

Recreation and Aesthetics Study Report

Lowell Hydroelectric Project (FERC No. 2790)

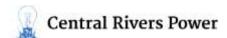
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List of Acronyms

ADA Americans with Disabilities Act

AW American Whitewater

Boott Hydropower, LLC (or Licensee)

C.F.R. Code of Federal Regulations

cfs cubic feet per second

Commonwealth Commonwealth of Massachusetts

DBH diameter at breast height

DLA Draft License Application

Enel Green Power North America

EPA Environmental Protection Agency

FERC Federal Energy Regulatory Commission (or Commission)

FGMP Final General Management Plan

FLA Final License Application

GIS Geographic Information System

GPS Global Positioning System

ILP Integrated Licensing Process

ISR Initial Study Report

LNHP Lowell National Historical Park

MADCR Massachusetts Department of Conservation and Recreation

MADEM Massachusetts Department of Emergency Management

MEOEEA Massachusetts Executive Office of Energy and Environmental Affairs

MOU memorandum of understanding

MW megawatt

NGVD 29 National Geodetic Vertical Datum 1929

NHDES New Hampshire Department of Environmental Services

NHDNCR New Hampshire Department of Natural and Cultural Resources

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NHFGD New Hampshire Fish and Game Department

NHL National Historic Landmark

NOI Notice of Intent

NPS National Park Service

NRPC Nashua Regional Planning Commission

OSRP Open Space and Recreation Plan

PAD Pre-Application Document

Project Lowell Hydroelectric Project (or Lowell Project)

Proprietors Proprietors of the Locks and Canals

PSP Proposed Study Plan

RM river mile

RMP Resources Management Plan

ROR run-of-river

RSP Revised Study Plan

SCORP Statewide Comprehensive Outdoor Recreation Plan

SD1 Scoping Document 1

SD2 Scoping Document 2

SPD Study Plan Determination

Study Workshop Lowell Hydroelectric Project Study Workshop

USFS U.S. Forest Service

USACE U.S. Army Corps of Engineers

USGS U.S. Geological Survey

USR Updated Study Report

Visitor Center E.L. Field Powerhouse Visitor Center

VP vegetation point

1 Introduction and Background

Boott Hydropower, LLC (Boott or Licensee) is the Licensee, owner, and operator of the 20.2-megawatt Lowell Hydroelectric Project (Project or Lowell Project) (FERC No. 2790). Boott operates and maintains the Project under a license from the Federal Energy Regulatory Commission (FERC or Commission). The Project's existing license expires on April 30, 2023. Boott is pursuing a new license for the Project using the Commission's Integrated Licensing Process (ILP) as defined in 18 Code of Federal Regulations (C.F.R.) Part 5.

In accordance with 18 C.F.R. § 5.15, Boott has conducted studies as provided in the study plan and schedule approved in the Commission's March 13, 2019 Study Plan Determination (SPD) for the Project. This report describes the methods and results of the approved Recreation and Aesthetics Study conducted in support of a new license for the Project.

1.1 Project Description and Background

The Lowell Project is located at river mile (RM) 41 on the Merrimack River in the City of Lowell in Middlesex County, Massachusetts, with an impoundment extending approximately 23 miles upstream into Hillsborough County, New Hampshire. As licensed, the existing Lowell Project consists of:

- A 1,093-foot-long, 15-foot-high masonry gravity dam (Pawtucket Dam) that includes a 982.5-foot-long spillway with a crest elevation of 87.2 feet National Geodetic Vertical Datum 1929 (NGVD 29) topped by 5-foot-high pneumatically-operated crest gates deployed in five independently-operable zones;
- 2) A 720-acre¹ impoundment with a normal maximum water surface elevation of 92.2 feet NGVD 29;
- 3) A 5.5-mile-long canal system which includes several small dams and gatehouses;
- A powerhouse (E.L. Field) which uses water from the Northern Canal and contains two turbine-generator units with a total installed capacity of 15.0 megawatts (MW);
- 5) A 440-foot-long tailrace channel;
- 6) Four powerhouses (Assets, Bridge Street, Hamilton, and John Street) housed in nineteenth century mill buildings along the Northern and Pawtucket

¹ As licensed by the Commission, the impoundment surface area is 720 acres. The actual impoundment surface area is estimated at 1,236 acres.

Canal systems containing 15 turbine-generator units with a total installed capacity of approximately 5.1 MW;

- 7) A 4.5-mile-long, 13.8-kilovolt transmission line connecting the powerhouses to the regional distribution grid;
- 8) Upstream and downstream fish passage facilities including a fish elevator and downstream fish bypass at the E.L. Field powerhouse, and a vertical-slot fish ladder at the Pawtucket Dam; and
- 9) Appurtenant facilities.

At the normal pond elevation of 92.2 feet NGVD 29 (crest of the pneumatic flashboards), the surface area of the impoundment encompasses an area of approximately 1,236 acres. The gross storage capacity between the normal surface elevation of 92.2 feet and the minimum pond level of 87.2 feet (at spillway crest) is approximately 6,180 acre-feet. The Project operates essentially in a run-of-river (ROR) mode using automatic pond level control and has no usable storage capacity.

The Project's primary features are located along the Merrimack River in the City of Lowell, Massachusetts. The City of Lowell was founded in the early 1820s by Boston merchant capitalists and became one of the most significant planned industrial cities in America (Hay 1991). Lowell's factory system, which used the waterpower of the Merrimack River, incorporated new technologies to provide for the mass production of cotton cloth in mills throughout the city (National Park Service [NPS] 1981). Lowell established the pattern for large-scale waterpower development for the next 50 years (Hay 1991).

Several Project facilities are located within overlapping locally, state, and nationally designated parks and historic properties/preservation districts. The Project's Pawtucket Dam and E.L. Field Powerhouse are located along the mainstem of the Merrimack River. The Project's two-tiered network of man-made canals extends throughout downtown Lowell. The 5.5-mile-long canal system provides flow to the Project's Hamilton, Assets, Bridge Street, and John Street developments. The Hamilton, Assets, Bridge Street, and John Street power stations and turbines are housed in large former mill buildings. The mill buildings are not included in the Project; the Project Boundary includes only the turbines and associated waterways and equipment at these downtown mill sites. In addition to the Pawtucket Dam and hydroelectric developments, the Project also includes miscellaneous civil works in the City of Lowell, including the Guard Lock and Gates, Moody Street Feeder Gatehouse, Lawrence Dam, Hall Street Dam, Tremont Wasteway, Lower Locks and Dam, Swamp Locks and Dam, Merrimack Dam and Merrimack Gate, Rolling Dam, and the Boott Dam.

The canal system, the downtown mill sites, and many of the Project's civil works, are contributing resources to Lowell Locks and Canals National Historic Landmark (NHL) District. The canal system and many Project facilities are also located within the Lowell National Historical Park (LNHP) managed by the NPS and the larger Lowell Historic Preservation District. The LNHP was established by Congress in 1978 to "preserve and interpret the nationally significant historical and cultural sites, structures, and districts in

Lowell, Massachusetts, for the benefit and inspiration of present and future generations." The park is by design a partnership park in which federal, state, and local governments as well as the private sector and local community carry out the legislative intent of the park unit. The Lowell National Historical Park is also listed on the National Register of Historic Places (NRHP), and certain properties within the park overlap with properties in the NHL District.

The Lowell Heritage State Park, established in 1974 as a precursor to the LNHP, is also located within the City of Lowell and is comprised of linear greenways along the Merrimack River and canal system and a collection of historic buildings and structures related to the industrial development of the city. These buildings and structures include Project features and properties located within the NHL District. The Lowell Heritage State Park is operated by the Massachusetts Department of Conservation and Recreation (MADCR) and features exhibits created in partnership with the NPS (MADCR 2018). With the exception of the Rynne Bathhouse, all of the built resources within the Lowell Heritage State Park fall within the Lowell Historic District, designated by the City of Lowell to "...ensure that development activities within the district are consistent with the preservation of its 19th century setting" (MADCR 2014). Portions of the Lowell Heritage State Park also overlap with the Lowell Locks and Canals NHL District and the LNHP.

On April 30, 2018, Boott initiated the ILP by filing a Pre-Application Document (PAD) and Notice of Intent (NOI) with the Commission. Major ILP milestones to-date are presented in Table 1-1.

Table 1-1. Major ILP Milestones Completed

Date	Milestone				
April 30, 2018	PAD and NOI Filed				
June 15, 2018	Scoping Document 1 (SD1) Issued by FERC				
July 17, 2018	FERC Agency and Public Scoping Meetings Conducted				
July 18, 2018	Project Site Visit Held				
September 27, 2018	Scoping Document 2 (SD2) Issued by FERC				
September 28, 2018	Proposed Study Plan (PSP) Filed				
October 18 & 19, 2018	PSP Meeting Conducted				
January 28, 2019	Revised Study Plan (RSP) Filed				
March 13, 2019	FERC Issued SPD				
February 25, 2020	Initial Study Report (ISR) Filed				
March 11, 2020	ISR Meeting				
June 12, 2020	FERC Issued Revised Process Plan and Schedule				
September 30, 2020	Revised ISR Filed				

Date	Milestone				
December 2, 2020	Draft License Application (DLA) Filed				
February 2, 2021	FERC Issued Determination on Requests				
February 25, 2021	Revised ISR Filed				
April 30, 2021	Final License Application (FLA) Filed				
June 23, 2021	FERC Issued Determination on Requests				
November 1, 2021	Updated Study Report (USR) Filed				
March 1, 2022	FERC Issued Determination on Requests				

Boott has continued consultation with stakeholders regarding the approved studies as required by the Commission's SPD. In accordance with the schedule presented in the RSP, Boott has also provided stakeholders with Quarterly ILP Study Progress Reports that include a description of study activities conducted during the previous quarter, activities expected to occur in the next quarter, and identified variances from the approved study plan.

The Commission's March 1, 2022 Determination on Requests requested the Recreation and Aesthetics Study Report be updated with new information to identify Project effects on recreation. Table 1-2 below provides a roadmap to where FERC and stakeholders can find the study updates included in this report.

Table 1-2. Roadmap to Study Report Updates Based on FERC's March 1, 2022 **Determination on Requests**

FERC Study Report Update	Boott's Response
(1) a description of boat tour routes used by NPS (past or present) within the Northern and Pawtucket Canal system, including a description of locks or other navigational features that the tours pass through;	See Boott's response in Section 5.5.1.
(2) an evaluation of the effects of Project operation on NPS boat tours in the Northern Canal;	See Boott's response in Section 5.5.1.1.
(3) an evaluation of the effects of Project operation on NPS boat tours, in relation to Boott's proposal to remove the majority of the canal system from the Project boundary;	See Boott's response as it relates to NPS boat tours on the Northern Canal in Section 5.5.1.1. See Boott's response as it relates to NPS boat tours on the Pawtucket Canal in Section 5.5.1.2.

FERC Study Report Update	Boott's Response
(4) an evaluation of the potential for expanding access to the canals for recreation (including NPS boat tours) in light of the results of the Operation Analysis of the Lowell Canal Study and in consideration of Project operation under normal and high flow conditions (including an assessment of surge gate and shut down options);	See Boott's response as it relates to NPS boat tours on the Northern Canal in Section 5.5.1.1. See Boott's response as it relates to public recreational access (including NPS boat tours) to the downtown canal system (i.e. excluding the Northern Canal) in Section 5.4.3.
(5) an analysis of the effects of Project operation on NPS boat tours and recreational rights, in relation to Boott's proposal to remove the majority of the canal system from the Project boundary.	See Boott's response in Section 5.4.1.
Northern Canal Walkway: Identify the number of days that the Northern Canal Walkway would need to be closed seasonally due to flows resulting from Project operation.	See Boott's response in Section 5.5.2.

1.2 Project Recreation Facilities

Pursuant to existing License Article 38 and the FERC-approved Recreation Plan, Boott maintains the E. L Field Powerhouse Visitor Center (Visitor Center). The Visitor Center is the Project's only FERC-approved recreation facility. The Visitor Center offers a secured view of the interior of the turbine gallery and an interpretive display which provides information regarding the development, history, and operation of the Project and nearby historic, natural, cultural, and recreational resources.

Non-Project related recreational facilities and opportunities in the Project's vicinity include the Depot Street Boat Ramp, Greely Boat Ramp, LNHP, Lowell Heritage State Park, Merrill Park, Moore's Falls Conservation Area, and the Rourke Brothers Boat Ramp. The Merrimack River provides extensive recreational opportunities, including boating, canoeing, kayaking, rowing, fishing, and swimming. The surrounding vicinity is used for hiking, picnicking, bird watching, nature study, and overall enjoyment of scenic views.

2 Study Goals and Objectives

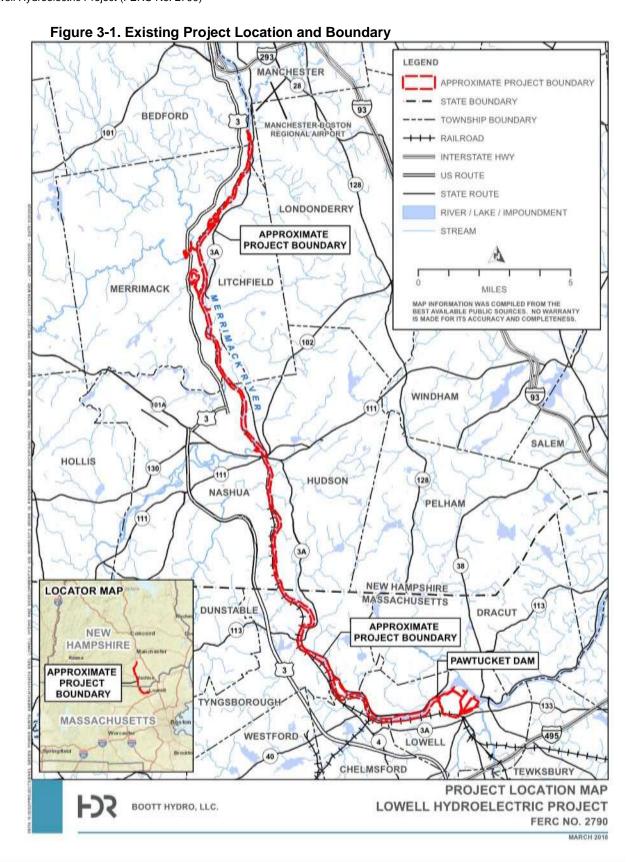
The goals of this study are to (a) document recreation resources and recreational activities that occur in the Project area; (b) determine the adequacy and capacity of existing recreational facilities to accommodate proposed enhancements and/or additional recreational activities; (c) assess potential effects of water levels and flow rates on existing recreational facilities; (d) assess the potential for expanded access to the canal system for recreation; and (e) identify areas within the canal system where vegetation growth on historic canal walls and waterborne trash are a concern.

The specific objectives of the study are to:

- Identify existing recreation facilities in the Project area;
- Quantify current recreational use based on recent and new surveys and interviews, and consultation with stakeholders, regional and statewide plans, and other available data (including NPS and MADCR planning documents);
- Identify proposed recreational uses based on surveys and interviews in consultation with stakeholders:
- Evaluate the potential effects of continued operation of the Project (including water levels and flow rates) on recreation resources and activities in the Project area;
- Assess the potential for expanded recreational access to the canal system in consultation with the NPS, MADCR, the City of Lowell, Lowell Parks and Conservation Trust, the Lowell Heritage Partnership, and other partners in recreation:
- Identify areas of concern related to waterborne trash and vegetation growth on historic canal walls and other structures or historic properties owned or under the control of Boott: and.
- Gather information on the condition of Boott's recreation facilities and identify any need for improvement.

Study Area 3

In accordance with the Commission's SPD, the study area for the Recreation and Aesthetics Study is a general area that includes the existing FERC Project Boundary and adjacent recreation facilities (Figure 3-1, Figure 3-2).



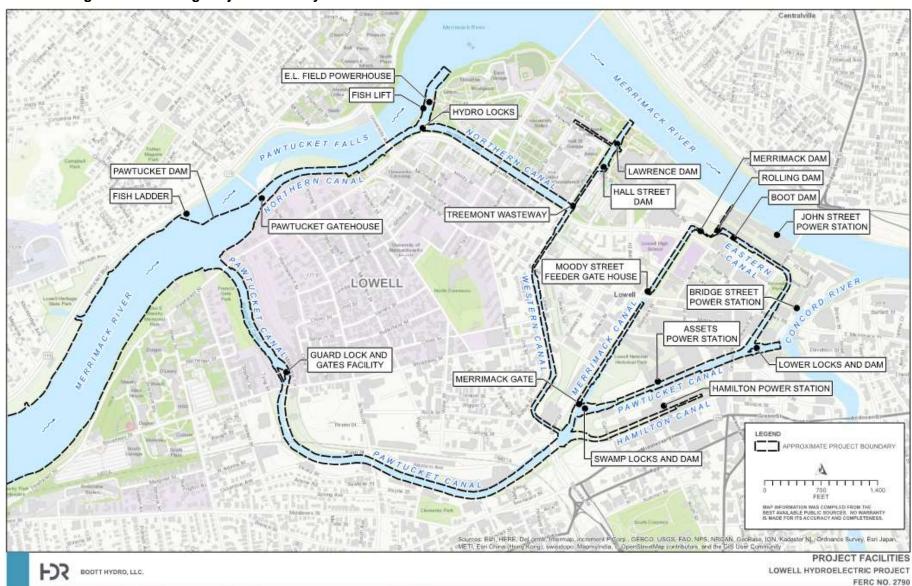


Figure 3-2. Existing Project Boundary and Facilities in Downtown Lowell

Methodology 4

4.1 Literature Review

Boott conducted desktop research and a literature review to identify and describe recreational uses in the Project area, including (but not limited to) whitewater boating, canoeing, kayaking, fishing, swimming, walking, and architectural/historical tours. As a component of this research, Boott reviewed existing recreational uses, facilities management plans (as applicable), and limitations and regulations applicable to the Project area. Additionally, Boott conducted a records search and literature review on the historical and current practices regarding vegetation and waterborne trash management and control on historic canal walls and other structures or historic properties owned or under the control of Boott.

4.2 Field Inventory

Boott conducted a field inventory to document existing non-Project recreation facilities within the Project's vicinity in the fall of 2019. Recreation sites inventoried included the Moore's Falls Conservation Area, Depot Street Boat Ramp, Chelmsford Boat Access, Greeley Boat Ramp, the Rourke Brothers Boat Ramp, Lowell Heritage State Park, Merrimack Trail System, LNHP, Merrill Park, NPS Canal Walkways, and Pawtucket Falls Overlook (Figure 4-1). The Visitor Center, the only Project-related recreation facility, was also inventoried. Pursuant to the RSP, Boott collected information regarding each facility including the type and location of existing recreation facilities, the type of recreation provided (e.g., boat access, angler access, picnicking, etc.), existing amenities and sanitation, the type of vehicular access and parking (if any), the suitability of facilities to provide recreational opportunities and access for persons with disabilities (i.e., compliance with current Americans with Disabilities Act [ADA] standards for accessible design), Global Positioning System (GPS) location data, and representative photographic documentation of recreation facilities.

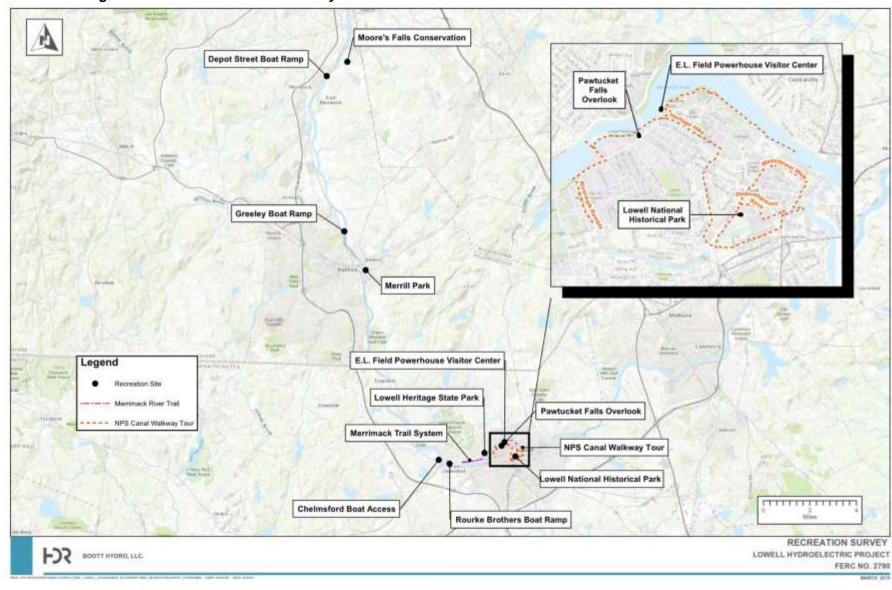


Figure 4-1. Recreation Field Inventory Locations

4.3 Collection of Visitor Use Data and Field Reconnaissance

4.3.1 Personal Interviews and Field Reconnaissance

As provided in the approved study plan, Boott conducted personal interviews (visitorintercept surveys) and field reconnaissance activities at recreation facilities in the Project's vicinity between May and October 2019. Boott conducted field reconnaissance and personal interview surveys on random weekdays and weekend days throughout the months of May, June, July, August, September, and October of 2019. Personal interviews and field reconnaissance were conducted on four days of each month on both weekdays, weekend days, and holidays. The actual dates that personal interviews and field reconnaissance took place in 2019 are presented in Table 4-1.

Table 4-1. Personal Interviews and Field Reconnaissance Schedule

Month	Specific Dates
May	Saturday May 25, 2019Sunday May 26, 2019Monday May 27, 2019Tuesday May 28, 2019
June	Friday June 7, 2019Monday June 10, 2019Saturday June 15, 2019Sunday June 16, 2019
July	Wednesday July 10, 2019Friday July 19, 2019Saturday July 27, 2019Sunday July 28, 2019
August	Tuesday August 6, 2019Sunday August 18, 2019Wednesday August 21, 2019Saturday August 24, 2019
September	 Saturday September 14, 2019 Thursday September 19, 2019 Sunday September 22, 2019 Wednesday September 25, 2019
October	 Wednesday October 9, 2019 Tuesday October 15, 2019 Saturday October 19, 2019 Sunday October 27, 2019

Boott developed survey questions based on general concepts and guidance from the U.S. Forest Service's (USFS) National Visitor Use Monitoring Handbook (USFS 2007) and questions that were asked during recreation studies for other relevant hydropower relicensings. The survey questions that were asked during the personal interviews are included in Appendix A of this study report. Boott consulted with the NPS, MADCR, and American Whitewater (AW) to identify specific recreation survey locations. The selected locations for the personal interviews and field reconnaissance (Figure 4-1) were:

- Lowell Heritage State Park
- Merrimack Trail System
- Pawtucket Falls Overlook
- NPS Canal Walkways
- LNHP Visitor Center
- Chelmsford Boat Access
- Rourke Brothers Boat Ramp
- Merrill Park, and
- Whitewater takeout location²

A team of two technicians traveled between each of the selected recreation sites and spent approximately one hour at each site conducting the personal interviews and collecting field reconnaissance data including (a) the various types of recreation activities, (b) an estimation of the number of vehicles, and (c) the approximate numbers of recreationists observed at each site. Before rotating to the next site, technicians also recorded the date, time, and weather conditions observed. For the personal interviews, individual recreationists and groups were interviewed, including visitors using boat launches and LNHP-managed facilities. Respondents answered questions verbally while a technician recorded their responses using the Qualtrics® offline survey platform to record and submit answers.³ The personal interview questions included topics such as: general user information; age group, resident/visitor; purpose and duration of visit; distance traveled; history of visiting the site or area; types of recreational activities respondents participated in or planned to participate in during their visit; other recreational sites that respondents visited or intended to visit during their trip; general satisfaction with recreational opportunities, flow conditions, facilities, and the respondents overall visit and/or areas that need improvement; accessibility of facilities or areas; economic aspects, including dollars spent during their trip; and day use/overnight lodging during their visit.

4.3.2 Online Visitor Use Surveys

In addition to the personal interviews, Boott developed a version of the interview questions to allow respondents to provide survey responses online. In accordance with the approved study plan, the survey was made available for one year, from June 2019 to June 2020, on the Project's relicensing website (www.lowellprojectrelicensing.com). The

² The Whitewater takeout location is not identified on Figure 4-1. This informal non-Project recreation area is located along the riverfront behind Edward A. Lelacheur Park.

³ While the survey questions in the approved study plan were utilized for these interviews, the numbering and specific wording was adapted during the interview to better facilitate the interview and to accommodate the Qualtrics[®] survey platform.

online survey was developed using the Qualtrics® survey platform. Boott posted a brief description of the purpose and intent of the survey and the website address at popular recreation access areas at the Project (Photo 4-1). During personal interviews and field reconnaissance, Boott provided handouts to recreationists with the relevant information on how to access the online survey. Boott notified the Commission and stakeholders of the availability of the online survey in the Second Quarterly Study Progress Report filed with the Commission on October 1, 2019. The survey questions developed for the online survey are also included in Appendix A of this study report.



Photo 4-1. Example of Signage for Participating in Online Visitor Use Surveys

Evaluation of Expanded Recreational Access in Project 4.4 Canals

NPS and NPS partners have expressed interest in new, different, and expanded recreational access to and within the Project canals. Boott consulted with the NPS to discuss various recreational opportunities based on the NPS's plans for developing recreational access within the LNHP and the visitor use data collected pursuant to Section 4.3 of this report.

Boott conducted an evaluation of prospective recreation access. This evaluation considered:

Public safety concerns associated with canal access;

- Infrastructure enhancement that may be required to provide safe public access to the canal system and how such improvements may affect aesthetic and historic resources; and,
- Potential options for improving canal system access, such as operational changes or other measures.

4.5 Documentation of Current Water Levels and Flows

In accordance with the SPD, Boott initiated the data collection associated with the Water Level and Flow Effects on Historic Resources Study and the Operation Analysis of the Lowell Canal Study, both filed with FERC on November 1, 2021. Pressure transducers (level loggers) were installed in the Project's canal system in 2019. On December 18, 2019, Boott held a Lowell Hydroelectric Project Study Workshop (Study Workshop)⁴ with stakeholders and refined the data needs for this study based on consultation with the NPS and NPS partners. This included moving the level loggers to locations in the Upper Pawtucket Canal and Northern Canal on March 10, 2020 to better understand and collect data regarding the effects of the crest gate on NPS boat tours and access to the Northern Canal Walkway. These level loggers were removed on September 23, 2020.

4.6 Visual Survey for Vegetation Growth

The visual survey for vegetation growth was conducted between September 25 and 27, 2019. The visual survey was conducted to identify vegetation growth along the canal walls within the study area. Technicians identified the relative quantity and spatial distribution of each vegetation type using aerial photography and observations of habitat and specific plant species occurrences. The methods for this study followed those that were described in the study plan approved by the Commission.

4.6.1 Review of Existing Information

Terrestrial vegetation types occurring in the study area were described based on a review of existing information, an inspection of aerial photography, a review of the U.S. Geological Survey (USGS) 7.5-minute quadrangles, and observations of habitat and specific vegetation type occurrences during the field surveys. Sources of existing information included but were not limited to the following:

 Massachusetts Natural Heritage and Endangered Species Program Classification of the Natural Communities of Massachusetts (Swain 2020): provides a basis for the discussion and conserving the diversity of the types of natural communities and the species they support within the Commonwealth of Massachusetts (Commonwealth). The primary aim of the classification is to describe the natural communities that are

⁴ The meeting minutes of the December 18, 2019 Study Workshop were appended to the ISR filed with FERC on February 25, 2020.

of conservation interest, while also including all types of natural communities in the state.

- Flora of the Northeast A Manual of the Vascular Flora of New England and Adjacent New York (Magee and Ahles 1999): a reference work and year-round field manual that contains more than 2,400 range maps and over 900 line drawings for identifying the vascular flora of New England and New York.
- Invasive Plants (Kaufman and Kaufman 2007): a guide to the identification and the impacts and control of common North American invasive plant species.

4.6.2 Mapping of Vegetation Growth on Canal Walls

For the purposes of examining vegetation type distribution, the study area was divided into the six canals associated with the Lowell Project canal system including: 1) Pawtucket Canal; 2) Northern Canal; 3) Western Canal; 4) Merrimack Canal; 5) Eastern Canal; and 6) Hamilton Canal (Figure 4-2).

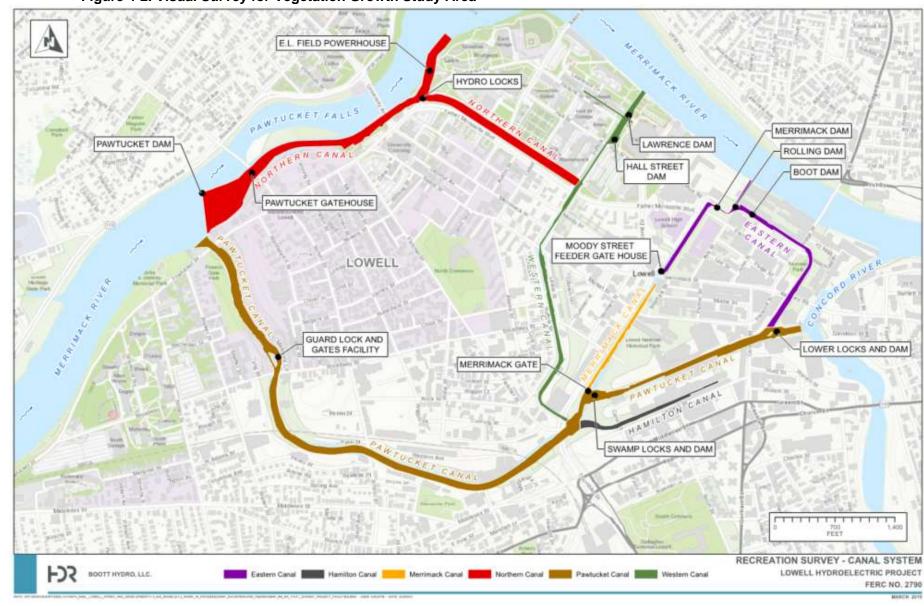


Figure 4-2. Visual Survey for Vegetation Growth Study Area

Visual qualitative surveys were conducted in the study area by foot along the shorelines of the canals, or via an NPS boat for the surveys conducted in the Pawtucket Canal from the Swamp Locks and Dam to the Merrimack River. Vegetation was characterized by dominant type (i.e., Herbaceous, Scrub-Shrub, Trees, Forested, or Mixed) (Table 4-2). The vegetation type assessments were based on overall dominant vegetation characteristics at the time of the survey that may have variations within small areas. In addition, the shoreline/canal was characterized by dominant features (i.e., Block Wall, Concrete, Earthen/Terrestrial Cultural, Stone Wall, Block Wall/Concrete/Stone Wall Mix) (Table 4-3). The shoreline/canal type assessments were based on overall dominant features at the time of the survey that may have variations within small areas.

Table 4-2. Dominant vegetation types used during field surveys

Vegetation Type	Description				
Herbaceous	Characterized by primarily herbaceous (non-woody) plants, including herbaceous vines, regardless of size, and woody plants less than 3 feet tall.				
Scrub-Shrub	Consists of woody plants less than 3 inches diameter at breast height (DBH) and greater than or equal to 3 feet tall.				
Trees	Consists of woody plants 3 inches or more in DBH, regardless of height. This vegetation type description was generally used to describe areas along canal walls where only a few trees were growing in a clump.				
Forested	Characterized as a relatively large area that consists of primarily trees and underbrush.				
Mixed	Characterized by a mosaic of herbaceous, scrub-shrub, and/or trees.				

Table 4-3. Dominant shoreline/canal types used during field surveys

Shoreline/Canal Type	Description				
Block Wall	Canal walls primarily dominated by placed, generally uniform sized blocks with concrete caps or block alone.				
Concrete	Canal walls primarily dominated by concrete, with various types of cement and aggregate.				
Earthen/Terrestrial Cultural	Canal walls generally dominated by earthen embankments (forested and unforested) and areas of exposed bedrock. Some of these areas (e.g., riprapped areas) have been created and/or maintained by human activities.				
Stone Wall	Canal walls primarily dominated by placed, generally non-uniformly sized blocks with concrete caps or block alone.				
Block Wall/ Concrete/Stone Wall Mix	Areas of canal walls predominantly composed of a conglomeration of block wall, concrete, or stone wall at varying quantities.				

Mapped Vegetation Polygons and Vegetation Points (VPs)⁵ were located using an EOS Positioning Systems Arrow 100[™] GNSS receiver linked to an iPad[™] Air 2 or Android device operating Collector for ArcGIS[™] hand-held GPS unit (equipped with a data dictionary aiding in feature attribution). The presence and extent of cover of the vegetation on/along the canal walls observed at the time of the field survey was evaluated based on photographs and field observations. Geospatial vegetation data were transferred to a Geographic Information System (GIS) format and used to develop both visual maps depicting vegetation presence boundaries and VPs along the canal walls as well as tabular information quantifying the abundance and distribution of dominant vegetation types in the study area. Vegetation polygons were then analyzed to calculate the percentage represented by each vegetation category within each canal; VPs were not included in vegetation category percentage calculations because they represent a single point on the canal wall.

Each representative vegetation type was photographed. Each vegetation polygon and VPs, including any canal descriptive features (e.g., riprap, concrete walls, earthen embankments, etc.) within a polygon or near a VP, was photo documented when possible.

4.6.3 Data Analysis and Processing

During the field effort, mapped vegetation type polygons were collected to represent current conditions. Vegetation type boundaries were mapped to reflect field observations of vegetation composition.

Upon completion of the field data collection effort, all data were checked for errors and omissions. The percentages of each vegetation type were calculated. Minor adjustments were made to a small number of vegetation polygon boundaries and subsequent percentages based on examination of the location of the GPS polygon data relative to banks and bends along the canals, or from recorded field data during mapping.

4.7 Visual Survey for Waterborne Trash

The visual survey for waterborne trash was formally conducted on April 9, 2020. The survey was conducted to identify locations within the study area where waterborne trash accumulates within the Project Boundary. Waterborne trash occurring along the canals was described based on observations of accumulated waterborne trash during the field reconnaissance survey. The methods for this study followed those that were described in the study plan approved by the Commission.

⁵ Vegetation points were used to identify areas along canal walls where a single vegetation type point was recorded. Vegetation points generally identify where a single species (e.g., shrub, tree) was located.

4.7.1 **Review of Existing Information**

Areas of waterborne trash occurring in the study area were described based on a review of existing information, an inspection of aerial photography, the observation of accumulated waterborne trash during other Project relicensing studies, a review of information provided to Boott by the NPS that identifies areas of trash accumulation (both on the canal bottom and waterborne) within the study area, as well as the specific waterborne trash occurrences during the field survey.

4.7.2 Waterborne Trash Mapping

For the purposes of examining waterborne trash accumulation areas, the study area was divided into the six canals associated with the Lowell Project canal system including: 1) Pawtucket Canal; 2) Northern Canal; 3) Western Canal; 4) Merrimack Canal; 5) Eastern Canal; and 6) Hamilton Canal, and associated NPS gatehouses and locks (Figure 4-2).

Visual qualitative surveys were conducted in the study area by vehicle as well as on foot along the shorelines of the canals. Waterborne trash was characterized by dominant type (i.e., Plastics/Household, Woody Debris, or Assorted) (Table 4-4). The canal level (low, medium, high) at the time of the site investigation was also recorded. The waterborne trash assessments were based on the overall dominant trash type observed at the time of the survey.

Table 4-4. Dominant Waterborne Trash Types Used During Field Surveys

Waterborne Trash Type	Description					
Plastics/Household	Characterized by plastic cups, plastic bags, wrapping materials, plastic water bottles, plastic containers, rubber balls, fast-food wrappers, shoes, construction barrels, etc.					
Woody Debris	Characterized by trees, logs, branches, stumps, boards, sections of plywood, etc.					
Assorted	Characterized by a conglomeration at varying densities of plastics/household and woody debris.					

Mapped areas of waterborne trash were located using an EOS Positioning Systems Arrow 100[™] GNSS receiver linked to an iPad[™] Air 2 or Android device operating Collector for ArcGIS™ hand-held GPS unit (equipped with a data dictionary aiding in feature attribution). The presence and extent of waterborne trash within the canals observed at the time of the field survey was evaluated based on field observations and photographs. Geospatial waterborne trash data were transferred to a GIS format and used to develop both visual maps depicting mapped areas of accumulated waterborne trash within the canals as well as tabular information describing the abundance and distribution of waterborne trash in the study area. The mapped polygons were then analyzed to calculate the area represented by each dominant trash type within each canal.

Each representative trash type was photographed. Each waterborne trash polygon, including any canal descriptive features (e.g., active construction adjacent to canal, primarily residential, commercial, etc.) in the vicinity of a polygon, was photo documented when possible.

4.7.3 Data Analysis and Processing

During the field effort, mapped waterborne trash polygons were collected to represent current conditions. Waterborne trash polygon boundaries were mapped to reflect field observations at the time of the investigations.

Upon completion of the field data collection effort, all data were checked for errors and omissions. The areas of each mapped waterborne trash polygon were calculated. Minor adjustments were made to a small number of mapped waterborne trash polygon boundaries and subsequent areas based on examination of the location of the GPS polygon data relative to banks and bends along the canals, or from recorded field data during mapping.

5 Study Results

5.1 Literature Review

Pursuant to the approved study plan, Boott reviewed several sources to summarize recreation in the Project area, including the Massachusetts Statewide Comprehensive Outdoor Recreation Plan (SCORP) (Massachusetts Executive Office of Energy and Environmental Affairs [MEOEEA] 2017); the New Hampshire Department of Natural and Cultural Resources (NHDNCR) SCORP 2018; the Massachusetts Recreational Trails Program Guide (MassTrails) 2020; the LNHP Foundation Document (LNHP 2017); The City of Lowell Open Space and Recreation Plan (City of Lowell 2018); and the City of Lowell's Comprehensive Master Plan, known as Sustainable Lowell 2025 (City of Lowell 2013). Additionally, Boott conducted a records and literature review on the historical and current practices regarding management of vegetation growth and waterborne trash. This section summarizes the results of the literature review to characterize these aspects in the Project area.

5.1.1 Recreation in the Project Area

The Merrimack River provides widespread recreational opportunities. The 116-mile-long Merrimack River begins at the confluence of the Winnipesaukee and Pemigewasset Rivers in the City of Franklin, New Hampshire, flows southward into Massachusetts, and then travels northeast until it discharges into the Atlantic Ocean (New Hampshire Department of Environmental Services [NHDES 2019]). Although the Merrimack River watershed is heavily forested (75% of the land area is covered with forest), it also supports all or parts of approximately 200 communities with a total population of 2.6

million people (Environmental Protection Agency [EPA] 2020; U.S. Army Corps of Engineers [USACE] 2006). The Merrimack River provides numerous recreational opportunities to the residents of the communities along its banks but is also utilized by residents of major cities in the region, particularly residents from Boston (Nashua Regional Planning Commission [NRPC] 2008; NHDES 2019; USACE 2006).

The Project dam is located at river mile 41 on the Merrimack River, and the impoundment extends upstream approximately 23 miles almost to the City of Manchester in New Hampshire. The Project impoundment is characterized by the urban/industrialized cities of Nashua, New Hampshire and Lowell, Massachusetts. Recreational opportunities differ closer to these larger, more populated cities along the river. The State of New Hampshire reports many recreational uses of the Project impoundment, including fishing, canoeing, kayaking, rowing, and motor boating. Lands adjacent to the Project impoundment are used for hiking, picnicking, birdwatching, nature study, and overall enjoyment of the scenic views (NHDES 2019; NHDNCR 2018; New Hampshire Fish and Game Department [NHFGD] 2020; NHFGD 2016).

The state of Massachusetts reports that recreation along the Project impoundment changes as open space generally decreases further downstream and riverfront communities are more industrialized (MEOEEA 2001). Water-based recreation (boating, fishing, canoeing, and swimming), is provided on the downstream portion of the Project impoundment by multiple boat ramps and waterfront parks. The City of Lowell, NPS, and MADCR report many additional recreational opportunities in and surrounding Lowell, including networks of trails, thousands of acres of nearby state forest, and urban passive parks for walking, jogging, dog-walking, and picnicking (City of Lowell 2018; MADCR 2014; LNHP 2017). As part of the LNHP or Lowell Heritage State Park, different sites in and around the city of Lowell are related to the historical era of textile manufacturing and offer museum exhibits, walking tours, and interpretive/interactive displays (LNHP 2017; MADCR 2014).

Although portions of the LNHP are within the Project boundary, it is not a FERCapproved recreation facility. As noted above in Section 1.2, the Visitor Center is the Project's only FERC-approved recreation facility. The Visitor Center offers a secured view of the interior of the turbine gallery and an interpretive display which provides information regarding the development, history, and operation of the Project and nearby historic, natural, cultural, and recreational resources.

Recreational opportunities available along the 23-mile impoundment are summarized in Table 5-1 and described in more detail below.

Table 5-1. Recreational Opportunities Available on the Project Impoundment

Recreational Facility	Canoe/Kayak Access	Boat Ramp	Picnic Area	Fishing Access	Trail System	Light Trails	Designated Swimming Area	Visitor Center	Historical/Heritage Exhibits
Moore's Falls Conservation Area	✓		✓	✓	✓	✓			
Depot Street Boat Ramp	✓		✓	✓					
John Bryant River Access	✓		✓	✓					
Thornton's Ferry Boat Launch	✓			✓					
Greeley Park & Boat Ramp	✓	✓	✓	✓	✓	✓			
Merrill Park	✓		✓	✓		✓			
Chelmsford Boat Access	✓	✓	✓	✓	✓				
Rourke Brothers Boat Ramp	✓	✓		✓					
Lowell Heritage State Park			✓	✓	✓	✓	✓		✓
Pawtucket Falls Overlook									✓
Lowell National Historical Park					✓	✓		✓	✓
E.L. Field Powerhouse Visitor Center								✓	✓

Much of the Project impoundment is in Hillsborough County in New Hampshire. The New Hampshire SCORP estimated that the county has approximately 54,480 acres of recreation lands and 116 public access sites to the water. Public lands maintained by state, federal, or local municipalities comprise the majority of identified recreational acreage in the county, followed by private non-profit organizations/land trusts. With an estimated 197 natural/passive recreation areas and 111 parks, picnics, and playground areas, Hillsborough County has the most of all counties in New Hampshire. Given the national trend of individuals choosing to recreate closer to home, the New Hampshire

SCORP states it is important that larger population bases, such as that of Hillsborough County, have higher proportions of recreation sites (NHDNCR 2018).

Most of the shore lands along the Merrimack River in New Hampshire are privately owned. Activities such as boating, canoeing, kayaking, rowing, and fishing take place immediately on the Merrimack River (NRPC 2008). There are six known boat access facilities in New Hampshire with direct access to the Project impoundment. These facilities range in design from concrete ramps to shoreline access and are described below:

Moore's Falls Conservation Area: Moore's Falls Conservation Area offers shoreline fishing and car-top boating access to Moore's Falls in the Project impoundment. Moore's Falls are a length of rapids on the Merrimack River which drop 6 feet in elevation over 650 feet in distance. There are also walking trails through the woods, an old trolly track trail, multiple access points to the Merrimack River for fishing, educational information regarding environmental conservation, and birdhouses. NHDES recommends this conservation area for angler fishing, as small and large mouth bass are often caught, as well as rainbow and brook trout, both of which are stocked by the NHFGD in the Lower Merrimack River (Middlesex Canal Association 2009; NHDES 2019).

Depot Street Boat Ramp: The Depot Street Boat Ramp offers a carry-in boat ramp and fishing access to the Merrimack River and is managed by the Town of Merrimack. The trail to the river runs under railroad tracks. This access is suitable for motorboats, as the river slows from the rocky rapids upstream (NHDES 2019; Merrimack Parks and Recreation 2020). There is also a scenic picnic area.

John Bryant River Access: The John Bryant River Access is a canoe/kayak car top facility managed by the Litchfield Recreation Commission. It provides fishing access, scenic views of the river, and birdwatching. It is available only to Town of Litchfield, New Hampshire residents (Litchfield Recreation Commission 2020).

Thornton's Ferry Boat Launch: Thornton's Ferry Boat Launch is owned by the Town of Merrimack and offers cartop carry-in boating and fishing access to the Merrimack River (NHFGD undated).

Greeley Park & Boat Ramp: Greeley Park is a 125-acre city park located in Nashua, New Hampshire. Greely Park offers many recreation amenities/facilities including baseball/softball fields, historical sites, picnic areas, playgrounds, restrooms, tennis courts, trails, and wading pools (NHFGD undated; City of Nashua 2020). In 2019, the City of Nashua issued an invitation to bid for reconstruction of the Greeley Park Boat Ramp, as well as construction of a gravel parking lot, placement of new signs, and three biological retention ponds. The work was scheduled for completion in July 2020 (NHFGD undated; City of Nashua 2019). A paved ramp at the north end of Greeley Park in Nashua also allows access to the river for boaters. NHDES recommends this conservation area for angler fishing (NHDES 2019).

Merrill Park: Merrill Park is a 9.3-acre city park located in Hudson, New Hampshire. It is adjacent to the east riverbank and Project boundary. The park is mostly forested with a few walking paths and picnic benches. It has a path which leads down to the Merrimack River, allowing hand-carry access for canoes or kayaks, or fishing (Town of Hudson undated).

The Merrimack River provides quickwater and flatwater experiences for canoeists and kayakers and is one of the largest surface water bodies in the region for motor boating. Local watershed organizations sponsor a variety of paddling trips on the Merrimack River and its tributaries throughout the spring, summer, and fall for beginner and intermediate paddlers (NHDES 2017). Upstream of the northern extent of the Project impoundment is a whitewater kayak course located in Manchester, New Hampshire. There are also class I-II+ rapids located between Amoskeag Falls to Goffs Falls (City of Manchester 2018).

The most popular outdoor activities for New Hampshire residents include wildlife observation, driving for pleasure, sightseeing, and jogging/running/walking. Day hiking tends to be more popular in New Hampshire than the national average (NHDNCR 2018). Natural areas in the vicinity of the Project in New Hampshire are also used for cross country skiing, picnicking, bird watching, nature study, and overall enjoyment of scenic views (NRPC 2008). In addition to the facilities mentioned above, the following facilities are within a 30-minute drive from the Project impoundment and are provided for these types of activities:

Litchfield State Forest: The Litchfield State Forest is a 450-acre forest in Litchfield managed by the State of New Hampshire. It is located about 1.5 miles east of the Project boundary. The 1.3-mile Litchfield State Forest Trail provides comfortable walking and biking trails. Off trails provide an additional four miles of hiking, wildlife observation, and scenic opportunities. The trails are often used for cross country skiing in the winter (Litchfield Recreation Commission 2020; ExploreYourSpaces 2020).

Flints Pond Access: Flints pond is a 50-acre, warm water pond located in the Town of Hollis in New Hampshire. The pond is open to the public for fishing, kayaking, and canoeing in the summer. In the winter, ice fishing, snowshoeing, and snowmobiling are also popular. A boat ramp is available at the north end of the pond (Flints Pond Improvement Association 2015). Flints Pond Access is approximately 0.2 miles west of the Project boundary.

Horse Hill Nature Preserve: Horse Hill Nature Preserve is a 560-acre property owned by the town of Merrimack, located about three miles west of the Project Boundary. It is primarily a mixed hardwood forest, with a series of streams, ponds, swamps, and numerous wetlands. Old logging roads form the basis of what is today a trail network used by hikers, bikers, cross country skiing, snowshoeing, hunters, snowmobilers, and horseback riders. This trail network covers most of the property, however, there are still large areas without defined access.

Leslie Bockes Memorial Forest: Forest Society owns and manages this approximately 226-acre forest located in Londonderry, New Hampshire (five miles east of the Project boundary). Nearly four miles of old logging roads provide hiking, skiing, and snowshoeing with numerous access points. The trails are on well-maintained woods roads that enable easy walking and generally good footing. The tract is a known spot for bird and nature-watching (Forest Society 2020).

Twin Bridge Park: Twin Bridge Park is in Merrimack, New Hampshire, and features a baseball field, playground, picnic area, and extensive hiking trails through 27 acres of woods along Baboosic Brook (Town of Merrimack undated). Twin Bridge Park is approximately 0.2 miles west of the Project boundary.

New Hampshire Heritage Trail: The completed trail system will connect trail segments along the Lower Merrimack River and ultimately extend south into Massachusetts, and north along the Merrimack, Pemigewasset, and Connecticut Rivers to the Canadian border. Several trail sections have been completed along this part of the river and northward, with existing segments in Nashua, Hooksett and Manchester, New Hampshire (NHDES 2019).

The most recent New Hampshire SCORP was developed in 2018 for the 2019-2023 program years (NHDNCR 2018). The primary goals of the New Hampshire SCORP are to identify outdoor recreation trends, needs, and issues for New Hampshire, as well as to provide a strategic plan to address changing recreation needs, conservation of natural resources, and the economic vitality of communities. Municipal officials in New Hampshire reported the availability and adequacy of developed recreation facilities and amenities to meet needs within their communities. Figure 5-1 below shows the facilities in order of greatest need in New Hampshire. Municipal officials reported youth and/or teen centers as least available and adequate to meet growing needs, while reporting indoor ice rinks and municipal golf courses as most available and adequate to meet needs. The most relevant to the Project of these rated recreation facilities and amenities in New Hampshire are state/municipal parks, beaches, boat launches, and public camping sites, all of which were identified as being at least moderately available and adequate to meet recreation needs (>50%).

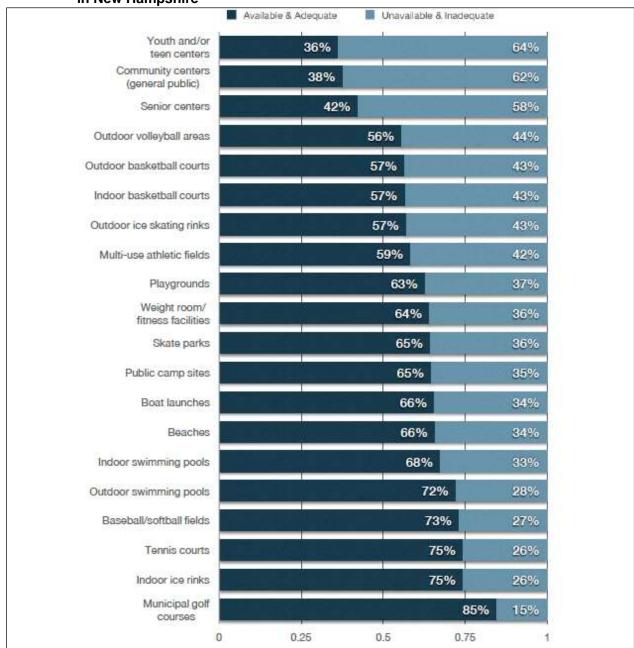


Figure 5-1. Availability and Adequacy of Developed Recreation Facilities/Amenities in New Hampshire

Source: NHDNCR 2018

The Massachusetts SCORP (MEOEEA 2017) is a planning document that discusses the available recreational resources in a state, as well as its changing recreation needs. In drafting of the SCORP, the Massachusetts Executive Office of Energy and Environmental Affairs hosted a series of public meetings across the state in the fall of 2017. Online surveys were also utilized to gather input from both residents and recreation providers. Around 780 citizens responded to the resident survey and 58

municipalities and 38 land trusts responded to the recreation provider survey. The Massachusetts SCORP categorized the most common recreational activities as either water-based recreation (e.g. boating, fishing, swimming at beach/lake/river) or trail-based recreation (e.g., hiking, biking, cross-country). The nearness of an outdoor recreation facility to home was the top reason that it was visited most frequently. Accordingly, when asked to identify the most-needed improvements, recreationists identified trail and waterbased recreation enhancements. Massachusetts municipalities reported the highest funding priorities for the next five years are playgrounds, ballfields (soccer, lacrosse, baseball, etc.), community or regional trail systems, and improved pedestrian access to parks (sidewalks, safe road crossings, etc.).

The downstream portion of the Project impoundment is accessible for water-based recreation by the following recreational facilities in Massachusetts:

Lowell Heritage State Park: The 83-acre Lowell Heritage State Park occupies a 2-mile long stretch along the north bank of the Project impoundment, upstream of the Pawtucket Dam. The park features historical exhibits that were created in partnership with the NPS to educate the public regarding the network of canals and mills constructed in the 19th century to power Lowell's then bustling textile industry. Activities available include biking, boating (non-motorized and motorized), canoeing and kayaking, swimming, fishing, hiking, and educational programs. Facilities include a paved bike path and walking esplanade, picnic area, a beach, restrooms, scenic viewing area, an outdoor concert stage, and visitors center (Commonwealth of Massachusetts 2018a). Also located within the park boundary is the University of Massachusetts Lowell Bellegarde Boathouse, which also houses the Merrimack River Rowing Association, a non-profit rowing club.

Rourke Brothers Boat Ramp (part of the Lowell Heritage State Park): The park provides a trailered boat launch, located on the north bank of the impoundment about 2 miles upstream of the Pawtucket Dam. Adjacent to the boat launch is an access dock for boating and fishing.

Chelmsford Boat Access: The park provides a trailered boat launch, shoreline fishing access, picnic areas, athletic fields, and trails.

