows from the river likely has aesthetic impacts.

We recognize that flow-related decisions affect not only recreation and aesthetics but also power generation and related economic factors. We look forward to exploring how all flow-related values relate to one another through participation in this relicensing process.

3. Yes, American Whitewater intends to participate in the Hawks Nest Project relicensing proceeding.
4. Comments: We believe that there may be significant opportunities to restore world class and regionally significant recreation opportunities to the New River Dries through reducing the amount of water diverted by the Hawks Nest Project during certain times of high recreational demand and specific inflows. We look forward to exploring these opportunities with the Licensee and other stakeholders.

We look forward to working with HDR, Hawks Nest Hydro, and Brookfield Renewable Energy Group on the relicensing of the Hawks Nest Project. Thank you for this opportunity to provide comments.

Sincerely,



Kevin R. Colburn
National Stewardship Director
American Whitewater

¹ Whittaker, Doug, Bo Shelby and John Gangemi. Flows and Recreation: A guide to studies for river professionals. 2005. This document can be downloaded at the following National Park Service website: <http://www.nps.gov/ncrc/programs/hydro/flowrec.pdf>.

² See: http://www.americanwhitewater.org/content/Wiki/stewardship:recreation_economics