The Resource Management Plan (RMP) for the MADCR Lowell/Great Brook Planning Unit (MADCR 2014) reports the following recreational facilities within the planning unit, located within a 30-minute drive from the Project boundary:

Lowell-Dracut Tyngsborough State Forest: The Lowell-Dracut Tyngsborough State Forest is approximately one mile north of the Project boundary. The Lowell-Dracut Tyngsborough State Forest spreads across three towns and features over 1,140 acres of protected land, including 180 acres of open water or wetlands and 457 acres of land in the city of Lowell. Popular activities include hiking, fishing, hunting, cycling, birding, picnicking, nature walking, mountain biking, and playing various field sports. In the

winter, people sled, ice skate, and cross-country ski (Commonwealth of Massachusetts 2018b).

Great Brook Farm State Park: Located seven miles south of the Project, this park is a working dairy farm connected to miles of trails that can be used for a variety of recreational activities. The park also includes historic buildings and resources, interpretive programming, and a cross-country ski concession.

Warren H. Manning State Forest: Located five miles south of the Project, this state forest is a largely wooded property with a small recreation area, complete with a spray deck, picnic area, water playground, and fitness trail.

Billerica State Forest: Located six miles south of the Project, this state forest offers rustic, multi-use trails and wooded areas for walking and wildlife viewing.

Carlisle State Forest: Located ten miles south of the Project, this state forest provides over a mile of trails through wooded property protected from forestry activities at the turn of the 20th century. The forest includes an older stand of exceptionally large eastern white pines.

Governor Thomas Dudley State Park: Located ten miles south of the Project, this 11-acre park is a small wooded parcel that provides access to the Concord River and links to other protected open spaces.

At the state level, the focus of outdoor recreation tends to be on recreation lands and facilities outside of urban areas. This is evidenced in the Massachusetts SCORP and MADCR's RMP for the area, which primarily discuss and address recreation in open undeveloped areas like state lands and forests.

Sustainable Lowell 2025 and the 2018 Lowell Open Space and Recreation Plan (OSRP) prepared by City of Lowell, estimates there are 463 acres of open space/recreational land owned or maintained by the city. The City of Lowell reports a variety of recreational amenities including sports facilities (basketball, tennis, softball, swimming, and skateboarding), passive parks for walking, jogging, dog-walking, and picnicking, community gardens, playgrounds, multiuse trails, and greenspaces. City-funded cemeteries provide an additional 222 acres of open space to Lowell residents and visitors (City of Lowell 2018). The City of Lowell has also collaborated with the LNHP to secure funding for and manage the development and redevelopment of 6,662 linear feet of canal walkways throughout Lowell, with work on an additional 11,360 linear feet underway (City of Lowell 2018).

The Concord River Greenway is still in development, but to date has 2,700 linear feet of trail and 1.3 acres of open space cutting through the City of Lowell. Public art and interpretive signs line the multi-modal path. Once complete, the Concord River Greenway will link to a network of trails in the area, including the Bay Circuit Trail, a 200-mile trail from coastal Boston to Kingston, as well as the Bruce Freeman Rail Trail from

Lowell to Framingham. It will also connect Rogers Fort Hill Park and Shedd Park with Lowell Cemetery and the city's cemeteries (City of Lowell 2018).

The attractions in Lowell that are open to the public as part of the LNHP are largely managed by NPS. The LNHP was established in 1978 and is operated by the NPS. It is a primary recreation attraction for the city of Lowell. According to the NPS Visitor Use Statistics website, the LNHP received around 481,536 visitors for the 2019 calendar year (NPS 2020). Opportunities available include museum exhibits, walking tours of the waterways, historic trolly rides, guided tours, music concerts, and boat tours on the Project canals.

The museum exhibits and activities are hands-on, interpretive, and educational opportunities. Key park experiences include the following:

Boott Cotton Mill Museum: Located in the Boott Cotton Mills Museum are interactive exhibits, a weave room, and video programs about the Industrial Revolution, labor, and the rise, fall, and rebirth of Lowell. This complex contains an adapted mill yard and is the most intact surviving example of the first phase of Lowell's mill construction. All four of the original 1835 mills in the Boott mill yard remain as part of an interconnected series of mill buildings.

Mill Girls and Immigrants Exhibit: The Mill Girls and Immigrants Exhibit is a selfguided tour through renovated boardinghouses displaying the kitchen, dining room, and bedrooms furnished in the style of the 1850s. Traditional museum exhibits are located on the second floor, including old photographs, newspaper articles, excerpts from letters, and highlights the lives of specific mill girls and immigrant workers.

Suffolk Mill Turbine Exhibit: This exhibit shows how water from the Western Canal flowed through an opening in the wall of a mill and fell on a large waterwheel in the basement to create kinetic energy. A guided tour also shows one restored turbine using a 13-foot drop of water to rotate shafts, gears, belts, and pulleys to a power loom.

Lowell National Historic Park Canal Walkways Tours: Self or professionally guided recreationists can follow walkways along the network of canals originating at the Pawtucket Dam and ending at the confluence of the Concord and Merrimack Rivers (NPS undated). Most of the walkways that follow the canals are also integrated into the common thoroughfares of the City of Lowell.

The Northern Canal Walkway: The Northern Canal Walkway provides interactive recreation with the historic structures of the Lowell Project, as well as a greenway along a scenic reach of the Merrimack River (NPS undated).

Boat tours led by NPS-guides also provide access to the Project impoundment. The canal boat tours highlight some of the Lowell Project facilities by travelling through the historic navigation locks (NPS undated). Additional recreational opportunities provided by NPS at the LNHP include trolley rides available for touring the city.

5.1.2 Vegetation and Waterborne Trash Management

Pursuant to the approved study plan, Boott reviewed several sources to summarize historical and current practices for vegetation and waterborne trash management in the Project Area.

Following establishment of the LNHP in 1978, MADCR⁶, NPS, and Proprietors of the Locks and Canals (Proprietors), entered into an agreement in 1979 regarding management of the Lowell canal system. This agreement establishes MADCR as the lead party responsible for the maintenance of canal structural components, including canal banks and walls. As the lead party, MADCR was responsible for "landscaping and damage repair" to canal banks and walls, with assistance provided by NPS if needed. NPS was charged with the operation of the canal-related exhibits and services, and Proprietors were responsible for the operation and maintenance of the hydroelectric and hydromechanical parts of the Lowell canal system (NPS 1981). NPS developed and issued a Final General Management Plan (FGMP) in August 1981 to provide a basis for visitor use, resource management, and general development within the LNHP. The FGMP states management of the Lowell canal system will be accomplished through cooperative agreements between private and public entities, but MADCR is the lead agency responsible for maintaining, developing, and renovating the major elements of the canal system (NPS 1981).

In 1991, MADCR, the NPS, and Boott executed a Memorandum of Understanding (MOU) for the purpose of maintaining and operating the Lowell Canal System.⁷ The MOU assigned specific responsibilities to each party and was filed with the Commission⁸ on April 25, 1991 (MOU 1991). Article IV of the MOU directed NPS to assist MADCR in the removal and control of vegetation along the canal system, ("particularly that growing on and in the canal walls") and to assist MADCR in performing ground maintenance. Article IV also directed NPS to assist MADCR in the removal of litter and other waterborne trash from the Lowell Canal System, and states NPS is solely responsible for maintaining and cleaning, ("including removal of trash") all existing trash booms and safety lines/booms on the Lowell Canal System (MOU 1991).

Responsibilities assigned to MADCR under Article V of the MOU include serving as the lead agency for all grounds maintenance, keeping all grass, trees, and shrubs neatly trimmed and in a healthy condition, removing dead or diseased plants, fertilizing, pruning, and thinning of plants (as required), and approving ground maintenance or improvement plans as proposed by NPS. Article V also directs MADCR to assist NPS in

⁶ The signatory of the 1979 agreement was the Massachusetts Department of Environmental Management (MADEM), the predecessor agency to MADCR.

⁷ Proprietors of the Locks and Canals on the Merrimack River was included as a party in the MOU but did not execute the agreement.

⁸ The 1991 Memorandum of Understanding is available on FERC's eLibrary (https://elibrary.ferc.gov/eLibrary/search) under docket number p-2790.

the removal and control of destructive vegetation along the canal system, and to cooperate with the NPS on developing a litter removal program for waterborne litter and trash on the canals. (MOU 1991). This article also directed MADCR to reimburse NPS for time and materials for work done on the canal system.

Article VI of the MOU directed NPS and MADCR to hold a joint annual meeting to develop an annual destructive vegetation clearing program and canal surface water cleanup program. The annual programs were to be developed in accordance with each agency's budget and seasonal staffing level. Under Article VI, MADCR was also directed to consult with NPS to develop a long-term capital improvement program for the canal system. The minutes of this annual meeting between MADCR and NPS were to be provided to Boott and the Proprietors each year (MOU 1991).

Article IX stated that the MOU would expire five years from the date of signing, with an option for renewal. Efforts to renew the MOU stalled in 1996, as MADCR issued a Grant of Easement⁹ to the NPS in late 1995. This Grant of Easement provided NPS rights to implement construction and maintenance improvements at forty-two MADCR-owned parcels around the canal system. Such rights include landscaping, decking, and lighting. The Grant of Easement did not exclusively limit NPS's rights, only stating that construction and maintenance improvements must be consistent with the use of the area as a park. The Grant of Easement did not relinquish MADCR's waterborne trash and vegetation management responsibilities provided by the FGMP or MOU, as described above.

In the RMP for the Lowell/Great Brook Planning Unit, MADCR elaborates the agency was directed by the Commonwealth in 1993 to "concentrate on maximizing the riverfront component and minimizing, but not eliminating, [its] position in the downtown." Under a lower annual budget, MADCR states it has since focused its resources on the riverfront portion of the Lowell Heritage State Park system and less on the downtown canal system (MADCR 2014).

Through the current license term, FERC and Boott have corresponded on vegetation growth and waterborne trash accumulation at facilities within the Project boundary. The FERC Regional Office has regularly inspected the Project pursuant to its dam safety authority under Part 12 of the Commission's regulations. The most recent inspection of the Lowell Project performed on May 14, 2019 found that the facilities were in satisfactory condition, and there were no safety issues observed which required immediate attention. Following the inspection, FERC directed Boott to remove the vegetation and small tree growth observed at the crest of the Great River Wall and on the Hall Street Dam (FERC 2020; FERC 2019). A review of previous inspection reports indicate FERC found the Project facilities to be in overall good condition, and if necessary, directed Boott to remove vegetation growth or waterborne trash observed at Project structures. Boott typically identifies canal structures in need of vegetation removal and control in its Dam Safety Surveillance and Monitoring Reports annually

⁹ The 1995 Grant of Easement is also generally referred to as LNHP Deed No. 40.

submitted to the FERC's New York Regional Office, and documents progress made during the preceding year.

Boott annually removes accumulated river-borne debris from the upstream side of the Northern Canal Gatehouse under an MADCR permit. This effort is performed as necessary, typically two to three times annually. Boott also removes debris that accumulates from the upstream side of the Guard Locks and Gatehouse in the Pawtucket Canal on an as necessary basis, both for aesthetics and to ensure that debris does not interfere with the proper functioning of the Guard Gates. Recently, Boott has agreed with the City of Lowell to conduct canal debris removal at recognized accumulation points, many of which are noted in this study.

According to documents and reports filed with the Commission, additional efforts to remove vegetation and waterborne trash from the Lowell canal system of have largely been independent or coordinated efforts between NPS, the City of Lowell, and Boott. In accordance with the MOU, NPS implemented frequent maintenance measures to limit trash accumulation and vegetation growth. On June 18, 2003, NPS filed their 2003 Lock Chamber Operations Manual with FERC. The manual states NPS employees should remove upstream trash in the vicinity of the lock chambers daily, and the lock chambers were to be flushed daily and cleaned of debris (NPS 2003). Operators were instructed to remove trash from in front of the following lock structures: Northern Lock at Pawtucket Gatehouse, Hydro Lock, Swamp Locks, and Francis Gate Lock (NPS 2003).

On October 26-27, 2006, Boott, the NPS, and the City of Lowell collaborated in a major effort to clean-up the canals and walkways The canals were drained for three days before workers from Boott, the City of Lowell, and LNHP could use heavy equipment to remove debris from within the canals. Volunteers also trimmed vegetation and picked up trash along the canal walkways (FERC 2007; Lowell Sun 2006).

After the Study Workshop, NPS provided a copy of their Exotic Species Treatment Calendar (dated September 11, 2018) prepared for the 2019 calendar year. The document presents the reported locations of target exotic vegetation species, methods for management, and an implementation calendar. The target exotic species were primarily reported at upland LNHP-structures outside of the Project boundary (Blacksmith Shop, Kerouac Park, Visitor Center Courtyard, Tremont Street Tracks, Kirk Street Headquarters, and Western Canal Walkway). At Project structures, NPS reported incidents of common invasive species including Garlic mustard (*Alliaria petiolata*), Asiatic bittersweet (*Celastrus orbiculatus*), Tree of Heaven (*Ailanthus altissima*), and Japanese knotweed (*Fallopia japonica*). Treatment methods employed by NPS include mechanical methods of hand-pulling, digging, cutting, seed-heading, mowing, and stump grinding, and chemical methods of foliar spray, herbicidal application to a cut stem/stump, basal bark, stem injection, and hand wicking (LNHP 2018).

There are also community efforts to manage the waterborne trash and vegetation growth. Local nonprofit groups including youth groups, Lowell Canalwaters Cleaners,

Coalition for a Better Acre, and Do-It-Yourself Lowell regularly host cleanup efforts during the warmer seasons.

Boott conducted visual surveys for vegetation growth and waterborne trash locations, and the results are provided below in Sections 5.5 and 5.6.

5.2 Field Inventory

As previously described, Boott conducted a field inventory to document existing non-Project recreation facilities within the Project's vicinity in the fall of 2019. Recreation sites inventoried included the Chelmsford Boat Access, Depot Street Boat Ramp, Greeley Boat Ramp, Lowell Heritage State Park, LNHP, Merrill Park, Merrimack Trail System, Moore's Falls Conservation Area, NPS Canal Walkway, Pawtucket Falls Overlook, and Rourke Brothers Boat Ramp. The Visitor Center (the only-FERC approved recreation facility), was closed on the days of inventory, but the external features (e.g. parking lot) were also inventoried.

Field inventory documentation, including a map of non-Project recreation facilities, representative photographs, and a description of amenities available at each facility is presented as Appendix B to this study report. The field inventory indicates there are considerable opportunities for recreation in the Project area. Most sites inventoried were reported in good condition, with parking lots, ample signage, and educational exhibits.

5.3 Visitor Use Data and Field Reconnaissance

In total, Boott conducted 53 personal interviews/visitor-intercept surveys between May 2019 and October 2019. In accordance with the approved study plan, Boott also collected field reconnaissance data during the personal interviews including estimating the number of vehicles, recreationists, and observed recreational activities. Results from the personal interviews are compiled in Appendix C and field reconnaissance data is summarized in Appendix D to this study report.

The online visitor use survey was made available to the public from June 2019 until June 2020. A total of 96 respondents completed the online survey. Results from the online surveys are compiled in Appendix E to this study report, and respondent zip codes with a representative map are compiled in Appendix F (for both the personal interviews and online surveys).

Of the personal interviews and online recreation surveys completed, the respondents thus far are typically regular visitors who visit three or more times per year (72 percent of personal interviewees and 76 percent of online respondents) and the remaining respondents identified themselves as first-time visitors or infrequent visitors. Personal interviewees travelled an average of 7.3 miles to the recreation area, with a range of 0.1 miles to 3,000 miles. Online respondents stated they travelled on average around 11 miles to the Project area. Most respondents stated they do not stay overnight in the

Project area in accommodations other than their primary residence (96 percent of personal interviewees and 90 percent of online respondents).

The most common recreational activities survey respondents participated in were trail-related activities (walking, dog-walking, hiking, running, or jogging), bank and/or boat fishing, and kayaking. Walking was the most common primary recreation activity. The majority (77 percent) of personal interview respondents rated their overall experience of recreational activities at the Project as "totally acceptable" or "acceptable." The majority (92 percent) of personal interview respondents rated their overall experience of recreational activities at the Project as "totally acceptable" or "acceptable."

According to respondents, the most frequently visited recreational facilities in the Project area were the Lowell Heritage State Park, the Rourke Brothers Boat Ramp, Chelmsford Boat Access, Merrimack Trail System, and LNHP-facilities. Participants were asked several questions regarding their general opinions of recreation in the vicinity of the Project, potential issues with the recreation facilities (i.e., crowding, safety), and recommendations for improvements to existing facilities. In general, the participants did not experience much crowding at the recreational facilities, parking issues, or lack of accessibility to the specific recreational facilities. Respondents both in-person and online tended to rate their overall experience at specific recreation facilities as "totally acceptable." The most common recommendations for recreational enhancements were: (1) bathrooms/porta potty (2) improving/maintaining the existing structures such as the boat ramps, and (3) the addition of trash cans/trash control measures.

Field reconnaissance data obtained during personal interviews indicates the recreation facilities are well-utilized for many different activities. Walking (and dog-walking) and jogging/running were by far the most common activities observed by technicians. Additional common activities included bicycling, boating, picnicking, and fishing. The Merrimack Trail System and the Lowell Heritage State Park were highly utilized for many different recreational opportunities; these are connecting facilities, so it was common for recreationists to visit both. The Rourke Brothers Boat Ramp and the Chelmsford Boat Access were predictably mostly used for boating, but also commonly utilized for walking, dog-walking, fishing, and picnicking. The Chelmsford Boat Access adjoins a series of softball fields, and technicians reported softball tournaments with hundreds of attendees during the summer weekends. At all facilities, technicians generally reported less activity during the early daylight hours, and during rainy, cool times of the day.

5.4 Evaluation of Expanded Recreational Access in Project Canals

NPS and other stakeholders have expressed interest in new, different, and expanded recreational access to and within the Project canals. In accordance with the SPD, Boott consulted with the NPS, the City of Lowell, and other interested stakeholders to discuss various recreational opportunities associated with the Project canals. During the Study Workshop, stakeholders clarified they were looking for specific practical opportunities for

community on-water recreation. Boott and stakeholders' primary concerns were the recreational rights to the canal system and understanding public safety issues associated with providing recreational access in the Project's canal system.

In their FLA filed on April 30, 2021, Boott proposed to remove the four mill power stations (John Street Power Station, Bridge Street Power Station, Assets Power Station, and Hamilton Power Station) and associated canal infrastructure from the new FERC license. In the Commission's March 1, 2022 Determination on Requests, staff requested an analysis of the effects of Project operation on NPS boat tours and recreational rights, in relation to Boott's proposal to remove the majority of the canal system from the Project boundary. Boott provides that evaluation below in Section 5.4.1.

FERC also requested an evaluation of the potential for expanding public access to the canals for recreation (including NPS boat tours) in light of the results of the Operation Analysis of the Lowell Canal Study and in consideration of Project operation under normal and high flow conditions. Boott provides that evaluation below in Section 5.4.3 as it pertains to the downtown canal system (i.e. excluding the Northern Canal, which is addressed separately in Section 5.5.1.1).

5.4.1 Rights to Recreational Access to Project Canals

Boott reviewed many sources to understand the recreational rights to the Lowell canal system, including the MOU, the 1984 Great Deed between Proprietors and Boott (Proprietors 1984), the 1986 Order of Taking (Commonwealth of Massachusetts 1986), and the 1995 Grant of Easement from the Commonwealth of Massachusetts to the LNHP (Commonwealth 1995). These documents form the basis of the Resources, Ownership, Boundaries, and Land Rights Study filed with the Commission on November 1, 2021. The 1984 Great Deed details the sale of portions of the Project from the Proprietors to the current owner (Boott), and provides the metes, bounds, and elevations of all the structures conveyed, as well as associated easements, access and repair rights (Proprietors 1984). The 1986 Order of Taking details the take of properties, rights, and responsibilities from Boott to the Commonwealth, operating through MADCR (Commonwealth 1986). The 1995 Grant of Easement describes the properties and parcels that were leased from the Commonwealth to the NPS and the rights and responsibilities of both parties with respect to those properties and parcels (Commonwealth 1995).

The review of these documents indicates that the 1984 Great Deed conveyed all canals throughout the canal system to Boott, except for the Pawtucket Canal and the Lower Pawtucket Canal. Proprietors instead retained ownership of the Pawtucket Canal and Lower Pawtucket Canal, and granted Boott an easement for the right to operate the structures of these canals, to "install conduits, pipes, and wiring" and the right to maintain, repair, or replace the existing structures (Proprietors 1984).

By letter dated May 14, 1980, MADCR stated that they were currently in the process of negotiating purchase rights to the Lowell canal system which would allow for recreational boating in the canals, stating further that use of the canals and implementation of the boating program were key elements of the Lowell Heritage State Park (Massachusetts Department of Emergency Management [MADEM] 1980). Through the 1986 Order of Taking, MADCR purchased all air rights over the canals, including over the canal walls and dams, and the exclusive right to use water in the entire canal system for recreational, educational, and navigational purposes, unless said purposes interfere with Boott's hydroelectric generation (Commonwealth 1986). Included in the 1986 Order of Taking is a permanent and exclusive easement to MADCR for all canal walls, beds, or bottoms throughout the canal system for purposes consistent with the use of the canal system as a recreational park. These purposes specifically include placement and attachment of docks, wharves, walls, and boat ramps of a temporary or permanent nature (Commonwealth 1986). The 1995 Grant of Easement from MADCR to LNHP did not convey these exclusive recreation rights to LNHP (Commonwealth 1995).

Based on the review of the MOU, the 1984 Great Deed between Proprietors and Boott, the 1986 Order of Taking, and the 1995 Grant of Easement from the Commonwealth of Massachusetts to the LNHP, Boott currently does not have any right to expand recreational opportunities throughout the Lowell canal system. MADCR purchased all recreational rights over all the canals and canal walls (even canals owned by Boott), including exclusive navigational rights such as boating or canoeing. MADCR maintains an exclusive and permanent easement throughout the entire canal system to install access points such as boat ramps, wharves, and docks. Boott and other stakeholders are not permitted to use the canals as recreational resources, as those rights are exclusively held by MADCR. Boott describes recreational rights and responsibilities in more detail in the Resources, Ownership, Boundaries, and Land Rights Study Report filed with FERC on November 1, 2021.

In the RMP for the Lowell/Great Brook Planning Unit, MADCR does reference its recreational rights over the Lowell canal system, but further elaborates the agency was directed in 1993 to minimize its position in the downtown area (MADCR 2014). On August 14, 2018, MADCR filed comments with FERC on the PAD and Scoping Document 1 for the Project. The comments discuss the various MADCR-owned properties, but do not reference their recreational rights to the Lowell canal system (MADCR 2018).

In their FLA filed on April 30, 2021, Boott proposed to remove the four mill power stations and associated canal infrastructure from the new FERC license. Boott also proposed to continue to manage the canal structures and water levels and flows, consistent with current agreements with the NPS and other stakeholders. Additionally, as reported in their November 15, 2021 Response to Additional Information Request filed with the Commission, Boott is proposing to maintain specific water levels throughout the downtown canal system as determined in consultation with NPS and other stakeholders.

As reported in detail in the Resources, Ownership, Boundaries, and Land Rights Study Report filed with the Commission on November 1, 2021, the 1995 Grant of Easement from MADCR to LNHP provides for specific recreational rights to structures of the downtown canal system including: Swamp Locks Gatehouse, Swamp Locks Dam (North), Swamp Locks Dam (South), Lower Locks Gatehouse, Lower Locks Lock Chamber, Lower Locks Dam, the Tremont Gatehouse, the Massachusetts Wasteway Gatehouse, the Rolling Dam Gatehouse (North), Rolling Dam Gatehouse (South), and the Hamilton Gatehouse. Although the rights to each structure vary, almost universally NPS was granted the rights at each structure to conduct land and canal tours, run interpretive programs, and the right to maintain, improve, and restore said structures. Additionally, through the 1995 Grant of Easement, MADCR conveyed to NPS easement rights at various structures and parcels adjacent to all the canals. These recreation and access rights at these structures and parcels exist independently of the owner of the structure, although it is worth noting that Boott is not known to have legal ownership of any structures of or within the Pawtucket Canal (where NPS boat tours currently operate). NPS does not currently run boat tours on the Western Canal, Eastern Canal, or Hamilton Canal, and Boott is not aware of any current interest to run boat tours on those canals. The primary structures of interest as it relates to current NPS boat tours in the downtown canal system (proposed to be removed from the Project boundary) are located on the Pawtucket Canal. NPS holds the rights to recreational access to these structures, as provided by the 1995 Grant of Easement, and these structures are jointly owned by MADCR and Proprietors.

Boott's proposal to remove the downtown canal system from the Project boundary will not affect NPS' recreational rights to conduct their boat tours. By way of the 1995 Grant of Easement with MADCR, NPS holds recreational rights to structures of the canals to operate their boat tours, run interpretive programs, and the right to maintain, improve, and restore said structures. This agreement exists independently of the Project license and the Commission's oversight. Boott does not hold recreational rights to the downtown canal system, and does not own structures of the Pawtucket Canal where NPS boat tours currently operate. As discussed in the in the November 1, 2021 Resources, Ownership, Boundaries, and Land Rights Study Report filed with the Commission, Boott does hold rights to flow water through the Pawtucket Canal. Boott is proposing to continue to manage the canal structures, water levels and flows using best practices, consistent with current agreements with the NPS and other stakeholders.

Public Safety of Recreational Access to Project Canals 5.4.2

Boott reviewed relevant safety and security requirements, guidance documents, and study reports, including the Project's approved Public Safety Plan (Boott 2020), FERC's Guidelines for Public Safety at Hydropower Projects (FERC 2011), Recreation Development at Licensed Hydropower Projects (FERC 1996a), and the Security Program for Hydropower Projects (FERC 2016). Boott also reviewed pertinent guidance, design, and planning documents relating to recreational access throughout the canal system.

In accordance with the Commission's approved Public Safety Plan for the Project, Boott maintains fences and gates, lights, sirens, and warning signs to protect the public from the hazards of Project operations (Boott 2020). Boott has historically worked with FERC to strengthen the Public Safety Plan and allow access only where appropriate and safe. As described above, Boott does not have recreational or navigational rights to the canal system. Further, because of the steep canal walls, dams, historic locks and gate structures, and intake/outlet structures associated with the Project, Boott maintains that such access presents an unacceptable risk to public safety and Project security. In the 1990s, incidents of accidental drownings/body recoveries throughout the canal system triggered Boott and FERC to update the Public Safety Plan, install additional warning signs, and fencing to enhance public safety (Boott 1991; FERC 1996b; Boott 1998; Boott 2000).

While Boott does not have recreational or navigational rights to the canal system, Boott believes that providing access would present a number of significant safety concerns. As an example, FERC's Guidelines for Public Safety at Hydropower Projects states that canals create hazardous conditions due to the steep sides and hard surfaces. The safety guidelines indicate water, algae, and mud make conditions too slick and dangerous for recreationists to escape or be rescued. The multiple dams located throughout the canal system (Swamp Locks Dam, Lower Locks and Dam, Lawrence Dam, Hall Street Dam, Merrimack Dam, Rolling Dam, and Boott Dam) as well as the many gates and lock structures, are all also considered potentially hazardous (Figure 3-2). Such structures can create unexpected dangers as surface waters appear calm, but undercurrents are unpredictable. Powerhouse intake areas throughout the canal system also pose hazards to recreationists as currents can change unexpectedly. Boaters will often want to go over lower dams or explore restricted areas, but this must be discouraged by warning signs and barrier systems. As stated in FERC's guidelines, allowing recreationists access to or near to Project facilities poses significant safety and security risks.

In accordance with the SPD, Boott researched infrastructure enhancement that may be required to provide safe public access to the canal system and how such improvements may affect aesthetic and historic resources. FERC recommends that access points, such as canoe/kayak or boat ramps, should be at least 300 feet away from any structure that may pose a hazard (such as dams, intakes, and gate structures). A system of warning devices such as signs, boat restraining barriers, sirens, and buoys also may need installation at least 300 feet from any hazardous structure. At a minimum, escape devices such as life preservers and safety ropes are recommended to be installed near dams, canals, and any other hazardous structures, although FERC acknowledges theft and vandalism can be an issue with such installations. Permanent escape ladders may be considered (especially for canals) and should be installed every 250 feet on either side, but these devices are "attractive nuisances" and can often exacerbate unsafe conditions. Boaters will need escape ladders or other similar emergency escape points as situations can turn dangerous, such as unexpected lightning storms. Any provision of public access to the canals would necessarily create additional responsibilities for city, state and NPS public safety and law enforcement authorities. Additionally, information on dangerous areas, restrictions on speed, direction, or access (especially in canals),

alcohol use restrictions, enforcement and penalties, and other information relevant to safe recreational practice should be provided to recreationists at access points (FERC 2011).

Expansion of Recreational Access to Project Canals 5.4.3

Given the information presented in Section 5.4.1 and 5.4.2, the opportunities for expansion of recreational opportunities in the Project canals are limited. MADCR exclusively owns all rights to allow recreation on or in the Project canals and holds easement rights to install recreational access points. As such, Boott does not have the rights to provide expanded recreational opportunities within the canal system. Surface water recreation in the canals was evaluated by the Lowell Historic Preservation Commission and the LNHP in public planning documents such as the 1977 Brown Book, the 1981 FGMP, and the 2017 Lowell Waterways Vitality Initiative Action Plan (Action Plan). The LNHP 1990 Preservation Plan Amendment stated:

"The canals offer few boating opportunities beyond the Park's well-organized tour boat program. Because of swift water, lack of depth and width, low clearances, and other physical restrictions, water recreation is limited. If pleasure boating by individuals is to be considered, it should be kept to the Pawtucket Canal, and allowed mainly as a link to the Merrimack River. Paddle boating is possible if access, safety, and permitting are addressed. The Merrimack Canal at Lucy Larcom Park has been identified as the best place for still water activities such as this. In general, water taxis, dinner boats, and other organized boating program's will be encouraged, subject to permission from the Heritage State Park [MADCR] which controls recreational boating rights on the canals. The Pawtucket and Northern Canals offer possible routes, and could become a feature of the Canalway through private concessions."

The 2017 Action Plan was published as a collaborative report from the City of Lowell, the Lowell Heritage Partnership, and ex-officio members from the LNHP. The report presented consensus from the group on certain water-related areas that offer the best potential. The Action Plan identified the following canal areas: Lucy Larcom Park (Merrimack Canal); Ecumenical Plaza (Western Canal); Lower Locks, and the Hamilton Canal Innovation District (Hamilton, Pawtucket, and Merrimack Canals). The areas identified are shown in Figure 5-2.

PAGES 12-15 SHILTON CANAL INNOVATION OF THE

Figure 5-2. Water-Based Areas Identified in the 2017 Action Plan

In their March 1, 2022 Determination on Requests, FERC recommended an evaluation of the potential for expanding access to the canals for recreation (including NPS boat tours) in light of the results of the Operation Analysis of the Lowell Canal Study and in consideration of Project operation under normal and high flow conditions. Boott provides that evaluation here as it pertains to the downtown canal system (i.e. excluding the Northern Canal, which is addressed separately in Section 5.5.1.1).

On February 25, 2021, Boott filed with the Commission their Operation Analysis of the Lowell Canal Study. This report determined that the four downtown power stations were only operated 34 percent of days during the total period of record studied (January 1, 1998 – December 31, 2007). This is primarily due to the fact that Boott operates the Project to maximize flow through the available units at the E.L. Field Powerhouse, then routes any additional flows through the Pawtucket Canal system. The E.L. Field turbinegenerator units are more efficient and operate at a higher head than the older canal units and are, therefore, the priority first-on, last-off units in the Project operations scheme. When river flows exceed the hydraulic capacity of the E.L. Field units (approximately 3,300 cubic feet-per-second [cfs] per unit or 6,600 cfs for both units), excess flows up to approximately 2,000 cfs are routed through the Guard Locks Complex into the downtown canal system and to the canal units. Any flows in excess of approximately 8,600 cfs (6,600 cfs at E.L. Field plus 2,000 cfs via canals) are passed over the Pawtucket Dam spillway.

The study found that during normal flow conditions, including the peak recreation season (May through October), Boott historically only operated the downtown units approximately 25 percent of the time. During higher flow conditions above 6,600 cfs, Boott would typically divert up to 2,000 cfs past the Guard Locks Complex to the canal units. Overall during the period of record, the four downtown power stations were only operated 34 percent of the time.

With recreational rights, Project operations and public safety, and prior scoping by stakeholders in mind, Boott has identified specific segments of the canal system as potentially compatible with public access for recreation, and those areas are shown below in Figure 5-3. This evaluation does not include the already-established NPS tour boat program. The Merrimack Canal along Lucy Larcom Park is a recreation area potentially compatible with public access for recreation. Surface water recreation should be restricted to the area in between the Moody Street Feeder Gatehouse and the Merrimack Dam, at least 300 feet from either structure. This area is acceptable for stillwater activities like paddle boating, as identified in the 1990 Preservation Plan Amendment. The portion of the Merrimack Canal downstream from Merrimack Gate is potentially compatible for similar surface water recreation, and this area was identified in the 2017 Action Plan as a part of the Hamilton Canal Innovation District. The segment of Western Canal along the Ecumenical Plaza area has also been identified as potentially compatible with stillwater recreation. The segment of the Northern Canal between Hydro Locks and Tremont Gatehouse could also be compatible with stillwater recreation.

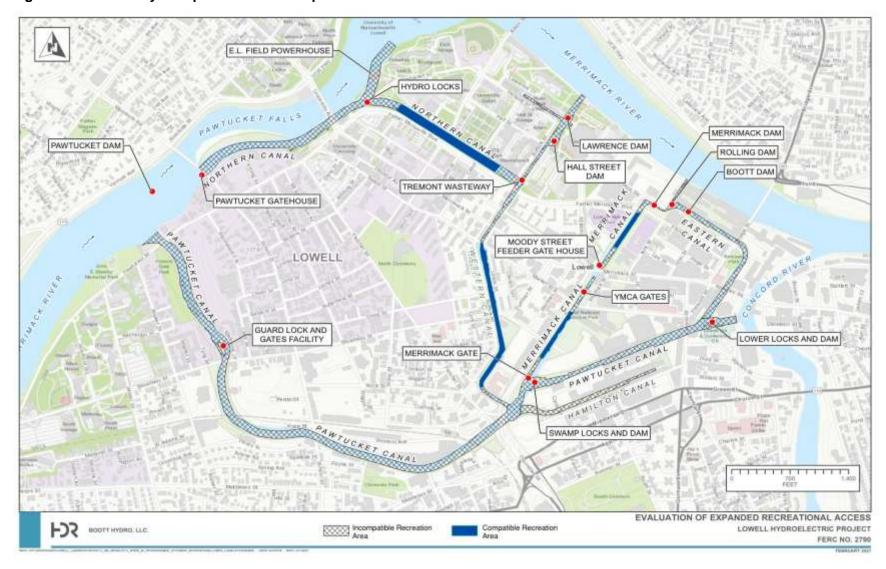


Figure 5-3. Potentially Compatible and Incompatible Recreation Areas

The remaining portions of canal system, including the remaining portion of the Hamilton Canal Innovation District (Pawtucket Canal, Hamilton Canal, and Swamp Locks) and the Lower Locks area, are not considered compatible due to public safety concerns, water levels and flows, and property rights. This is consistent with prior evaluations of on water recreation in the canals, with the 1977 Brown Book stating "the canals offer few boating opportunities beyond the Park's well-organized tour boat program. Because of swift water, lack of depth and width, low clearances, and other physical restrictions, water recreation is limited." These areas identified by Boott may have swift currents and hazardous structures through the canals, including intakes, dams, locks, gate structures, and low-clearance bridges. Boott intends to retain current public safety signage throughout the canal system in accordance with the existing Public Safety Plan, such as the signage at Swamp Locks and Lower Locks stating, "Beware Water Rises Rapidly." In addition to being unsafe, Hamilton Canal and the Lower Pawtucket Canal below Swamp Locks are both flanked with tall, renovated mill buildings on either side which severely limit emergency access and the ability to construct safety devices. Notably, Boott does not own the Pawtucket Canal, Swamp Locks, or Lower Locks; these structures remain under the ownership of Proprietors.

The Operation Analysis of the Lowell Canal Study indicates that Boott historically did not typically operate the downtown units during peak recreation season due to lack of high flows during the summer months. Therefore, it is Boott's understanding that their proposal to remove the majority of the downtown canal system from the Project boundary does not change the limited recreation expansion options available in the downtown canal system, as presented above. As proposed in the FLA, Boott will continue to manage the canal structures, water levels and flows using best practices and consistent with current agreements with the NPS and other stakeholders. Boott does not have any right to expand recreational access in the Project canals regardless of the removal of the four downtown mill power stations from the Project boundary; MADCR holds those recreational rights, and public safety hazards will remain due to the fact that Boott will maintain current flows and water levels as agreed upon with NPS and other stakeholders.

As noted, FERC also requested an evaluation of the potential for expanding access to the canals for NPS boat tours in the downtown canal system light of the results of Operation Analysis of the Lowell Canal Study. The Operation Analysis of the Lowell Canal Study does not provide any new information to inform expansion of NPS boat tours in the downtown canal system. Recent conversations with NPS indicate their boat tours on the Pawtucket Canal are not notably affected by canal flows or Project operations as long as water levels are maintained within specified limits. As discussed below in Section 5.5.1, NPS historically operated boat tours on the Pawtucket Canal and the Northern Canal, and NPS currently operates boat tours on the Pawtucket Canal. Based on recent consultation with NPS, there is limited to no interest currently in expanding the boat tours to the Western and Eastern Canals due to low-lying bridges and other obstructions. To NPS' knowledge, the Western Canal has never been successfully navigated, and to date Boott is not aware of any desire to navigate the

Western Canal as part of the NPS boat tour program. The Eastern Canal and the connecting Merrimack Canal in particular were never deemed suitable by the NPS for boat tours according to early public planning documents. Although Boott does not consider navigation of the Hamilton Canal safe due to reasons mentioned above, that decision is left to the discretion of NPS and MADCR, as they hold the recreational rights. Boott and/or Project operations do not currently prevent NPS from conducting boat tours on the Western Canal, Eastern Canal, or Merrimack Canal, and Boott's future management of the canal system will also not prevent such expansion of NPS boat tours. Based on recent consultation with NPS, NPS' main goal with the expansion of boat tours is to regain use of the Northern Canal as part of their regular boat tours (this is addressed separately below in Section 5.5.1.1).

Boott notes that the information presented above is developed at a conceptual/screening level only for purposes of this report. The feasibility of any potential safety, security, and recreation development activities is subject to additional design, permitting, and other federal, state, and local municipal requirements as may be appropriate. Further, this information is not intended to serve as a proposal by Boott for any recreation enhancements and should not be construed as such.

5.5 Evaluation of Water Levels and Flows on Recreational Access

In accordance with the SPD, Boott initiated data collection to better understand effects of the crest gate and water levels and flows on (1) NPS boat tours and (2) access to the Northern Canal Walkway.

In their letter dated March 1, 2022, the Commission requested a description of boat tour routes used by NPS (past or present) within the Northern and Pawtucket Canal system, including a description of locks or other navigational features that the tours pass through. Boott provides that information below in Section 5.5.1. FERC also requested an evaluation of the effects of Project operation on NPS boat tours in the Northern Canal. Boott provides that analysis below in Section 5.5.1.1.

FERC requested an evaluation of the effects of Project operation on current NPS boat tours, in relation to Boott's proposal to remove the majority of the canal system from the Project boundary. Boott provides this evaluation as it relates to the Northern Canal in Section 5.5.1.1, and as it relates to the Pawtucket Canal in Section 5.5.1.2.

FERC also requested an evaluation of the potential for expanding NPS boat tours in light of the results of the Operation Analysis of the Lowell Canal Study and "in consideration of Project operation under normal and high flow conditions (including an assessment of surge gate and shut down options)." Given that use of the surge gate/shut down options only pertain to NPS boat tours on the Northern Canal, this is addressed below in Section 5.5.1.1.

Lastly, FERC also recommended the Recreation and Aesthetics Study Report identify the number of days that the Northern Canal Walkway would need to be closed

seasonally due to flows resulting from Project operation, and this is provided in Section 5.5.2.

5.5.1 Historical and Current NPS Boat Tours

The 1977 Brown Book introduced the concept of combined train and boat tours throughout and around the canal system as a major attraction of the LNHP. The Downtown Canal Loop was designed as two segments: a boat tour to the south and a train to the north (Figure 5-4). Starting at the LNHP Visitor Center on the Merrimack Canal, the visitors could travel by boat through the Merrimack Canal to Swamp Locks on the Lower Pawtucket Canal, and descend down through the Swamp Locks Lock Chamber into the area known as the Industrial Canyon. The terminus to this boat tour was located on the Eastern Canal past the confluence with Lower Locks. Along this route, visitors would be allowed to disembark for a closer look at the Swamp Locks and Lower Lock Complexes, or walk among scale models of the mills and operate control devices on the canals. The visitor could then continue the Downtown Canal Loop by train around the Eastern Canal bends, Boott Mill, and the Merrimack Canal, ending back at the LNHP Visitor's Center.

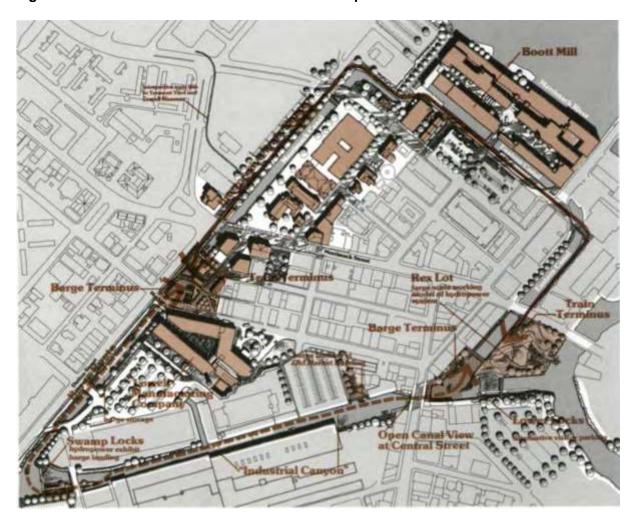


Figure 5-4. 1977 Brown Book Downtown Canal Loop

As presented in the 1977 Brown Book, the Outlying Canal Loop was also designed to take off from the LNHP Visitor Center on the Merrimack Canal and proceed north up the Pawtucket Canal (Figure 5-5). The tour would utilize the Guard Locks Lock Chamber to complete the tour north through the Pawtucket Canal and enter the Merrimack River. The tour would continue through the Pawtucket Gatehouse utilizing the lock structure into the Northern Canal. Proceeding down the Northern Canal, the visitor would pass by the Northern Canal Wastegate House and the Northern Canal Walkway. The designed route continues along the Northern Canal and Western Canal (where there are no lock structures), before returning to the LNHP Visitor Center.



Figure 5-5. 1977 Brown Book Outlying Canal Loop

During the licensing of the Project, the Licensee reported that the lock at the Pawtucket Gatehouse had not been used since 1871 and was blocked by a concrete wall built in 1939. Additionally, the Licensee was in consultation with historic preservation and recreation officials regarding the Project's balance with NPS boat tours and other recreational boating. At the time, the plans for boat tours and recreational boating on the canals were hindered by low bridges on the Western Canal and the inland section of the Northern Canal. Long-range planning for boat traffic through the entire length of the Pawtucket Canal, from the Merrimack River to the Concord River, was also hindered by a bridge problem. However, the installation of Hydro Locks during the construction of the Lowell Hydroelectric Project meant the flows of the Northern Canal could be hydraulicly separated from remainder of the canal system, allowing for the maintenance of lower water levels in the downtown canal system during the boating season, thus allowing for clearance under low-lying bridges (Boott 1980).

As noted above in Section 5.4, by letter dated May 14, 1980, MADCR stated that they were in the process of negotiating purchase rights to the Lowell canal system which

would allow for recreational boating in the canals (MADEM 1980). Through the 1986 Order of Taking, MADCR purchased all air rights over the canals, including over the canal walls and dams, and the exclusive right to use water in the entire canal system for recreational, educational, and navigational purposes (Commonwealth 1986). Included in the 1986 Order of Taking is a permanent and exclusive easement to MADCR for all canal walls, beds, or bottoms throughout the canal system for purposes consistent with the use of the canal system as a recreational park. These purposes specifically include placement and attachment of docks, wharves, walls, and boat ramps of a temporary or permanent nature (Commonwealth 1986).

As reported in the 1990 Preservation Plan Amendment, the acquisition of these rights to MADCR allowed for the significant restorations of lock structures at Lower Locks, Guard Locks, and the Pawtucket Canal. Between the advent of the LNHP and the 1986 Order of Taking, boat tour operations were very limited due to the recreational rights issue as well as the infrastructure improvements and physical obstructions noted above. The 1990 Preservation Plan Amendment provided an updated layout of the combined canal boat tours and train system, showing the tour boats proceeding through the Pawtucket Canal and Lower Pawtucket Canal and the Northern Canal. The plans for full passage through the Western and Merrimack Canals were deemed infeasible due to overhead obstructions (e.g. bridges) that blocked passage, and it was noted that Swamp Locks Lock Chamber was inoperable but under repair by MADCR (Figure 5-6).

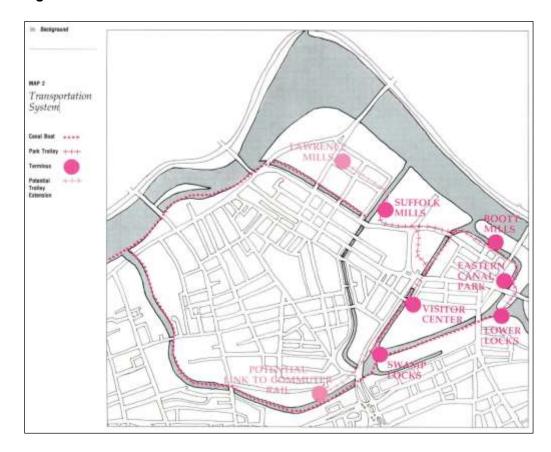


Figure 5-6. 1990 Preservation Plan Amendment Canal Boat Route

On April 14, 2022, Boott held a conference call with NPS to obtain information on their historical and current canal boat tour operations. The information discovered through this literature review is consistent with NPS operations staff's understanding of historical boat operations during this time frame. NPS states they do not ever recall successful navigation on the Western Canal (as originally conceived), and infrequent use, if any, of the Merrimack Canal for boat tours. As reported by NPS, between the late 1980s through 1994, NPS boat tours would run in either direction from Swamp Locks up through Guard Locks Locking Gatehouse (Guard Locks Complex), continuing north onto the Merrimack River and through the Pawtucket Gatehouse, using the Pawtucket Gatehouse Lock Chamber to enter onto the Northern Canal. Navigation on the Northern Canal continued through Hydro Locks to the Aiken Street dock before turning around to loop back to Swamp Locks. NPS staff would usually end the tour at Swamp Locks, or lock down Swamp Locks to the Lower Locks Complex. NPS staff report they usually did not lock down Lower Locks to access the Concord River.

NPS staff report the full loop of this tour was 1-2 hours and could be performed up to six times a day. There was usually interpretation at the Guard Locks Complex and the Pawtucket Gatehouse, and visitors could disembark to explore these features. In all, these tours spent about a full hour on the canals, and another hour at interpretations and other stops. NPS staff noted that there were no stops on the Northern Canal from the

Pawtucket Gatehouse to the Aiken Street dock; approximately ten minutes were spent navigating from Hydro Locks to the Aiken Street dock and back, and another fifteen minutes from Hydro Locks to the Pawtucket Gatehouse. About up to half an hour was spent navigating on the Northern Canal in total per tour.

Following the partial failure of the bayboard section of the Great River Wall in 1994 (Enel Green Power North America [Enel] 2008), NPS ceased boat tour operations on the Northern Canal, as discussed more below in Section 5.5.1.1. With the installation of the surge gate in 1999, and the safety threshold of 3,500 cfs established, NPS could resume canal boat tour operations on the Northern Canal. However, complications with Hydro Locks between 1996-1997 made the locking mechanisms inoperable, and NPS has not resumed regular boat tour operations on the Northern Canal, but will navigate the Northern Canal on specific occasions.

Currently, the NPS boat tour season lasts from May 15 through October 15. NPS reports that for the last 10-12 years they have offered up to four boat tours a day, during the boating season, touring up and down the Pawtucket and Lower Pawtucket Canal. Essentially, they launch at Swamp Locks, locking down using the Swamp Locks Lock Chamber, navigating to the Lower Locks Complex, turning around and locking back up through the Swamp Locks Lock Chamber and the Guard Locks Locking Gatehouse, and turning around at the confluence of the canal with the Merrimack River. The tour continues back down the Pawtucket Canal, locking down at the Guard Locks Locking Gatehouse and ending at the Swamp Locks Complex. Depending on whether they are locking up or down, NPS will allow boaters to disembark to view the complexes. NPS does not currently dock at or lock up/down at Lower Locks due to safety concerns.

5.5.1.1 Evaluation of Effects of Project Operations on NPS Boat Tours on the Northern Canal

In their letter dated March 1, 2022, the Commission recommended (1) an evaluation of the effects of Project operation on NPS boat tours in the Northern Canal; (2) an evaluation of the effects of Project operation on NPS boat tours, in relation to Boott's proposal to remove the majority of the canal system from the Project boundary; and (3) an evaluation of the potential for expanding access to the canals for recreation (including NPS boat tours) in light of the results of the Operation Analysis of the Lowell Canal Study and in consideration of Project operation under normal and high flow conditions (including an assessment of surge gate and shut down options). Boott provides those evaluations here as they pertain to the NPS boat tours on the Northern Canal.

As noted above, NPS operated boat tours on the Northern Canal from the late 1980s to 1994, spending up to a half hour per tour navigating the Northern Canal from the Pawtucket Gatehouse, turning around at the Aiken Street dock, and navigating back through Hydro Locks to the Pawtucket Gatehouse. In 1994 NPS ceased boat tours on the Northern Canal after overtopping and failure of the bayboard section of the Great River Wall. The FERC New York Regional Office expressed their concerns by letter to the NPS on March 31, 1994, recommending that NPS discontinue both the Northern

Canal boat tours and walking along the Northern Canal Walkway until further studies were conducted (FERC 1994; Enel 2008). In their September 1994 Environmental Inspection Report, FERC stated "the existence of a boat tour in a power canal is a practice that normally would be discouraged. Aside from the obvious hazards associated with power production it can also present unforeseen dangers. The Project, however, was designed with the idea that tour boats would operate in the canal. Recent events seem to indicate that this practice be revisited in terms of public safety" (FERC 1994).

In 1999, Boott completed construction and testing of the surge gate. The surge gate is designed to automatically open when the E.L. Field station is tripped off-line, which prevents overtopping of the Great River Wall and prevents flooding of the historic Pawtucket Gatehouse and Northern Canal Waste Gatehouse. Testing of the surge gate indicated the gate successfully attenuated the resulting transient wave that can occur in the Northern Canal during sudden plant shutdown. However, testing posed the safety concern that should the station trip off-line while the NPS is operating tour boats on the Northern Canal, the boat and passengers could be drawn through the open surge gate (Enel 2008; FERC 2000). Testing demonstrated that the transient wave produced on unit trip was not large enough to overtop the Great River Wall when Northern Canal flows are less than 3,500 cfs (e.g., operating the E.L Field at half-capacity) and so the surge gate may be temporarily deactivated under such conditions. Thus, NPS and Boott agreed that boat tour operations can occur on the Northern Canal only if the Merrimack River flow is less than 3,500 cfs and if the surge gate is locked out/tagged out to prevent automatic opening (Enel 2008; FERC 2000). At Merrimack River flows as low as 3,500 cfs, flows in the Merrimack River are effectively equal to flows in the Northern Canal.

In a letter addressed to NPS and dated June 1, 1999, 10 FERC stated "while this office conceptually disagrees with allowing recreational vessels in a power canal, the license stipulates the use of the canal for this purpose." FERC indicated in this letter the agreedupon protocol between NPS and Boott for tour boat operation on the Northern Canal was satisfactory. This letter from FERC also indicates a May 6, 1999 conference call in which NPS and Boott outlined the agreement to FERC.

The 1999 testing of the surge gate indicated it may only be deactivated (i.e. lockedout/tagged-out) if Merrimack River flows are less than 3,500 cfs. This lock-out/tag-out procedure is jointly undertaken by Boott and NPS personnel (Enel 2008; FERC 2000). When flows in the Merrimack River (and consequently the Northern Canal) are above 3,500 cfs and the surge gate is deactivated to prevent automatic opening, there is risk of overtopping of the Great River Wall, flooding of the Pawtucket Gatehouse and Northern Canal Waste Gatehouse, and undermining and/or weakening of the gatehouse and portions of the Northern Canal. If persons are boating on the Northern Canal, there is risk to human life in that passengers could be drawn through the open surge gate.

¹⁰ Ascension Number 19990614-0512

Accordingly, the 3,500 cfs threshold for boating on the Northern Canal was agreed upon between Boott and NPS, and approved by FERC in 1999.

As discussed above, in recent years NPS holds boat tours on the Northern Canal only on special occasions mostly due to the locking issues at Hydro Locks that arose around 1996. NPS staff recently report that Hydro Locks is inoperable as pins were bent as they were frozen in at one point. Based on drawings these pins may be the hinge pins or the pins that lock the gates together in the closed position. The pins can no longer be moved or removed. Since they were frozen, they do not lock tight enough and there is leakage. Additionally, NPS reports that Hydro Locks is mired in mud (NPS 2018). As reported to FERC in their March 31, 2022 Response to Additional Information Request, Boott intends to install a downstream fish exclusion system including a new trashrack structure in the E.L. Field powerhouse forebay. During the installation of the downstream fish exclusion system, the Northern Canal will be dewatered, providing Boott the opportunity to inspect and repair as needed Hydro Locks and its locking mechanisms, as well as to determine whether the Hydro Locks gates are mired in mud.

In their March 1, 2022 Determination on Requests, FERC requested an evaluation of the effects of Project operation on current NPS boat tours, in relation to Boott's proposal to remove the majority of the canal system from the Project boundary. The majority of the Northern Canal, i.e., the section between the Northern Canal Gatehouse and Hydro Locks, will remain within the Project boundary. However, the section of the Northern Canal between Hydro Locks and the Western Canal is proposed to be removed from the Project boundary. Boott does not anticipate the removal of this section of the Northern Canal from the Project boundary will affect NPS boat tours. In their FLA filed on April 30, 2021, Boott proposed to continue to manage the canal structures and water levels and flows using best practices, consistent with current agreements with the NPS and other stakeholders. Given Boott's canal elevation agreement with NPS, Boott regularly coordinates on water elevations with the NPS and other stakeholders. As reported in their November 1, 2021 Response to Additional Information Request, Boott is proposing to maintain specific water levels throughout the canal system as determined in consultation with NPS. The target water level for this portion of the Northern Canal is 86.7 ft NGVD 29.

Lastly, in their March 1, 2022 Determination on Requests, FERC requested an evaluation of the potential for expanding NPS boat tours in light of the results of the Operation Analysis of the Lowell Canal Study and in consideration of Project operation under normal and high flow conditions (including an assessment of surge gate and shut down options). The Operation Analysis of the Lowell Canal Study did not incorporate Northern Canal operations so that report is not discussed here.

As noted above, the surge gate can only be disabled when Merrimack River flows are less than 3,500 cfs, because testing of the surge gate indicated that a transient wave of less than 3,500 cfs is not enough to overtop the Great River Wall. At flows above 3,500 cfs, the surge gate is programmed to open automatically during a unit trip to prevent overtopping of the Great River Wall. The safety threshold of 3,500 cfs was agreed upon

between NPS and Boott, and FERC indicated their concurrence in the letter dated June 1, 1999. Boott acknowledges that NPS has expressed interest in raising this threshold, previously requesting a threshold of 4,000 cfs (NPS 2003), but deactivating the surge gate when flows are above 3,500 cfs defeats the purpose of its installation and presents the unacceptable risk to human life and Project safety. There are also circumstances under which Boott cannot deactivate the surge gate in order to protect worker safety and/or to ensure compliance with the Project's minimum flow requirement. For example, during any work on the crest of the Pawtucket Dam, the surge gate must remain active to prevent spillage from occurring in the event of a unit trip. Likewise, while the impoundment is being refilled following work on the spillway crest the gate must remain active to ensure minimum flow compliance should the E.L. Field Station trip off-line. In such situations Boott historically notified NPS and advised against any boat access to the Northern Canal until normal operations resume (Enel 2008).

For reasons mentioned, at this time Boott does not support broadly changing the safety threshold of 3,500 cfs in the Merrimack River to allow boat tours on the Northern Canal without a more thorough review of the 1998/1999 surge gate test data. At this time Boott has not been able to locate the 1998/1999 surge gate testing report in its records, and does not feel that it would be prudent to commit to modifying the established safety procedures until the report can be thoroughly reviewed. 11 Any modification to the established protocol will need to be carefully re-evaluated on a case-by-case basis in consultation and coordination among Boott, NPS and FERC's Division of Dam Safety and Inspections. Boott does not consider it practical or safe however to match the historical level of daily tours or six tours per day on the Northern Canal, prior to the bayboard washout incident and installation of the surge gate system. The inherent dangers of allowing tour boats to navigate a power canal during higher flows were not well understood when NPS was operating six tours a day on the Northern Canal from the late 1980s to 1994.

There may be a limited opportunity to expand the Northern Canal navigation flow threshold during the fish passage season. As proposed in the FLA, during the upstream fish passage season (which generally runs from late April through mid-July), Boott proposes to release a minimum flow of up to 500 cfs into the bypassed reach via the existing fish ladder at the Pawtucket Dam. At the time that the canal navigation protocol was developed, the fish ladder was only operated during higher flow conditions when there was spillage at the dam, thus this flow was not considered. Thus, under the proposed operating regime, flows in the Merrimack River will not be equal to Northern Canal flows, and Northern Canal flows may be equal to or below the 3,500 cfs safety threshold. Boott and NPS would need a defined protocol to evaluate this on a case-bycase basis, and in light of the results of the 1998/1999 surge test once that report is located.

¹¹ The report does not appear to be available via eLibrary, however there are two letters from Boott to FERC which indicate that the tests were planned to take place during the summer or fall of 1998.

FERC requested Boott consider shutdown options in their evaluation of expansion of NPS boat tours on the Northern Canal. As noted above, NPS boat tours historically only navigated the high flow portion of the Northern Canal (from Pawtucket Gatehouse to Hydro Locks) for approximately fifteen minutes but up to a half hour per tour, at around six tours a day. It is not practical for Boott to shut down or curtail operations regularly for NPS to run their boat tours for a limited amount of time on the Northern Canal. Boott currently sells all the electricity generated at the Project into the regional grid under a Power Purchase Agreement, but will likely sell energy under Independent Systems Operator – New England market conditions starting in 2023. Boott has a duty to provide clean renewable electric energy when possible to meet the demands of the electricity grid and cannot shut down or curtail operations on a regular basis.

As noted, Boott does not consider it practical or feasible to match historical levels of boat tours on the Northern Canal. The risks associated with allowing tour boats in a power canal have been evaluated since and are better understood. Additionally, NPS is not precluded from operating boat tours on the Pawtucket Canal during higher flow days when it is not appropriate to be on the Northern Canal. However, Boott believes there may be an opportunity to work with NPS to allow tour boats on occasion on the Northern Canal when Merrimack River flows are higher than 3,500 cfs but below 4,000 cfs.

Boott would be required to deviate from ROR operations in order to provide lower flow rates in the Northern Canal, as inflow to the Project would not match outflow. However, in the FLA, Boott proposed to operate the Project in a ROR mode using automatic pond level control of the E.L. Field powerhouse units, but with the stipulation that ROR operations may be temporarily modified for short periods to allow flow management for other Project and non-Project needs, e.g., for recreational purposes.

5.5.1.2 Evaluation of Effects of Project Operations on NPS Boat Tours on the Pawtucket Canal

In their March 1, 2022 Determination on Requests, FERC recommended an evaluation of the effects of Project operation on NPS boat tours, in relation to Boott's proposal to remove the majority of the canal system from the Project boundary. As discussed above in Section 5.5.1, NPS currently operates their boat tours on the Pawtucket Canal.

In their FLA filed on April 30, 2021, Boott proposed to continue to manage the canal structures, water levels and flows using best practices, consistent with current agreements with the NPS and other stakeholders. Given Boott's canal elevation agreement with NPS, Boott regularly coordinates on water elevations with the NPS and other stakeholders. Additionally, as reported in their November 1, 2021 Response to Additional Information Request, Boott is proposing to maintain specific water levels throughout the canal system as determined in consultation with NPS. The target water levels for the canals are:

 Upper canal system (including Upper Pawtucket Canal between Guard Locks and Swamp Locks): staff gage reading = 86.7 ft NGVD29; Lower canal system (including Lower Pawtucket Canal): staff gage reading = 71.8 ft NGVD29.

Boott's proposal to remove the downtown canal system from the Project boundary is not expected to have any effect on NPS boat tours in the Pawtucket Canal. By way of the 1995 Grant of Easement with MADCR, NPS holds recreational rights to structures of the canals to operate their boat tours. This agreement exists independently of the Project license. Boott does not hold recreational rights to the downtown canal system, and does not own structures of the Pawtucket Canal where NPS' boat tours currently operate. Additionally, Boott is proposing to continue to manage the canal structures, water levels and flows using best practices, consistent with current agreements with the NPS and other stakeholders.

Evaluation of Effects of Crest Gate on NPS Boat Tours 5.5.1.3

This section of the Recreation and Aesthetics Study report is retained from the February 25, 2021 version of this report filed with the Commission. On April 26, 2021, NPS reported that recent work by the City of Lowell to renovate the Pawtucket Street Bridge has eliminated overhead clearance issues for NPS tour boats. Therefore, this concern is resolved, but for SPD completion purposes, Boott retains this evaluation.

In their original request for this evaluation, NPS stated that their tour boats barely pass under the Pawtucket Street Bridge over Pawtucket Canal. 12 With even a 1-foot elevation rise of the Project impoundment, NPS states their boats would be unable to pass under the Pawtucket Street Bridge.

On April 18, 2013, FERC authorized Boott to replace the existing wooden flashboard system on the Project's Pawtucket Dam with a pneumatic crest gate system. FERC approved the amended Crest Gate System Operations Plan on March 30, 2015. The plan describes the operation of the pneumatic crest gate system under normal and highwater operations. Under the amended Crest Gate System Operations Plan, when there is no flow over the spillway and flows in the river are below 8,600 cfs [the combined hydraulic capacity of the E.L. Field Powerhouse (6,600 cfs) and downtown canal system (2,000 cfs)], the elevation of the reservoir would be at the normal pond elevation of 92.2 ft NGVD 29. When Merrimack River flows exceed 8,600 cfs, the Crest Gate System Operations Plan allows for a gradual rise in elevation to ± 93.2 ft NGVD 29 until flows reach approximately 11,850 cfs. 13 Under high flows exceeding 11,850 cfs and reaching 31,600 cfs, the crest gate maintains an elevation of \pm 93.2 ft.

¹² NPS also stated in their letter they are barely able to pass under Central Street Bridge over the Lower Pawtucket Canal. The crest gate does not affect the elevation of waters of the Lower Pawtucket Canal and thus is not included in this analysis.

¹³ 11,850 cfs was determined by adding the hydraulic capacity of the E.L. Field Powerhouse (6,600 cfs), the downtown canal system (2,000 cfs) and the extra spillway flow (3,250 cfs) allowed by the Crest Gate System Operations Plan.

On November 20, 2019, NPS filed a consultation letter with FERC and Boott. In the letter, NPS stated that Merrimack River flows must be below 12,500 cfs in order for them to operate boat tours in the Pawtucket Canal, and the operating season for boat tours runs from May 15 to October 15.

Flows from United States Geological Survey (USGS) Gage No. 01099500 *Concord R Below R Meadow Brook*, at Lowell, MA were subtracted from flows at USGS Gage No. 01100000 *Merrimack River BL Concord River at Lowell, MA* to calculate the hydrologic data tabulated in Table 5-2, presenting data at the Project from the past 30 years (water years 1987- 2016).

Table 5-2. Lowell Hydroelectric Project Hydrologic Data (1987-2016)

Month	Minimum (cfs)	90% Exceedance (cfs)	Average (cfs)	10% Exceedance (cfs)	Maximum (cfs)
January	916	3,462	7,651	12,834	39,710
February	1,478	3,272	6,813	11,415	39,180
March	1,914	4,508	11,484	21,355	50,220
April	2,765	6,558	17,901	31,178	78,890
May	2,034	4,112	10,749	18,657	88,410
June	874	2,279	6,768	13,286	44,660
July	670	1,325	4,207	9,270	29,820
August	569	1,121	3,526	6,852	30,030
September	460	1,008	3,162	6,025	32,264
October	787	1,676	5,938	12,706	50,150
November	1,345	2,888	7,978	14,747	30,990
December	1,839	3,472	9,141	17,243	34,810
Annual	460	1,723	7,941	17,059	88,410

The Project maintains a normal pond elevation of 92.2 ft NGVD 29 when flows in the Merrimack River are up to 8,600 cfs. According to USGS gage data presented in Table 5-2, average flows during the operating season (May 15 through October 15) for NPS boat tours generally do not exceed 8,600 cfs. May is the only month with an average Merrimack River flow above 8,600 cfs.

As described above, when Merrimack River flows exceed 8,600 cfs, the crest elevation gradually rises to 93.2 ft NGVD 29 until flows reach 11,850 cfs. Ultimately, only between Merrimack River flows of 11,850 cfs and 12,500 cfs (NPS' self-reported limit), are NPS boats supposedly unable to pass under Pawtucket Street Bridge. This is a relatively narrow window, especially since the average flow for the entire operating season never reaches 11,850 cfs, and a 10% chance of exceedance of 11,850 cfs only occurs in May, June, and October. The majority of flows through the Lowell Project are a direct result of the annual hydrologic cycle, much of which is unpredictable and inconsistent. Merrimack

River flows high enough to raise the pond elevation 1-foot are seemingly just as likely to rise above NPS' self-reported threshold.

5.5.2 Northern Canal Walkway

The Northern Canal Walkway opens seasonally (May 15 through October 15) when flow rates in the Merrimack River and Northern Canal are lower than 3,500 cfs. This threshold was determined because a study demonstrated that a surge wave above 3,500 cfs in the Northern Canal poses a risk of overtopping the Great River Wall. In 1999, the Licensee completed construction of the surge gate, designed to attenuate the surge wave in the canal that occurs during sudden plant shutdown. A test of the surge gate revealed that the gate did attenuate the resulting transient wave. However, as reported to FERC, the test indicated when fully opened, the significant volume of discharge through the surge gate is hazardous to any persons in the riverbed below or near the gate. FERC directed Boott to design a Public Safety Plan to warn the public of this hazard, which included warning signs, sirens and beacons installed at various locations along and in the Merrimack River (FERC 2000). Accordingly, to be conservative and assure public safety, the 3,500 cfs threshold to open the Northern Canal Walkway remained despite the installation of the surge gate.

Boott acknowledges that the 3,500 cfs threshold is strict. However, the surge gate must open during a unit trip when Merrimack River flows are over 3,500 cfs, otherwise there is a threat of overtopping the Great River Wall and the Northern Canal Walkway. Conversely, the significant amount of flow that is released through the surge gate when opened poses an extreme risk to anyone below on the rocky shore or in the riverbed. NPS, City of Lowell, or MADCR staffing/guarding of the area may mitigate this risk below the surge gate, but due to the lack of any emergency access to that area it is not recommended by Boott.

Boott analyzed USGS data to determine how many days during the recreation season (May 15 through October 15) the Northern Canal Walkway is closed due to Project operations. Project hydrology can be determined by subtracting flows from USGS Gage No. 01099500 (Concord R Below R Meadow Brook, at Lowell, MA) from USGS Gage No. 01100000 (Merrimack River BL Concord River at Lowell, MA). Using the daily mean average means for both gages for the period of record of January 1, 2000 through January 1, 2022, Boott has determined on average, the NPS closes the Northern Canal Walkway 125 days during the recreation season. According to the LNHP website (NPS 2022), they make this determination each morning during the season by reviewing the most recent instantaneous value recorded at USGS Gage No. 01100000.

5.6 Visual Survey for Vegetation Growth

In total, 96 Vegetation Polygons (representing 80% of the total survey data collected in the study area) and 24 VPs (representing 20% of the total survey data collected in the study area) were mapped between September 25 and September 27, 2019 (Appendix G; Appendix H). As shown in Table 5-3, the total study area encompassed approximately 44 acres and mapped vegetation on/along canal walls accounted for approximately 5 acres (11%) of the study area¹⁴. The Pawtucket Canal (19.63 acres; 44% of the total study area), Northern Canal (11.67 acres; 26% of the total study area), and Western Canal (5.51 acres; 13% of the total study area) represent more than 80 percent of the total study area (Table 5-3, Appendix G).

Maps showing the results of the vegetation assessment and mapping within the study area are illustrated in a 21-sheet, 11 by 17-inch vegetation type map set with numbered polygons (e.g., 1, 2) and VPs (e.g., VP1, VP2) for each vegetation polygon and/or VP, respectively in Appendix G. Results from the canal wall vegetation mapping are compiled in Appendix H and field reconnaissance data is summarized in Appendix I to this study report.

Table 5-3. Percent total acreage and mapped vegetation acreage of the six major canals associated with the Lowell Project canal system

Canal	Area (acres)	Percentage (%) of Total Study Area	Mapped Vegetation Area (acres)	Percentage (%) of Total Study Area with Mapped Vegetation
Eastern Canal	4.03	9%	0.93	2%
Hamilton Canal	2.01	5%	0.35	1%
Merrimack Canal	1.40	3%	0.38	1%
Northern Canal	11.67	26%	0.89	2%
Pawtucket Canal	19.63	44%	1.33	3%
Western Canal	5.51	13%	0.90	2%
Total	44.25	100%	4.78	11%

Pursuant to the approved study plan, vegetation type assessments were completed in the Pawtucket Canal, Northern Canal, Western Canal, Merrimack Canal, Eastern Canal, and Hamilton Canal. In addition, the shoreline/canal type was characterized by dominant features found in each of the mapped polygons and VPs. Field inventory documentation, including a map identifying each polygon or VP, representative photographs, and a description of the vegetation type observed at each polygon or VP is presented in Appendices G-J to this study report.

5.6.1 Eastern Canal

The vegetation mapping and characterization effort was conducted in the Eastern Canal on September 25, 2019. Sheets 8, 11, 12, and 16 present mapped vegetation types

¹⁴ VPs are not included in mapped vegetation acreage calculations because they represent a single point(s) on a canal wall.

within the Eastern Canal (Appendix G). Additional canal-specific information describing vegetation and shoreline/canal features is provided in Appendix H.

The Eastern Canal study area represents 4.03 acres (approximately 9%) of the total study area (Table 5-3, Appendix G). Three (3) VPs were mapped in the Eastern Canal, representing approximately 13 percent of total mapped VPs in the total study area. At the time of the study, mapped VPs in the Eastern Canal had a dominant vegetation type of Scrub-Shrub (100% of the total). The dominant shoreline type of mapped VPs within the Eastern Canal is either Block Wall (approximately 33.3% of the total) or Block Wall/Concrete/Stone Wall Mix (approximately 66.7% of the total) (Appendix G, Appendix H, and Appendix I).

Fifteen (15) Vegetation Polygons were mapped in the Eastern Canal, representing approximately 16 percent of total mapped Vegetation Polygons in the total study area (Appendix G, Appendix H, and Appendix I). Vegetation was mapped on 0.93 acres of the Eastern Canal walls, representing approximately 19 percent of the total mapped vegetation area within the total study area and approximately 23 percent of the Eastern Canal study area. At the time of the study, the majority of mapped Vegetation Polygons in the Eastern Canal had a dominant vegetation type of Mixed (approximately 62% of the total). The dominant shoreline type of mapped Vegetation Polygons within the Eastern Canal is either Block Wall (approximately 80% of the total) or Block Wall/Concrete/Stone Wall Mix (approximately 20%) (Appendix G, Appendix H, and Appendix I).

Mapped Vegetation Polygons within the Eastern Canal with a dominant shoreline type of Block Wall had a dominant vegetation type of Mixed (0.43 acres; approximately 58% of the total) at the time of the study. Scrub-Shrub (0.17 acres; approximately 23% of the total) and Herbaceous (0.12 acres; approximately 16% of the total) were present in lesser amounts, with Trees (0.02 acres; approximately 3% of the total) being minimal at the time of the study. Mapped Vegetation Polygons within the Eastern Canal with a dominant shoreline type of Block Wall/Concrete/Stone Wall Mix had a dominant vegetation type of Mixed (0.15 acres; approximately 79% of the total) or Trees (0.04 acres; approximately 21% of the total) at the time of the study (Appendix G, Appendix H, and Appendix I).

At the time of the study, no mapped VPs or Vegetation Polygons within the Eastern Canal had a dominant vegetation type of Forested. No mapped VPs or Vegetation Polygons within the Eastern Canal have dominant shoreline types of Concrete, Earthen/Terrestrial Cultural, or Stone Wall (Appendix G, Appendix H, and Appendix I).

5.6.2 Hamilton Canal

The vegetation mapping and characterization effort was conducted in the Hamilton Canal on September 25, 2019. Sheets 19 and 20 present mapped vegetation types within the Hamilton Canal (Appendix G). Additional canal specific information describing vegetation and shoreline/canal features is provided in Appendices H and I.

The Hamilton Canal study area represents 2.01 acres (approximately 5%) of the total study area (Table 5-3). One (1) VP was mapped in the Hamilton Canal, representing approximately 4 percent of total mapped VPs in the total study area. At the time of the study, the mapped VP in the Hamilton Canal had a dominant vegetation type of Herbaceous (100% of the total). The dominant shoreline type of the mapped VP within the Hamilton Canal is Block Wall/Concrete/Stone Wall Mix (100% of the total) (Appendix G, Appendix H, and Appendix I).

Seven (7) Vegetation Polygons were mapped in the Hamilton Canal, representing approximately 7 percent of total mapped Vegetation Polygons in the total study area. Vegetation was mapped on 0.35 acres of the Hamilton Canal walls, representing approximately 7 percent of the total mapped vegetation area within the total study area and approximately 17 percent of the Hamilton Canal study area. At the time of the study, the majority of mapped Vegetation Polygons in the Hamilton Canal had a dominant vegetation type of Mixed (approximately 74% of the total). The majority of mapped Vegetation Polygons in the Hamilton Canal have a dominant shoreline type of Block Wall/Concrete/Stone Wall Mix (approximately 83% of the total) (Appendix G, Appendix H, and Appendix I).

Mapped Vegetation Polygons within the Hamilton Canal with a dominant shoreline type of Block Wall/Concrete/Stone Wall Mix had a dominant vegetation type of Mixed (0.26 acres; approximately 90% of the total), Herbaceous (0.02 acres; approximately 7% of the total), or Trees (0.01 acres; approximately 3% of the total) at the time of the study. Mapped Vegetation Polygons within the Hamilton Canal that had a dominant shoreline type of Block Wall had a dominant vegetation type of Trees (0.03 acres; 50% of the total) or Scrub-Shrub (0.03 acres; 50% of the total) at the time of the study. (Appendix G, Appendix H, and Appendix I)

At the time of the study, no mapped VPs or Vegetation Polygons within the Hamilton Canal had a dominant vegetation type of Forested. No mapped VPs or Vegetation Polygons within the Hamilton Canal have a dominant shoreline type of Concrete, Earthen/Terrestrial Cultural, or Stone Wall (Appendix G, Appendix H, and Appendix I).

5.6.3 Merrimack Canal

The vegetation mapping and characterization effort was conducted in the Merrimack Canal on September 25, 2019. Sheets 11 and 15 present mapped vegetation types within the Merrimack Canal (Appendix G).

The Merrimack Canal study area represents 1.4 acres (approximately 3%) of the total study area (Table 5-3). No VPs were mapped in the Merrimack Canal at the time of the study (Appendix G, Appendix H, and Appendix I).

Nine (9) Vegetation Polygons were mapped in the Merrimack Canal, representing approximately 9 percent of total mapped Vegetation Polygons in the total study area. Vegetation was mapped on 0.38 acres of the Merrimack Canal walls, representing

approximately 8 percent of the total mapped vegetation area within the total study area and approximately 27 percent of the Hamilton Canal study area. At the time of the study, the majority of mapped Vegetation Polygons in the Merrimack Canal had a dominant vegetation type of Herbaceous (approximately 53% of the total). The majority of mapped Vegetation Polygons in the Merrimack Canal have a dominant shoreline type of Block Wall/Concrete/Stone Wall Mix (approximately 54% of the total), followed closely by Block Wall (approximately 46% of the total) (Appendix G, Appendix H, and Appendix I).

Mapped Vegetation Polygons within the Merrimack Canal with a dominant shoreline type of Block Wall/Concrete/Stone Wall Mix had a dominant vegetation type of Herbaceous (0.15 acres; approximately 75% of the total) or Scrub-Shrub (0.05 acres, approximately 25% of the total) at the time of the study. Mapped Vegetation Polygons within the Merrimack Canal with a dominant shoreline type of Block Wall had a dominant vegetation type of Mixed (0.12 acres; 71% of the total) or Herbaceous (0.05 acres; 29% of the total), at the time of the study. Trees represented less than 1 percent (0.003 acres) of the total mapped vegetation area within the Merrimack Canal study area and were the dominant vegetation type of mapped Vegetation Polygons that have a dominant shoreline type of Concrete. (Appendix G, Appendix H, and Appendix I)

At the time of the study, no mapped Vegetation Polygons within the Merrimack Canal had a dominant vegetation type of Forested. No mapped Vegetation Polygons within the Merrimack Canal have a dominant shoreline type of Earthen/Terrestrial Cultural or Stone Wall (Appendix G, Appendix H, and Appendix I).

5.6.4 Northern Canal

The vegetation mapping and characterization effort was conducted in the Northern Canal on September 26 and 27, 2019. Sheets 2, 3, 5, and 6 present mapped vegetation types within the Northern Canal (Appendix G).

As previously described, the Northern Canal study area represents 11.67 acres (approximately 26%) of the total study (Table 5-3). Eight (8) VPs were mapped in the Northern Canal, representing approximately 33 percent of total mapped VPs in the total study area. At the time of the study, the dominant vegetation type of mapped VPs in the Northern Canal was either Trees (50% of the total) or Scrub-Shrub (50% of the total). The dominant shoreline type of all mapped VPs within the Northern Canal is Block Wall (100% of the total) (Appendix G, Appendix H, and Appendix I)

Thirteen (13) Vegetation Polygons were mapped in the Northern Canal, representing approximately 14 percent of total mapped Vegetation Polygons in the total study area. Vegetation was mapped on 0.89 acres of the Northern Canal walls, representing approximately 19 percent of the total mapped vegetation area within the total study area and approximately 8 percent of the Northern Canal study area. At the time of the study, the majority of mapped Vegetation Polygons in the Northern Canal had a dominant vegetation type of Mixed (approximately 32% of the total), followed closely by Forested

and Herbaceous (each representing 28% of the total). The majority of mapped Vegetation Polygons in the Northern Canal have a dominant shoreline type of Block Wall (approximately 53% of the total) (Appendix G, Appendix H, and Appendix I).

Mapped Vegetation Polygons within the Northern Canal with a dominant shoreline type of Block Wall had a dominant vegetation type of Forested (0.19 acres; approximately 40% of the total), Mixed (0.16 acres; approximately 34% of the total); Scrub-Shrub (0.08 acres; approximately 17% of the total), Trees (0.03 acres; approximately 6% of the total); or Herbaceous (0.01 acres; approximately 2% of the total) at the time of the study. Mapped Vegetation Polygons within the Northern Canal with a dominant shoreline type of Bock Wall/Concrete/Stone Wall Mix had a dominant vegetation type of Forested (0.05 acres; 17% of the total) or Herbaceous (0.24 acres; 83% of the total) at the time of the study. Mapped Vegetation Polygons within the Northern Canal with a dominant shoreline type of Earthen/Terrestrial Cultural had a dominant vegetation type of Mixed (0.13 acres; 100% of the total) at the time of the study. (Appendix G, Appendix H, and Appendix I)

At the time of the study, the Northern Canal is the only canal with Forested vegetation observed on the dominant shoreline type of Block Wall. No mapped VPs or Vegetation Polygons within the Northern Canal had a dominant shoreline type of Concrete or Stone Wall (Appendix G).

5.6.5 Pawtucket Canal

The vegetation mapping and characterization effort was conducted on the Pawtucket Canal on September 25 and 26, 2019. An NPS boat was used to collect data in the Pawtucket Canal from the Swamp Locks and Dam to the Merrimack River on September 26, 2019. Additional data was collected for the remainder of the Pawtucket Canal on foot from the shoreline on September 25 and 26, 2019. Sheets 13 and 15 through 21 present mapped vegetation types within the Pawtucket Canal (Appendix G). Additional canal specific information describing vegetation and shoreline/canal features is provided in Appendix H and Appendix I.

As previously described, the Pawtucket Canal study area represents 19.63 acres (approximately 44%) of the total study area (Table 5-3, Appendix G). Eight (8) VPs were mapped in the Pawtucket Canal, representing approximately 33 percent of total mapped VPs in the total study area (Appendix G). At the time of the study, the majority of mapped VPs within the Pawtucket Canal had a dominant vegetation type of Trees (approximately 63% of the total). The majority of mapped VPs within the Pawtucket Canal have a dominant shoreline type of Block Wall (38% of the total), followed closely by Block Wall/Concrete/Stone Wall Mix and Stone Wall (each representing 25% of the total) (Appendix G, Appendix H, and Appendix I).

Thirty-two (32) Vegetation Polygons were mapped in the Pawtucket Canal, representing approximately 33 percent of total mapped Vegetation Polygons in the total study area. Vegetation was mapped on 1.33 acres of the Pawtucket Canal walls, representing approximately 28 percent of the total mapped vegetation area within the total study area

and approximately 7 percent of the Pawtucket Canal study area. At the time of the study, the majority of mapped Vegetation Polygons in the Pawtucket Canal had a dominant vegetation type of Trees (53% of the total). The majority of mapped Vegetation Polygons in the Pawtucket Canal have a dominant shoreline type of Block Wall (approximately 85% of the total) (Appendix G, Appendix H, and Appendix I).

Mapped Vegetation Polygons within the Pawtucket Canal with a dominant shoreline type of Block Wall had a dominant vegetation type of Trees (0.61 acres; approximately 54% of the total), Mixed (0.42 acres; 37% of the total), Scrub-Shrub (0.08 acres; 8% of the total), or Herbaceous (0.01 acres; 1% of the total) at the time of the study. The majority of mapped Vegetation Polygons within the Pawtucket Canal with a dominant shoreline type of Block Wall/Concrete/Stone Wall Mix had a dominant vegetation type of Scrub-Shrub (0.03 acres; 34% of the total) at the time of the study. Mapped Vegetation Polygons within the Pawtucket Canal with a dominant shoreline type of Concrete had a dominant vegetation type of either Mixed (0.04 acres; 50% of the total) or Trees (0.04 acres; 50% of the total) at the time of the study and mapped Vegetation Polygons within the Pawtucket Canal with a dominant shoreline type of Stone Wall had a dominant vegetation type of Trees (0.03 acres; 100% of the total) at the time of the study. (Appendix G, Appendix H, and Appendix I).

At the time of the study, no mapped VPs or Vegetation Polygons within the Pawtucket Canal had a dominant vegetation type of Forested. No mapped VPs or Vegetation Polygons within the Pawtucket Canal have a dominant shoreline type of Earthen/Terrestrial Cultural. The Pawtucket Canal is the only canal in the total study area that had vegetation mapped on the dominant shoreline type of Stone Wall (Appendix G, Appendix H, and Appendix I).

It should be noted, based on the elevation of the water within the Pawtucket Canal at the time of the investigation, that the majority of the upstream extent of the Pawtucket Canal, upstream of the NPS Guard Lock and Gates Facility, is dominated by typical forested/riparian vegetation on earthen stream embankments and the canal in this area is assumed to not be bordered by one of the shoreline/canal types described in Table 4-2, therefore, no mapping of dominant vegetation types occurred in this area.

5.6.6 Western Canal

The vegetation mapping and characterization effort was conducted in the Western Canal on September 25 and 26, 2019. Mapbook sheets 6, 7, 10, 14, and 19 present mapped vegetation types within the Western Canal (Appendix G). Additional canal specific information describing vegetation and shoreline/canal features is provided in Appendix H and Appendix I.

As previously described, the Western Canal study area represents 5.51 acres (13%) of the total study area (Table 5-3, Appendix G). Four (4) VPs were mapped in the Western Canal, representing approximately 17 percent of total mapped VPs in the total study

area. At the time of the study, the majority of mapped VPs in the Western Canal had a dominant vegetation type of Scrub-Shrub (approximately 50% of the total). Mapped VPs in the Western Canal have a dominant shoreline type of either Block Wall (75% of the total) or Block Wall/Concrete/Stone Wall Mix (Appendix G, Appendix H, and Appendix I).

Twenty (20) Vegetation Polygons were mapped in the Western Canal, representing approximately 21 percent of total mapped Vegetation Polygons in the total study area. Vegetation was mapped on 0.9 acres of the Western Canal walls, representing approximately 19 percent of the total mapped vegetation area within the total study area and approximately 16 percent of the Western Canal study area. At the time of the study, the majority of mapped Vegetation Polygons in the Western Canal had a dominant vegetation type of Forested (approximately 53% of the total). The majority of mapped Vegetation Polygons in the Western Canal have a dominant shoreline type of Block Wall/Concrete/Stone Wall Mix (approximately 77% of the total) (Appendix G, Appendix H, and Appendix I).

Mapped Vegetation Polygons within the Western Canal with a dominant shoreline type of Block Wall/Concrete/Stone Wall Mix had a dominant vegetation type of Forested (0.48 acres; 62% of the total), Mixed (0.16 acres; approximately 21% of the total), or Herbaceous (0.05 acres; 6% of the total) at the time of the study. Mapped Vegetation Polygons within the Western Canal with a dominant shoreline type of Block Wall had a dominant vegetation type of Mixed (0.01 acres; 8% of the total); Herbaceous (0.09 acres; 75% of the total); or Scrub-Shrub (0.02 acres; 17% of the total) at the time of the study. No mapped Vegetation Polygons within the Western Canal had dominant shoreline type of Concrete, Earthen/Terrestrial Cultural, or Stone Wall (Appendix G, Appendix H, and Appendix I).

5.7 Visual Survey for Waterborne Trash

Pursuant to the RSP, on April 9, 2020, Boott mapped areas within the canal system owned or under the control of Boott where waterborne trash may be a potential concern. The amount and type of waterborne trash that accumulates within the Project Boundary can vary according to several factors including the season, Project operations, the magnitude and duration of the flow events. During the visual survey for waterborne trash, the USGS Gage 01100000 Merrimack River BL Concord River at Lowell, MA, reported a discharge of over approximately 16,000 cfs (USGS 2020), and Boott's operations data reported an inflow of 14,500 cfs.¹⁵

Accumulated waterborne trash includes material floating on the impoundment surface and/or found on the surface of the canal system. Most of the waterborne trash accumulation within the Lowell Canal system appears to be derived from upstream

¹⁵ Inflow to the project is typically estimated as flow reported at USGS Gage 01100000 Merrimack River BL Concord River at Lowell, MA minus the flow reported at USGS 01099500 Concord R Below R Meadow Brook, at Lowell, MA.

inputs (the Merrimack River) as well as direct canal inputs (accidental and intentional littering) and from runoff events (also likely from accidental and intentional littering).

In total, eight (8) areas of waterborne trash totaling 0.21 acres (representing 0.48% of the total study area) were mapped on April 9, 2020 (Appendix K) as well as three additional areas of accumulated trash on the canal bed and a single area with a waterborne sheen. The total study area encompassed approximately 44 acres and as shown in Table 5-4 all mapped areas within the canal were 3.531 acres or approximately 154,000 square feet.

Maps showing the results of the waterborne trash assessment and mapping within the study area are illustrated by a map set with numbered polygons (e.g., WBT-1, WBT-2) for each mapped waterborne trash polygon (Appendix K). Results from the waterborne trash mapping are compiled in Appendix K and field reconnaissance data is summarized in Table 5-4 and Photo 5-2 through Photo 5-11.

Table 5-4. Percent total acreage of waterborne trash mapped within the Lowell canal system.

Mapped Polygon Identifier	Location	Mapped Area (acres)	Mapped Area (sq. ft.)	Canal Water Level	Potential Local Cause
WBT-1	Merrimack River at Fishway Exit	0.007	286.0	High	Eddy Area at head of fishway
WBT-2	Merrimack River Upstream of Pawtucket Gatehouse	0.063	2,765.0	High	Gatehouse
WBT-3	Western Canal at Merrimack Street	0.011	488.0	Normal	Iron support beams for bridge
WBT-4	Western Canal at Moody Street	0.038	1,674.0	Normal	Gate
WBT-5	Northern Canal and Western Canal Junction	0.013	545.0	Normal	Fremont Gatehouse, structure creating eddy
WBT-6	Merrimack Canal at Market Street	0.024	1,045.0	Normal	Gates
WBT-7	Pawtucket Canal at Guard Locks	0.049	2,120.0	Normal	Gatehouse
WBT-8	Hamilton Canal adjacent to Hamilton Mills	0.004	182.0	Normal	End of Canal (Intake)
CBT-1	Pawtucket Canal from Industrial Canyon to Kerouac Park	1.833	79,832.0	Low	Canal dewatered
CBT-2	Pawtucket Canal adjacent to Appleton Mills	0.537	23,411.0	Low	Canal dewatered

Mapped Polygon Identifier	Location	Mapped Area (acres)	Mapped Area (sq. ft.)	Canal Water Level	Potential Local Cause
CBT-3	Eastern Canal adjacent to Tsongas and Boarding House Park	0.468	20,395.0	Low	Canal dewatered
WBS-1	Merrimack Canal adjacent to Visitor Center	0.484	21,066.0	Normal	Unknown sheen
	Total	3.531	153,809.0	-	-

Pursuant to the approved study plan, waterborne trash assessments were completed in the Pawtucket Canal, Northern Canal, Western Canal, Merrimack Canal, Eastern Canal, Hamilton Canal, and in the Merrimack River upstream of the dam and Northern Canal intake. Field inventory documentation, including a map identifying each polygon and a description of the type of waterborne trash observed at each polygon is presented in Appendix K to this study report.

Boott surveyed the Lowell canal system on foot and by vehicle to visually inspect and document waterborne trash within the study area. Observations were recorded regarding evidence and location of waterborne trash. Data collected during this portion of the survey included field notes, digitized locations of waterborne trash, and photographic documentation.

In addition to mapping waterborne trash, during incidental observations for other field efforts, Boott observed aged substrate trash accumulation in the bottom of the Eastern Canal and portions of the Pawtucket Canal during dewatered for various construction and maintenance activities not associated with hydroelectric operations. This aged substrate trash is further described in Section 5.6.9 below and is also depicted on the map of the study area in Appendix K.

Boott also observed a surface sheen on the Merrimack Canal on April 9, 2020. This sheen is further described in Section 5.6.10 below and is also depicted on the map of the study area in Appendix K.

5.7.1 Merrimack River at the Fishway Exit

Waterborne trash observed on the Merrimack River fishway exit (WBT-1) encompassed a water surface area of approximately 0.007 acres (Table 5-4). This trash appears to accumulate in an eddy type feature and above the intake water for the fishway. Waterborne trash consisted of buoys, plastics, shoes, rubber mats, foam, and bait containers (No photo available).

5.7.2 Merrimack River Upstream of the Pawtucket Gatehouse

Waterborne trash observed on the Merrimack River upstream of the Pawtucket Gatehouse (WBT-2) encompassed a water surface area of approximately 0.063 acres (Table 5-4). This trash appears to accumulate in an eddy type feature and above the gatehouse intakes. Waterborne trash consisted of logs, boards, organic debris, plastic cups, plates, shoes, water bottles, buoys, plastics, foam, and bait containers (Photo 5-1).



Photo 5-1. Waterborne trash on the Merrimack River upstream of the Northern Canal Gate entrance.

5.7.3 Western Canal at Merrimack Street

Waterborne trash observed on the Western Canal at Merrimack Street (WBT-3) encompassed a water surface area of approximately 0.011 acres (Table 5-4). This trash appears to be behind steel beams across the canal, potentially for structural support of the road bridge for Merrimack Street. Waterborne trash consisted of foam plates, plastic cups, rubber balls plastic jugs, plastic wrappers and bags (Photo 5-2).



Photo 5-2. Waterborne trash on the Western Canal at Merrimack Street.

5.7.4 Western Canal at Moody Street

Waterborne trash observed on the Western Canal at Moody Street (WBT-4) encompassed a water surface area of approximately 0.038 acres (Table 5-4). This trash appears to accumulate behind an operable gate structure. Waterborne trash consisted of tires, umbrellas, foam plates, plastic cups, plastic bottles, rubber balls, plastic jugs, plastic wrappers, foam boards and bags (Photo 5-3).



Photo 5-3. Waterborne trash on the Western Canal at Moody Street.

Northern Canal and Western Canal Junction at the Tremont 5.7.5 Gatehouse and Powerhouse

Waterborne trash observed on the Northern Canal and Western Canal junction at the Tremont Gatehouse and Powerhouse (WBT-5) encompassed a water surface area of approximately 0.013 acres (Table 5-4). This trash appears to accumulate in an eddy within a large indent within the canal wall structure located just upstream of the Fremont Gatehouse. Waterborne trash consisted of foam board pieces, plastic cups, foam plates, foam bait containers, shoes, plastic bottles, and organic debris (Photo 5-4).



Photo 5-4. Waterborne trash on the Western Canal at the Northern Canal Junction.

5.7.6 Merrimack Canal at Market Street

Waterborne trash observed on the Merrimack Canal at Market Street (WBT-6) encompassed a water surface area of approximately 0.024 acres (Table 5-4). This trash appears to accumulate behind the operational gates at this location. Waterborne trash consisted of plastic bottles, foam containers, foam cups, plastic bags, rubber balls, diapers, glass bottles, wood, plastic wrappers, soft drink cans, and organic debris (Photo 5-5).



Photo 5-5. Waterborne trash on the Merrimack Canal at Market Street.

Pawtucket Canal at the Guard Lock and Gate Facility 5.7.7

Waterborne trash observed on the Pawtucket Canal at the Guard Lock and Gate Facility (WBT-7) encompassed a water surface area of approximately 0.049 acres (Table 5-4). This trash appears to accumulate upstream of the Guard Lock water release structure on river left. Waterborne trash consisted of paper, foam boards, all types of balls (rubber, plastic, baseball, soccer, etc.), organic matter, logs, tires, construction barrels, plastic bottles, cans, foam containers (Photo 5-6).

5.7.8 Hamilton Canal Adjacent to Hamilton Mills

Waterborne trash observed at the end of Hamilton Canal at the intake (WBT-8) encompassed a water surface area of approximately 0.004 acres (Table 5-4). This trash appears to accumulate at the intake (No photo available).



Photo 5-6. Waterborne trash on the Pawtucket Canal at Guard Lock and Gate Facility.

5.7.9 Observations of Aged Substrate Trash Accumulation on the bottom of the Eastern Canal and Portions of the Bottom of the Pawtucket Canal

Observations of substrate trash accumulation on the bottom of the Eastern Canal and portions of the Pawtucket Canal occurred during a dewatering event associated with non-Project construction and maintenance activities. This substrate accumulation encompassed an area of approximately 0.468 acres (Table 5-4) in the Eastern Canal, approximately 1.833 acres in the Pawtucket Canal near "Industrial Canyon", and 0.537 acres in the Pawtucket Canal immediately downstream of the Swamp Locks. The substrate trash in the Eastern Canal consist largely of iron, traffic cones, cans, and woody debris. In the Pawtucket Canal near Industrial Canyon, the substrate trash consists mostly of wood, iron, and plastic trash. The Pawtucket Canal downstream of Swamp Locks consists mostly of metal and some minimal floating plastic bottles (Photo 5-7 through Photo 5-10).



Photo 5-7. Substrate trash on bottom of Eastern Canal across from Boarding House Park.



Photo 5-8. Substrate trash on bottom of Eastern Canal across from Boott Cotton Mills Museum and Tsongas Industrial History Center.



Photo 5-9. Substrate debris at the bottom of Pawtucket Canal adjacent to Appleton Mills and downstream of Swamp Locks.



Photo 5-10. Waterborne trash immediately downstream of Swamp Locks.

5.7.10 Observations of Surface Sheen

Boott also observed a surface sheen on the Merrimack Canal on April 9, 2020. The location of the source of this sheen was undetermined but appear to begin at or upstream of the Swamp Locks (Photo 5-11).



Photo 5-11. Surface sheen observed on April 9, 2020 on Merrimack Canal adjacent to the Visitor Center and downstream of the Swamp Locks.

Summary and Discussion 6

6.1 Field Inventory and Visitor Use Data

The results from the field inventory and the visitor use data (personal interviews, field reconnaissance, and online surveys) are consistent with the literature review. The field inventory identified extensive recreational facilities in the Project area, with the available amenities reported in good condition. Of the fifty-three (53) personal interviews and ninety-six (96) online recreation surveys completed, the respondents are typically regular visitors who visit three or more times per year. Respondents travelled an average of 7.3 miles (personal interviews) and 11 miles (online survey respondents) to the Project area. The most reported recreational activities are light activities such as walking, dog walking, and jogging, with most respondents rating their overall experience of recreational activities at the Project as "acceptable" or "totally acceptable." The most frequently visited recreational facilities in the Project area were the Lowell Heritage State Park, the Rourke Brothers Boat Ramp, Chelmsford Boat Access, Merrimack Trail System, and LNHP-related facilities. Respondents both in-person and online tended to rate their

overall experience at these specific recreation facilities as "acceptable" or "totally acceptable."

6.2 Evaluation of Recreational Access

The opportunities for expansion of recreational opportunities in the Project canals are limited. MADCR exclusively owns all rights to allow recreation on or in the Project canals and holds easement rights to install recreational access points. Boott's proposal to remove the majority of the downtown canal system from the Project boundary does not affect the recreational rights held by MADCR, and granted to NPS. Boott identified segments of the Merrimack Canal, Western Canal, and Northern Canal as surface water recreation areas potentially compatible with public safety and recreational and property rights. Boott's proposal to remove the majority of the downtown canal system from the Project boundary is not expected to affect recreational access (including NPS boat tours) in the downtown canal system. During the recreation season, which generally corresponds with lower flows in the Merrimack River, Boott infrequently operated the downtown mill power stations. Therefore, the removal of the downtown system from the new FERC license is not going to noticeably impact recreation opportunities in the canal system.

Boott also evaluated the effects of water levels and flows and crest gate operations on NPS-boat tours and the Northern Canal Walkway access. Between flows of 11,850 cfs and 12,500 cfs (NPS' self-reported limit), NPS boats are reportedly unable to pass under Pawtucket Street Bridge. This is a relatively narrow difference, and such high flows are not common during the operating season (May 15 to October 15).

Boott also researched the 3,500 cfs threshold to open the Northern Canal Walkway. While the surge gate was installed to mitigate the risk of overtopping of the Great River Wall, the volume of water released from the surge gate is considered dangerous to any persons below on the riverbed or bank.

6.3 Visual Survey for Vegetation Growth

A wide variety of vegetation types, occurrences, and distribution, ranging from herbaceous, non-woody plants to forested areas of trees and underbrush, and shoreline/canal types, ranging from earthen embankments to placed, uniformly sized blocks, were observed during the canal wall vegetation surveys. The following summary statements are based on an analysis of survey results (Appendix G-Appendix I):

Mapped vegetation¹⁶ was greatest in the Pawtucket Canal (1.33 acres; approximately 28% of the total study area), followed by the Eastern Canal (0.93 acres), Western Canal (0.90 acres), and Northern Canal (0.89 acres) (each representing approximately 19% of the total study area).

¹⁶ VPs are not included in mapped vegetation acreage calculations because they represent a single point(s) on a canal wall.

- At the time of the study, most mapped VPs within the total study area had a dominant vegetation type of Scrub-Shrub (46% of the total VP count), followed closely by Trees (38% of the total VP count). The majority of mapped Vegetation Polygons within the total study area had a dominant vegetation type of Mixed (41% of the total mapped vegetation area) at the time of the study.
- Within the total study area, most mapped VPs had a dominant shoreline type of Block Wall (63% of the total VP count). The majority of mapped Vegetation Polygons within the total study area also had a dominant shoreline type of Block Wall (58% of the total mapped vegetation area).
- Mapped Vegetation Polygons with a dominant vegetation type of Forested were only recorded within the Western Canal (53% of the Western Canal study area), and the Northern Canal (28% of the Northern Canal study area) at the time of the study. Forested vegetation was recorded on Block Wall (0.19 acres; approximately 4% of total mapped vegetation area) and Block/Wall/Concrete Stone Wall Mix (0.53 acres; approximately 11% of the total mapped vegetation area) at the time of the study.

Visual Survey for Waterborne Trash 6.4

The surveys for waterborne trash have shown that waterborne trash accumulates within the Project's canal system, and these accumulations are somewhat dependent on the level of the water within the canals as well as the required operation of some of the NPS gates within the study area. For example, NPS gates that are operated on a routine basis had minimal signs of waterborne trash associated with them, while others that are largely in the closed position tended to have accumulations of waterborne trash behind them at varying densities.

The combination of past and present land use activities in and around the Project area have contributed and will likely continue to contribute to the accumulation of waterborne trash within the Project's canal system that occur in the study area today (e.g., industrialization, commercial development, residential areas in close proximity to canals, etc.). However, the complexity and diversity of historical and current land use activities in the study area create a problem for tracing and identifying the sources of waterborne trash and its movement and distribution within the study area. Waterborne trash consisted of common materials such as foam board pieces, plastic cups, foam plates, foam bait containers, shoes, plastic bottles, and organic debris.

It is well known that many types of land uses contribute to the accumulations of waterborne trash including stormwater drainage systems, upstream sources, inappropriately discarded trash, natural events (woody debris), densely populated areas, etc. Roads, construction, recreation, residential developments, and commercial and industrial developments all can contribute to the problem. Ongoing Project operation and maintenance has very little potential to cause and/or significantly contribute to the waterborne trash accumulation areas observed during the study.

7 Variances from FERC-Approved Study Plan

The Recreation and Aesthetics Study was conducted in full accordance with the methods described in the FERC-approved study plan except for the following variances:

- When conducting personal interviews at the recreation facilities identified in
 consultation with stakeholders, field technicians generally attempted to visit each of
 the selected recreation facilities during every survey event. In some instances, field
 technicians encountered conditions at recreation facilities that presented safety risks.
 In such instances, field technicians avoided those facilities during the survey event
 and documented the unsafe conditions encountered that prevented personal
 interviews from occurring.
- When conducting canal wall vegetation surveys within/along the six canals identified, field technicians generally attempted to survey the entirety of the canal study area. In some instances, field technicians encountered conditions within/along the canals that restricted access for surveying. In such instances, field technicians advanced within/along the canal wall to the extent practicable and assessed vegetation from a distance collecting photo documentation.
- During the evaluation of expanded recreational access to the canal system, Boott did
 not generate cost estimates to develop recreational access to the Lowell canal
 system, as proposed in the RSP. Boott did not develop these cost estimates because
 Boott does not have any rights to develop recreational access to the Lowell canal
 system.

8 Germane Consultation and Correspondence

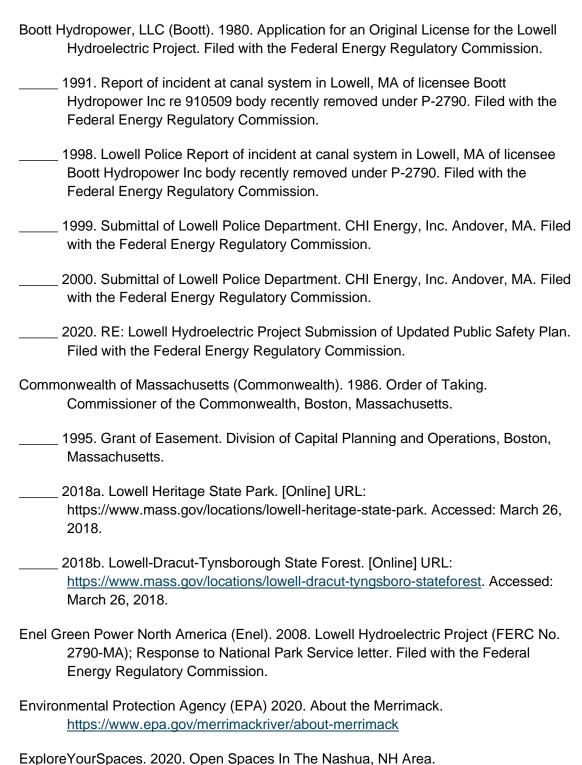
A summary of germane correspondence and consultation related to the Recreation and Aesthetics Study is presented in Table 8-1. Appendix L provides copies of relevant correspondence.

Table 8-1. Germane Consultation and Correspondence

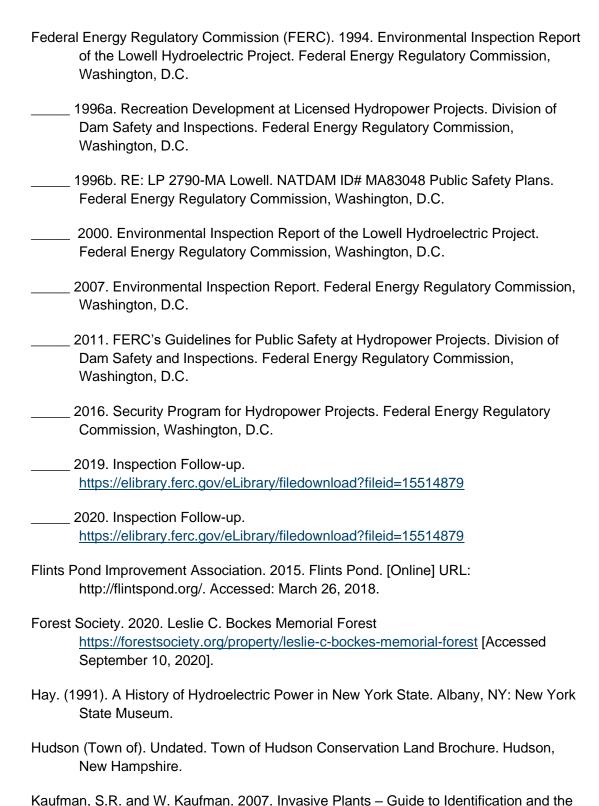
Date	Туре	From	То	Subject
May 7, 2019	Email/Letter	HDR and Boott	NPS, American Whitewater, and MADCR	Consultation on locations for visitor- intercept/personal interview locations
May 17, 2019	Letter	American Whitewater	HDR and Boott	Consultation on locations for visitor- intercept/personal interview locations
June 3, 2019	Email	HDR	NPS	Schedule regarding trash mapping activities for the Lowell Recreation and Aesthetics Study
June 4, 2019	Email	NPS	HDR	Schedule regarding trash mapping activities for the Lowell Recreation and Aesthetics Study
June 12, 2019	Email	NPS	HDR	Schedule regarding trash mapping activities for the Lowell Recreation and Aesthetics Study
June 12, 2019	Email	HDR	NPS	Schedule regarding trash mapping activities for the Lowell Recreation and Aesthetics Study
June 14, 2019	Email	HDR	NPS	Schedule regarding trash mapping activities for the Lowell Recreation and Aesthetics Study
July 2, 2020	Email	HDR	NPS	Lowell Recreation and Aesthetics Study
July 3, 2020	Email	NPS	HDR	Lowell Recreation and Aesthetics Study
October 1, 2019 (Accession Number 20191001-5038)	Letter	NPS	FERC, Boott, HDR	Comments on Study Process and the Recreation and Aesthetics Study
November 1, 2019	Email	HDR and Boott	NPS, MADCR, City of Lowell, Lowell Parks and Conservation Trust	Study Workshop Planning
November 1, 2019	Email	NPS	HDR	Study Workshop Planning
November 4, 2019	Email	City of Lowell	HDR	Study Workshop Planning
November 8, 2019	Email	HDR and Boott	NPS, MADCR, City of Lowell, Lowell Parks and Conservation Trust	Study Workshop Planning

Date	Туре	From	То	Subject
December 9, 2019	Email	HDR and Boott	NPS, MADCR, City of Lowell, Lowell Parks and Conservation Trust	Study Workshop Planning
December 19, 2019	Email	NPS	HDR	Vegetation Mapping Consultation
December 20, 2019	Email	MADCR	HDR	Lowell Recreation and Aesthetics Study
December 20, 2019	Email	HDR	MADCR	Lowell Recreation and Aesthetics Study
March 13, 2020	Email	HDR	NPS	Schedule regarding trash mapping activities for the Lowell Recreation and Aesthetics Study
March 13, 2020	Email	NPS	HDR	Schedule regarding trash mapping activities for the Lowell Recreation and Aesthetics Study
April 10, 2020 (Accession Number 20200410-5033)	Email	NPS	HDR	Comments on the Recreation and Aesthetics Study
April 22, 2020 (Accession Number 20200422-5027)	Letter	American Whitewater	FERC, Boott, HDR	Comments on the Recreation and Aesthetics Study
April 26, 2021 (Accession Number 20210426-5218)	Letter	NPS	FERC, Boott, HDR	Comments on the Recreation and Aesthetics Study
April 5, 2022	Letter	HDR, Boott	NPS	Consultation regarding the Recreation and Aesthetics Study
May 10, 2022	Letter	HDR, Boott	NPS	Consultation regarding the Recreation and Aesthetics Study

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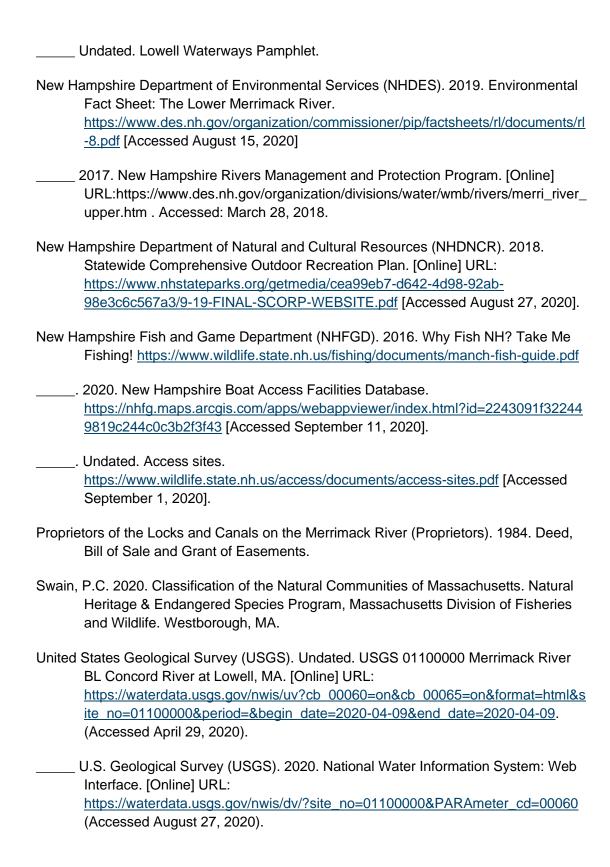
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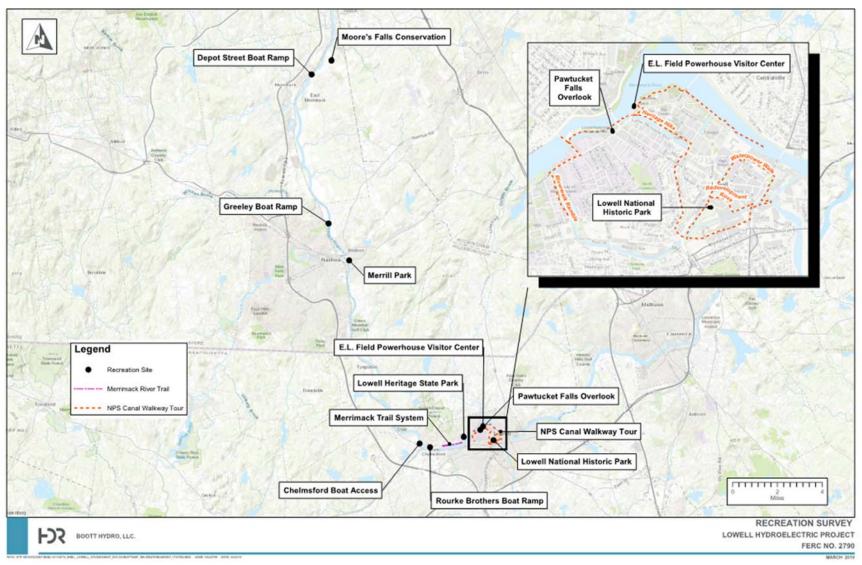


ON-SITE/IN-PERSON RECREATION INTERVIEW Lowell Project (FERC No. 2790) Recreation Survey

Boott Hydropower, LLC (Boott), a subsidiary of Enel Green Power North America, Inc., owns and operates the Lowell Project, which is licensed by the Federal Energy Regulatory Commission (FERC). The current operating license for the Project was issued on May 1, 1973 and expires on April 30, 2023. Boott will file its application with FERC for a new license for continued project operation no later than April 30, 2021. As part of this relicensing process, Boott is conducting a series of resource studies to enable FERC to prepare its environmental review document and develop a new operating license. The purpose of this survey is to gather information regarding participation in outdoor recreation activities at the Lowell Project.

I	nterview Location:			
	Home Zip Code:		Dat	e:
	Age:		Tim	
	River Conditions:			
	Are you:	Male □	Female \square	Prefer not to answer \square
	Interviewer:			
Q-1.	Regarding the Lo	well Project area,	do you consider yourself: (Please	circle one)
	1. A regular vis	itor to this area (3	3 or more times per year)	
	2. An occasiona	al visitor (1-2 time	es per year)	
	3. An infrequer	nt visitor (<i>Less tha</i>	ın 1 time per year)	
	4. This is my fir	st visit		
Q-2.	On this trip to the	e Lowell Project a	rea, when did you arrive?	
	Arrival Date		Arrival Time	
	/		AM/PM	
	When did you or	do you expect to	leave the Lowell Project area?	
	Departure Date		Departure Time	
			AM/PM	
Q-3.	During the last 12	2 months (includi	ng this trip), which month(s) did yo	ou visit the Lowell Project area?
	Δ			

Project Area Recreation Map



Q-4.		Which of the following recreation areas at or near the Lowell Project did you utilize for recreation during the past 12 months? (Please circle all that apply)							
	•								
		Lowell Heritage State Park							
		Merrimack River Trail							
		E.L. Field Powerhouse Visitor Center							
		NPS Walkway Tours							
		Riverwalk Ramble							
		Heritage Hike							
		,							
	9.	Redevelopment Rove							
	10.	10. Boat access facilities on the Project impoundment11. Lowell Heritage State Park – Rourke Brothers Boat Ramp							
	11.								
	12.	Pawtucket Falls Overlook (Lowell, MA)							
	13.	Chelmsford Boat Access (Chelmsford, MA)							
	14.	Merrill Park (Hudson, NH)							
	15.	15. Greeley Boat Ramp (Nashua, NH)16. Depot St. Boat Ramp (Merrimack, NH)17. Moore's Falls Conservation Area (Litchfield, NH)							
	16.								
	17.								
	18.	18. Informal Shoreline Parking/Access Areas19. None of the above							
	19.								
	20.	20. Other (Please list)							
Q-5.	On y	our last trip, about how many miles did you travel to get to the Lowell Project?							
	Α	miles							
Q-6.	Are	you staying overnight in the Lowell Project area (not including at your own home) on this trip?							
	1. Y	res 2. No							
Q-7.	If yo	u answered yes to Q-6 , at what type of accommodations will you be staying? (Please circle one)							
	1.	RV/Auto/Tent Campground							
	2.	• •							
	3.								
	4.								
	5.	Other (Please specify:)							
Q-8.	How	many people (including you) are in your group?							
	Α.	people							

Q-9. Which of the following best describes your group during this trip?
1. Individual
2. Adult group (over 21)
3. Youth group (under 21)
4. Family (with children)

5. Mixed group (groups with children, adults, and/or teens)

Q-10. On this trip to the Lowell Project area, in which of the following activities have you or do you expect to participate? (**Please circle all that apply**)

1.	Bank fishing	12. Canoeing	24. RV camping
2.	Boat fishing	13. Kayaking	25. Tent camping
3.	Guided fishing experience	14. Commercial whitewater boating	26. Photography
4.	Walking tour	15. Museum-going	27. Sightseeing
5.	Hiking	16. Shopping and/or dining	28. Relaxing
6.	Backpacking	17. Swimming	29. Sunbathing
7.	Guided canal tours	18. Off-highway vehicle (dirt bike/ATV)	30. Dog walking
8.	Historical/heritage site visiting	19. Horseback riding	31. Painting/drawing
9.	Running, jogging, and fitness	20. Off-road mountain biking	32. Other (please describe):
10.	Rock climbing/bouldering	21. Road cycling	
11.	Picnicking	22. Adventure sports	
		23. Geo-caching	

Q-11. Of the activities you circled in **Q-10** above, what is the primary activity that you participated in, or expect to participate in, on this visit? (**Please write in the corresponding number from above**)

A. Primary activity # _____

Q-12. Please rate the following for the primary activity you chose above:

	Totally				
	Unacceptable	Unacceptable	Neutral	Acceptable	Totally Acceptable
Challenge	1	2	3	4	5

Safety	1	2	3	4	5
Enjoyment	1	2	3	4	5
River/Canal Flow	1	2	3	4	5
Crowding	1	2	3	4	5
Overall Experience	1	2	3	4	5

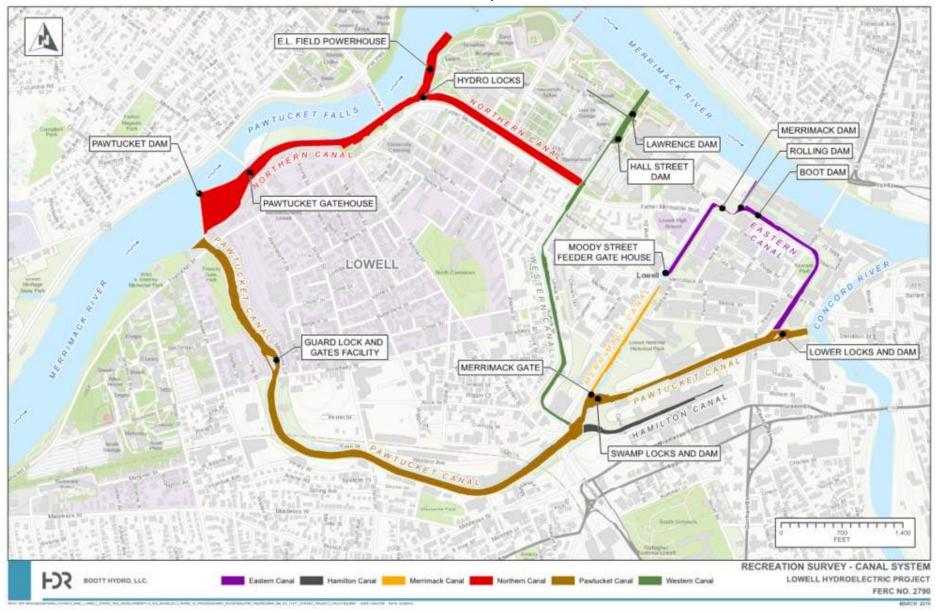
Q-13. Approximately how much money did you or do you intend to spend in preparation for or in association with your recreational trip to the Lowell Project (meals, gas, lodging, equipment, etc.)

A. \$_____

Q-14. On previous visits to the Lowell Project, how would you rate the accumulation of waterborne trash in any of the canals shown in the figure below?

	Totally Unacceptable	Unacceptable	Neutral	Acceptable	Totally Acceptable
Eastern Canal	1	2	3	4	5
Hamilton Canal	1	2	3	4	5
Merrimack Canal	1	2	3	4	5
Northern Canal	1	2	3	4	5
Pawtucket Canal	1	2	3	4	5
Western Canal	1	2	3	4	5

Lowell Canal System



Q-15. On previous trips to the Project, please rate the following:

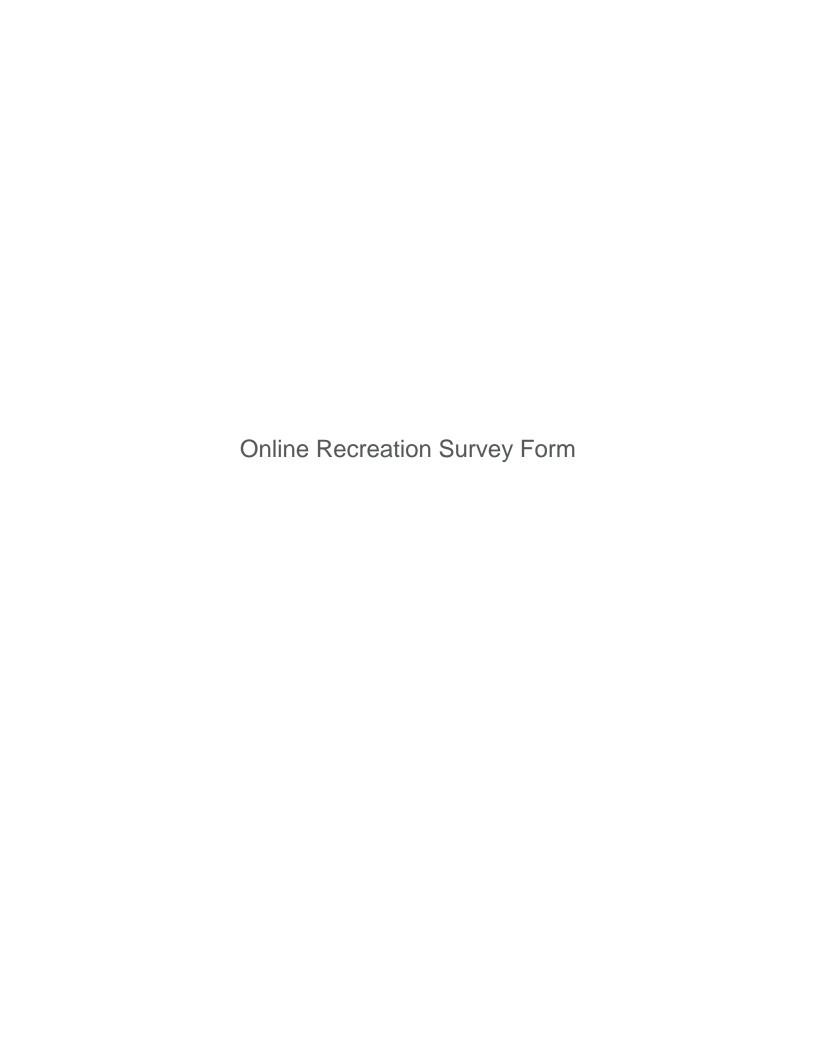
	Accessibility	Parking	Crowding	Condition of Recreation Facilities	Available Amenities	River/Canal Flow	Overall Experience
Lowell Heritage State Park							
Merrimack River Trail							
E.L. Field Powerhouse							
Visitor Center							
NPS Walkway Tours							
Riverwalk Ramble							
Waterpower Walk							
Heritage Hike							
Northern Canal Walkway							
Redevelopment Rove							
Boat access facilities							
Rourke Brothers Boat Ramp							
Pawtucket Falls Overlook							
Chelmsford Boat Access							
Merrill Park							
Greeley Boat Ramp							
Moore's Falls Conservation							
Area							
Informal Shoreline							
Parking/Access Areas							

Please use the following numerical scale to rate the formal recreation areas at the Lowell Project:

1) Totally Unacceptable; 2) Unacceptable; 3) Neutral; 4) Acceptable; 5) Totally Acceptable

Q-16.	Please tell us what type(s) of recreation enhancements you believe are needed and at what spec location(s) at the Lowell Project.							
	1.	Type of recreation enhancement:						
		Location(s):						
	2.	Type of recreation enhancement:						
		Location(s):						
	3.	Type of recreation enhancement:						
		Location(s):						
Q-17.		e share any other comments that you have regarding recreation at the Lowell ect:						

Thank you for completing the Recreation Survey!



ONLINE RECREATION SURVEY Lowell Project (FERC No. 2790)

Middlesex County, Massachusetts and Hillsborough County, New Hampshire

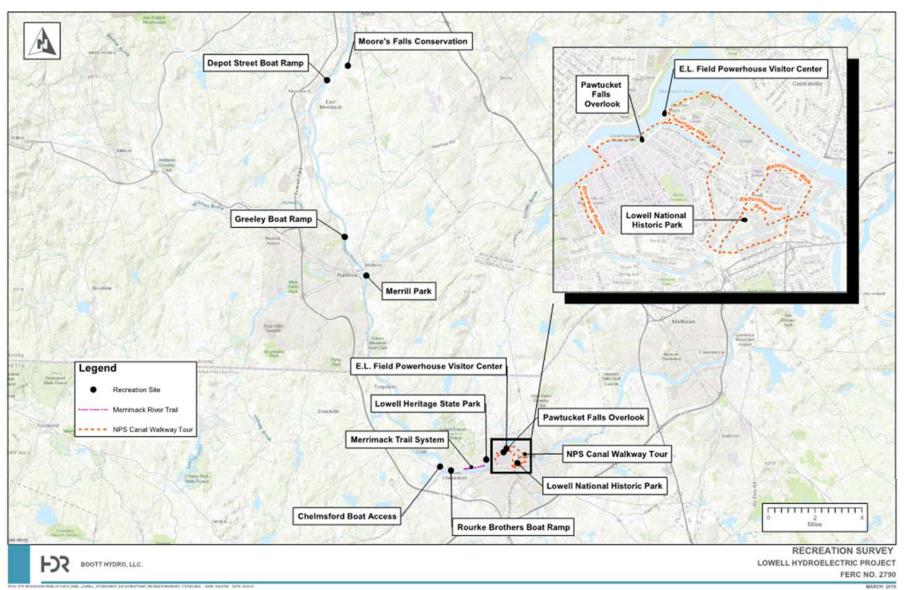
Boott Hydropower, LLC (Boott), a subsidiary of Enel Green Power North America, Inc., owns and operates the Lowell Project, which is licensed by the Federal Energy Regulatory Commission (FERC). The current operating license for the Lowell Project was issued on May 1, 1973 and expires on April 30, 2023. Boott will file its application with FERC for a new license for continued project operation no later than April 30, 2021. As part of this relicensing process, Boott is conducting a series of resource studies to enable FERC to prepare its environmental review document and develop a new operating license.

The purpose of this survey is to gather information regarding participation in outdoor recreation activities at the Lowell Project.

The E.L. Field Powerhouse Visitor Center is the Lowell Project's only formal recreation area. Other, non-Project recreation facilities are also located near the Lowell Project, including the Lowell National Historical Park, Merrimack River Trail, Pawtucket Falls Overlook, boat access facilities on the Lowell Project impoundment, and the Rourke Brothers Boat Ramp. These and other non-Project facilities are not owned or operated by Boott, but are popular Merrimack River recreational areas. In addition, there are numerous informal access areas on Lowell Project lands that are used by the public to access the Merrimack River.

The Lowell Project area relevant to this survey is defined on the map. The information provided in this survey will inform the development of appropriate management measures for recreational resources at the Lowell Project.

Lowell Project Area Recreation Map



	What is the zip code of your primary residence?
!.	What is your age?
3.	Are you: Male \square Female \square Prefer not to answer \square
١.	Regarding the Lowell Project area, do you consider yourself:
	 A regular visitor to this area (3 or more times per year) An occasional visitor (1-2 times per year) An infrequent visitor (Less than 1 time per year)
i.	During the last 12 months, which month(s) did you visit the Lowell Project area? (select all that apply)?
	Jan 🗆 Feb 🗆 Mar 🗆 Apr 🗆 May 🗀 Jun 🗀 Jul 🗀 Aug 🗀 Sep 🗀 Oct 🗀 Nov 🗀 Dec 🗀
	I have not visited in the last 12 months \square
5.	Which of the following recreation areas at or near the Lowell Project did you utilize for recreation during the past 12 months? (Please select all that apply)
	 Lowell Heritage State Park Merrimack River Trail E.L. Field Powerhouse Visitor Center NPS Walkway Tours Riverwalk Ramble Waterpower Walk Heritage Hike Northern Canal Walkway Redevelopment Rove Boat access facilities on the Lowell Project impoundment Lowell Heritage State Park – Rourke Brothers Boat Ramp Pawtucket Falls Overlook (Lowell, MA) Chelmsford Boat Access (Chelmsford, MA) Merrill Park (Hudson, NH) Greeley Boat Ramp (Nashua, NH) Depot St. Boat Ramp (Merrimack, NH) Moore's Falls Conservation Area (Litchfield, NH) Informal Shoreline Parking/Access Areas None of the above Other (Please list)
'.	On your last trip, about how many miles did you travel to get to the Lowell Project? Amiles
3.	During the past 12 months, when did you visit the Lowell Project? (Please select one)

- 1. Only on weekdays (Monday Friday) 2. Only on weekends (Saturday or Sunday) and/or holidays
- 3. Both weekdays AND weekends and/or holidays
- Q-9. On previous visits to the Lowell Project have you stayed overnight (not including your own home)?

2. Yes 2. No

- Q-10. At what type of accommodations do you usually stay? (Please select one)
 - 6. RV/Auto/Tent Campground
 - 7. Motel/hotel
 - 8. Bed and Breakfast
 - 9. Vacation or Rental Home
 - 10. Other (Please specify: _____
- What was the approximate size of your group during your last trip to the Lowell Project area? Q-11.

A. _____people

- Q-12. Which of the following best describes your group during previous trips to the Lowell Project Area?
 - 6. Individual
 - 7. Adult group (over 21)
 - 8. Youth group (under 21)
 - 9. Family (with children)
 - 10. Mixed group (groups with children, adults, and/or teens)
- On previous trips to the Lowell Project area, in which of the following activities have you or do you expect Q-13. to participate? (Please select all that apply)

12. Canoeing	24. RV camping
	211111 50111191119
13. Kayaking	25. Tent camping
14. Commercial whitewater boating	26. Photography
15. Museum-going	27. Sightseeing
16. Shopping and/or dining	28. Relaxing
17. Swimming	29. Sunbathing
18. Off-highway vehicle (dirt bike/ATV)	30. Dog walking
19. Horseback riding	31. Painting/drawing
20. Off-road mountain biking	32. Other (please describe):
	 14. Commercial whitewater boating 15. Museum-going 16. Shopping and/or dining 17. Swimming 18. Off-highway vehicle (dirt bike/ATV) 19. Horseback riding

10. Rock climbing/bouldering	21. Road cycling
11. Picnicking	22. Adventure sports
	23. Geo-caching

Q-14. Of the activities you circled in **Q-13** above, what is the primary activity that you participated in during previous visits? (**Please write in the corresponding number from above**)

A. Primary activity # _____

Q-15. You selected (Primary Activity Number) as the Primary activity in Question 14. Please rate the following:

	Totally Unacceptable	Unacceptable	Neutral	Acceptable	Totally Acceptable
Challenge	1	2	3	4	5
Safety	1	2	3	4	5
Enjoyment	1	2	3	4	5
River/Canal Flow	1	2	3	4	5
Crowding	1	2	3	4	5
Overall Experience	1	2	3	4	5

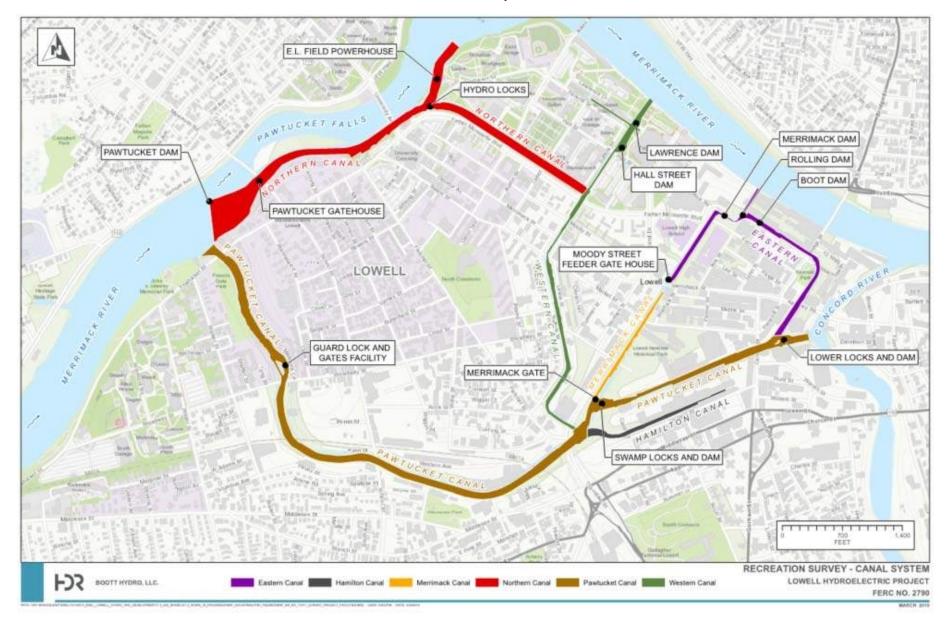
Q-16. Approximately how much money did you spend in preparation for or in association with your last recreational trip to the Lowell Project (meals, gas, lodging, equipment, etc.)?

A. \$_____

Q-17. On previous visits to the Lowell Project, how would you rate the accumulation of waterborne trash in any of the canals shown in the below figure?

	Totally				
	Unacceptable	Unacceptable	Neutral	Acceptable	Totally Acceptable
Eastern Canal	1	2	3	4	5
Hamilton Canal	1	2	3	4	5
Merrimack Canal	1	2	3	4	5
Northern Canal	1	2	3	4	5
Pawtucket Canal	1	2	3	4	5
Western Canal	1	2	3	4	5

Lowell Canal System



Q-19. Thinking about your visit to the Lowell Heritage State Park...

(please use the following numerical scale to rate the recreation area)

- 1.) Totally Unacceptable
- 2.) Unacceptable
- 3.) Neutral
- 4.) Acceptable
- 5.) Totally Acceptable

Accessibility	
Parking	
Crowding	
Safety	
Condition of Recreation Facilities	
Available Amenities	
River/Canal Flow	
Overall Experience	

Q-20. Thinking about your visit to the Merrimack River Trail....

- 1.) Totally Unacceptable
- 2.) Unacceptable
- 3.) Neutral
- 4.) Acceptable
- 5.) Totally Acceptable

Accessibility	
Parking	
Crowding	
Safety	
Condition of Recreation Facilities	
Available Amenities	
River/Canal Flow	
Overall Experience	

Q-21. Thinking about your visit to the E.L. Field Powerhouse Visitor Center...

(please use the following numerical scale to rate the recreation area)

- 1.) Totally Unacceptable
- 2.) Unacceptable
- 3.) Neutral
- 4.) Acceptable
- 5.) Totally Acceptable

Accessibility	
Parking	
Crowding	
Safety	
Condition of Recreation Facilities	
Available Amenities	
River/Canal Flow	
Overall Experience	

Q-22. Thinking about your visit on the NPS Walkway Tours....

- 1.) Totally Unacceptable
- 2.) Unacceptable
- 3.) Neutral
- 4.) Acceptable
- 5.) Totally Acceptable

Accessibility	
Parking	
Crowding	
Safety	
Condition of Recreation Facilities	
Available Amenities	
River/Canal Flow	
Overall Experience	

Q-23. Thinking about your visit to the Riverwalk Ramble....

(please use the following numerical scale to rate the recreation area)

- 1.) Totally Unacceptable
- 2.) Unacceptable
- 3.) Neutral
- 4.) Acceptable
- 5.) Totally Acceptable

Accessibility	
Parking	
Crowding	
Safety	
Condition of Recreation Facilities	
Available Amenities	
River/Canal Flow	
Overall Experience	

Q-24. Thinking about your visit to the Waterpower Walk....

- 1.) Totally Unacceptable
- 2.) Unacceptable
- 3.) Neutral
- 4.) Acceptable
- 5.) Totally Acceptable

Accessibility	
Parking	
Crowding	
Safety	
Condition of Recreation Facilities	
Available Amenities	
River/Canal Flow	
Overall Experience	

Q-25. Thinking about your visit to the Heritage Hike....

(please use the following numerical scale to rate the recreation area)

- 1.) Totally Unacceptable
- 2.) Unacceptable
- 3.) Neutral
- 4.) Acceptable
- 5.) Totally Acceptable

Accessibility	
Parking	
Crowding	
Safety	
Condition of Recreation Facilities	
Available Amenities	
River/Canal Flow	
Overall Experience	

Q-26. Thinking about your visit to the Northern Canal Walkway....

- 1.) Totally Unacceptable
- 2.) Unacceptable
- 3.) Neutral
- 4.) Acceptable
- 5.) Totally Acceptable

Accessibility	
Parking	
Crowding	
Safety	
Condition of Recreation Facilities	
Available Amenities	
River/Canal Flow	
Overall Experience	

Q-27. Thinking about your visit to the Redevelopment Rove....

(please use the following numerical scale to rate the recreation area)

- 1.) Totally Unacceptable
- 2.) Unacceptable
- 3.) Neutral
- 4.) Acceptable
- 5.) Totally Acceptable

Accessibility	
Parking	
Crowding	
Safety	
Condition of Recreation Facilities	
Available Amenities	
River/Canal Flow	
Overall Experience	

Q-28. Thinking about your visit to boat access facilities on the Lowell Project impoundment...

- 1.) Totally Unacceptable
- 2.) Unacceptable
- 3.) Neutral
- 4.) Acceptable
- 5.) Totally Acceptable

Accessibility	
Parking	
Crowding	
Safety	
Condition of Recreation Facilities	
Available Amenities	
River/Canal Flow	
Overall Experience	

Q-29. Thinking about your visit to the Rourke Brothers Boat Ramp...

(please use the following numerical scale to rate the recreation area)

- 1.) Totally Unacceptable
- 2.) Unacceptable
- 3.) Neutral
- 4.) Acceptable
- 5.) Totally Acceptable

Accessibility	
Parking	
Crowding	
Safety	
Condition of Recreation Facilities	
Available Amenities	
River/Canal Flow	
Overall Experience	

Q-30. Thinking about your visit to the Pawtucket Falls Overlook...

(please use the following numerical scale to rate the recreation area)

- 1.) Totally Unacceptable
- 2.) Unacceptable
- 3.) Neutral
- 4.) Acceptable
- 5.) Totally Acceptable

Accessibility	
Parking	
Crowding	
Safety	
Condition of Recreation Facilities	
Available Amenities	
River/Canal Flow	
Overall Experience	

Q-31. Thinking about your visit to the Chelmsford Boat Access...

- 1.) Totally Unacceptable
- 2.) Unacceptable
- 3.) Neutral
- 4.) Acceptable
- 5.) Totally Acceptable

Accessibility	
---------------	--

Parking	
Crowding	
Safety	
Condition of Recreation Facilities	
Available Amenities	
River/Canal Flow	
Overall Experience	

Q-32. Thinking about your visit to the Merrill Park...

(please use the following numerical scale to rate the recreation area)

- 1.) Totally Unacceptable
- 2.) Unacceptable
- 3.) Neutral
- 4.) Acceptable
- 5.) Totally Acceptable

Accessibility	
Parking	
Crowding	
Safety	
Condition of Recreation Facilities	
Available Amenities	
River/Canal Flow	
Overall Experience	

Q-33. Thinking about your visit to the Greeley Boat Ramp...

- 1.) Totally Unacceptable
- 2.) Unacceptable
- 3.) Neutral
- 4.) Acceptable
- 5.) Totally Acceptable

Accessibility	
Parking	
Crowding	
Safety	
Condition of Recreation Facilities	
Available Amenities	
River/Canal Flow	
Overall Experience	

Q-34. Thinking about your visit to the Depot St. Boat Ramp...

(please use the following numerical scale to rate the recreation area)

- 1.) Totally Unacceptable
- 2.) Unacceptable
- 3.) Neutral
- 4.) Acceptable
- 5.) Totally Acceptable

Accessibility	
Parking	
Crowding	
Safety	
Condition of Recreation Facilities	
Available Amenities	
River/Canal Flow	
Overall Experience	

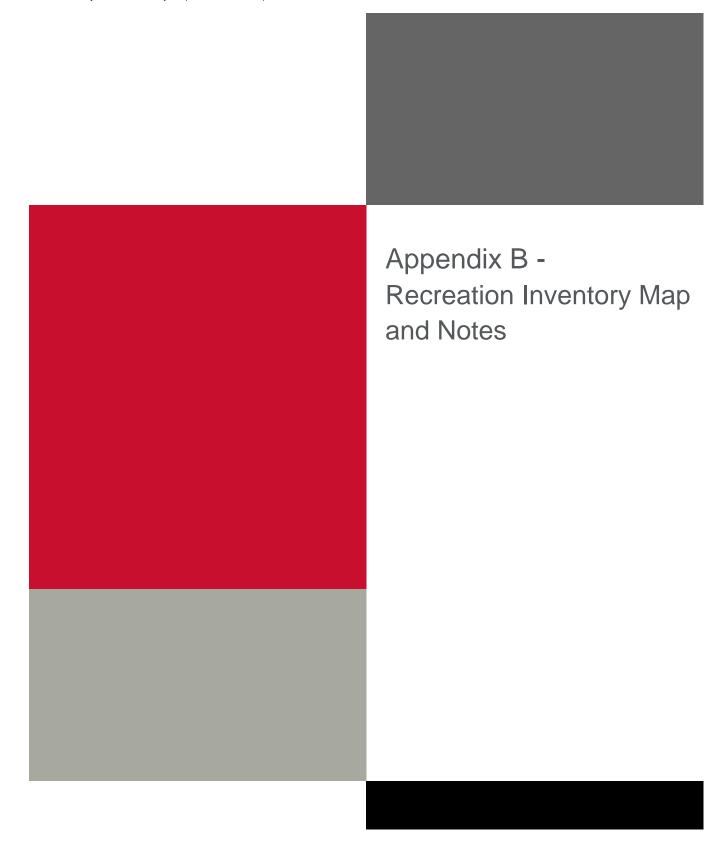
Q-35. Thinking about your visit to the Moore's Falls Conservation Area...

- 1.) Totally Unacceptable
- 2.) Unacceptable
- 3.) Neutral
- 4.) Acceptable
- 5.) Totally Acceptable

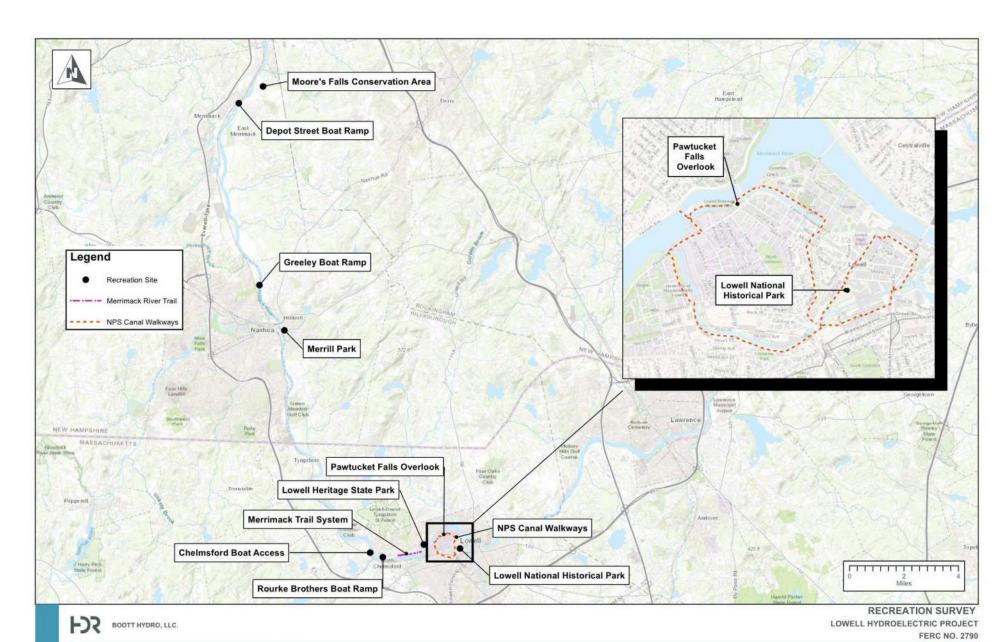
Accessibility	
Parking	
Crowding	
Safety	
Condition of Recreation Facilities	
Available Amenities	
River/Canal Flow	
Overall Experience	

Q-36.		e tell us what type(s) of recreation enhancements you believe are needed and at what specific on(s) at the Lowell Project.
	4.	Type of recreation enhancement:
		Location(s):
	5.	Type of recreation enhancement:
		Location(s):
	6.	Type of recreation enhancement:
		Location(s):
Q-37.	Please	share any other comments that you have regarding recreation at the Lowell Project:

Thank you for completing the Online Recreation Survey!









Chelmsford Boat Access Recreation Inventory December 16, 2019

Parking	Signage	Recreation Amenities	Condition of Recreation Amenities	Additional Features
 Parking lot for approximately 50 cars Parking circle Boat trailer only parking 	Signage with public launch information Kiosk with boat access rules and regulations Blank kiosk	Boat rampRiver trailPicnicking tablesWaste receptacles	Structural damage to boat ramp Picnic tables noted to need ongoing maintenance Trash receptables in good condition	- Baseball/softball fields



Photo 1 - Chelmsford Boat Access Kiosk



Photo 2 - Chelmsford Boat Access Ramp

Depot Street Boat Ramp Recreation Inventory December 16, 2019

Parking	Signage	Recreation Amenities	Condition of Recreation Amenities	Additional Features
 6-8 car capacity parking lot Emergency parking Offstreet overflow parking 	 Signage with public boat ramp information Kiosk with boat access rules and regulations Kiosk with information on the Landing Site of Reeds Ferry 	Boat rampShort trail to boat ramp with tunnelTrash receptacles	 Boat ramp in good condition Trail in good condition Trash receptacles noted in good condition 	- Grassy area for picnicking -



Photo 3 – Depot Street Boat Ramp Sign



Photo 4 - Depot Street Boat Ramp

Greeley Boat Ramp Recreation Inventory December 16, 2019

Parking	Signage	Recreation Amenities	Condition of Recreation Amenities	Additional Features
 Parking for 2 near boat ramp Parking for 4 just above boat ramp 	 Entry signage with park hours and rules Poor, unreadable signage near boat ramp 	- Boat ramp - Off-road trail	Boat ramp reported in good condition Trail noted in good condition	- Access road



Photo 5 – Access road to Greeley Boat Ramp



Photo 6 - Greeley Boat Ramp

Lowell Heritage State Park Recreation Inventory December 16, 2019

Parking	Signage	Recreation Amenities	Condition of Recreation Amenities	Additional Features
20-30 car parking lotStreet parking	- Signage with rules, directions, and park hours	Outdoor stage with grassy lawnSand beachBenchesPavilionEmergency boat ramp	- All recreation amenities reported in good condition	Restrooms inside building Waste receptacles



Photo 7 – Parking lot at Lowell Heritage State Park



Photo 8 – Outdoor stage at Lowell Heritage State Park



Photo 9 – Beach at Lowell Heritage State Park

Lowell National Historical Park (Visitor Center) Recreation Inventory December 16, 2019

Parking	Signage	Recreation Amenities	Condition of Recreation Amenities	Additional Features
- Ample free car parking lot (~100 spots)	 "Bus, RV and Trailer Parking Only" Lowell National Historical Park Visitor Center Sign Visitor Center Sign with hours Map of Lowell National Historical Park Features 	Standing exhibits with historical and hydropower information Interactive equipment for education Restrooms and water-fountain	- All recreation amenities reported in good condition	 Information front desk Wheel chair ramp Gift shop Restrooms



Photo 10 – Standing educational exhibits and gift shop inside Lowell National Historical Park Visitor Center



Photo 11 – Map of canal layout and Lowell National Historical Park Features (located inside Visitor Center)

Merrill Park Recreation Inventory December 16, 2019

Parking	Signage	Recreation Amenities	Condition of Recreation Amenities	Additional Features
- No formal park lot Dirt parking area for approximately 5 cars	- Entry sign to park	- Walking trail - Hand-carry launch area	 Parking area is minimal, could be graded, many deep ruts Hand-carry launch and walking trail acceptable 	- Bicycle motocross jump - Adjacent to graveyard (common area for dog walking)



Photo 12 – Entry sign to Merrill Park



Photo 13 –Access road to Merrill Park

Merrimack Trail System Recreation Inventory December 17, 2019

Parking	Signage	Recreation Amenities	Condition of Recreation Amenities	Additional Features
Parking for approximately 20 cars Street parking	- Welcome sign with rules and hours	Trail to waterWalking trailsBenchesTrash receptaclesBathrooms	- All recreation amenities reported in good condition	- Not applicable



Photo 14 – Walking Path

Moore's Falls Conservation Area Recreation Inventory December 16, 2019

Parking	Signage	Recreation Amenities	Condition of Recreation Amenities	Additional Features
- Parking lot for 7- 11 cars	 Welcome kiosk with rules and information on young forest and shrubland Welcome sign with rules Caution signs regarding hunting and other uses of the area Educational exhibits with environmental information 	TrailsEducational exhibits	- All recreation amenities reported in good condition	- Birdhouses



Photo 15 – Welcome Kiosk to Moore's Falls Conservation Area



Photo 16 – Birdhouses at Moore's Falls Conservation Area

National Park Service Canal Walkways Recreation Inventory December 17, 2019

Parking	Signage	Recreation Amenities	Condition of Recreation Amenities	Additional Features
- Parking available at NPS Visitor Center	Information and direction signs Educational exhibits and signs	- Canalways - Benches - Education signs - Lighting	- All recreation amenities reported in good condition	- Not applicable

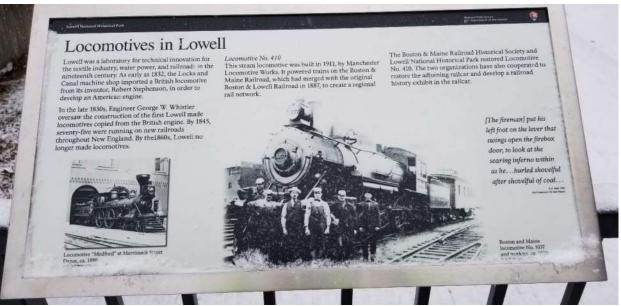


Photo 17 - Example photograph of educational signs



Photo 18 - Canalways and benches along Merrimack Canal Walk

Pawtucket Falls Overlook Recreation Inventory December 16, 2019

Parking	Signage	Recreation Amenities	Condition of Recreation Amenities	Additional Features
- Not applicable	- Educational signage	- Overlook area	- Good condition	- Not applicable

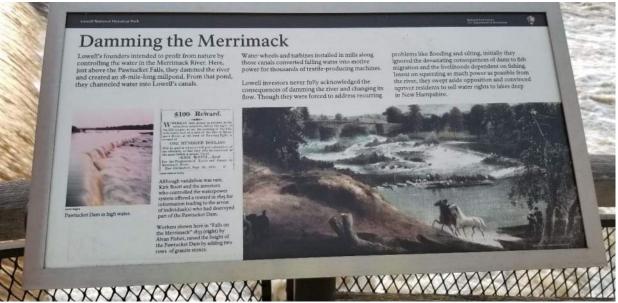


Photo 19 - Educational sign at the Pawtucket Falls Overlook



Photo 20 - View of dam and Pawtucket Falls from Pawtucket Falls Overlook

Rourke Brothers Boat Ramp Recreation Inventory December 16, 2019

Parking	Signage	Recreation Amenities	Condition of Recreation Amenities	Additional Features
 Parking for approximately 60 cars Handicap parking/ADA- compliant 	Welcome signKiosk with rules and regulationsRourke Brothers Memorial Sign	- Boat ramp - Dock - Tables	- All recreation amenities reported in good condition	- Grassy picnic areas



Photo 21 – Kiosk with rules and regulations

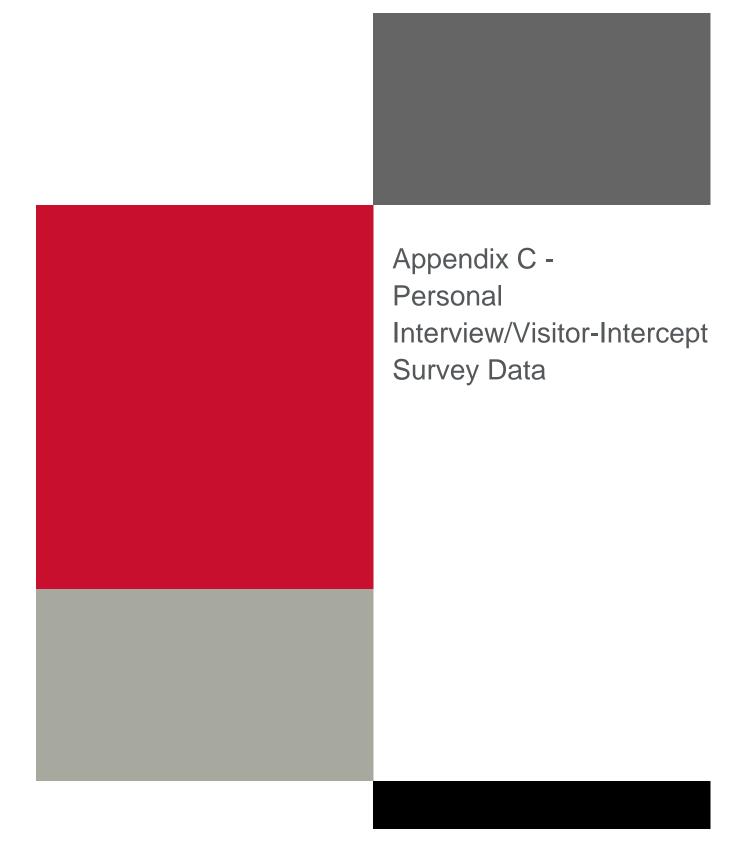


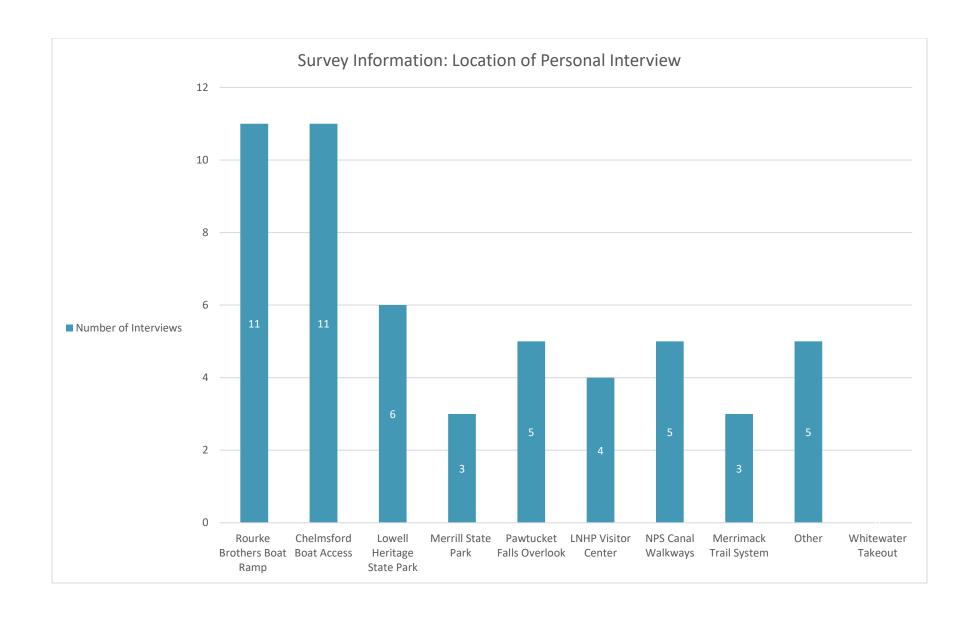
Photo 22 - Paved Rourke Brothers Boat Ramp

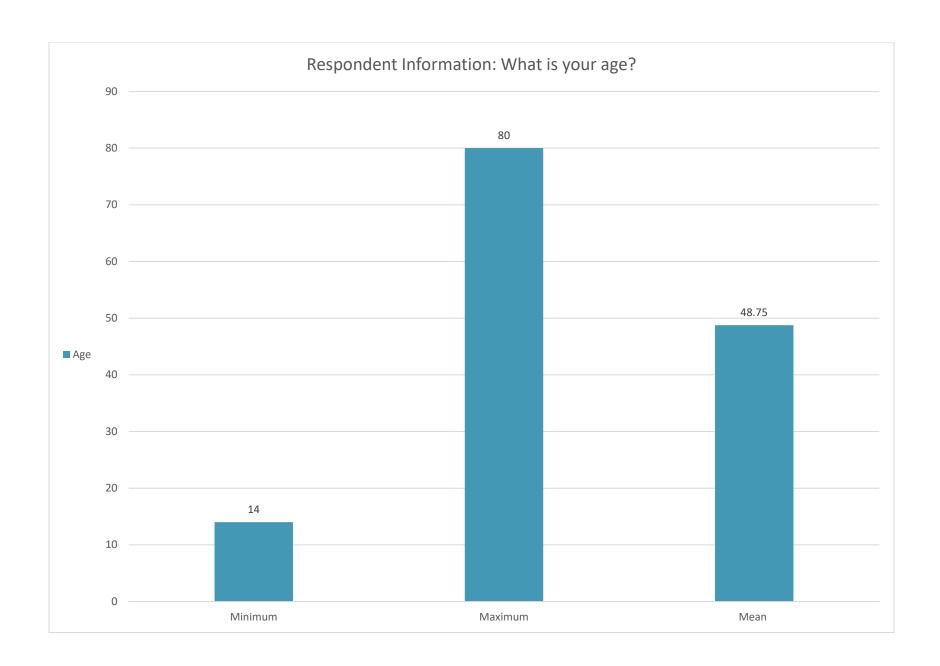
E.L. Field Powerhouse Visitor Center Recreation Inventory December 16, 2019

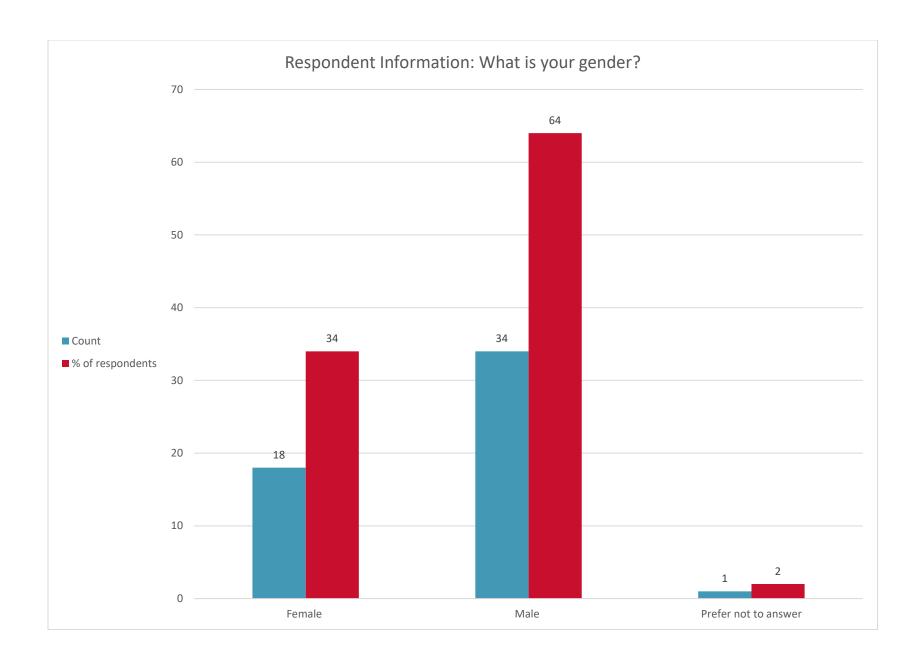
Parking	Signage	Recreation Amenities	Condition of Recreation Amenities	Additional Features
 Large locked gated area available for parking Asphalt/gravel parking area 	- Welcome sign	 Standing exhibits with historical and hydropower information Interactive and interpretive equipment for education 	- Reported in good condition	- ADA- compliant elevator

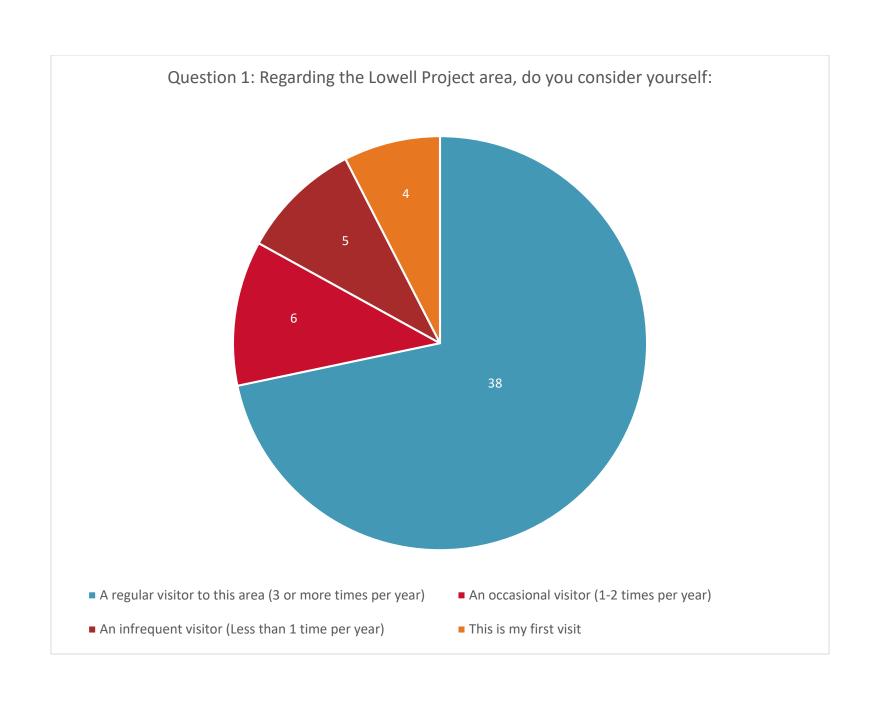
^{*}The E.L. Field Powerhouse Visitor Center was closed the days of inventory. Only the outside portions were included in this inventory.

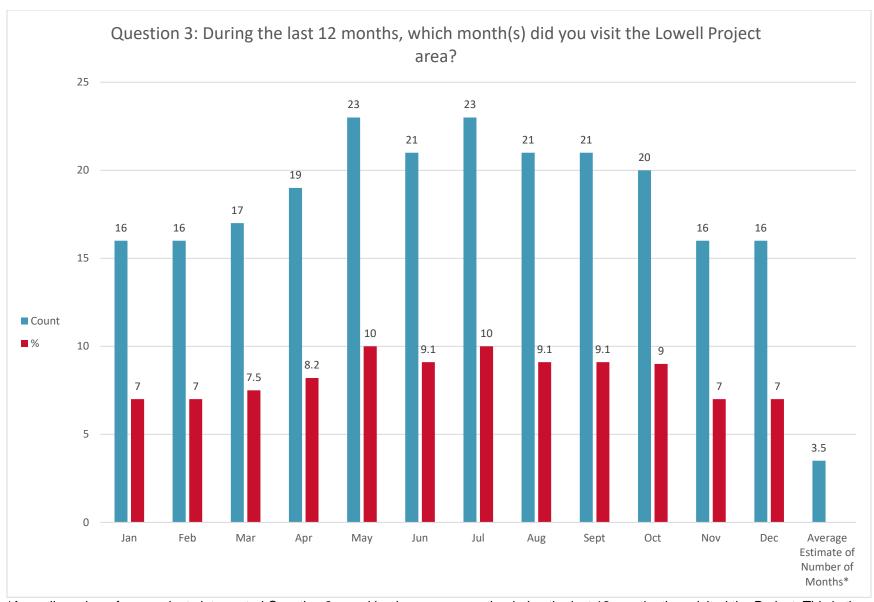




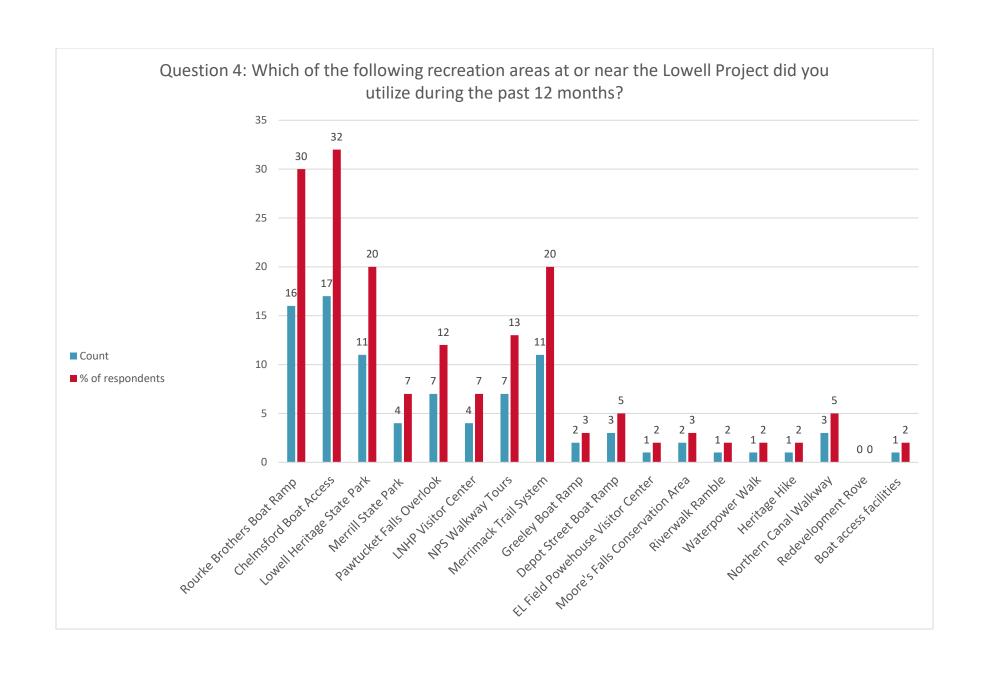


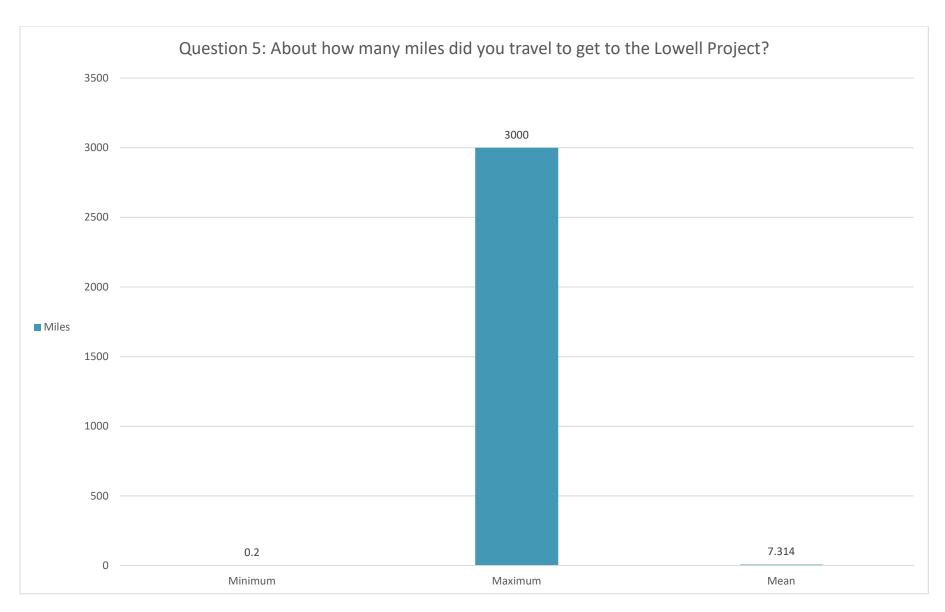




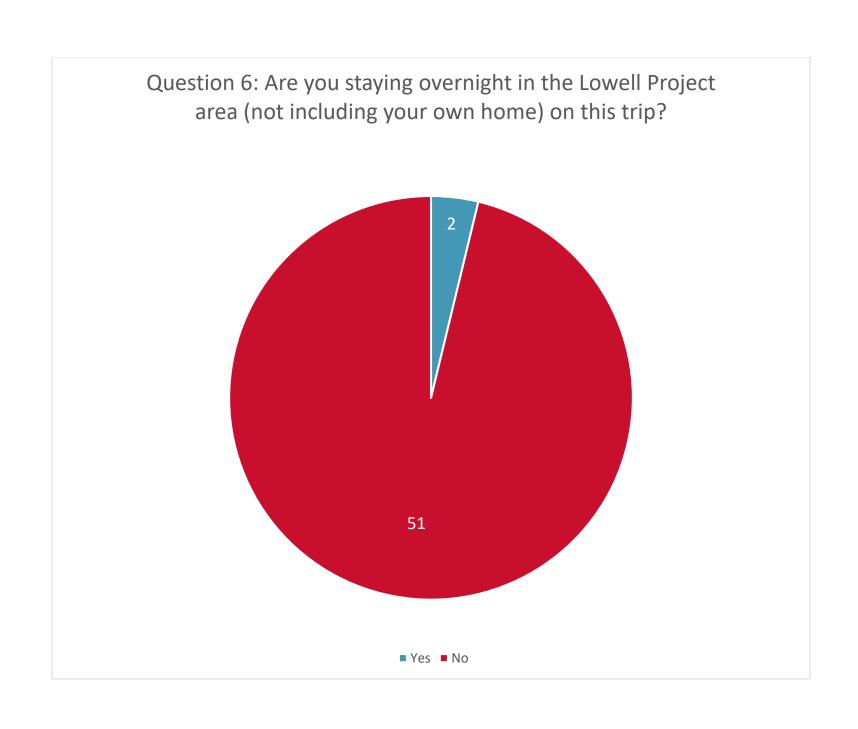


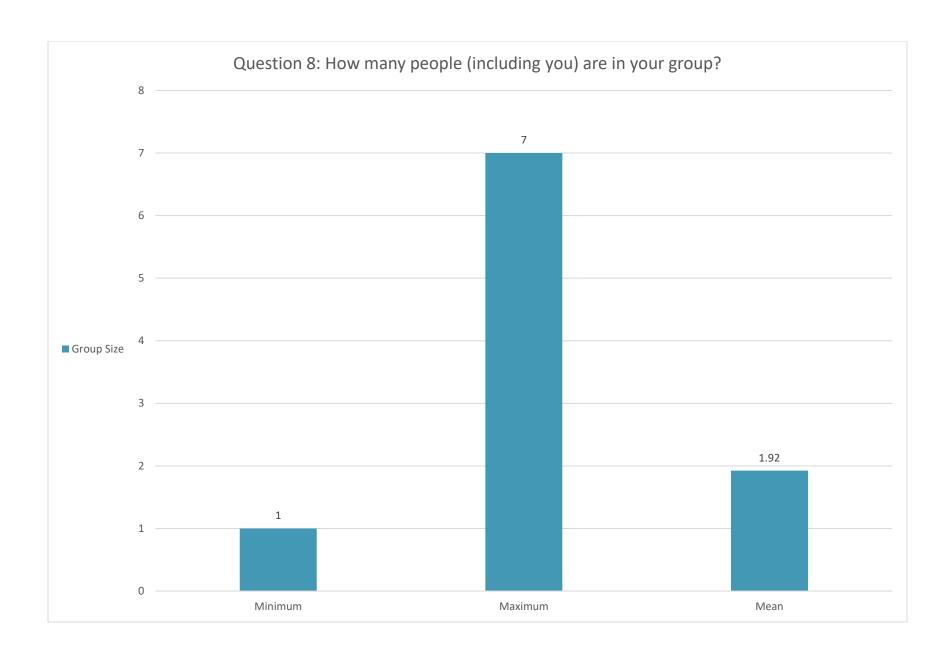
^{*}A small number of respondents interpreted Question 3 as asking how many months during the last 12 months they visited the Project. This is the average of those responses.

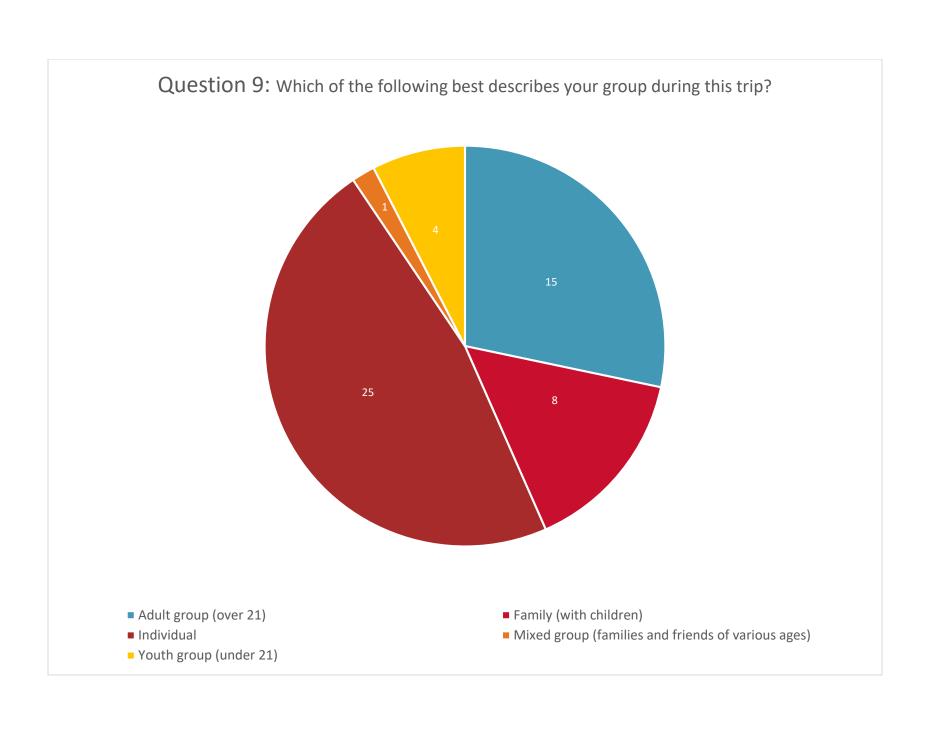


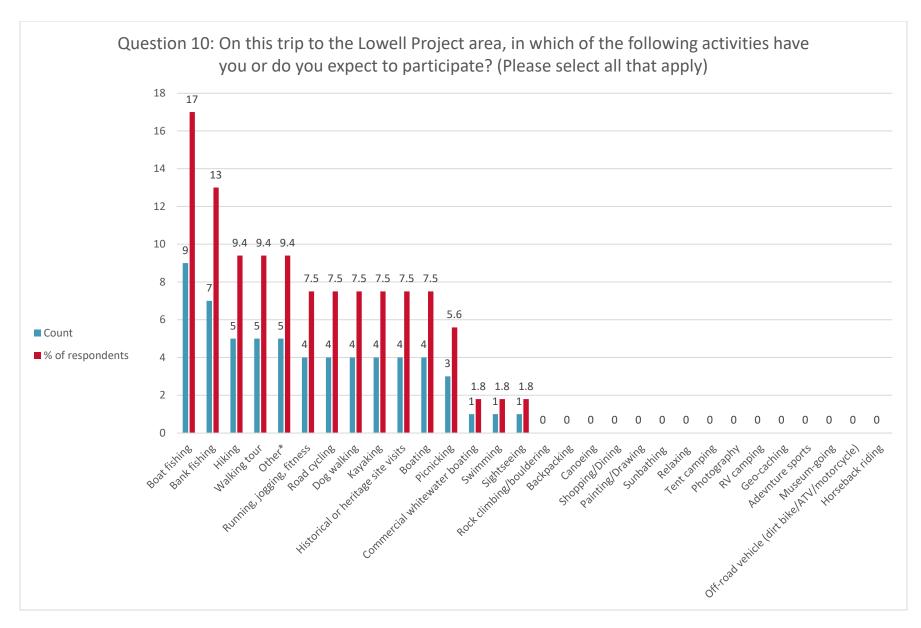


^{*}The mean does not include the 3,000 miles as it would significantly skew the results. To see the full list of respondent residential zip codes and a representative map, see Appendix F.

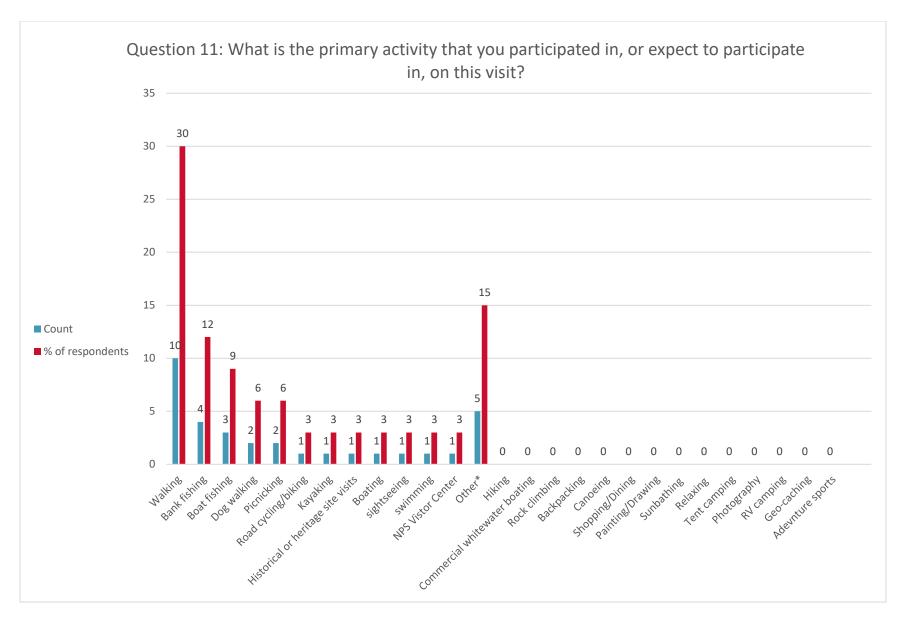




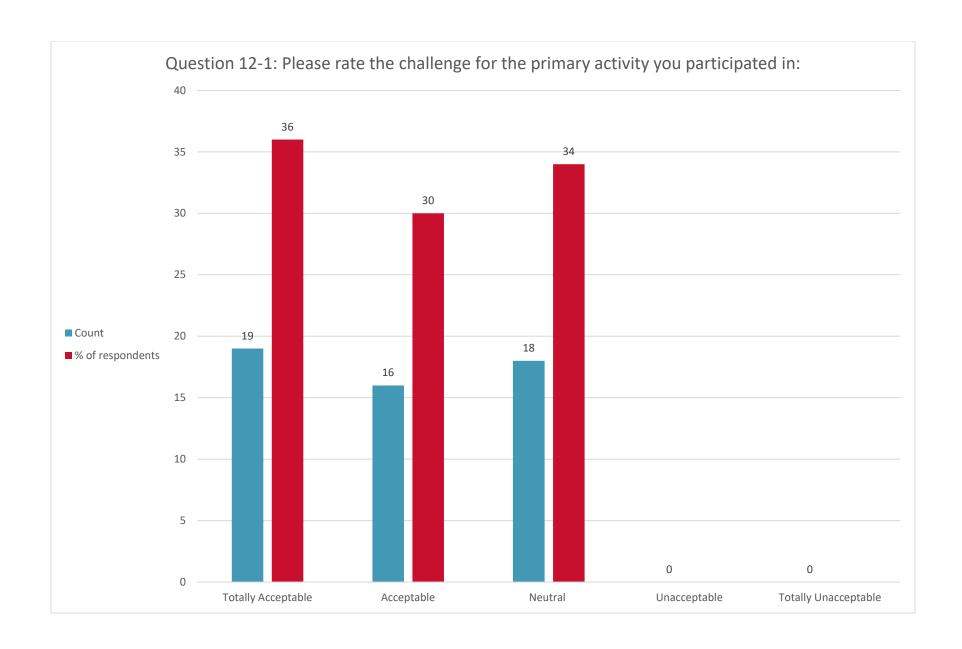


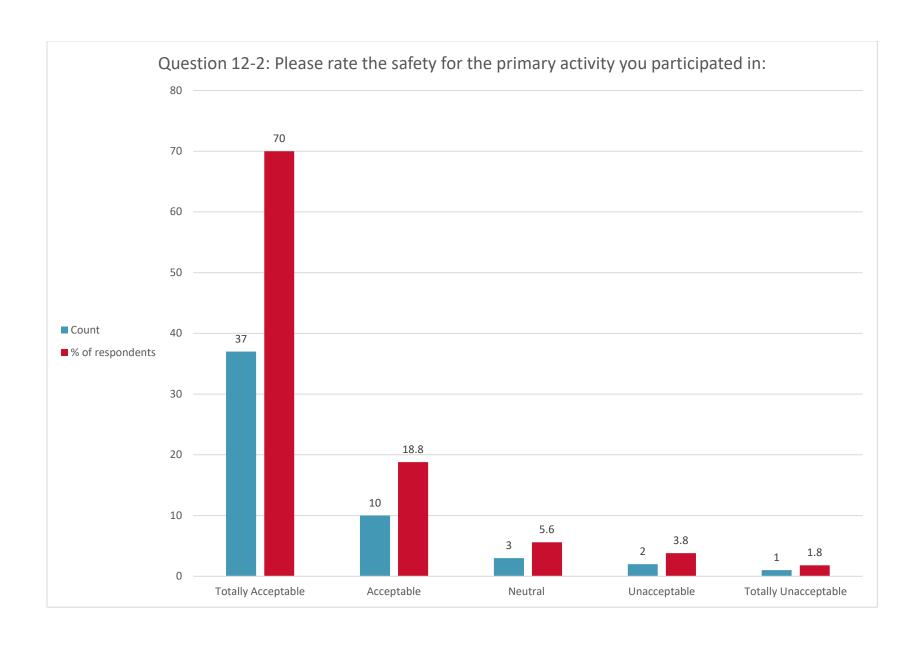


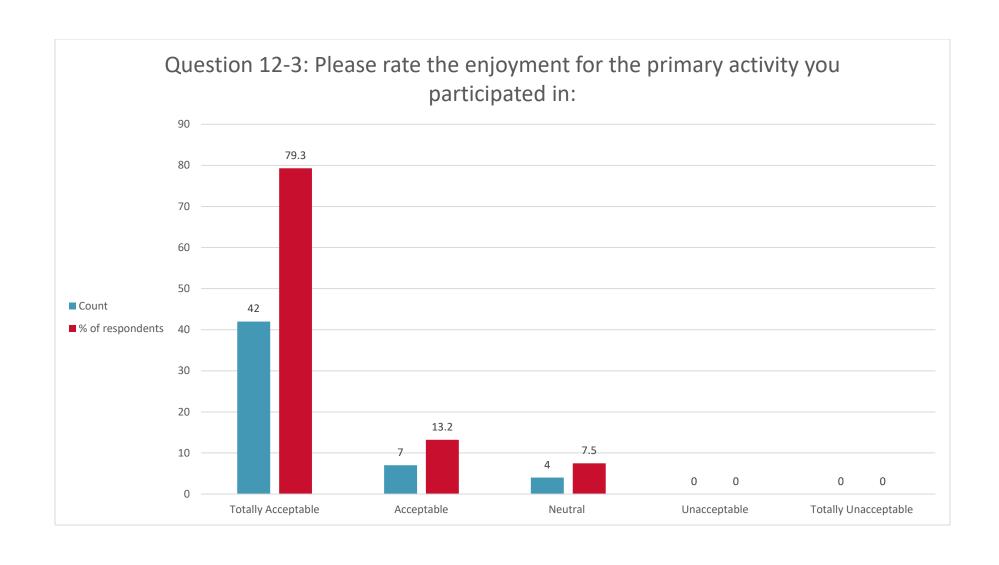
^{*}Other activities included duck feeding, playground, jet skiing, rowing, and wake boarding.



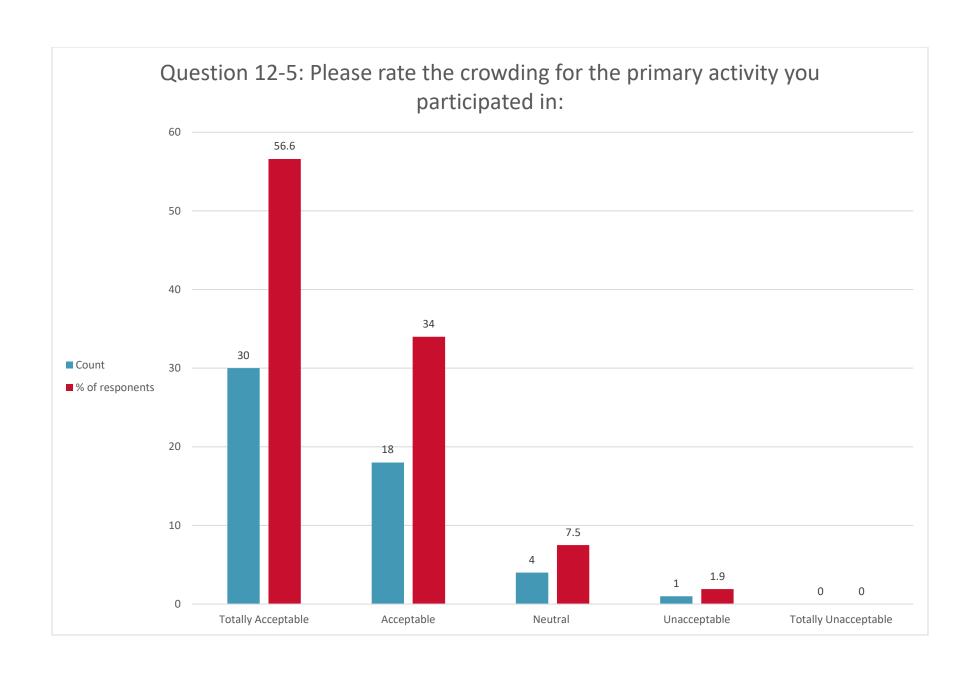
^{*}Other activities included duck feeding, playground, jet skiing, rowing, and wake boarding.

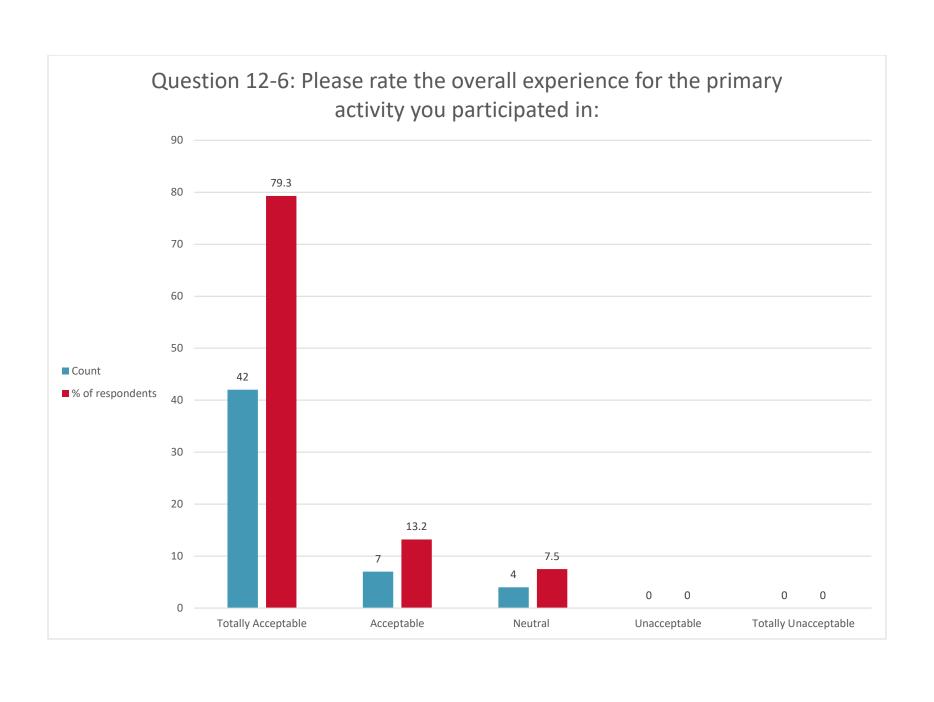


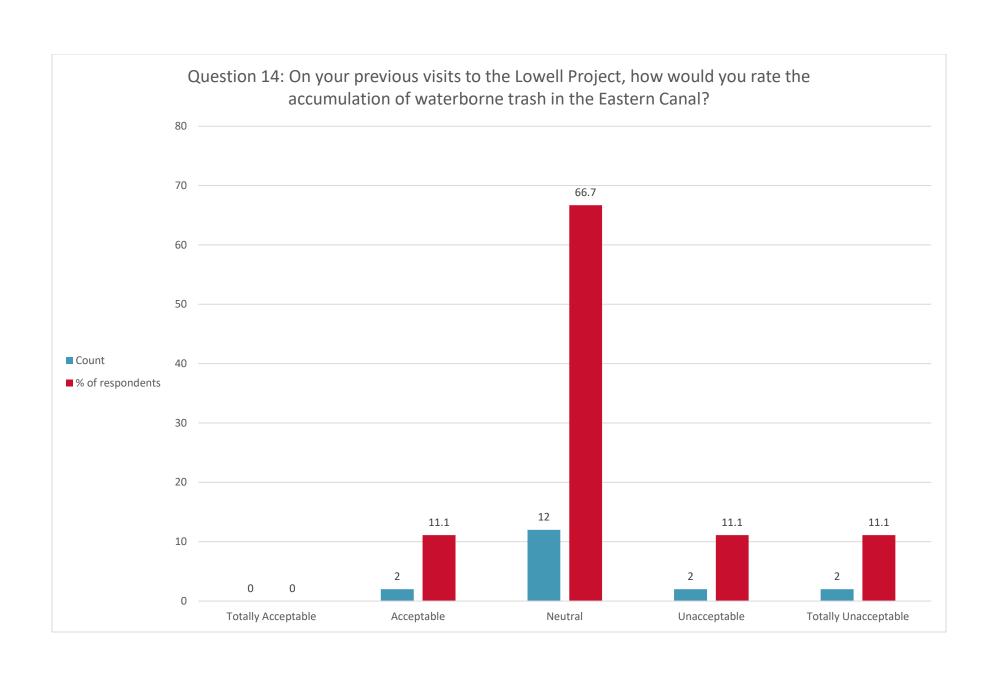




Question 12-4: Please rate the enjoyment for the primary activity you participated in: 70 58.5 60 50 40 ■ Count ■ % of respondents 30 20.8 20 15.1 11 10 5.6 0 0 **Totally Acceptable** Acceptable Neutral Unacceptable Totally Unacceptable







Question 14: On your previous visits to the Lowell Project, how would you rate the accumulation of waterborne trash in the Hamilton Canal? 70 — Count ■ % of respondents 30 20 13 10 10 **Totally Acceptable** Acceptable Neutral Unacceptable Totally Unacceptable

Question 14: On your previous visits to the Lowell Project, how would you rate the accumulation of waterborne trash in the Merrimack Canal? 70 63.1 60 50 Count ■ % of respondents 20 15.8 15.8 12 10 5.3 3 3

Neutral

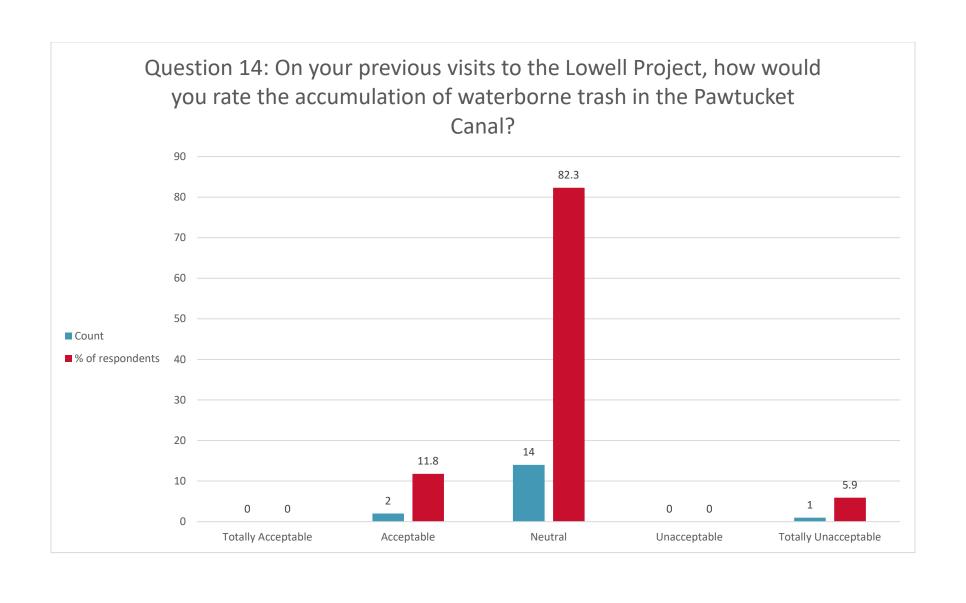
Unacceptable

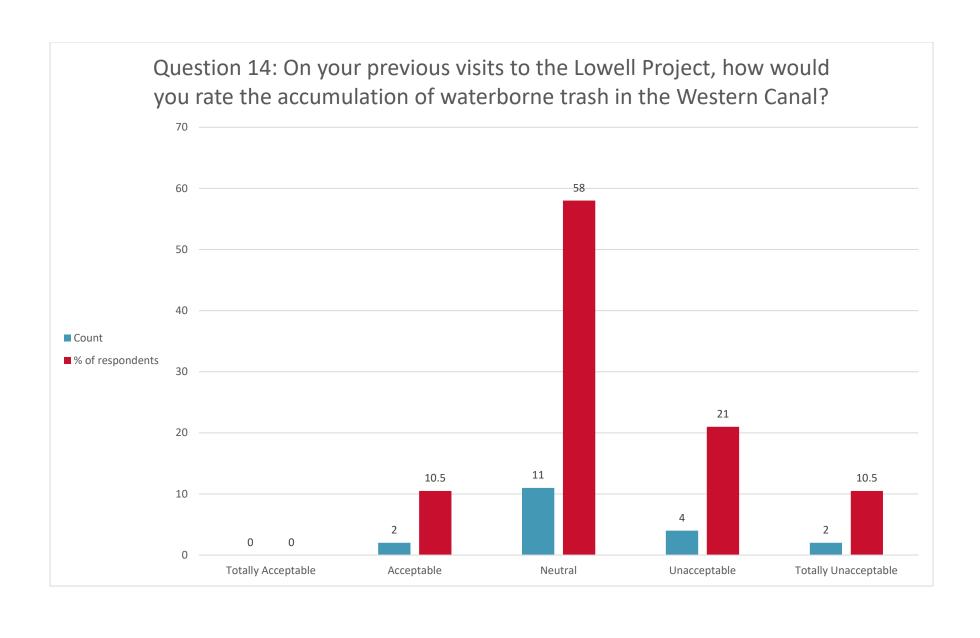
Totally Unacceptable

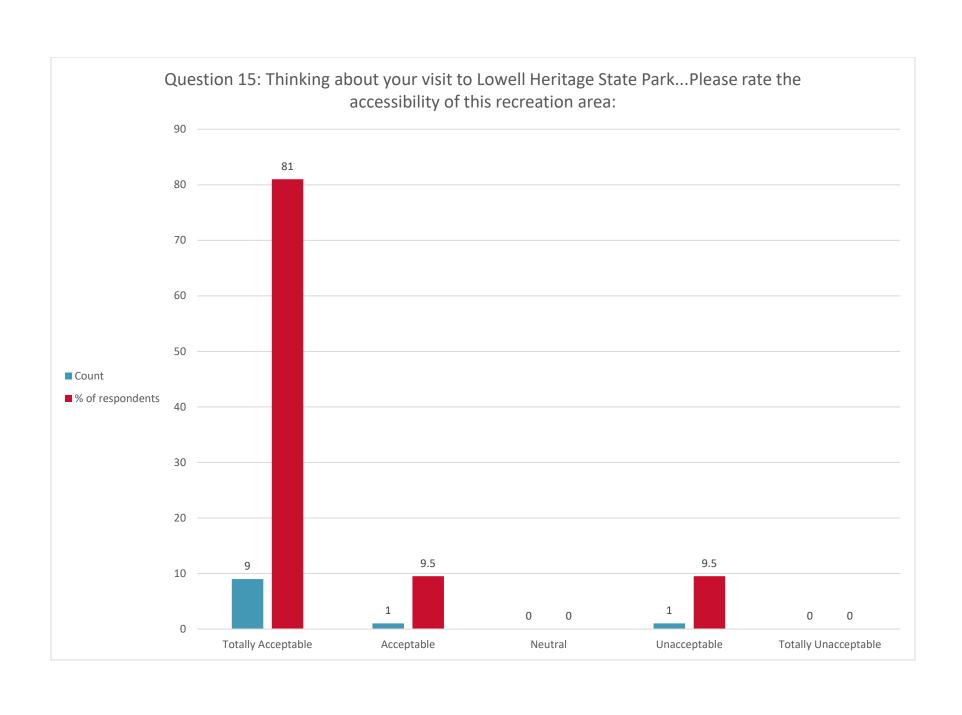
Acceptable

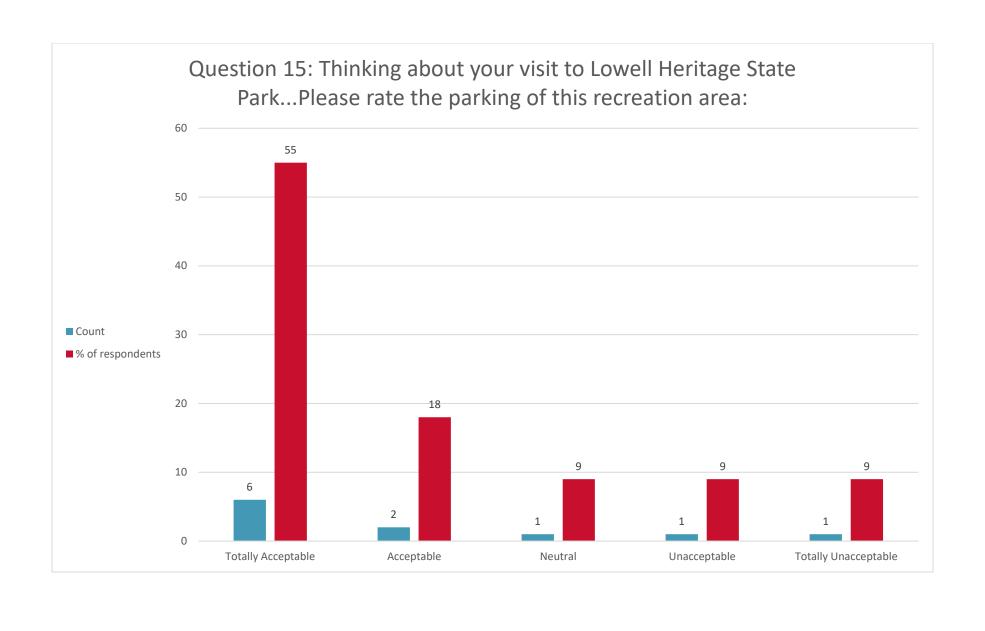
Totally Acceptable

Question 14: On your previous visits to the Lowell Project, how would you rate the accumulation of waterborne trash in the Northern Canal? 90 82.3 70 Count ■ % of respondents 20 14 11.8 10 5.9 0 0 0 Totally Acceptable Acceptable Unacceptable Totally Unacceptable Neutral

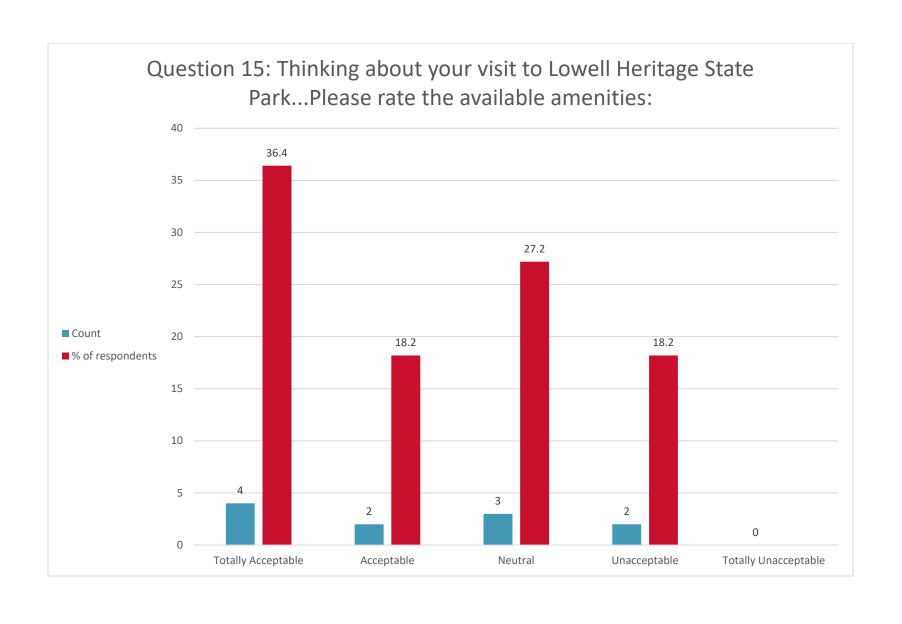


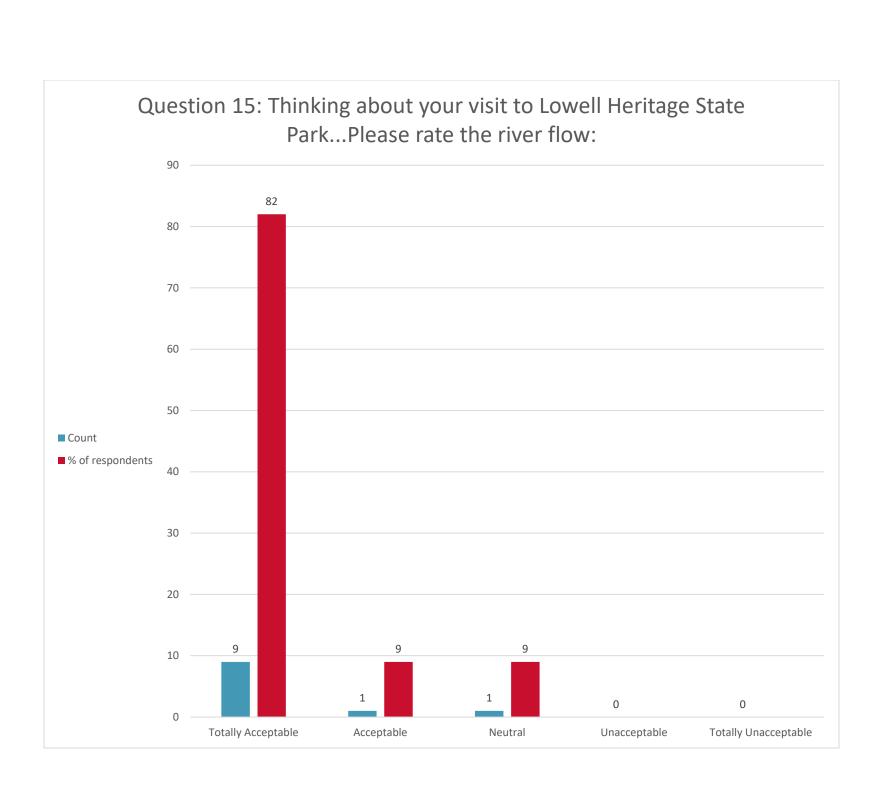


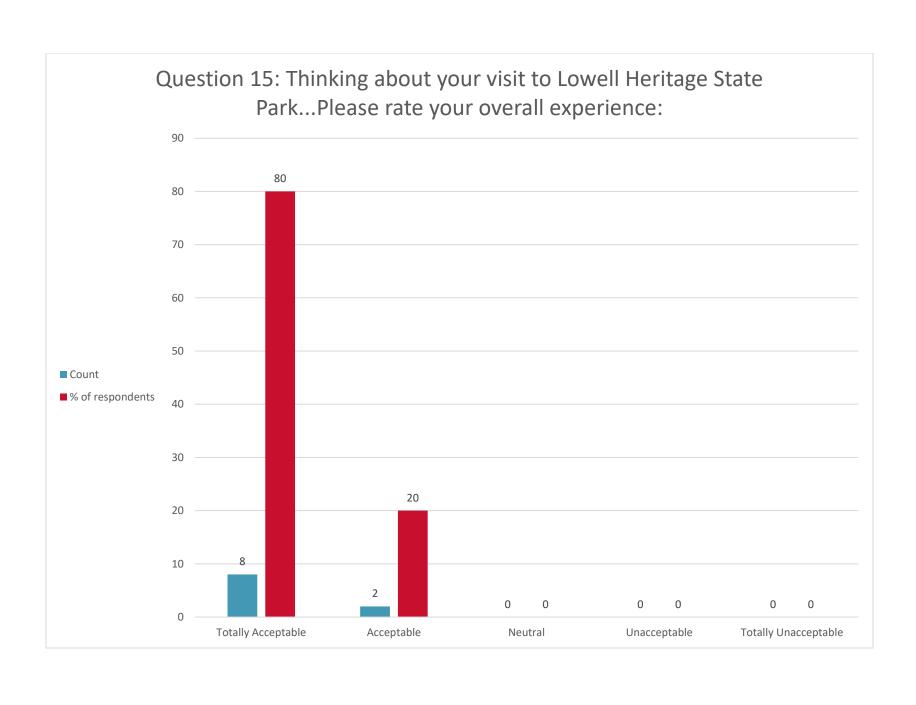


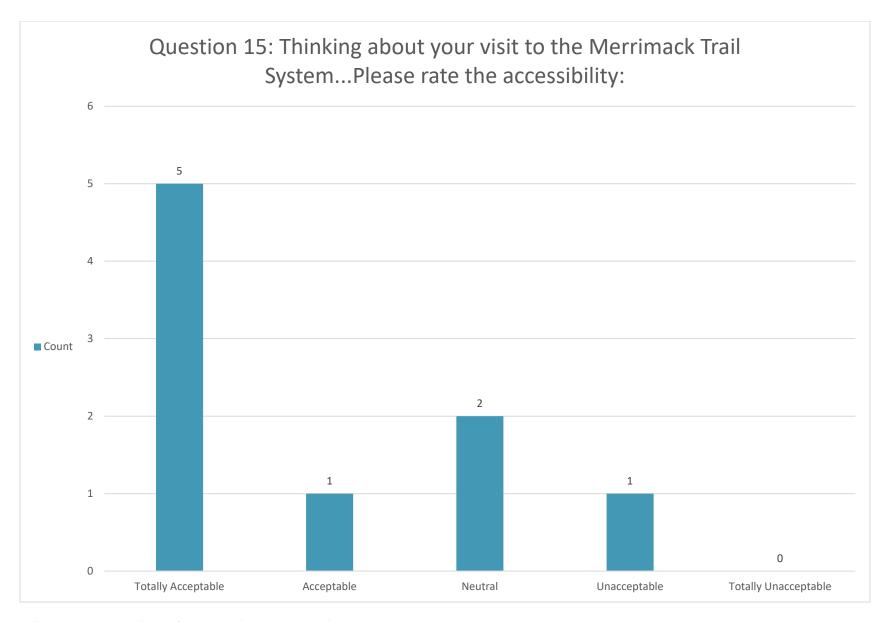


Question 15: Thinking about your visit to Lowell Heritage State Park...Please rate the crowding of this recreation area: 50 45.4 45 40 35 30 ■ Count 25 ■ % of respondents 20 18.2 18.2 18.2 15 10 5 2 2 2 0 Totally Unacceptable **Totally Acceptable** Acceptable Neutral Unacceptable





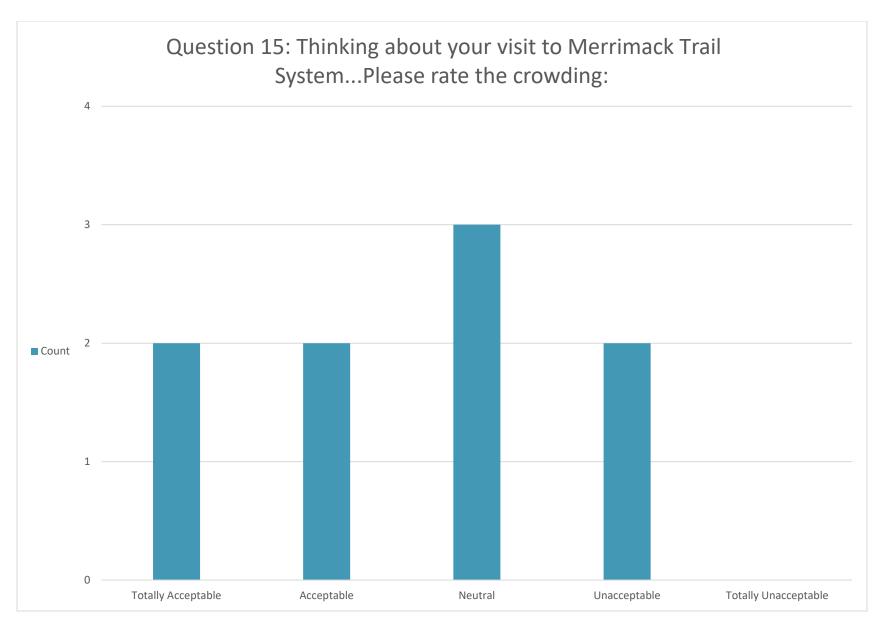




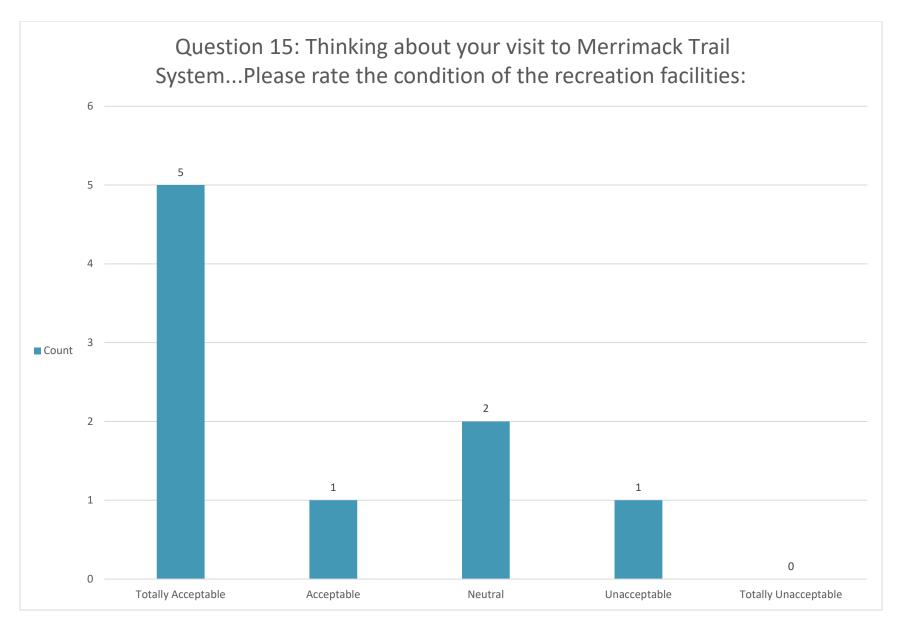
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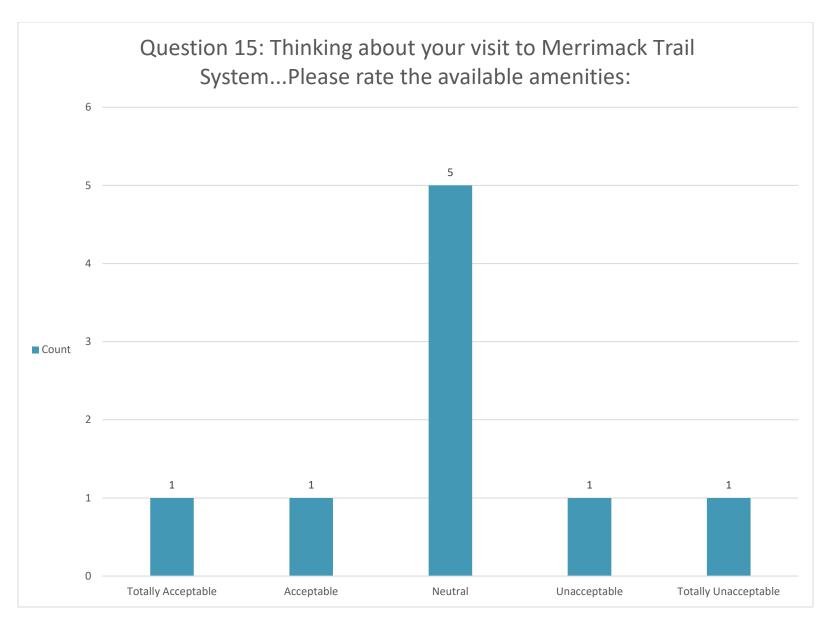
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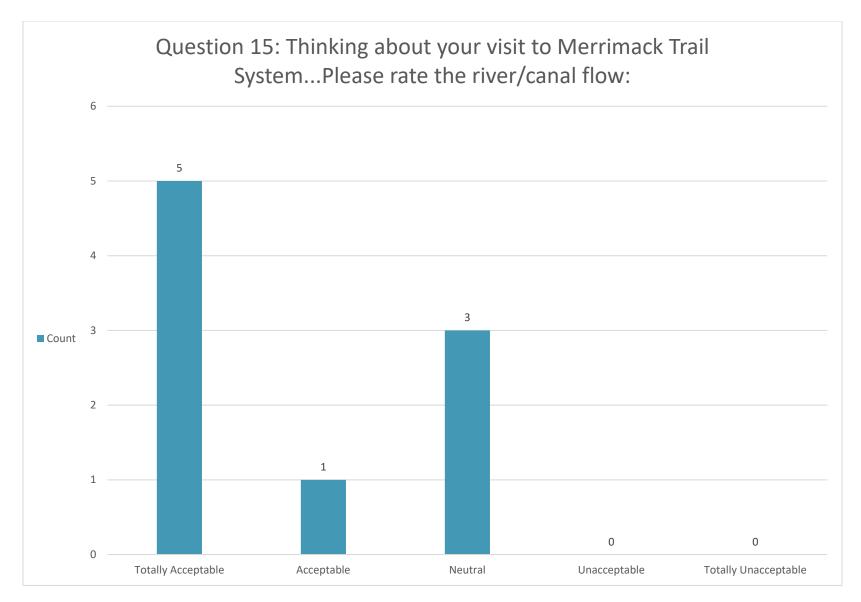
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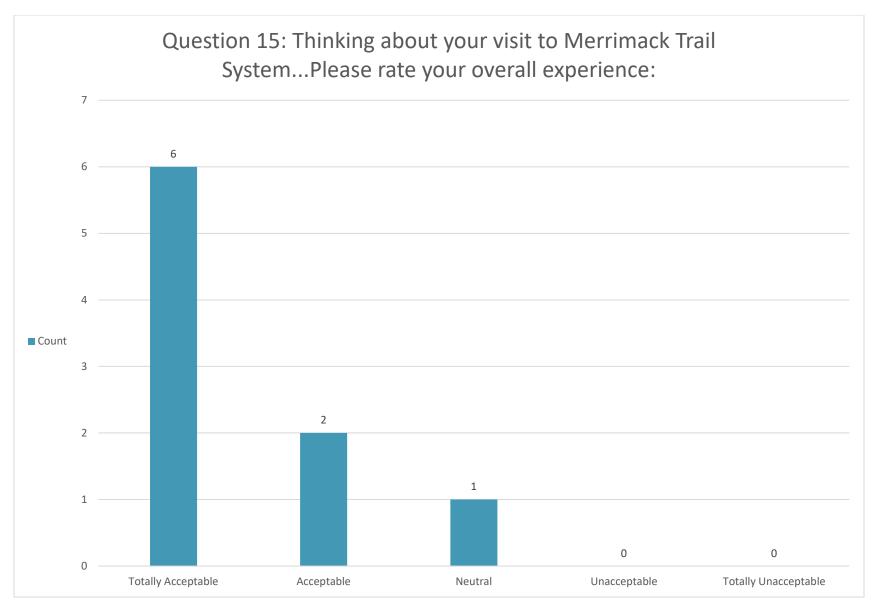
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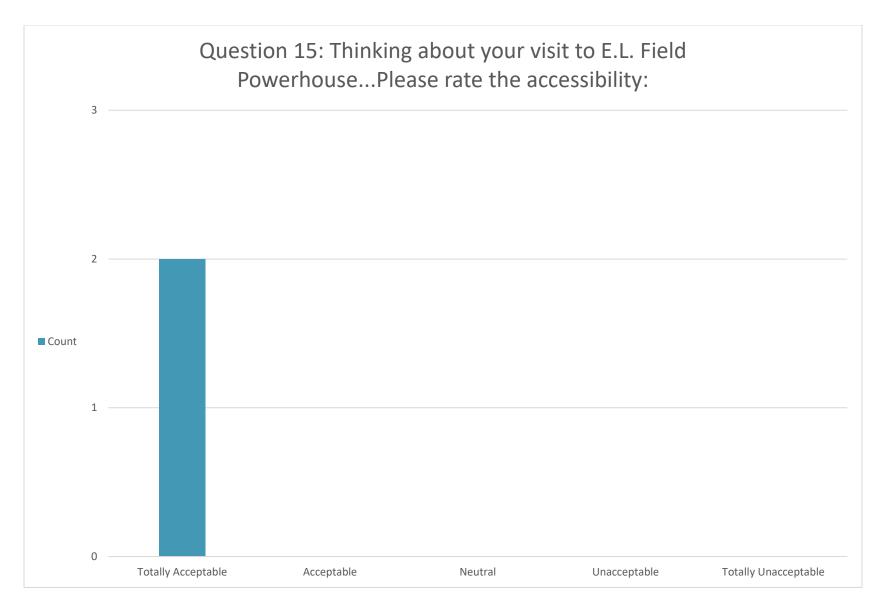
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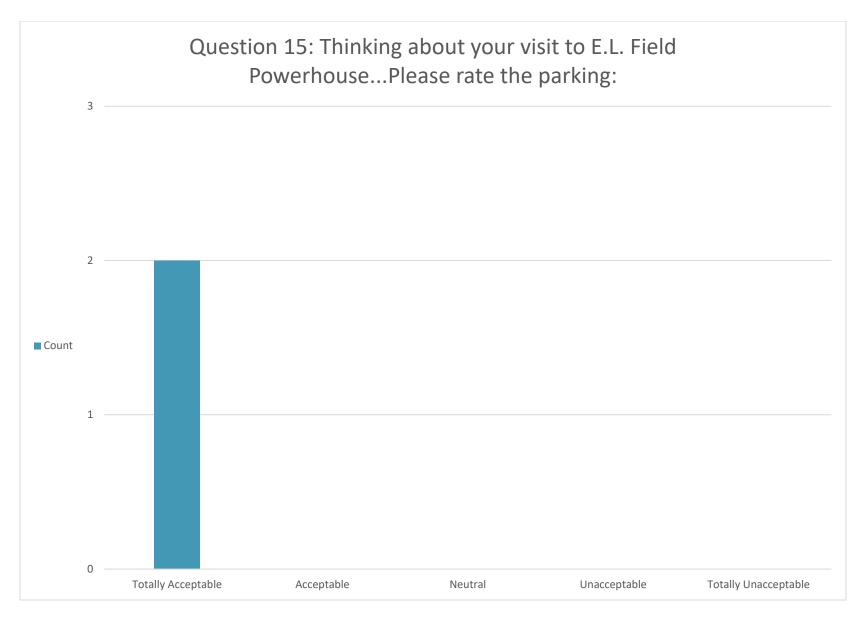
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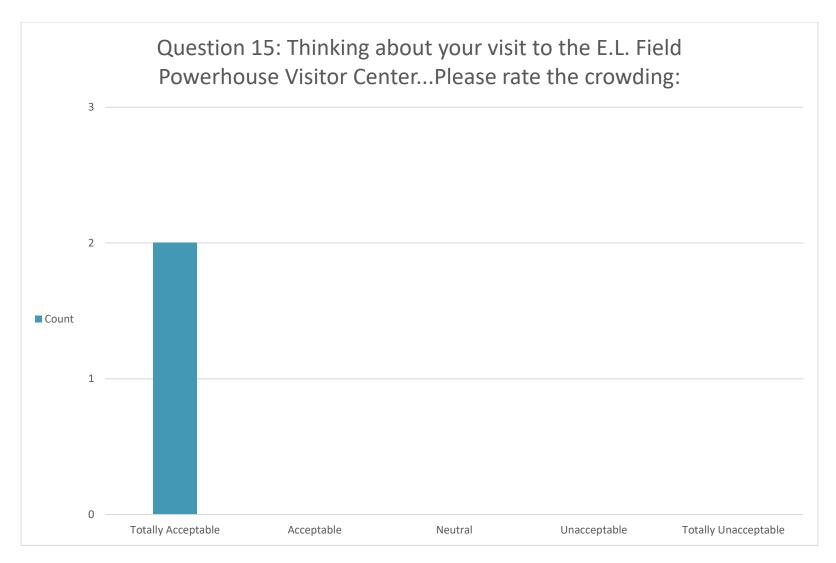
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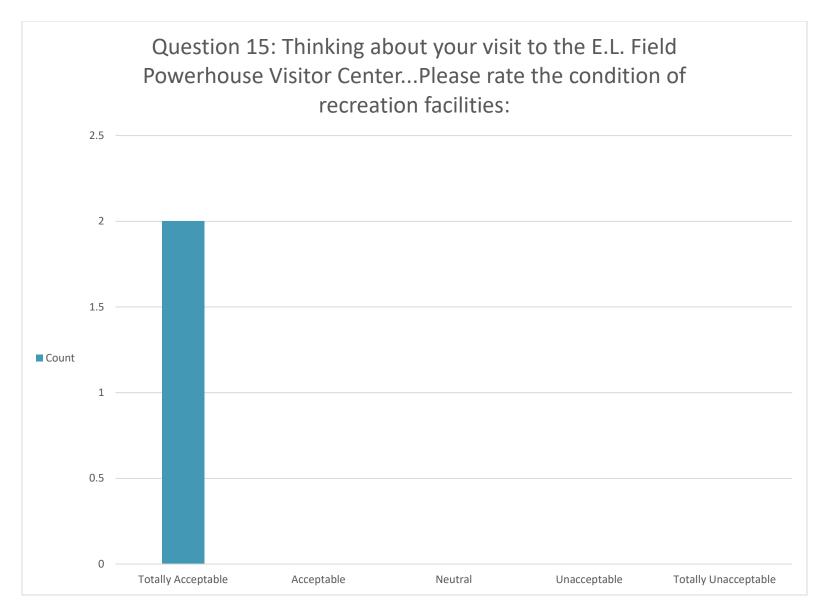
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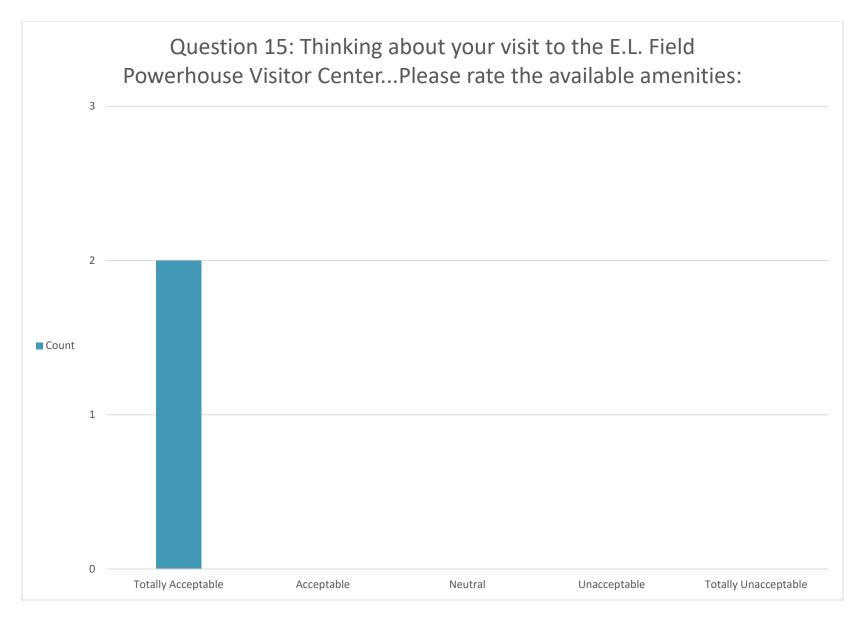
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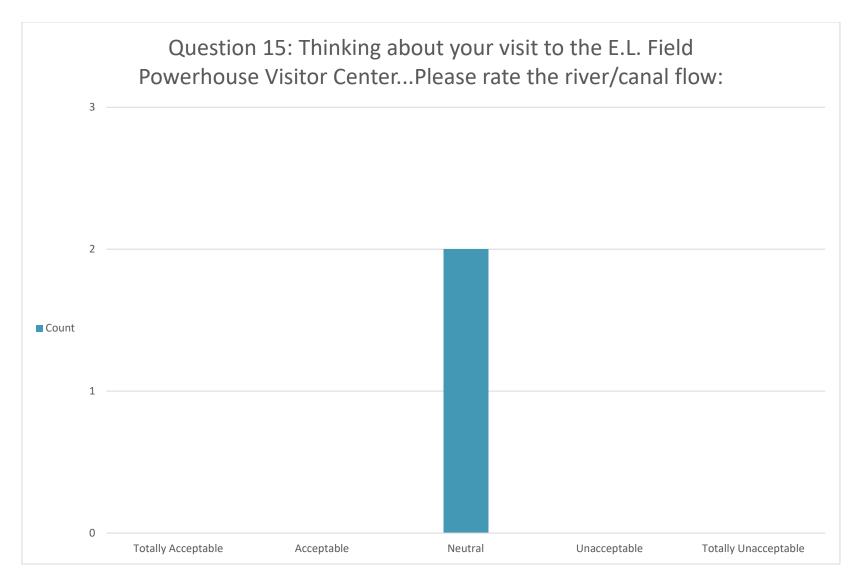
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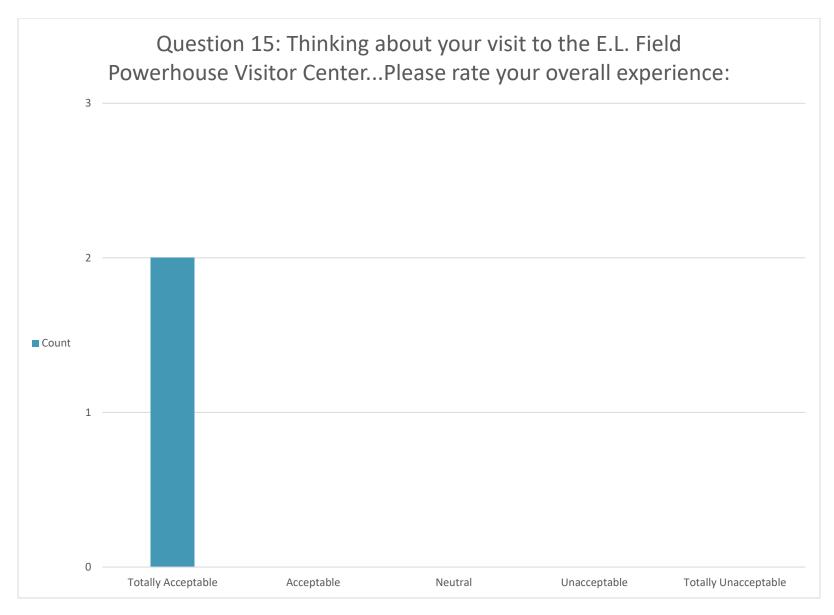
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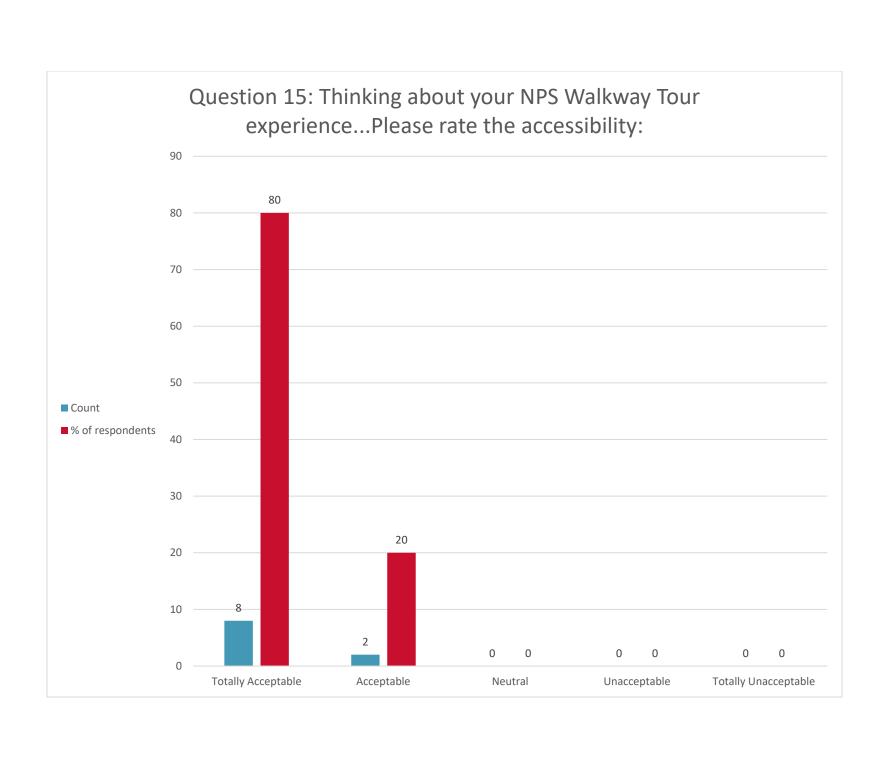
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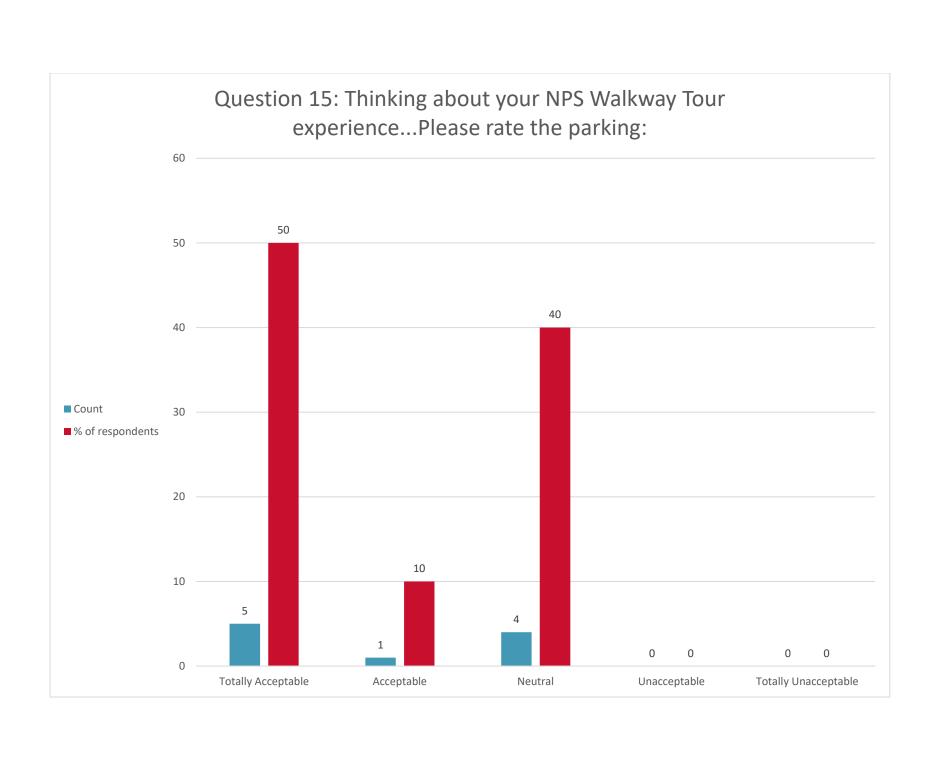


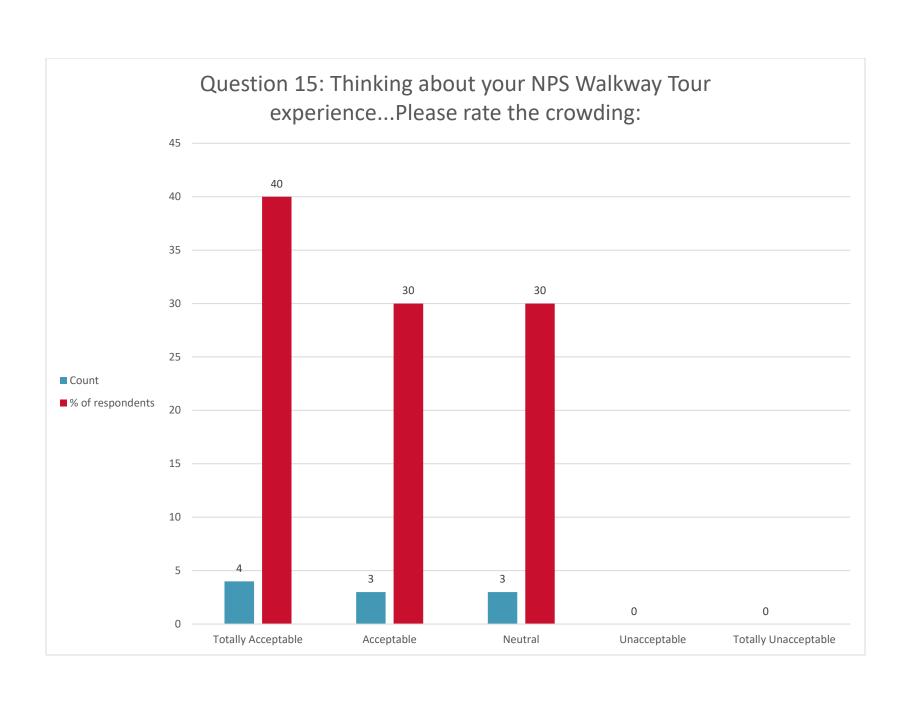
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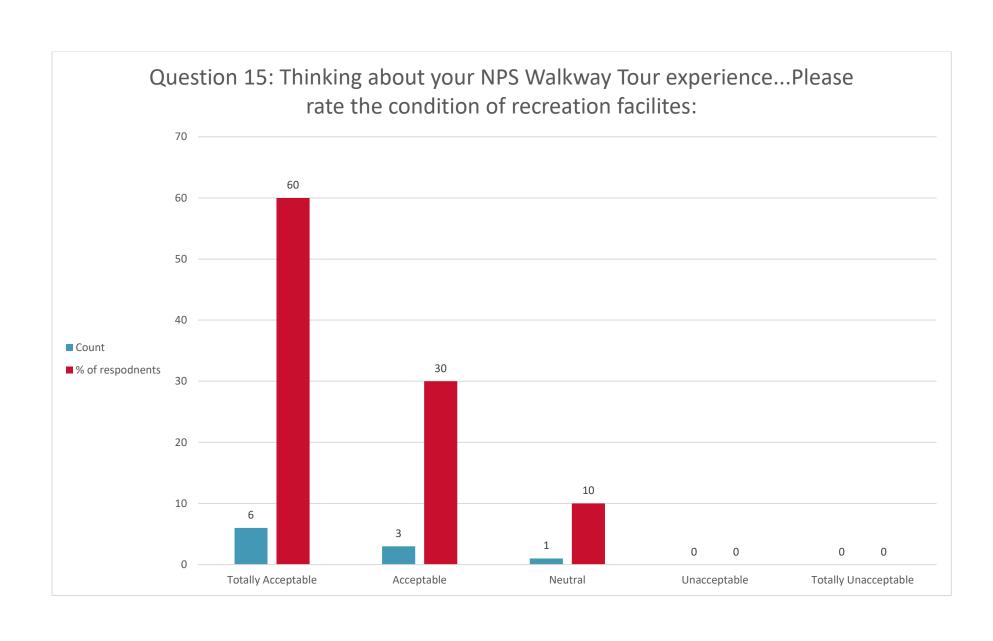


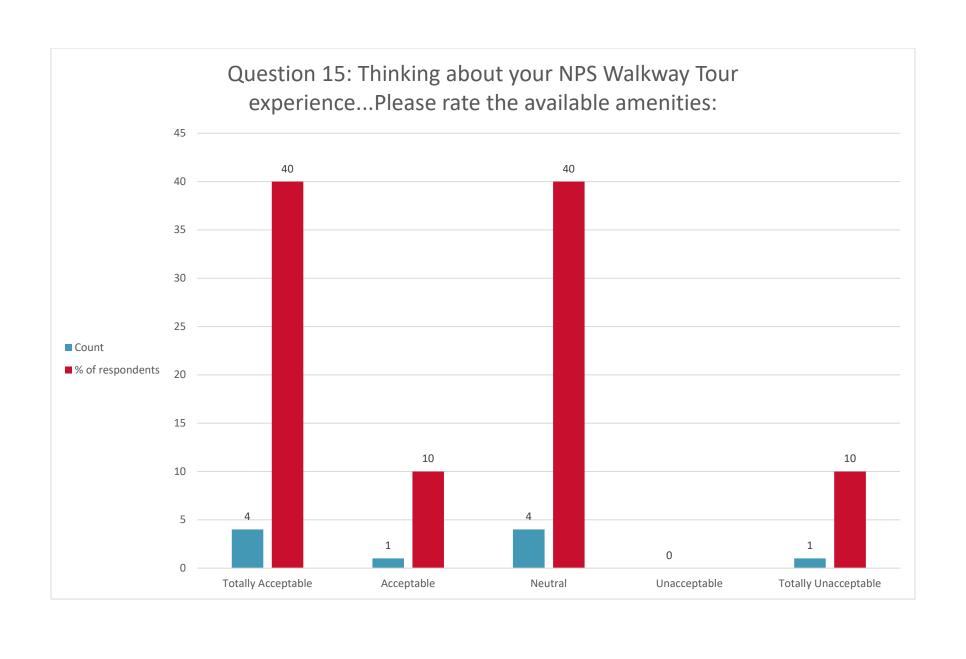
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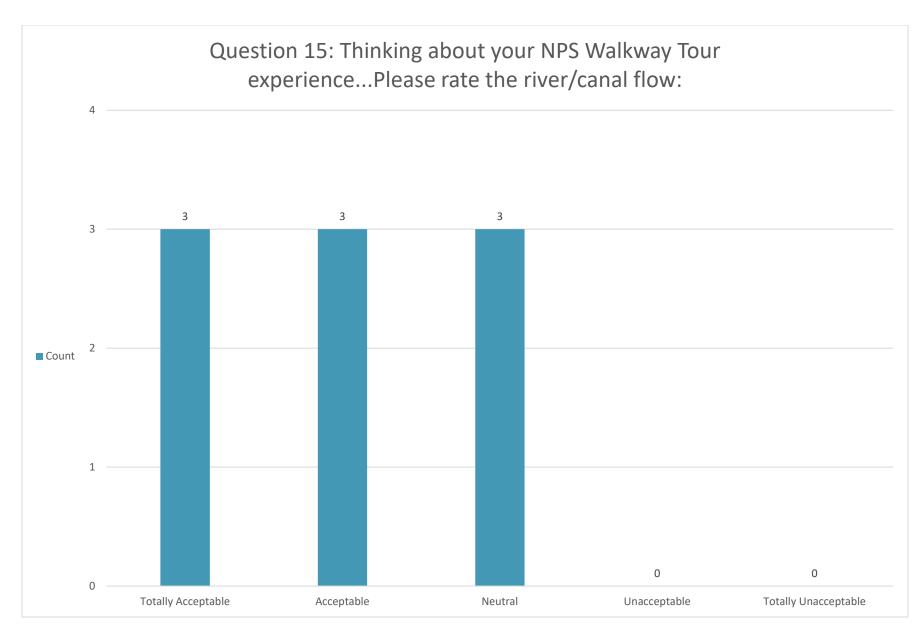




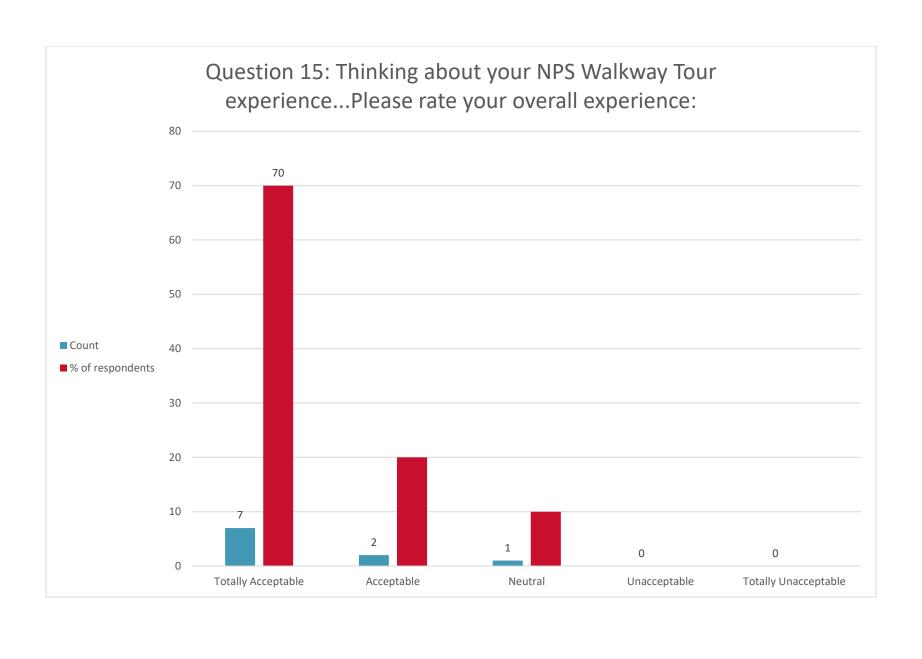


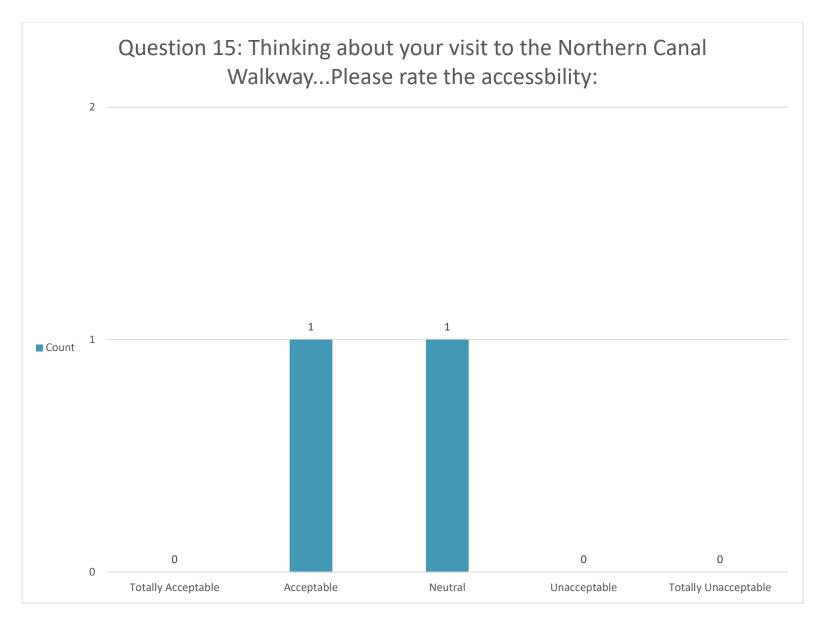




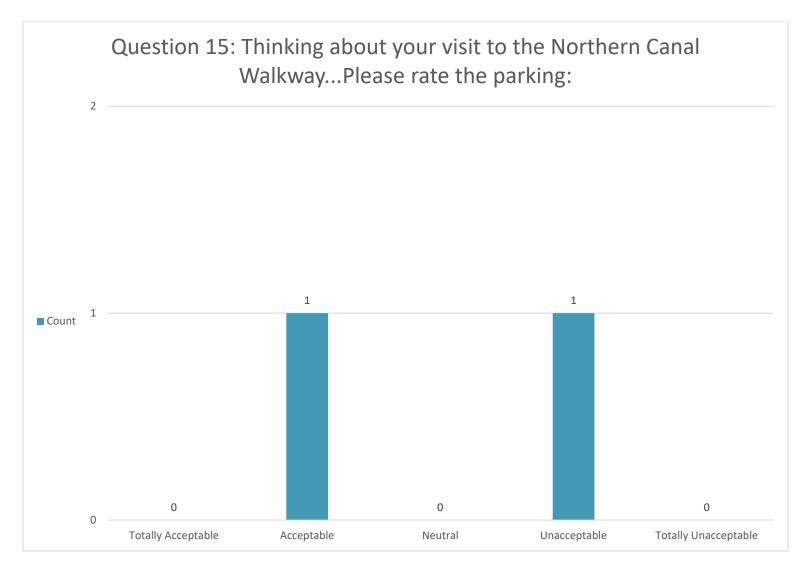


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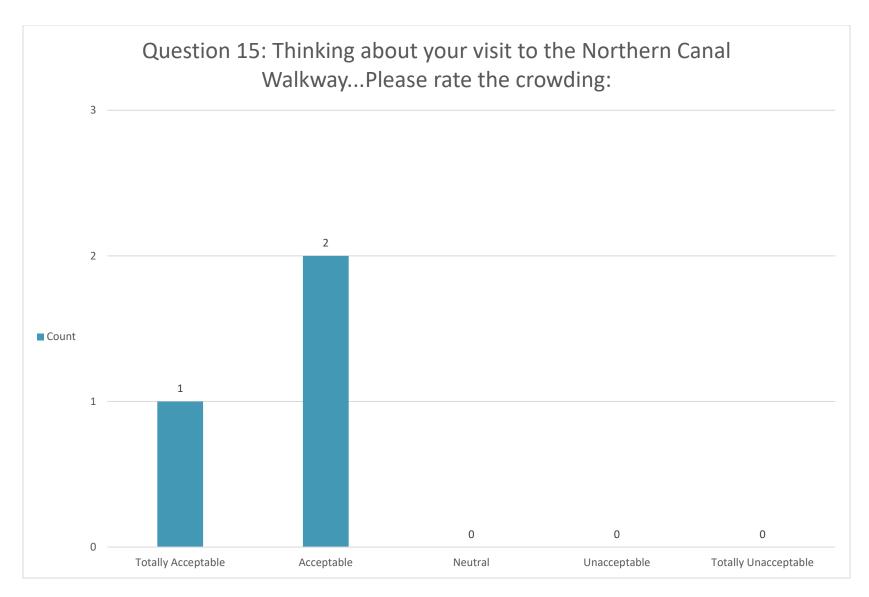




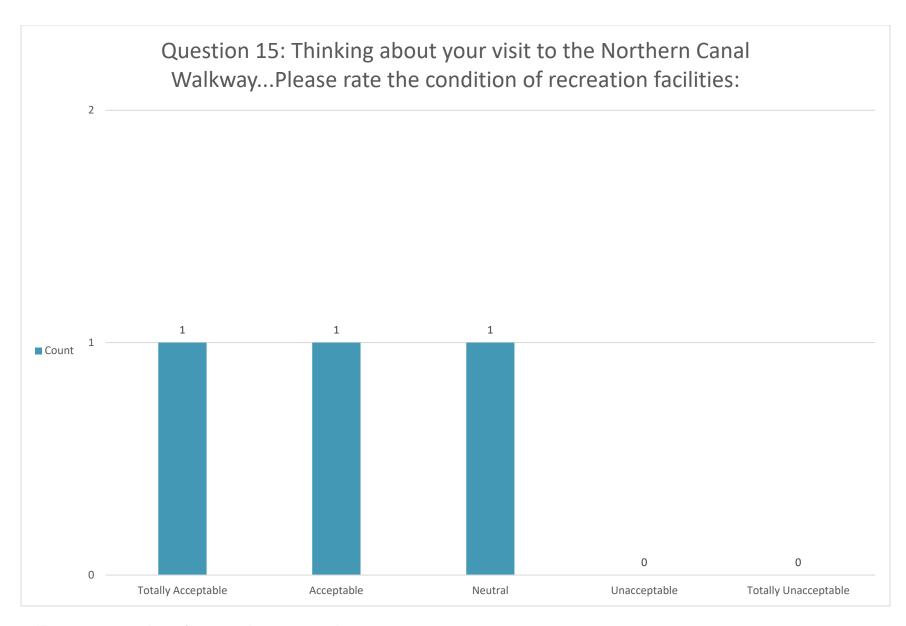
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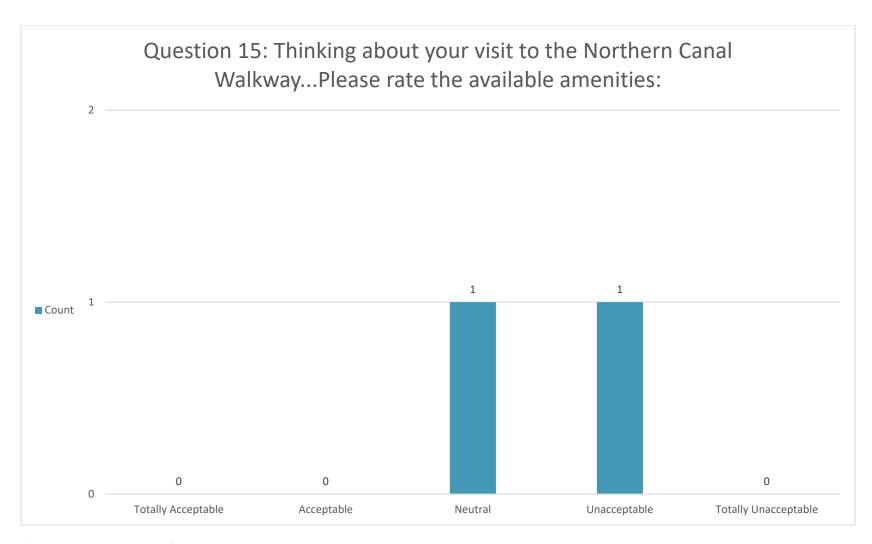
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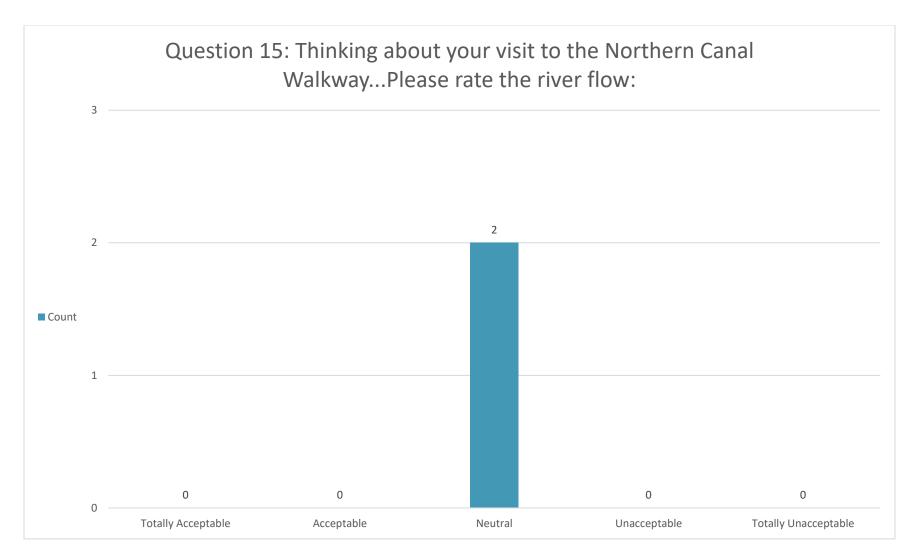
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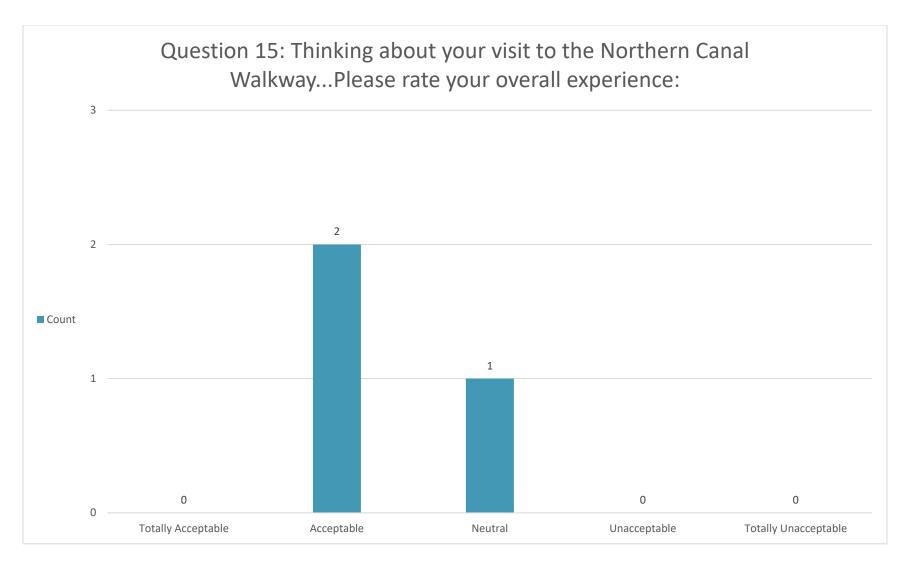
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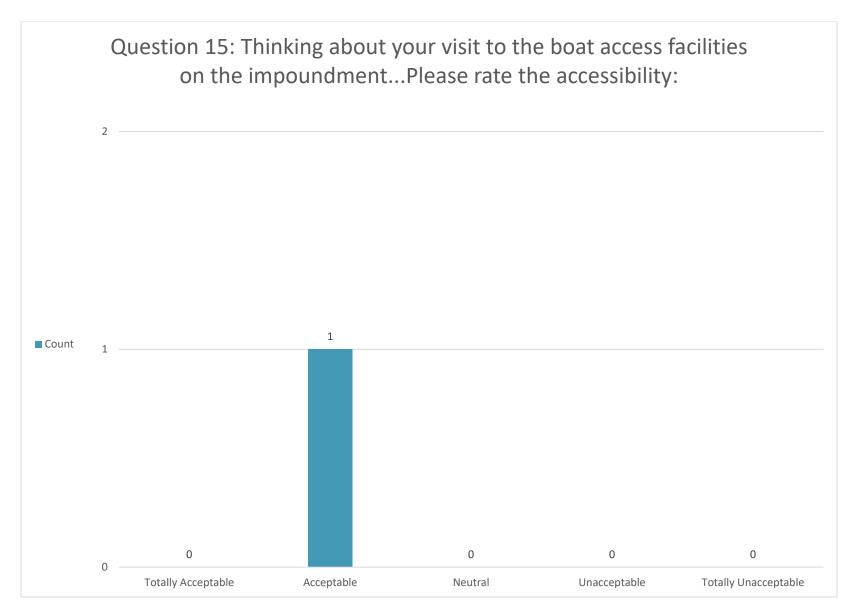
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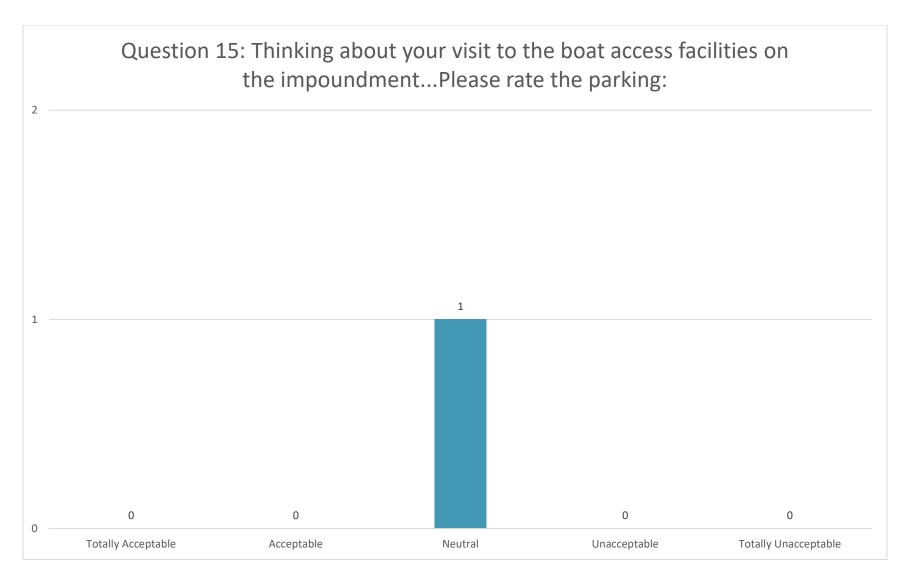
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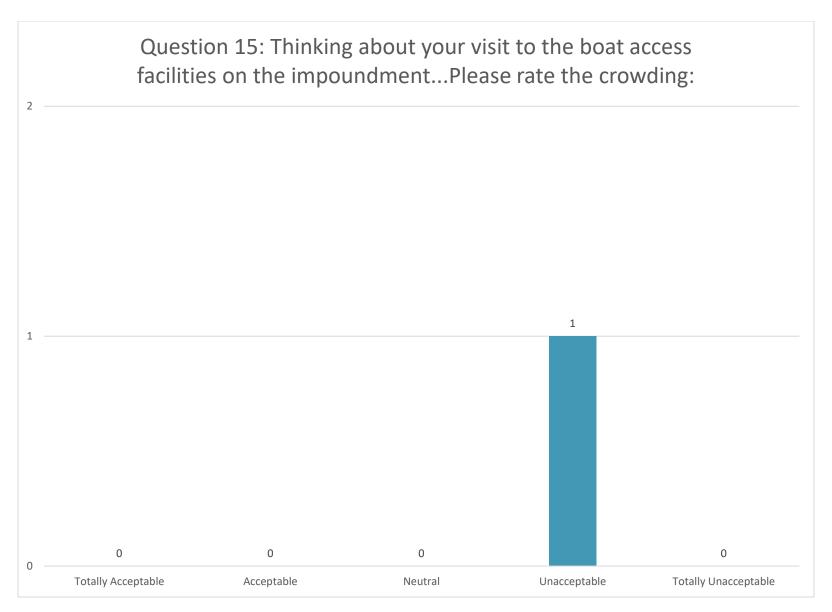
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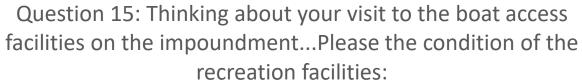
^{*}Percentages not shown for respondent counts under ten.

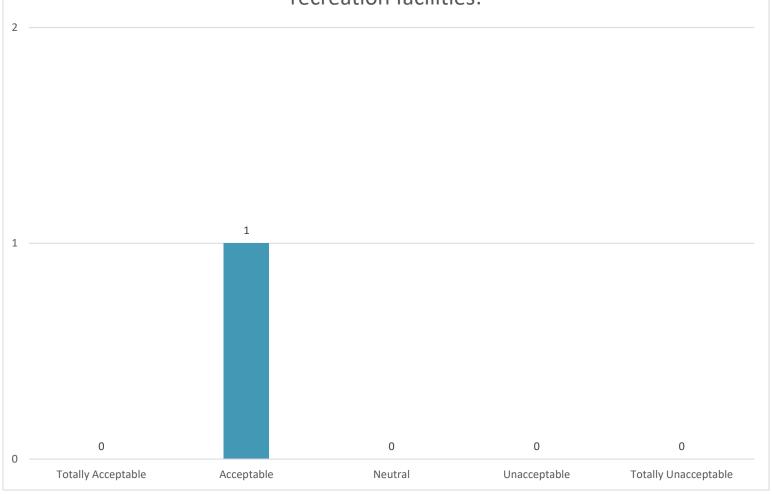


^{*}Percentages not shown for respondent counts under ten.

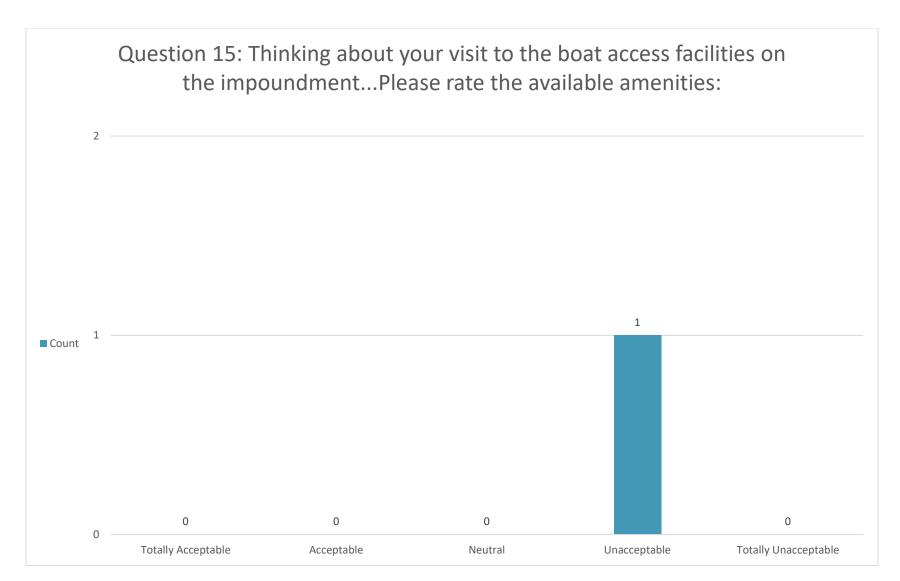


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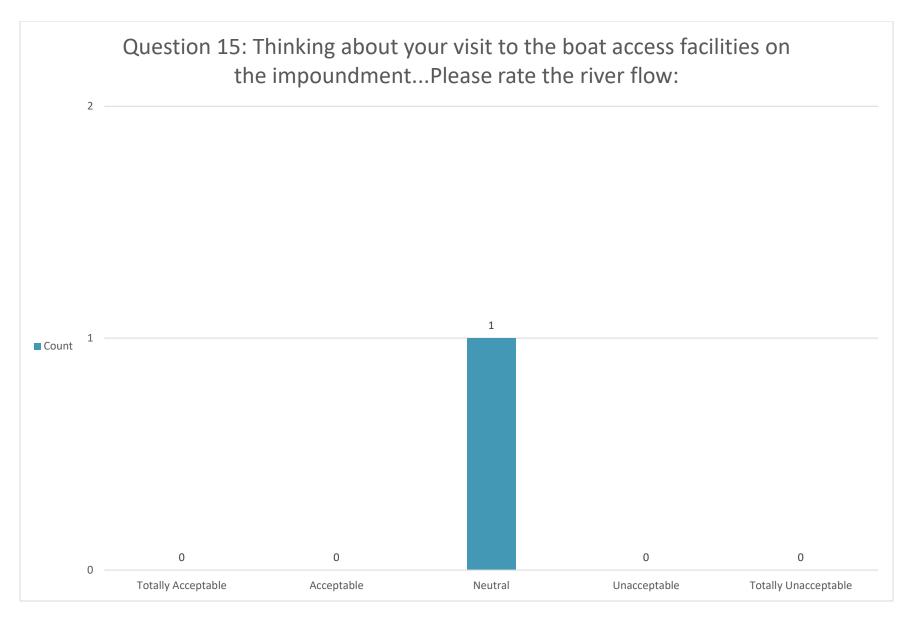




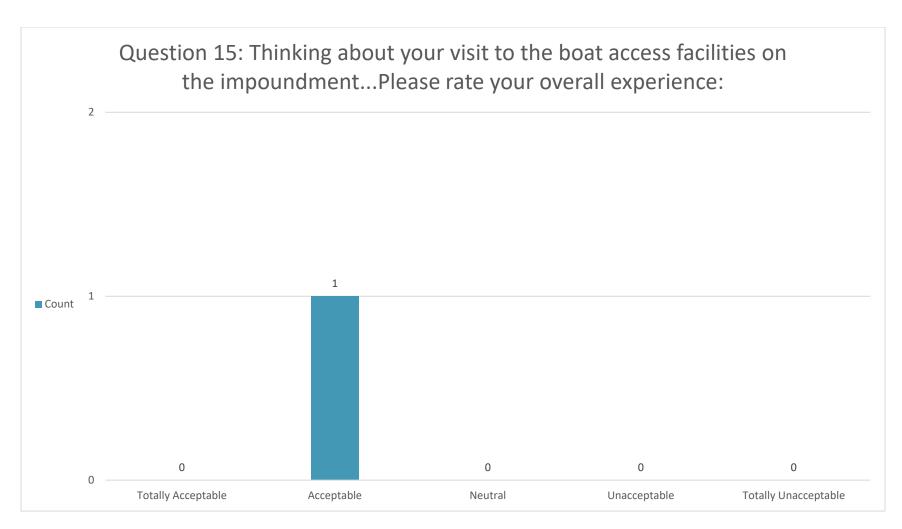
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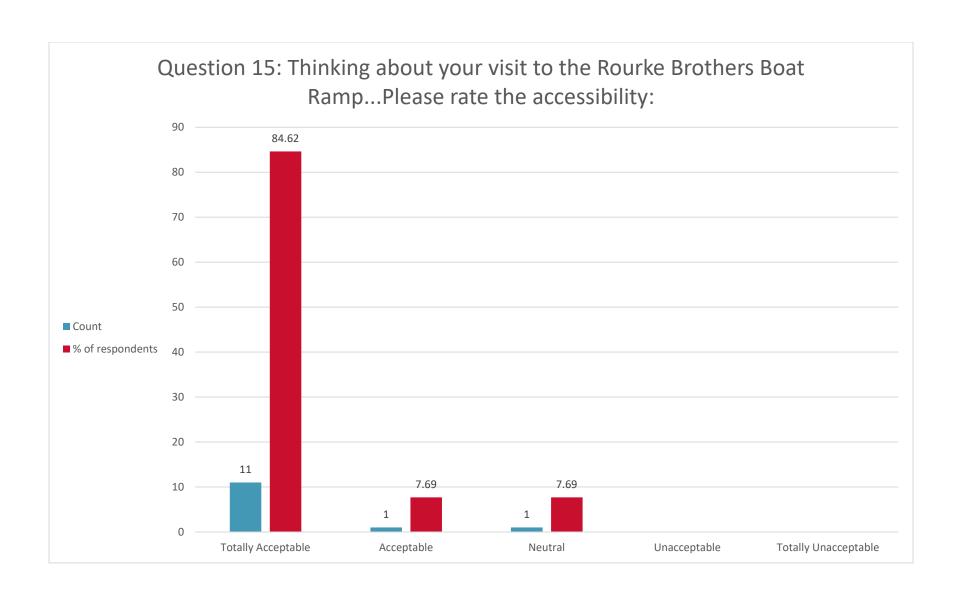
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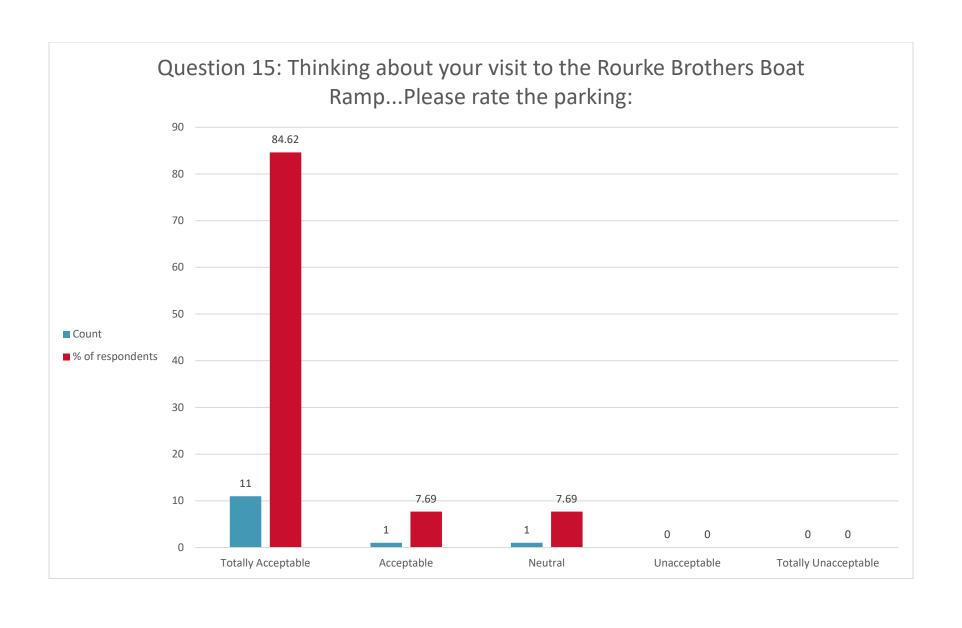


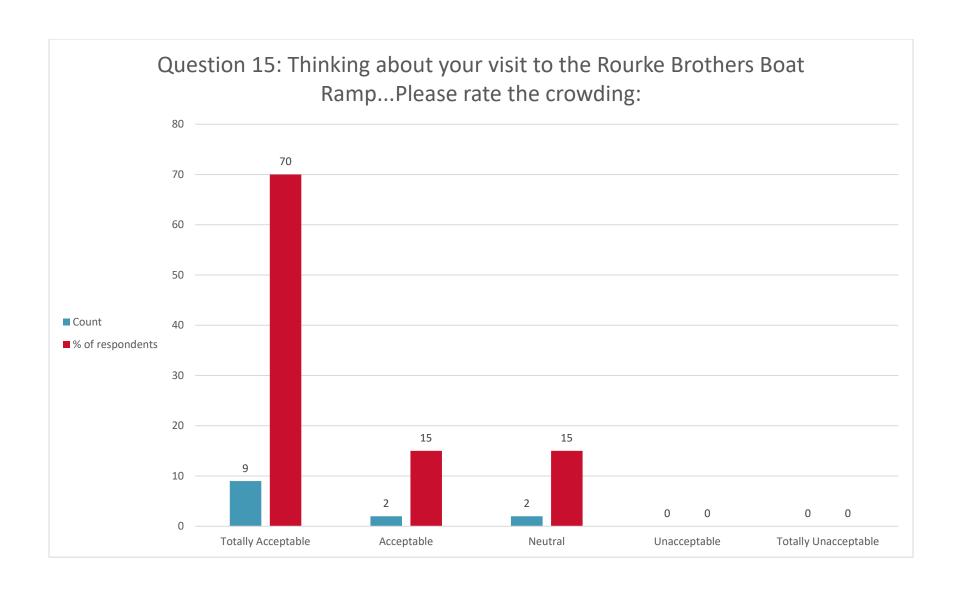
^{*}Percentages not shown for respondent counts under ten.



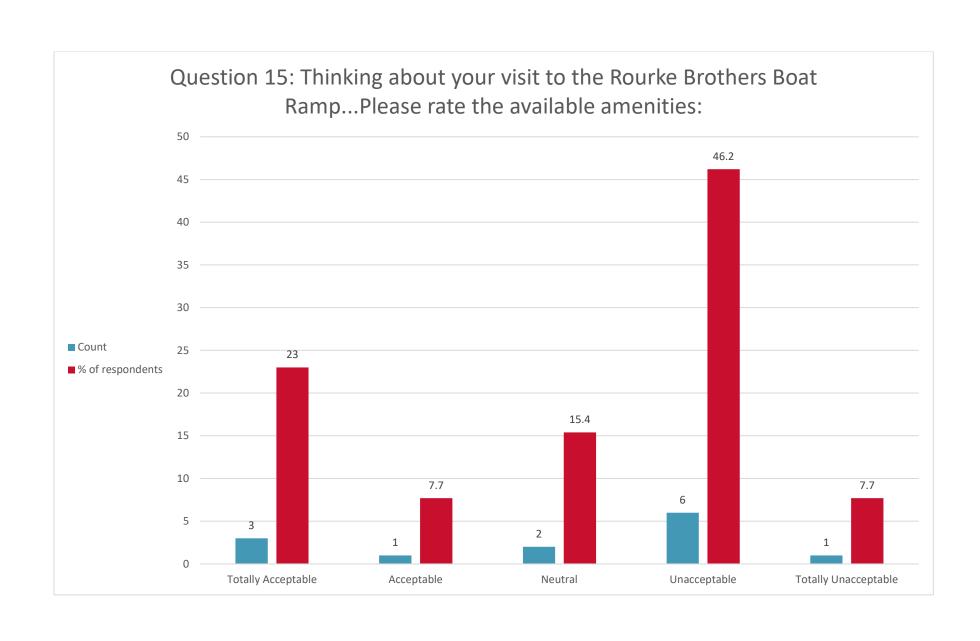
^{*}Percentages not shown for respondent counts under ten.



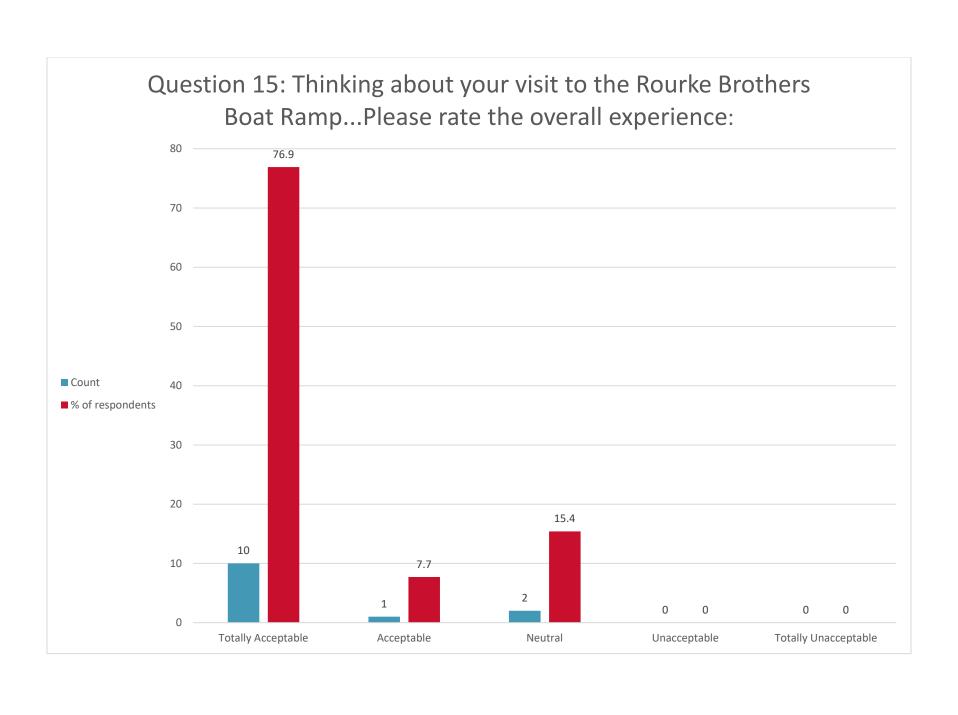


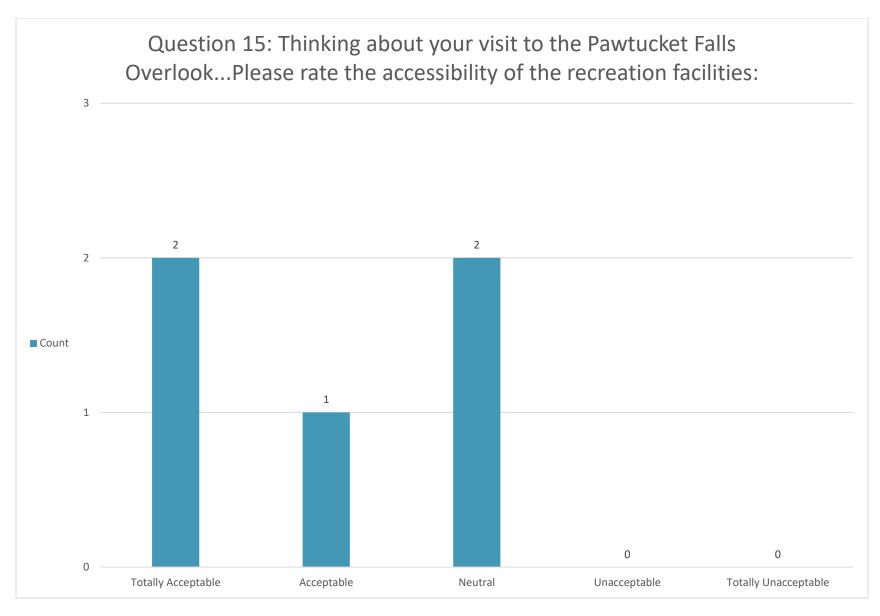


Question 15: Thinking about your visit to the Rourke Brothers Boat Ramp...Please rate the condition of the recreation facilities: 100 92.3 90 80 70 60 Count 50 ■ % of respondents 40 30 20 12 7.70 10 0 0 0 0 0 Totally Acceptable Acceptable Totally Unacceptable Neutral Unacceptable

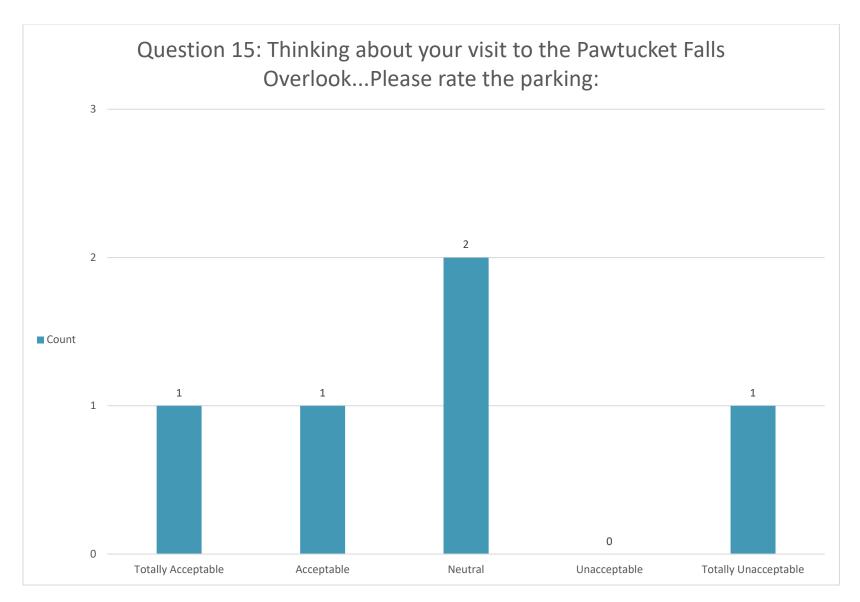


Question 15: Thinking about your visit to the Rourke Brothers Boat Ramp...Please rate the river flow: 90 80 70 60 50 ■ Count ■ % of respondents 30 20 15.00 11 10 0 0 Totally Acceptable Totally Unacceptable Acceptable Neutral Unacceptable

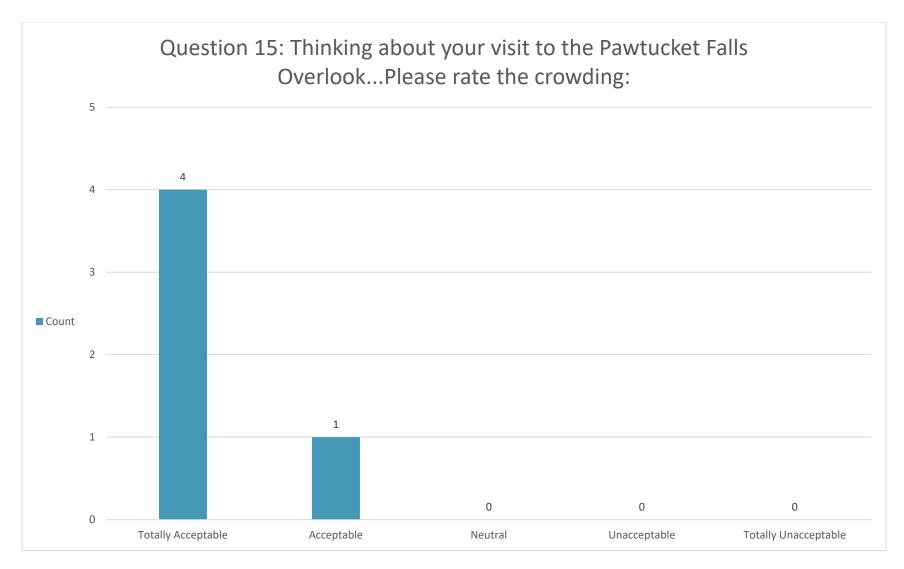




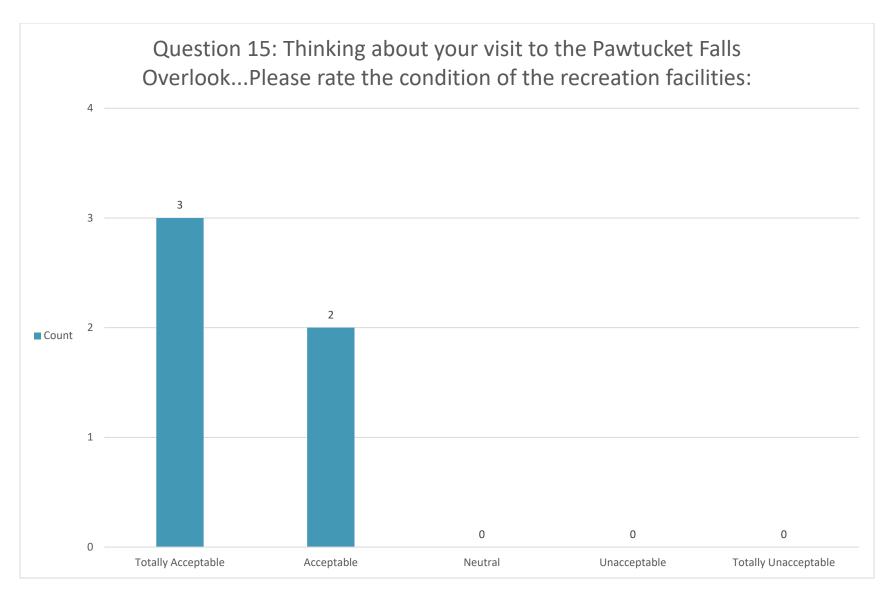
^{*}Percentages not shown for respondent counts under ten.



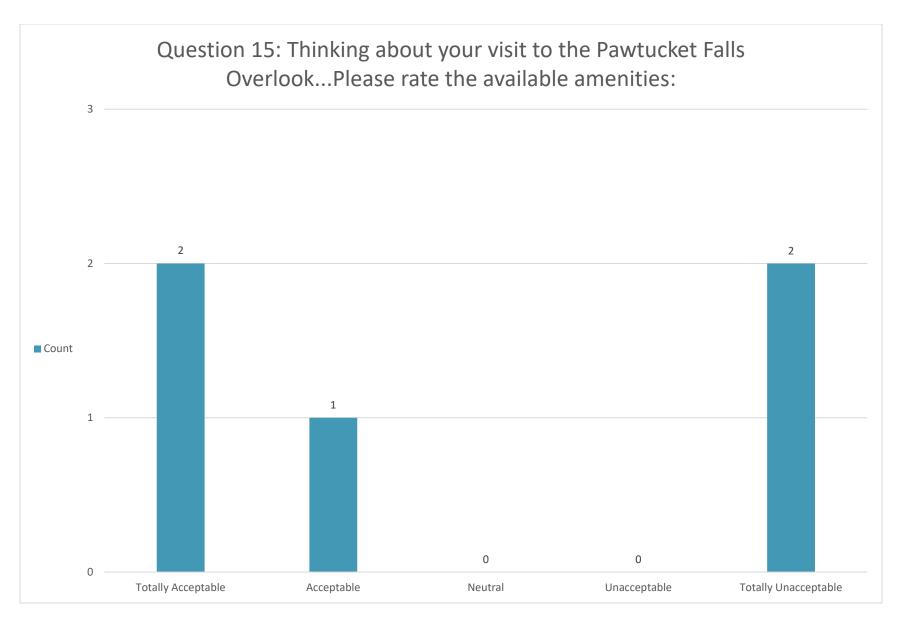
^{*}Percentages not shown for respondent counts under ten.



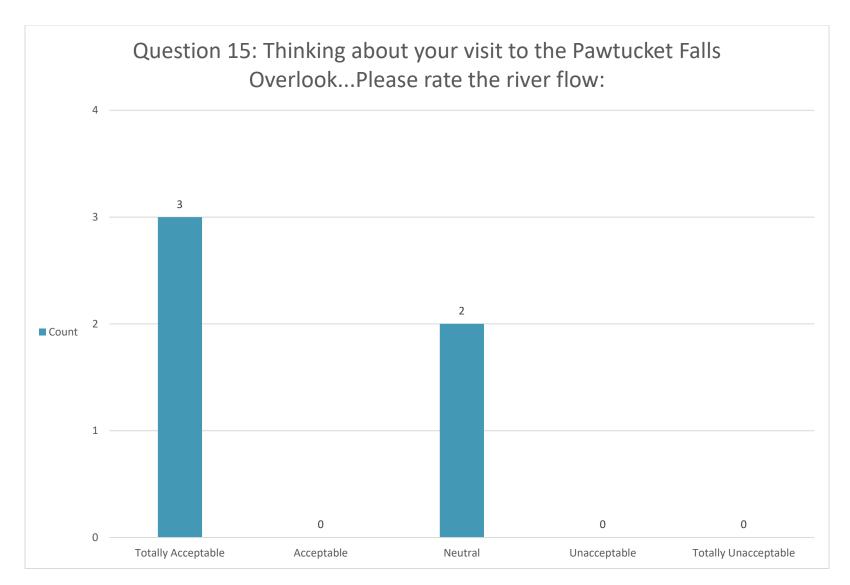
^{*}Percentages not shown for respondent counts under ten.



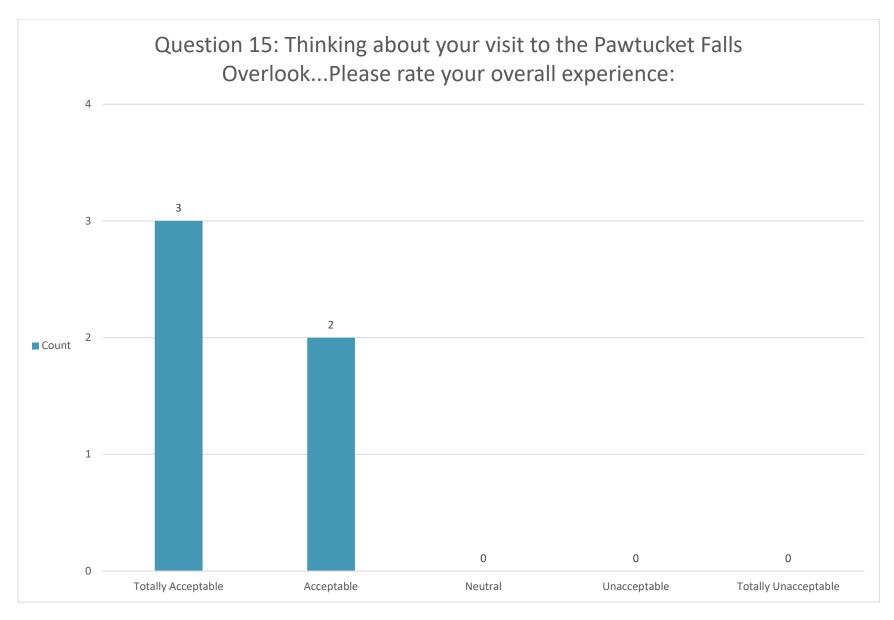
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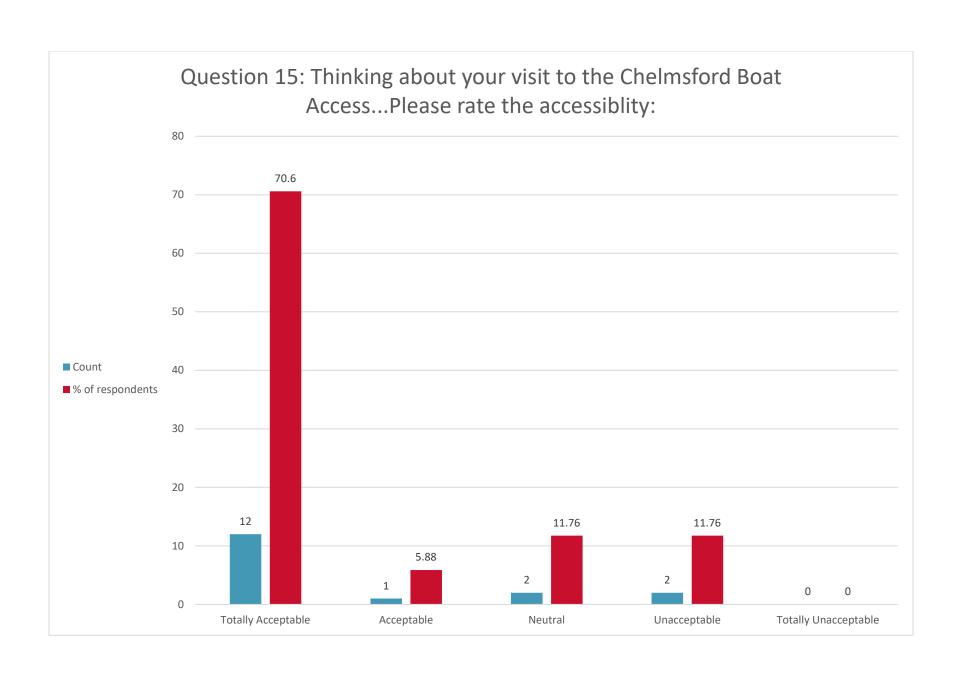
^{*}Percentages not shown for respondent counts under ten.

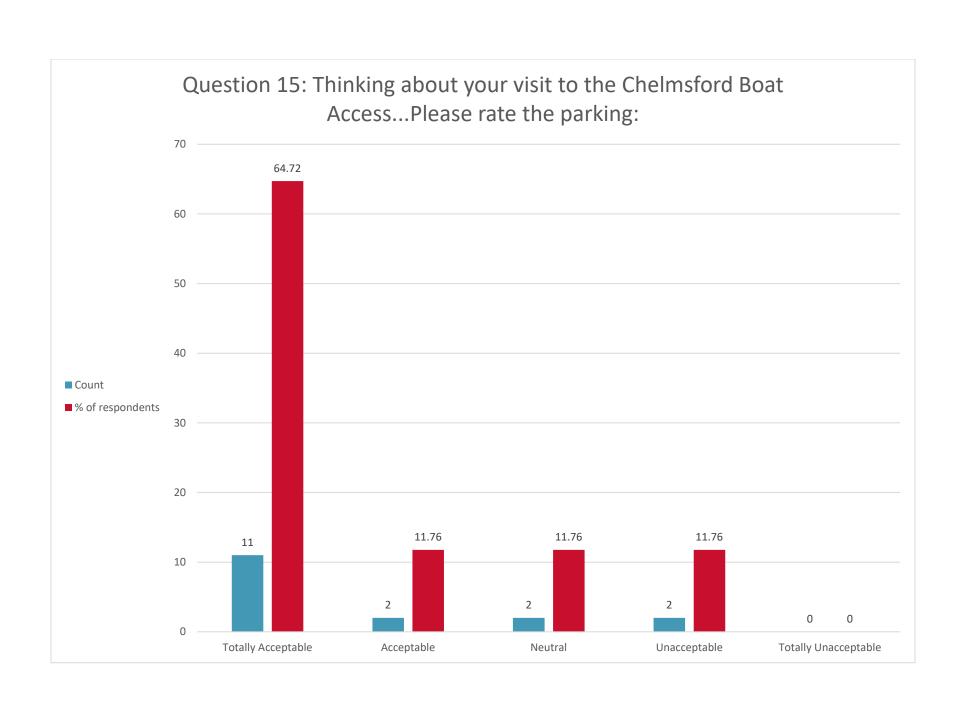


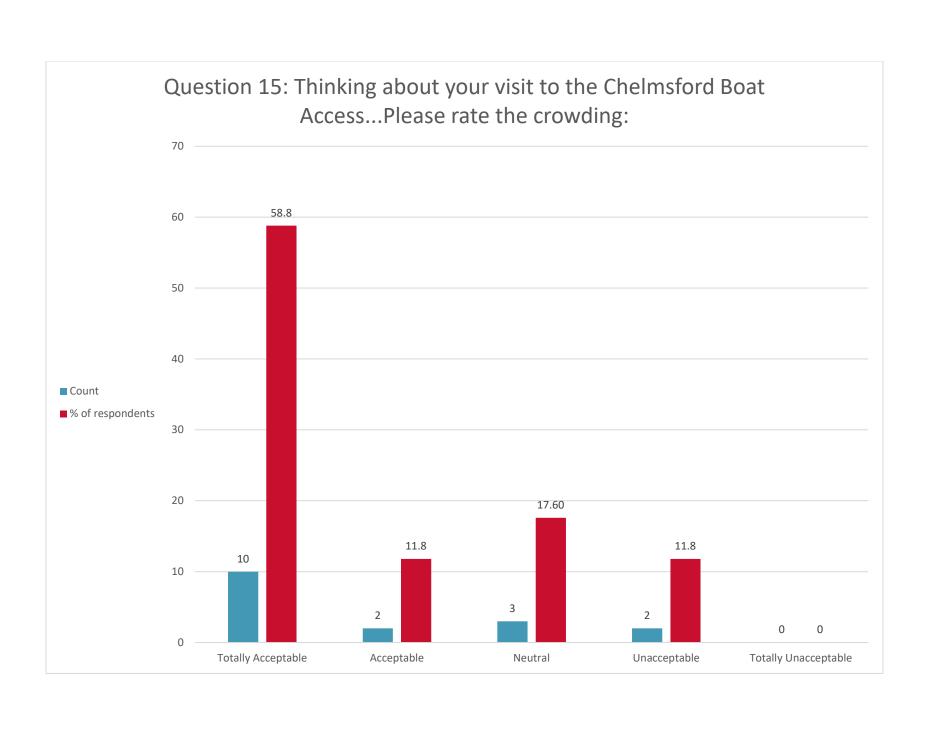
^{*}Percentages not shown for respondent counts under ten.



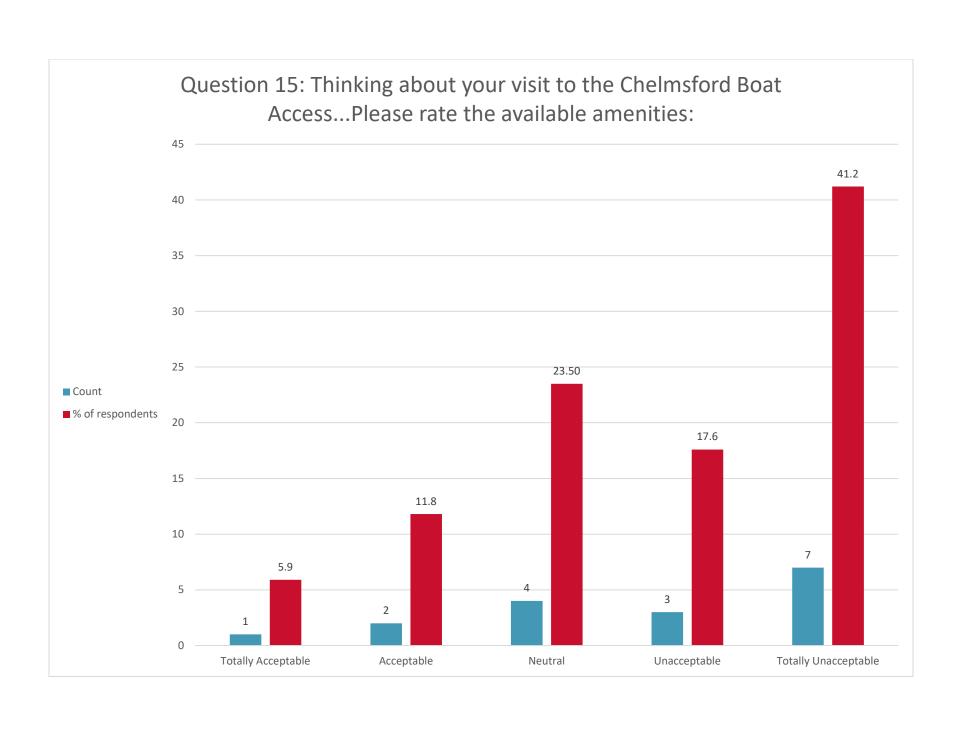
^{*}Percentages not shown for respondent counts under ten.

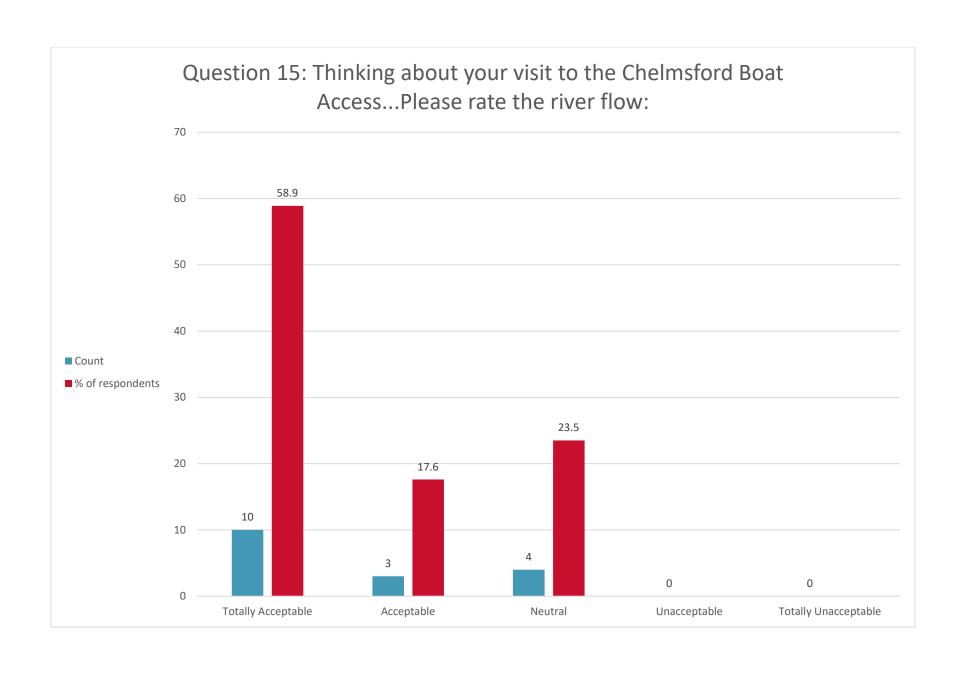


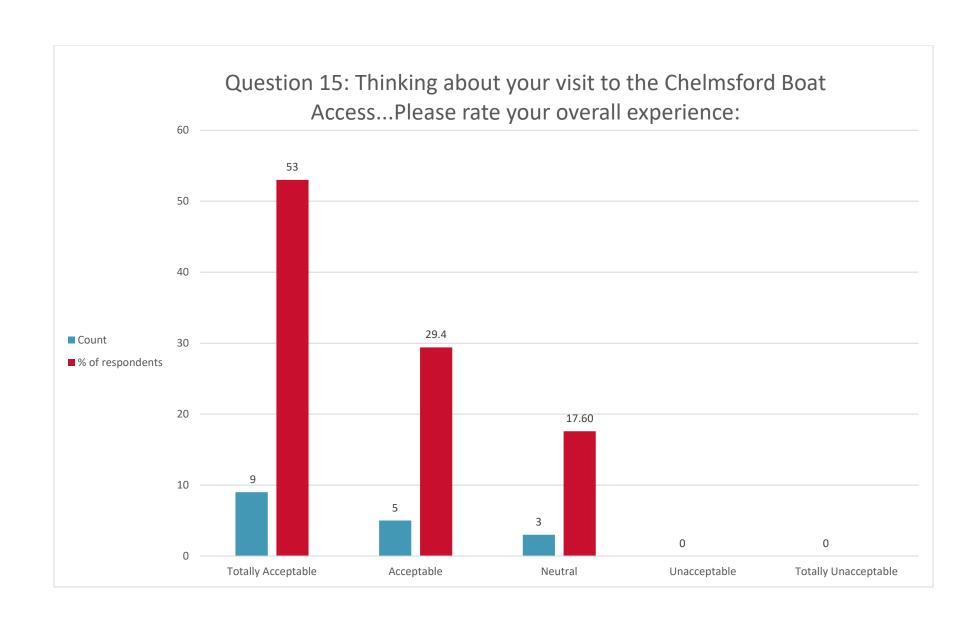


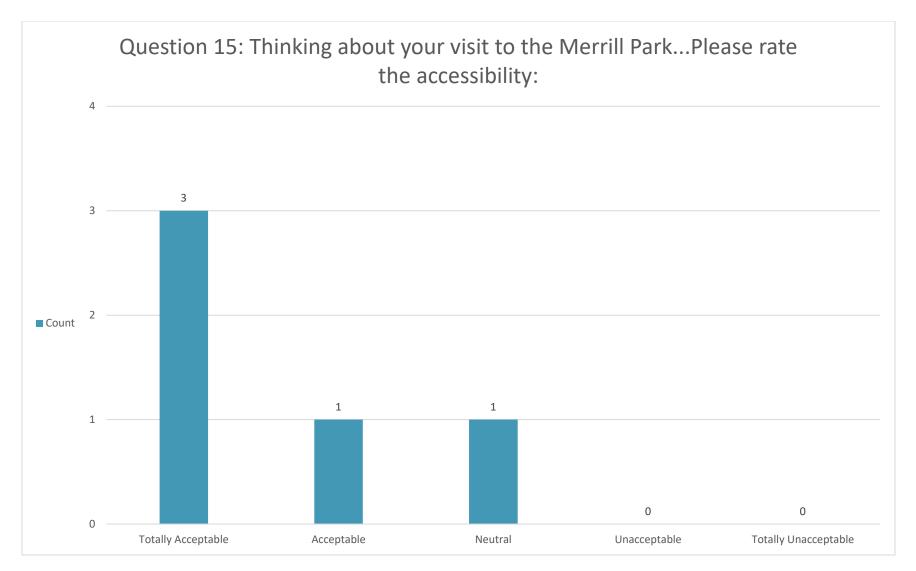


Question 15: Thinking about your visit to the Chelmsford Boat Access...Please rate the condition of the recreational facilities: 50 47.1 45 40 35 30 Count 25 23.50 ■ % of respondents 20 15 11.8 11.7 10 5.9 2 2 Totally Unacceptable Acceptable Unacceptable Totally Acceptable Neutral

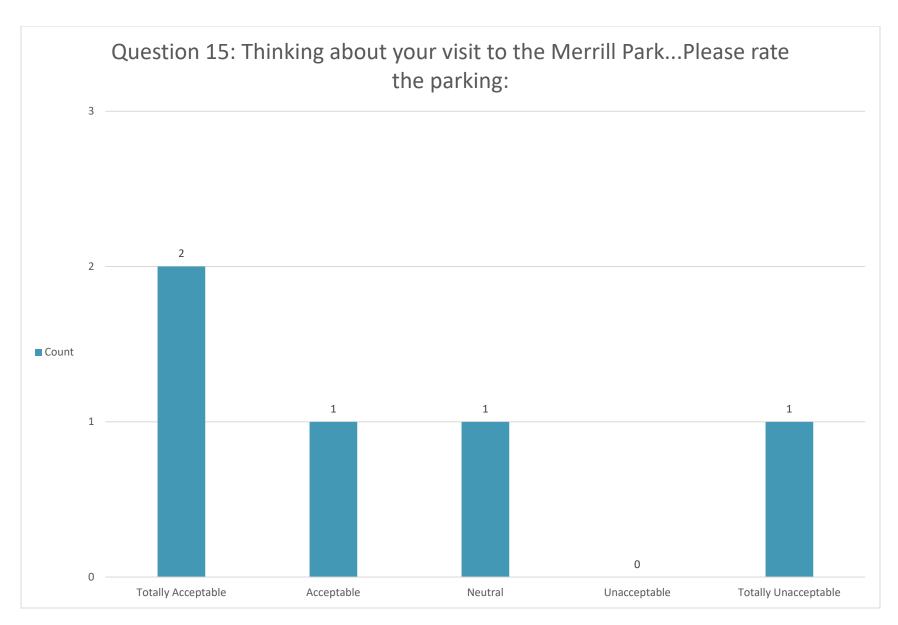








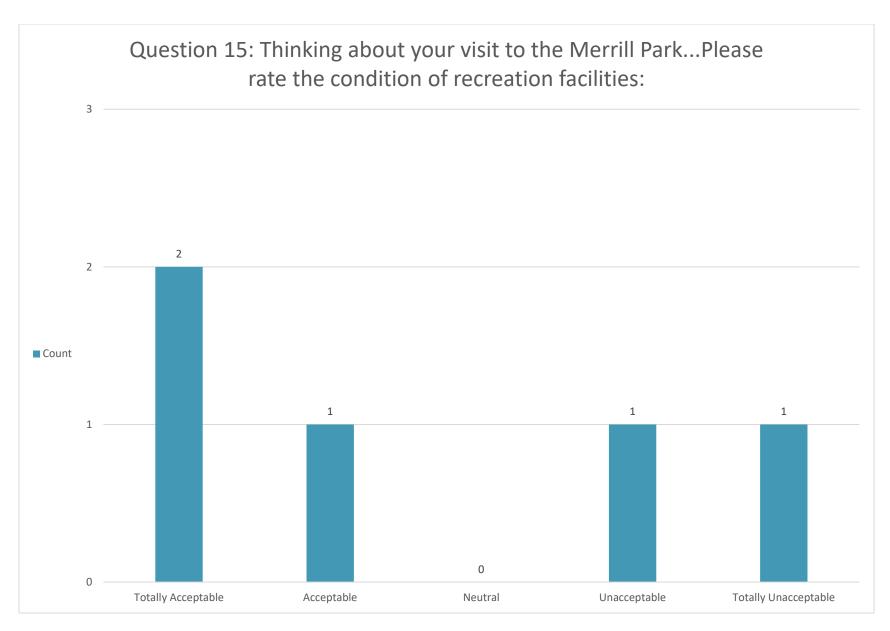
^{*}Percentages not shown for respondent counts under ten.



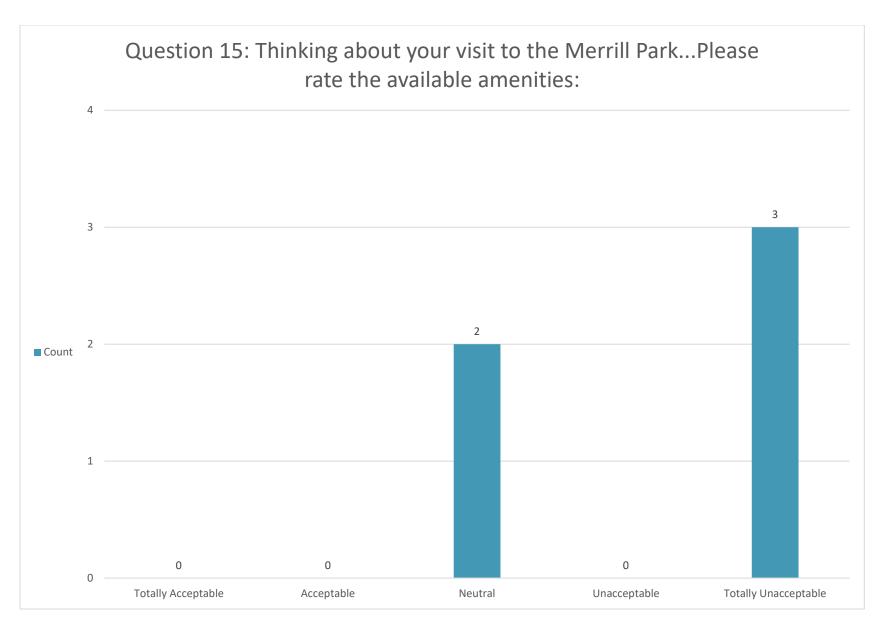
^{*}Percentages not shown for respondent counts under ten.



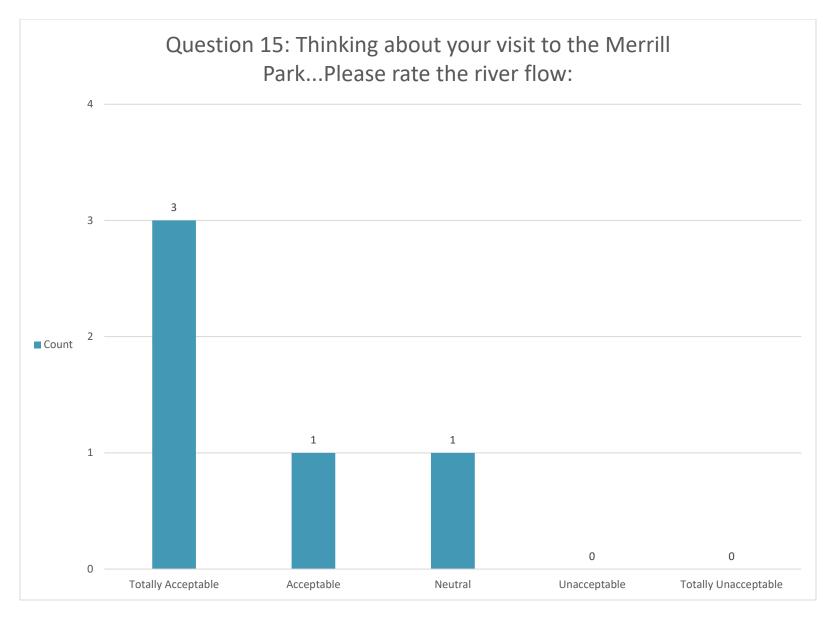
^{*}Percentages not shown for respondent counts under ten.



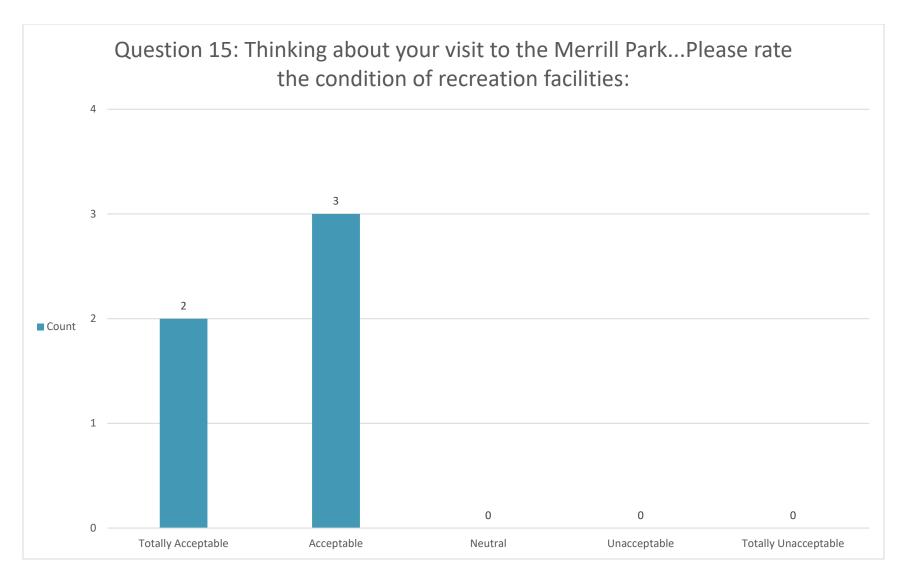
^{*}Percentages not shown for respondent counts under ten.



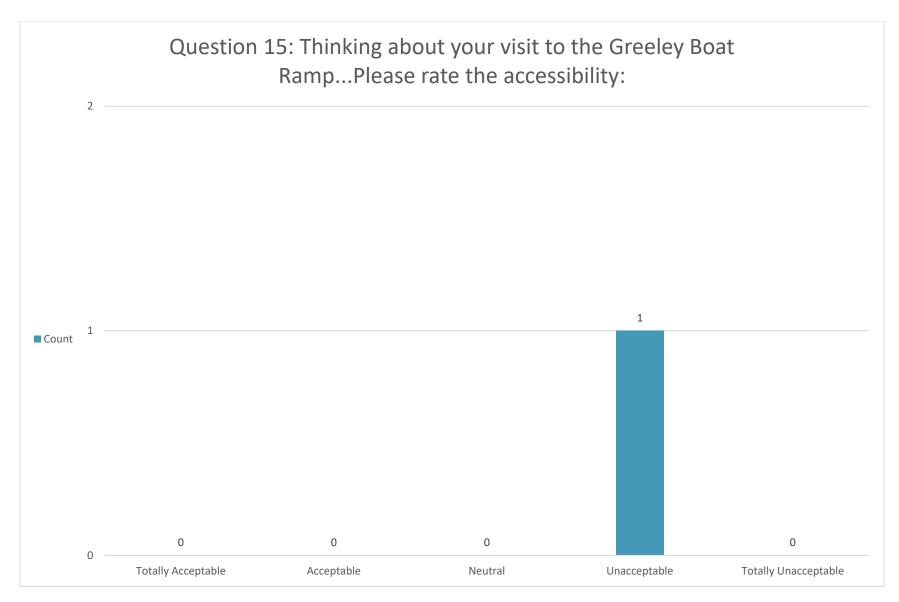
^{*}Percentages not shown for respondent counts under ten.



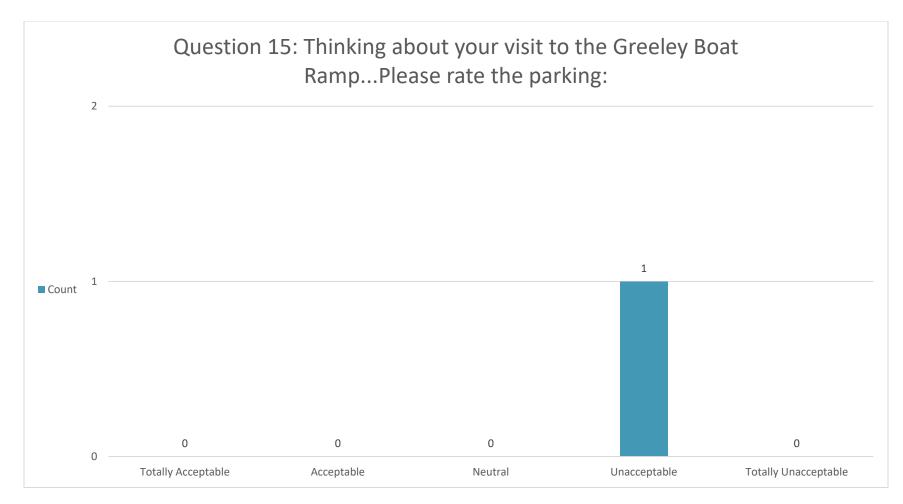
^{*}Percentages not shown for respondent counts under ten.



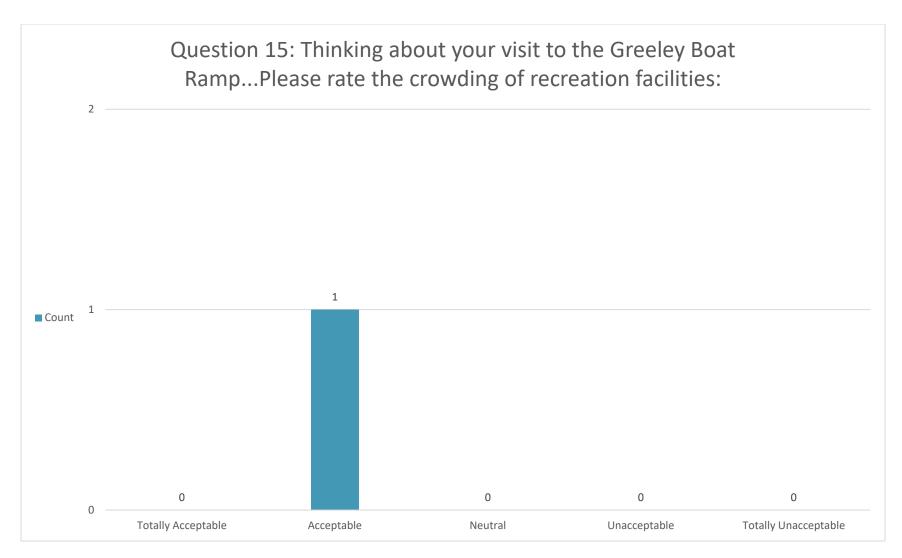
^{*}Percentages not shown for respondent counts under ten.



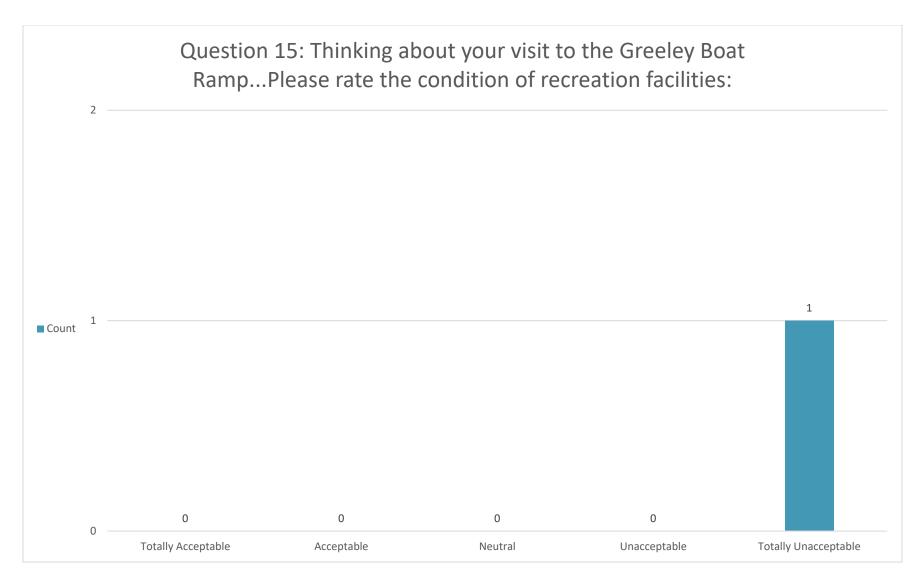
^{*}Percentages not shown for respondent counts under ten.



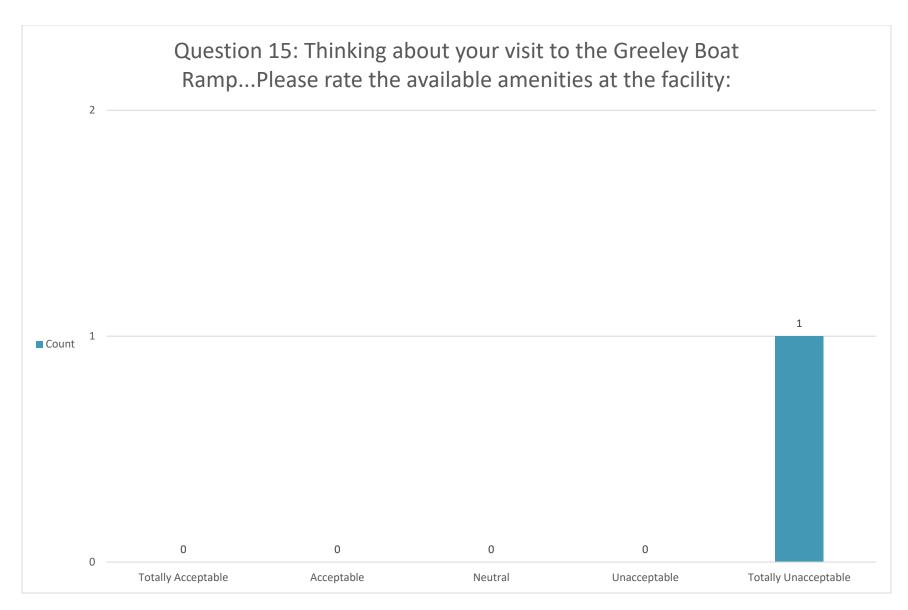
^{*}Percentages not shown for respondent counts under ten.



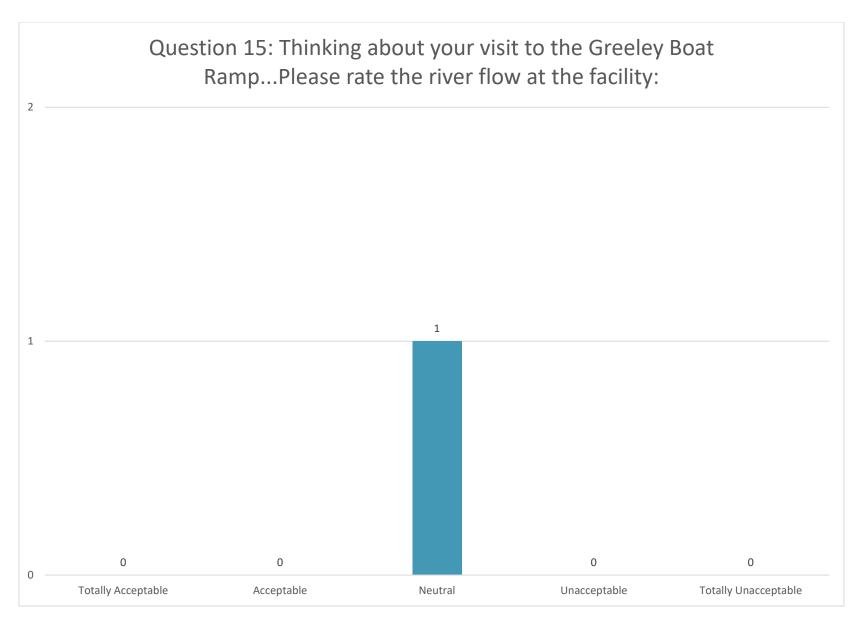
^{*}Percentages not shown for respondent counts under ten.



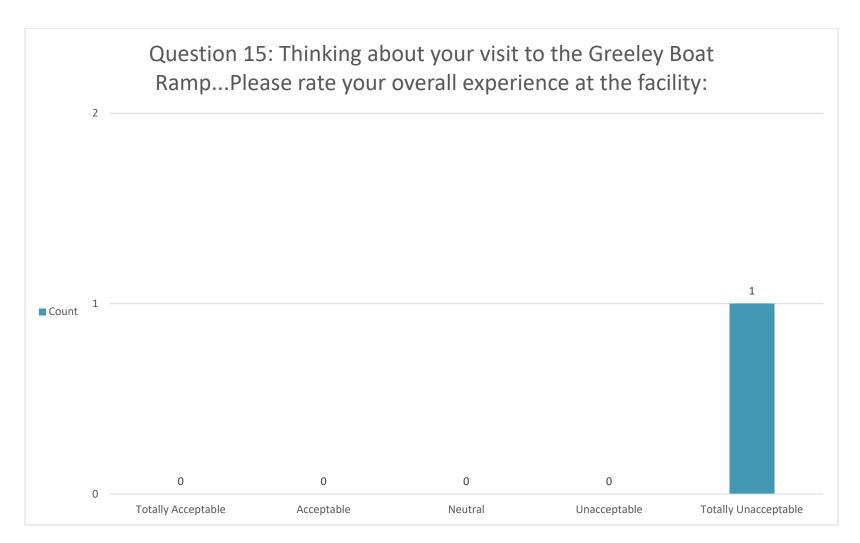
^{*}Percentages not shown for respondent counts under ten.



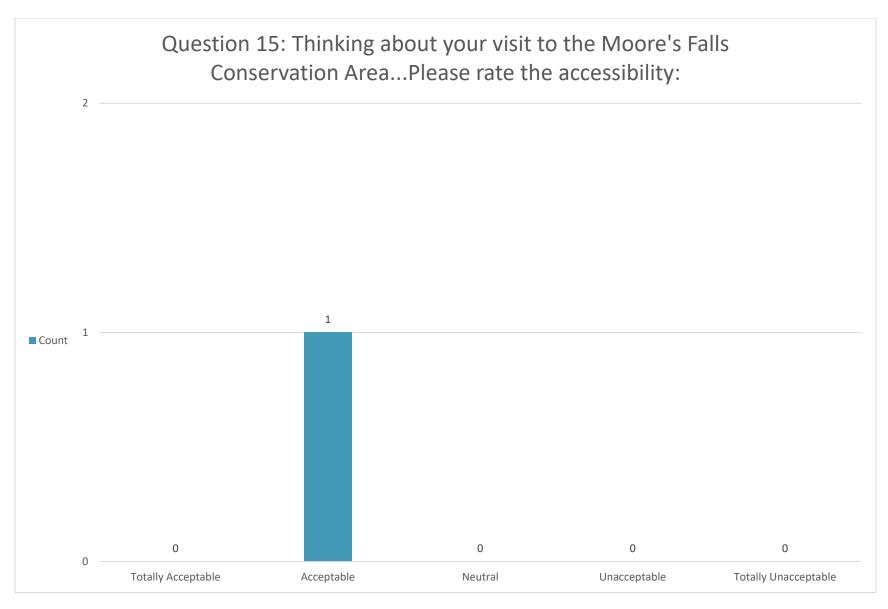
^{*}Percentages not shown for respondent counts under ten.



^{*}Percentages not shown for respondent counts under ten.



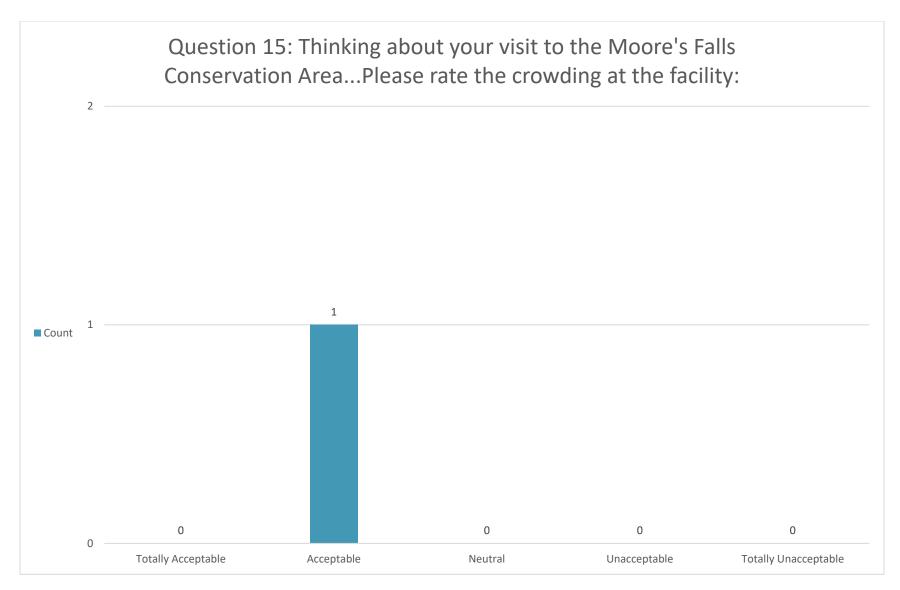
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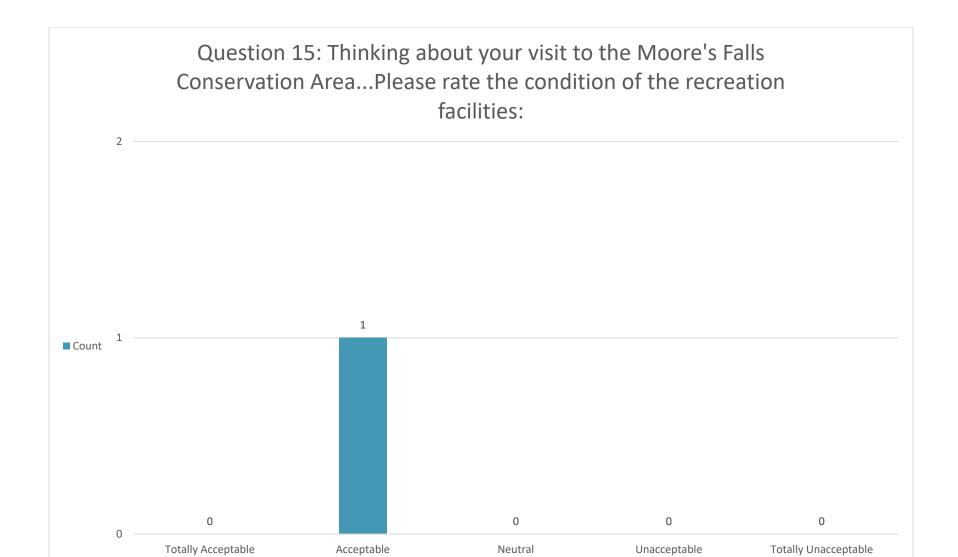
^{*}Percentages not shown for respondent counts under ten.



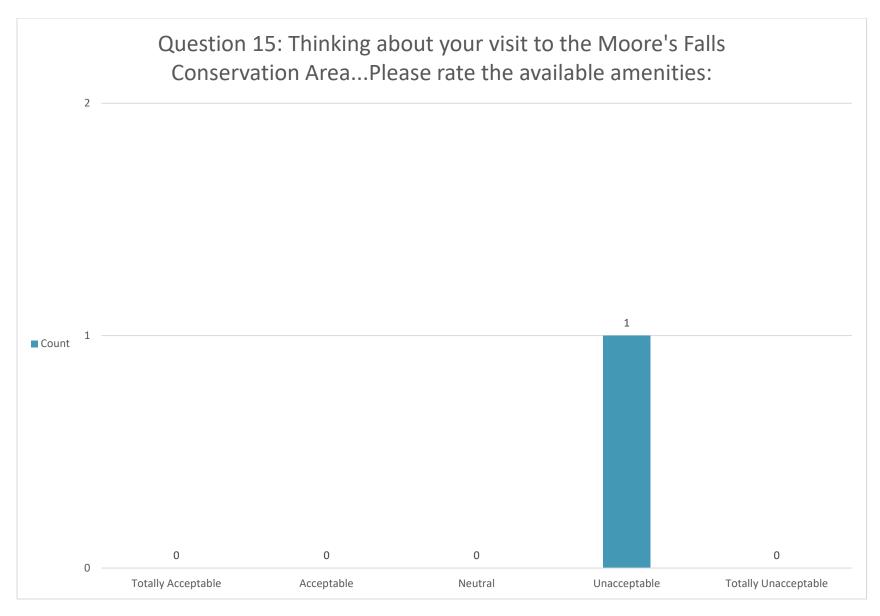
^{*}Percentages not shown for respondent counts under ten.



^{*}Percentages not shown for respondent counts under ten.



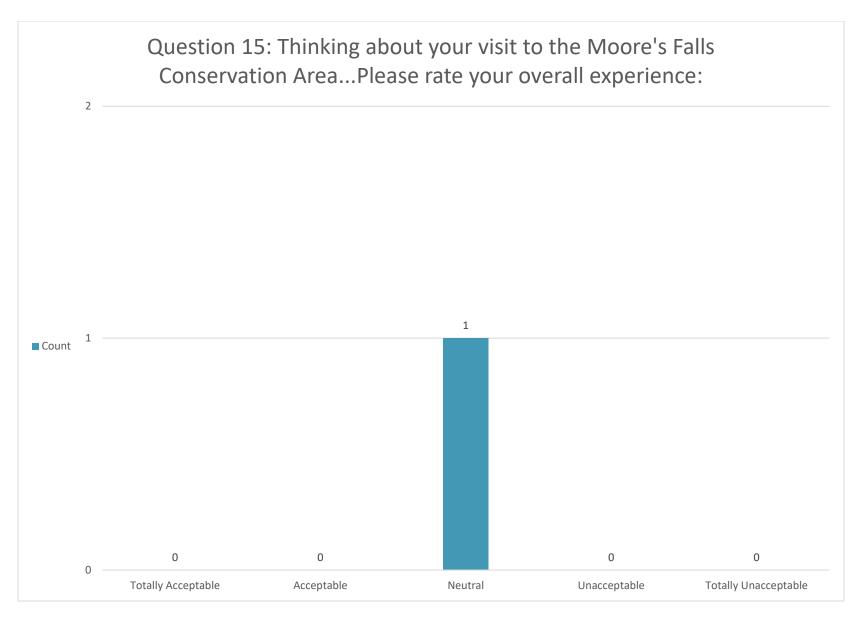
^{*}Percentages not shown for respondent counts under ten.



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^{*}Percentages not shown for respondent counts under ten.

	Question 16: Please tell us what type(s) of recreation enhancements you believe are needed and at what specific location(s) at the Lowell Project:		Question 16: Please tell us what type(s) of recreation enhancements you believe are needed and at what specific location(s) at the Lowell Project:		Question 17: Please share any other comments that you have regarding recreation at the Lowell Project:
Recorded Date	Q16. Type of Recreation Enhancement:	Q. 16 Location(s)	Q16. Type of Recreation Enhancement:	Q. 16 Location(s)	Q17. General comments
5/26/2019 19:18	Bathroom, fix boat ramp	Chelmsford Boat Ramp			
5/26/2019 19:18	Better parking more; more cleanliness	Lowell Heritage State Park	Needs a bathroom	Rourke Brothers Boat Ramp	
5/26/2019 19:18	Bathroom would be nice	Rourke Brothers Boat Ramp			Very clean, Every year is cleaner!
5/26/2019 19:18	Better ramp	Chelmsford Boat Ramp			
5/26/2019 19:18	Fix sidewalks, add grills, add picnic tables	Lowell Heritage State Park			Need professionally experienced oversight of programs that are held here. Hold events on holidays. More park staff for events.
5/26/2019 19:18	Bike and walk lanes	Merrimack River trail	Signage for opening of gates	Northern canal walkway	Nice dam; aesthetically pleasing
5/26/2019 19:18	Dock sanding, longer ramp	Rourke Brothers Boat Ramp	Repave of ramp, dock, trash barrel	Chelmsford	More access on opposite side of river of rourke bros ramp
5/26/2019 19:18	More fishing piers	Rourke Brothers Boat Ramp			
5/26/2019 19:18	New boat launch- deteriorating, public bathroom	Chelmsford Boat Ramp	Bathroom	Rourke ramp; Canal walkways	Flooding upstream with obermeyer; safety with powered crafts- post safety regs
5/27/2019 21:51	When students row rowing they should park on the side of the road				Need bathrooms; trash cans. Two more American Disabilities Act parking at the parking spot. Rowers take all the parking spots.
5/27/2019 21:51	Access to the water	Merrill Park			

	Question 16: Please tell us what type(s) of recreation enhancements you believe are needed and at what specific location(s) at the Lowell Project:		Question 16: Please tell us what type(s) of recreation enhancements you believe are needed and at what specific location(s) at the Lowell Project:	Question 17: Please share any other comments that you have regarding recreation at the Lowell Project:
Recorded Date	Q16. Type of Recreation Enhancement:	Q. 16 Location(s)	Q16. Type of Recreation Enhancement: Q. 16 Location(s) Q17. General comments	Q17. General comments
5/27/2019 21:51	Porta potty; trail should be widened; some type of advertisement;			
5/27/2019 21:51	Access to the beach and walkway	Chelmsford Boat Ramp		
5/27/2019 21:51	Improve the boat ramp	Chelmsford Boat Ramp		
5/27/2019 21:51	Porta Potty/ bathrooms on site of the boat launch	Chelmsford Boat Ramp		
5/27/2019 21:51				
5/27/2019 21:51	Some access points to the river esp folks want to launch a kayak or canoe	NPS walkway tours		
5/27/2019 21:51	Forest ranger presence	All		Great upkeep of rec facilities
5/27/2019 21:51	Bathroom hours extended until 9pm	Merrimack Trail System		Sometimes the music is too loud.
6/12/2019 7:41				
6/12/2019 7:41				Docks
6/12/2019 7:41				Bathrooms
6/12/2019 7:41				Rope swing to swim.
6/12/2019 7:41				

	Question 16: Please tell u recreation enhancements needed and at what speci-Lowell Project:	you believe are		s what type(s) of recreation e are needed and at what specific Project:	Question 17: Please share any other comments that you have regarding recreation at the Lowell Project:	
Recorded Date	Q16. Type of Recreation Enhancement:	Q. 16 Location(s)	Q16. Type of Recreation Enhancement:	Q. 16 Location(s)	Q17. General comments	
6/12/2019 7:41	More bathrooms; litter looks bad	Merrimack Trail System				
6/12/2019 7:42						
6/12/2019 7:42						
6/12/2019 7:42						
6/12/2019 7:42	Improve boat ramp and bathroom facilities	Chelmsford Boat Ramp				
6/12/2019 7:42	Trash can	Rourke Brothers Boat Ramp				
6/12/2019 7:42	Rent paddleboards	Chelmsford Boat Ramp				
7/26/2019 19:47	Turning lane into facility	Rourke Brothers Boat Ramp			Considers rourke bros third in the state; really nice	
7/26/2019 19:47	Porta potty	Rourke Brothers Boat Ramp				
7/26/2019 19:47	Trash can	Pawtucket Overlook and Canal Walkways				
7/26/2019 19:47	Porta potty and trash can	Chelmsford Boat Ramp				
7/26/2019 19:48						
8/26/2019 10:55						

	Question 16: Please tell us recreation enhancements needed and at what specif Lowell Project:	you believe are	Question 16: Please tell usenhancements you believe location(s) at the Lowell P	s what type(s) of recreation e are needed and at what specific roject:	Question 17: Please share any other comments that you have regarding recreation at the Lowell Project:
Recorded Date	Q16. Type of Recreation Enhancement:	Q. 16 Location(s)	Q16. Type of Recreation Enhancement:	Q. 16 Location(s)	Q17. General comments
8/26/2019 10:55					"Informational panels great
8/26/2019 10:55	Paving, add flowering trees, higher barrier	Merrimack Trail System			
8/26/2019 10:55	Clean up trash in canal	Pawtucket Falls Overlook			
8/26/2019 10:55	Lifeguards during summer	Lowell Heritage State Park			
8/26/2019 10:55	Porta potty	Rourke Brothers Boat Ramp			
8/26/2019 10:55	Tray barrel and porta potty	Rourke Brothers Boat Ramp			
10/13/2019 19:46	Update bathrooms				
10/13/2019 19:46	Roads in and out need work and parking	Chelmsford Boat Launch			
10/31/2019 15:17	Blacktop the path occasionally	Merrimack Trail System			Walkway tours = visitor center
10/31/2019 15:17	Maintenance of benches, signs, add signage of existing facilities	Canal Walkway			
10/31/2019 15:17	More tables	Lowell Heritage State Park			
10/31/2019 15:17	Permanent bathroom or porta potty	Rourke Brothers Boat Ramp	Trashcan	Rourke brothers	

	Question 16: Please tell us what type(s) of recreation enhancements you believe are needed and at what specific location(s) at the Lowell Project:			s what type(s) of recreation re are needed and at what specific Project:	Question 17: Please share any other comments that you have regarding recreation at the Lowell Project:	
Recorded Date	Q16. Type of Recreation Enhancement:	Q. 16 Location(s)	Q16. Type of Recreation Enhancement:	Q. 16 Location(s)	Q17. General comments	
10/31/2019 15:17	Benches, trash can	Pawtucket Falls Overlook				
10/31/2019 15:17	Numbering of trees for emergency reasons	Lowell Heritage State Park	Volunteer ranger Dogs on leash	Lowell Heritage State Park	Policing good on weekends	
10/31/2019 15:17					Trash at dam	
10/31/2019 15:17	More benches in some areas; better signage at intersections				Set up volunteer rangers	

Appendix D -Field Reconnaissance Data

Field Reconnaissance Data

Personal Interviews and Field Reconnaissance Date	Location	Weather Conditions	Time (Military)	Approximate Vehicles Observed	Estimated Number of Recreationists Observed	Observed Recreational Activities
May 25, 2019	Chelmsford Boat Access	Cloudy/partially sunny	8:04 – 9:06	• 3 cars	2	HikingBoating
May 25, 2019	Merrill Park	Cloudy/partially sunny	9:30 – 10:30	• 0	1	Walking
May 25, 2019	Rourke Brothers Boat Ramp	Cloudy/partially sunny	11:03 – 11:57	10 cars8 cars with trailers	16	BoatingKayakingPaddle board
May 25, 2019	Merrimack Trail System	Cloudy/partially sunny	12:10 – 1:07	• 0	100	BoatingRunning, jogging, hiking
May 25, 2019	Pawtucket Falls Overlook	Cloudy/partially sunny	1:58 – 2:57	• 0	8	BoatingHiking
May 25, 2019	Lowell Heritage State Park	Cloudy/partially sunny	3:14 – 4:11	Not recorded	150	HikingRunning, jogging, and fitnessDog walkingBoating
May 25, 2019	NPS Canal Walkways	Cloudy/partially sunny	4:50 - 5:50	• N/A	30	Picnicking
May 26, 2019	Lowell Heritage State Park	Sunny, 70s	8:30 – 9:30	• 30 cars	90	BoatingHikingBicyclingPicnickingRunning, jogging, and fitnessDogwalking
May 26, 2019	Pawtucket Falls Overlook	Sunny, 70s	9:41 – 9:45	• 0	4	Hiking/walking
May 26, 2019	Lowell National Historical Park Visitor Center	Sunny, 70s	10:57 – 12:02	• 20 cars	35	Park attendance
May 26, 2019	NPS Canal Walkways	Sunny, 70s	12:10 - 13:18	• N/A	40	 Walking

Personal Interviews and Field Reconnaissance Date	Location	Weather Conditions	Time (Military)	Approximate Vehicles Observed	Estimated Number of Recreationists Observed	Observed Recreational Activities
May 26, 2019	Chelmsford Boat Access	Sunny, 70s	14:10 – 15:10	7 cars5 cars with boat trailers		Boating
May 26, 2019	Merrimack Trail System	Sunny, 70s	17:09 – 18:10	 60 cars (not including overflow parking) 	175	Hiking/Walking
May 27, 2019	Lowell National Historical Park Visitor Center	Sunny, 70s	8:30 – 9:30	• 0	2	Park attendance
May 27, 2019	Merrimack Trail System	Sunny, 70s	9:55 – 11:00	20 rowing boats	250	 A regatta for the Massachusetts Public Schools Rowing Association Hiking, walking, bicycling
May 27, 2019	Rourke Brothers Boat Ramp	Sunny, 70s	11:56 – 12:59	25 cars3 boats1 Moped1 car trailer	10	BoatingDog walking
May 27, 2019	Chelmsford Boat Access	Sunny, 70s	15:38 – 16:42	5 jet skis7 boat trailers	26	BoatingHiking, walkingDog walking
May 27, 2019	Pawtucket Falls Overlook	Sunny, 70s	16:59 – 18:00	• 0	1	Hiking/Walking
May 28, 2019	Rourke Brothers Boat Ramp	Overcast, 50s	8:05 – 9:08	• 2 cars	2	Hiking/walking
May 28, 2019	NPS Canal Walkways	Overcast, 50s	9:20 – 10:30	• 0	14	Park attendanceFishing
May 28, 2019	Merrimack Trail System	Overcast, 50s	10:45 – 11:45	• 15 cars	29	Hiking/walkingFishingRunning/jogging
May 28, 2019	Lowell Heritage State Park	Overcast, 50s	11:48 – 12:45	• 3	2	Dog walkingHiking/walkingRunning/Jogging

Personal Interviews and Field Reconnaissance Date	Location	Weather Conditions	Time (Military)	Approximate Vehicles Observed	Estimated Number of Recreationists Observed	Observed Recreational Activities
May 28, 2019	Pawtucket Falls Overlook	Overcast, 50s	12:53 – 13:56	• 1 car	1	 Walking
May 28, 2019	Chelmsford Boat Access	Overcast, 50s	14:27 – 15:24	• 1 car	0	• N/A
May 28, 2019	Lowell National Historical Park Visitor Center	Overcast, 50s	17:50 – 18:00	• 0	0	Park was closed
June, 07, 2019	Rourke Brothers Boat Ramp	Sunny, 80s	8:00 – 9:01	• 2 cars	2	Bicycling
June, 07, 2019	Merrill Park	Sunny, 80s	9:24 – 10:24	• 0	0	• N/A
June, 07, 2019	Chelmsford Boat Access	Sunny, 80s	10:54 – 12:00	• 4 cars	4	BoatingFishing
June, 07, 2019	Lowell National Historical Park Visitor Center	Sunny, 80s	12:15 – 13:18	• 0	36	Park attendance
June, 07, 2019	NPS Canal Walkways	Sunny, 80s	13:18 – 14:20	• 0	40	WalkingBicycling
June, 07, 2019	Pawtucket Falls Overlook	Sunny, 80s	14:20 – 15:20	• 1 cars	2	Walking
June, 07, 2019	Lowell Heritage State Park	Sunny, 80s	15:29 – 16:30	• 5 cars	40	Hiking/walkingPicnickingBicyclingBoating
June, 07, 2019	Merrimack Trail System	Sunny, 80s	16:30 – 17:30	• 35 cars	60	Hiking/walkingPicnickingBoatingFishingSkateboardingPaddle boarding
June, 07, 2019	Rourke Brothers Boat Ramp	Sunny, 80s	17:40 – 18:00	• 9 cars	10	BoatingWalking

Personal Interviews and Field Reconnaissance Date	Location	Weather Conditions	Time (Military)	Approximate Vehicles Observed	Estimated Number of Recreationists Observed	Observed Recreational Activities
June 10, 2019	Merrimack Trail System	Sunny, 80s	8:08 – 9:08	• 30 cars	40	FishingRunning/joggingHiking/walking
June 10, 2019	Lowell Heritage State Park	Sunny, 80s	9:08 – 10:06	• 40 cars	60	Running/joggingHiking/walkingBicycling
June 10, 2019	Pawtucket Falls Overlook	Sunny, 80s	10:19 – 11:17	• 4 cars	2	 Walking
June 10, 2019	Rourke Brothers Boat Ramp	Sunny, 80s	11:28 – 12:26	• 13 cars	12	Boating
June 10, 2019	Merrill Park	Sunny, 80s	13:15 – 14:13	• 0 cars	2	BoatingBicycling
June 10, 2019	Chelmsford Boat Access	Sunny, 80s	14:45 – 15:53	• 5 cars	8	BoatingFishing
June 10, 2019	Lowell National Historical Park Visitor Center	Sunny, 80s	16:10 – 17:09	• 0 cars	8	Park attendance
June 10, 2019	NPS Canal Walkways	Sunny, 80s	17:09 – 18:09	• 0 cars	20	Hiking/walkingFishing
June 15, 2019	Rourke Brothers Boat Ramp	Sunny, 70s	8:00 – 9:00	• 3 cars	3	Boating
June 15, 2019	Merrill Park	Sunny, 70s	9:25 – 10:25	• 0	2	Bicycling
June 15, 2019	Chelmsford Boat Access	Sunny, 70s	11:10 – 12:13	1 boat trailer	5	BoatingFishingSoftball tournament
June 15, 2019	NPS Canal Walkways	Sunny, 70s	13:10 – 14:10	• 0	15	Hiking/walkingPicnicking
June 15, 2019	Pawtucket Falls Overlook	Sunny, 70s	14:32 – 15:35	• 0	3	Hiking/walking
June 15, 2019	Merrimack Trail System	Sunny, 70s	15:47 – 16:48	• 100	100	Hiking/walkingBicyclingPicnickingFishingBoatingRunning

Personal Interviews and Field Reconnaissance Date	Location	Weather Conditions	Time (Military)	Approximate Vehicles Observed	Estimated Number of Recreationists Observed	Observed Recreational Activities
June 15, 2019	Rourke Brothers Boat Ramp	Sunny, 70s	17:00 – 18:00	• 14 cars	30	BoatingJet skiingDog walking
June 16, 2019	Rourke Brothers Boat Ramp	Rainy, 60s	8:00 – 9:03	1 boat trailer1 car	1	Dog walker
June 16, 2019	Lowell Heritage State Park	Rainy, 60s	9:23 – 10:23	• 8 cars	55	Running/joggingHiking/walkingBicyclingPicnicking
June 16, 2019	Lowell National Historical Park Visitor Center	Rainy, 60s	10:30 – 11:30	• 0	7	Hiking/walking
June 16, 2019	NPS Canal Walking	Rainy, 60s	11:37 – 12:37	• 0	4	 Walking
June 16, 2019	Merrill Park	Rainy, 60s	13:21 – 14:28	• 1 car	2	Dog walking
June 16, 2019	Chelmsford Boat Access	Rainy, 60s	15:10 – 16:10	• N/A	N/A	• N/A
June 16, 2019	Pawtucket Falls Overlook	Rainy, 60s	16:21 – 17:21	• 0	2	WalkingDog walking
June 16, 2019	Merrimack Trail System	Rainy, 60s	17:25 – 18:00	• 8	10	Sitting in cars (raining)Walking
July 10, 2019	Merrimack Trail System	Cloudy and Sunny, 60s	8:15 – 9:15	• 7 cars	8	Hiking/walking
July 10, 2019	Merrill Park	Cloudy and Sunny, 60s	9:55 – 10:55	• 0	0	• N/A
July 10, 2019	Chelmsford Boat Access	Cloudy and Sunny, 60s	11:25 – 12:25	• 3 cars	5	• N/A
July 10, 2019	Pawtucket Falls Overlook	Cloudy and Sunny, 60s	13:15 – 14:15	• 0	0	• N/A
July 10, 2019	NPS Canal Walkways	Cloudy and Sunny, 60s	14:40 – 15:40	• 5	50	Hiking/WalkingBicyclingSwimming
July 10, 2019	Whitewater takeout	Cloudy and Sunny, 60s	15:52 – 16:50	• 0	0	• N/A
July 10, 2019	Rourke Brothers Boat Ramp	Cloudy and Sunny, 60s	16:50 – 18:00	• 8 cars	7	Boating

Personal Interviews and Field Reconnaissance Date	Location	Weather Conditions	Time (Military)	Approximate Vehicles Observed	Estimated Number of Recreationists Observed	Observed Recreational Activities
July 19, 2019	Rourke Brothers Boat Ramp	Overcast, 70s	8:00 – 9:00	• 5 cars	2	Dog walkingBicyclingFishing
July 19, 2019	Pawtucket Falls Overlook	Overcast, 70s	9:35 – 10:44	• 0	0	• N/A
July 19, 2019	Lowell National Historical Park Visitor Center	Overcast, 70s	10:58 – 11:58	• 0	9	• N/A
July 19, 2019	NPS Canal Walkways	Overcast, 70s	12:24 – 13:20	• 0	10	• N/A
July 19, 2019	Merrimack Trail System	Overcast, 70s	13:38 – 14:42	• 20 cars	50	BoatingRunning/joggingHiking/walkingBicyclingDog walking
July 19, 2019	Merrill Park	Overcast, 70s	15:25 – 16:25	• 1 car	8	Bicycling
July 19, 2019	Whitewater Takeout	Overcast, 70s	17:00 – 18:00	• 0	0	• N/A
July 27, 2019	Merrimack Trail System	Sunny, 80s	8:07 – 9:06	• 40 cars	80	Dog walkerPicnickingBicyclingHiking/walkingRunning/jogging
July 27, 2019	Merrill Park	Sunny, 80s	9:45 – 10:45	• 1	2	Dog walkerJet ski
July 27, 2019	Chelmsford Boat Access	Sunny, 80s	11:06 –12:07	2 cars4 boat trailers	10	PicnickingBoatingSoftball tournaments
July 27, 2019	Rourke Brothers Boat Ramp	Sunny, 80s	12:19 – 13:20	• 20 cars	15	BoatingFishingBicyclingPicnicking
July 27, 2019	Pawtucket Falls Overlook	Sunny, 80s	14:02 – 15:02	• 0	0	• N/A
July 27, 2019	Whitewater Takeout	Sunny, 80s	15:10 – 16:10	• 0	0	• N/A
July 27, 2019	Lowell Heritage State Park	Sunny, 80s	16:20 – 17:20	• 30 cars	70	Boating

Personal Interviews and Field Reconnaissance Date	Location	Weather Conditions	Time (Military)	Approximate Vehicles Observed	Estimated Number of Recreationists Observed	Observed Recreational Activities
						PicnickingHiking/walkingDog walkingSwimming
July 27, 2019	Rourke Brothers Boat Ramp	Sunny, 80s	18:00 – 19:00	14 cars6 trailers3 boaters	3	BoatingWalking
July 28, 2019	Lowell National Historical Park Visitor Center	Sunny, 70s	8:30 – 9:30	• 0	7	Park attendance
July 28, 2019	NPS Canal Walkways	Sunny, 70s	9:35 - 10:35	• 0	10	 Walking
July 28, 2019	Pawtucket Falls Overlook	Sunny, 70s	10:52 – 11:52	• 0	0	• N/A
July 28, 2019	Chelmsford Boat Access	Sunny, 70s	12:10 – 13:10	5 boat trailers	10	Running/hikingBoatingBicycling
July 28, 2019	Merrill Park	Sunny, 70s	13:45 – 14:45	• 0	3	 Boating (not at Merrill Park, but observed from Merrill Park) Fishing
July 28, 2019	Rourke Brothers Boat Ramp	Sunny, 70s	15:05 – 16:05	15 boat trailers	23	BoatingBicyclingSailboatingJet skiing
July 28, 2019	Lowell Heritage State Park	Sunny, 70s	16:25 – 17:25	• 35 cars	100	 Swimming Running/jogging Hiking/walking Picnicking Bicycling Skateboarding Dog walking
August 6, 2019	Merrimack Trail System	Sunny, 80s	8:10 – 9:10	• 50 cars	70	BoatingFishingRunning/joggingHiking/walkingBicyclingPicnicking

Personal Interviews and Field Reconnaissance Date	Location	Weather Conditions	Time (Military)	Approximate Vehicles Observed	Estimated Number of Recreationists Observed	Observed Recreational Activities
						 Dog walking
August 6, 2019	Merrill Park	Sunny, 80s	09:45 - 10:45	• 0	0	• N/A
August 6, 2019	Chelmsford Boat Access	Sunny, 80s	11:20 – 12:20	• 3 cars	3	Picnicking
August 6, 2019	Pawtucket Falls Overlook	Sunny, 80s	13:15 – 14:15	• 0	4	Hiking/walking
August 6, 2019	Rourke Brothers Boat Ramp	Sunny, 80s	14:31 – 15:32	7 cars2 boat trailers	5	 Jet ski Boating Bicycling
August 6, 2019	Lowell Heritage State Park	Sunny, 80s	16:00 – 17:00	• 20 cars	60	PicnickingSwimming
August 6, 2019	Lowell National Historical Park Visitor Center	Sunny, 80s	17:21 – 18:00	• 0	11	Park attendance
August 18, 2019	Lowell Heritage State Park	Cloudy, 80s	8:07 – 9:07	• 20 cars	90	Running/joggingHiking/walkingPicnickingBoatingDog walkers
August 18, 2019	Chelmsford Boat Access	Cloudy, 80s	9:20 – 10:30	1 car1 trailer	4	Softball tournamentBoating
August 18, 2019	Merrill Park	Cloudy, 80s	11:10 - 12:10	• 1 car	2	Picnicking
August 18, 2019	Merrimack Trail System	Cloudy, 80s	12:45 – 13:45	• 50 cars	125	Running/joggingHiking/walkingBicycling
August 18, 2019	Lowell National Historical Park Visitor Center	Cloudy, 80s	14:35 – 15:35	• 0	21	Park attendance
August 18, 2019	Pawtucket Falls Overlook	Cloudy, 80s	15:56 – 16:56	• 0	2	Hiking/walking
August 18, 2019	Rourke Brothers Boat Ramp	Cloudy, 80s	17:09 – 18:00	11 cars8 boat trailers	14	BoatingFishing
August 21, 2019	Lowell Heritage State Park	Overcast, Rainy, 70s	8:00 – 9:00	• 15 cars	55	Running/joggingHiking/walkingDog walking
August 21, 2019	NPS Canal Walkways	Overcast, Rainy, 70s	9:15 – 10:15	• 0	30	WalkingDog walking

Personal Interviews and Field Reconnaissance Date	Location	Weather Conditions	Time (Military)	Approximate Vehicles Observed	Estimated Number of Recreationists Observed	Observed Recreational Activities
						 Picnicking
August 21, 2019	Merrill Park	Overcast, Rainy, 70s	10:55 - 11:55	• 0	0	• N/A
August 21, 2019	Pawtucket Falls Overlook	Overcast, Rainy, 70s	12:30 – 13:30	• 0	2	Dog walking
August 21, 2019	Rourke Brothers Boat Ramp	Overcast, Rainy, 70s	14:20 – 15:20	6 cars2 boat trailers	0	Boating
August 21, 2019	Chelmsford Boat Access	Overcast, Rainy, 70s	15:30 – 16:30	• 0	0	• N/A
August 21, 2019	Merrimack Trail System	Overcast, Rainy, 70s	16:50 – 17:50	• 15 cars	40	Running/joggingHiking/walkingBicyclingDog walking
August 24, 2019	Pawtucket Falls Overlook	Sunny, 70s	9:30 – 10:30	• 0	0	• N/A
August 24, 2019	Merrill Park	Sunny, 70s	11:20 - 12:20	• 0	0	• N/A
August 24, 2019	Chelmsford Boat Access	Sunny, 70s	12:45 – 13:45	10 cars6 trailers	18	BoatingBicycling
August 24, 2019	Lowell National Historical Park Visitor Center	Sunny, 70s	14:45 – 15:45	• 0	49	Park attendance
August 24, 2019	NPS Canal Walkways	Sunny, 70s	16:00 – 17:00	• 0	12	WalkingPicnicking
August 24, 2019	Rourke Brothers Boat Ramp	Sunny, 70s	17:15 – 18:00	4 cars5 trailers	8	BoatingFishingBicycling
September 14, 2019	Rourke Brothers Boat Ramp	Cloudy, rainy, 60s	8:15 – 9:15	• 2 cars	2	Walking
September 14, 2019	Pawtucket Falls Overlook	Cloudy, rainy, 60s	9:25 –10:25	• 0	0	• N/A
September 14, 2019	Merrill Park	Cloudy, rainy, 60s	11:02-12:05	• 3 cars	3	 Picnicking
September 14, 2019	Chelmsford Boat Access	Cloudy, rainy, 60s	12:35 –13:35	• 0	2	FishingSoftball tournament
September 14, 2019	NPS Canal Walkways	Cloudy, rainy, 60s	14:45 – 15:45	• 0	1	 Running/jogging
September 14, 2019	Lowell Heritage State Park	Cloudy, rainy, 60s	16:08 – 17:08	• 2 cars	23	Hiking/walking
September 14, 2019	Merrimack Trail System	Cloudy, rainy, 60s	17:18 – 18:00	• 10 cars	7	Hiking/walking

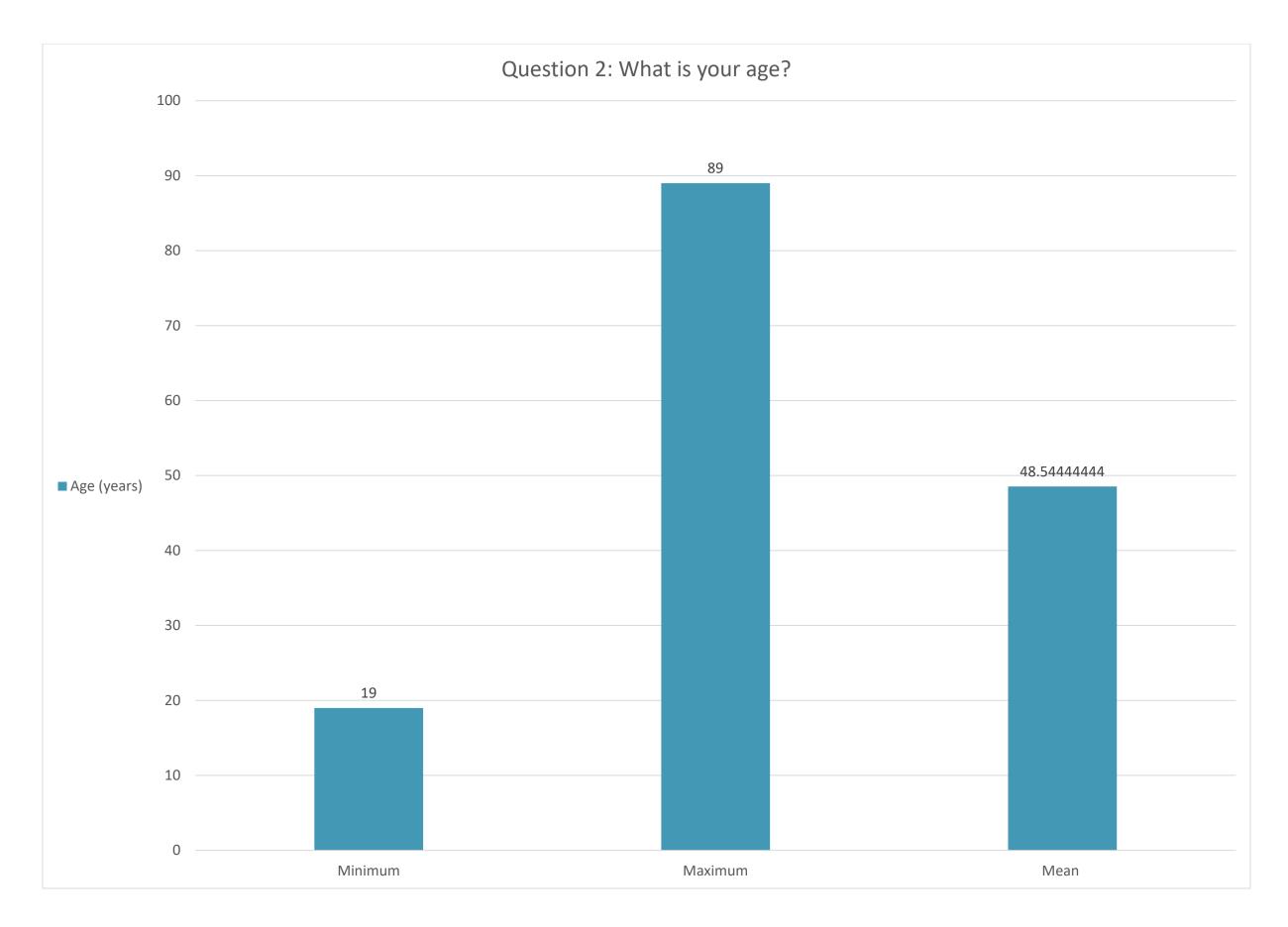
Personal Interviews and Field Reconnaissance Date	Location	Weather Conditions	Time (Military)	Approximate Vehicles Observed	Estimated Number of Recreationists Observed	Observed Recreational Activities
September 19, 2019	Merrimack Trail System	Sunny, cool, 60s	8:00 – 9:00	• 0	54	FishingRunning/joggingHiking/walking
September 19, 2019	Rourke Brothers Boat Ramp	Sunny, cool, 60s	9:00 – 10:00	5 cars2 boat trailers	6	BoatingFishing
September 19, 2019	Merrill Park	Sunny, cool, 60s	10:30 - 11:30	• 1	2	 Hiking/walking
September 19, 2019	Chelmsford Boat Access	Sunny, cool, 60s	12:00 – 13:00	• 5 cars	1	PicnickingFishing
September 19, 2019	Lowell National Historical Park Visitor Center	Sunny, cool, 60s	13:20 – 14:20	• 0	17	Park attendance
September 19, 2019	Pawtucket Falls Overlook	Sunny, cool, 60s	15:05 – 16:05	• 0	0	• N/A
September 19, 2019	Lowell Heritage State Park	Sunny, cool, 60s	16:24 – 17:24	Not Recorded	50	Hiking/walkingRunning/joggingBicycling
September 19, 2019	Rourke Brothers Boat Ramp	Sunny, cool, 60s	17:30 – 18:00	4 cars2 boat trailers	3	FishingBoating
September 22, 2019	Rourke Brothers Boat Ramp	Sunny, 70s – 80s	8:00 – 9:00	 3 cars 4 boat trailers	5	BoatingFishing
September 22, 2019	Pawtucket Falls Overlook	Sunny, 70s – 80s	9:30 – 10:30	• 0	0	• N/A
September 22, 2019	Merrill Park	Sunny, 70s – 80s	11:00 – 12:00	• 2 trucks	4	 Hiking/walking
September 22, 2019	Chelmsford Boat Access	Sunny, 70s – 80s	12:25 – 13:25	6 cars5 boat trailers	8	Boating
September 22, 2019	Lowell National Historical Park Visitor Center	Sunny, 70s – 80s	13:40 – 14:40	• 0	20	Park attendancePower outage occurred
September 22, 2019	NPS Canal Walkways	Sunny, 70s – 80s	15:00 – 16:00	• 0	13	Hiking/walkingRunning/joggingBicycling
September 22, 2019	Lowell Heritage State Park	Sunny, 70s – 80s	16:10 – 17:10	15 cars1 boat docked	70	SwimmingRunning/joggingHiking/walkingBicyclingDog walking
September 22, 2019	Merrimack Trail System	Sunny, 70s – 80s	17:17 – 18:00	Not recorded	30	FishingRunning/jogging

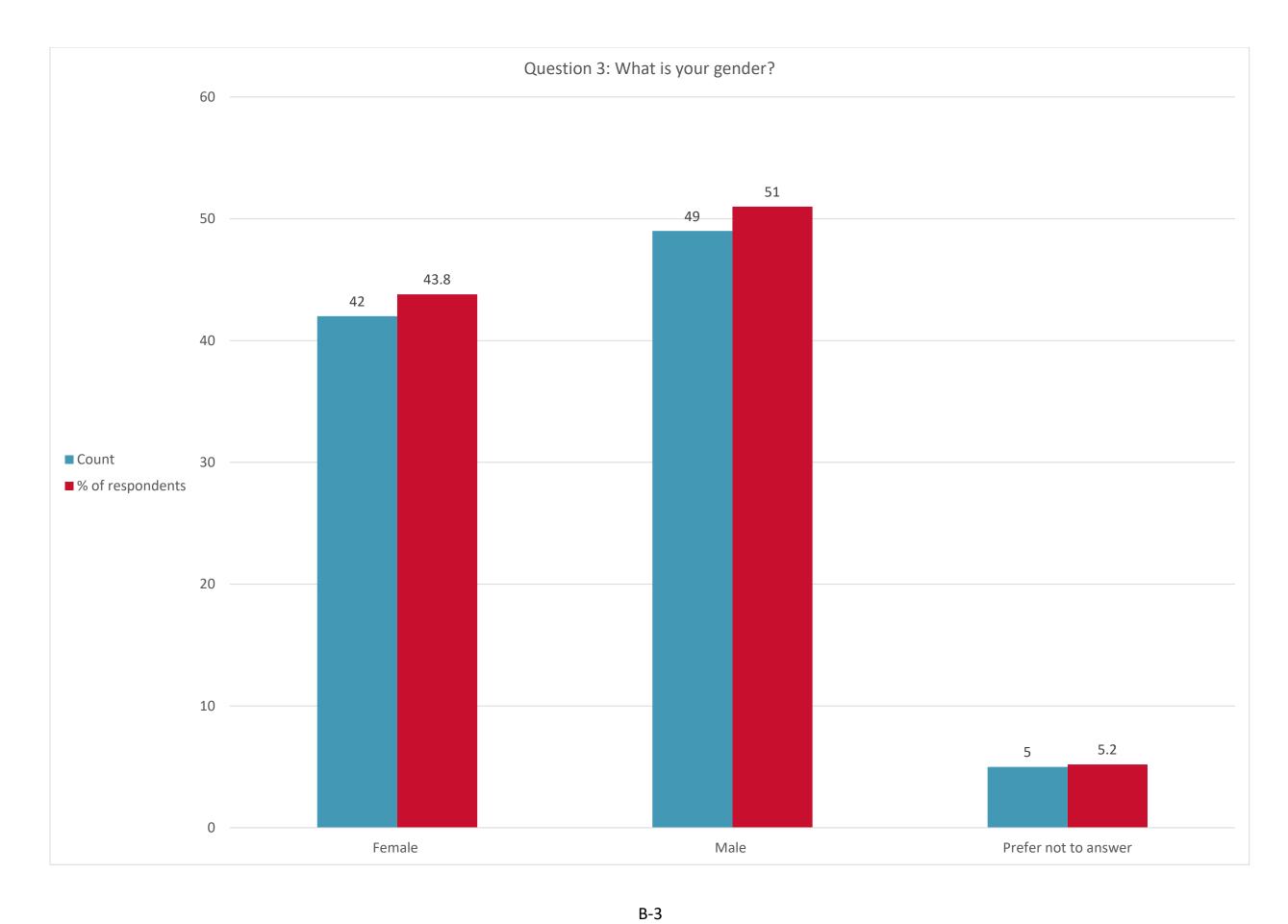
Personal Interviews and Field Reconnaissance Date	Location	Weather Conditions	Time (Military)	Approximate Vehicles Observed	Estimated Number of Recreationists Observed	Observed Recreational Activities
						Hiking/walkingBicycling
September 25, 2019	Merrill Park	Sunny, 70s	8:40 - 9:40	• 1 car	1	 Hiking/walking
September 25, 2019	Lowell Heritage State Park	Sunny, 70s	10:20 – 11:20	Not recorded	60	Running/joggingHiking/walkingBicycling
September 25, 2019	Pawtucket Falls Overlook	Sunny, 70s	11:25 – 12:25	• 3 cars	0	• N/A
September 25, 2019	Lowell National Historical Park Visitor Center	Sunny, 70s	13:10 – 14:10	• 0	10	Park attendance
September 25, 2019	NPS Canal Walkways	Sunny, 70s	14:30 - 15:45	• 0	60	 Hiking/walking
September 25, 2019	Rourke Brothers Boat Ramp	Sunny, 70s	16:20 – 17:20	• 4 cars	4	• N/A
September 25, 2019	Merrimack Trail System	Sunny, 70s	17:23 – 18:00	• 45 cars	50	FishingRunning/joggingHiking/walking
October 9, 2019	Lowell Heritage State Park	Cloudy, windy, 50s	8:20 – 9:20	• 15 cars	19	Hiking/walkingRunning/joggingDog walking
October 9, 2019	Rourke Brothers Boat Ramp	Cloudy, windy, 50s	9:30 – 10:30	• 3 cars	1	 Dog walking
October 9, 2019	Merrill Park	Cloudy, windy, 50s	11:09 - 12:09	• 0	0	• N/A
October 9, 2019	NPS Canal Walkways	Cloudy, windy, 50s	12:59 - 13:59	• 0	13	 Hiking/walking
October 9, 2019	Chelmsford Boat Access	Cloudy, windy, 50s	14:46 – 15: 46	• 2 cars	1	Hiking/walking
October 9, 2019	Pawtucket Falls Overlook	Cloudy, windy, 50s	16:03 – 17:00	• 0	0	• N/A
October 9, 2019	Merrimack Trail System	Cloudy, windy, 50s	17: 11 – 18:00	20 cars3 boats	32	Hiking/walkingRunning/JoggingBoating
October 15, 2019	Merrill Park	Sunny, cool, 40-50s	8:10 - 9:10	• 0	0	• N/A
October 15, 2019	Lowell Heritage State Park	Sunny, cool, 40-50s	9:35 – 10:35	• 2 cars	40	Running/joggingHiking/walkingBicycling
October 15, 2019	Pawtucket Falls Overlook	Sunny, cool, 40-50s	10:40 –11:40	• 0	0	• N/A

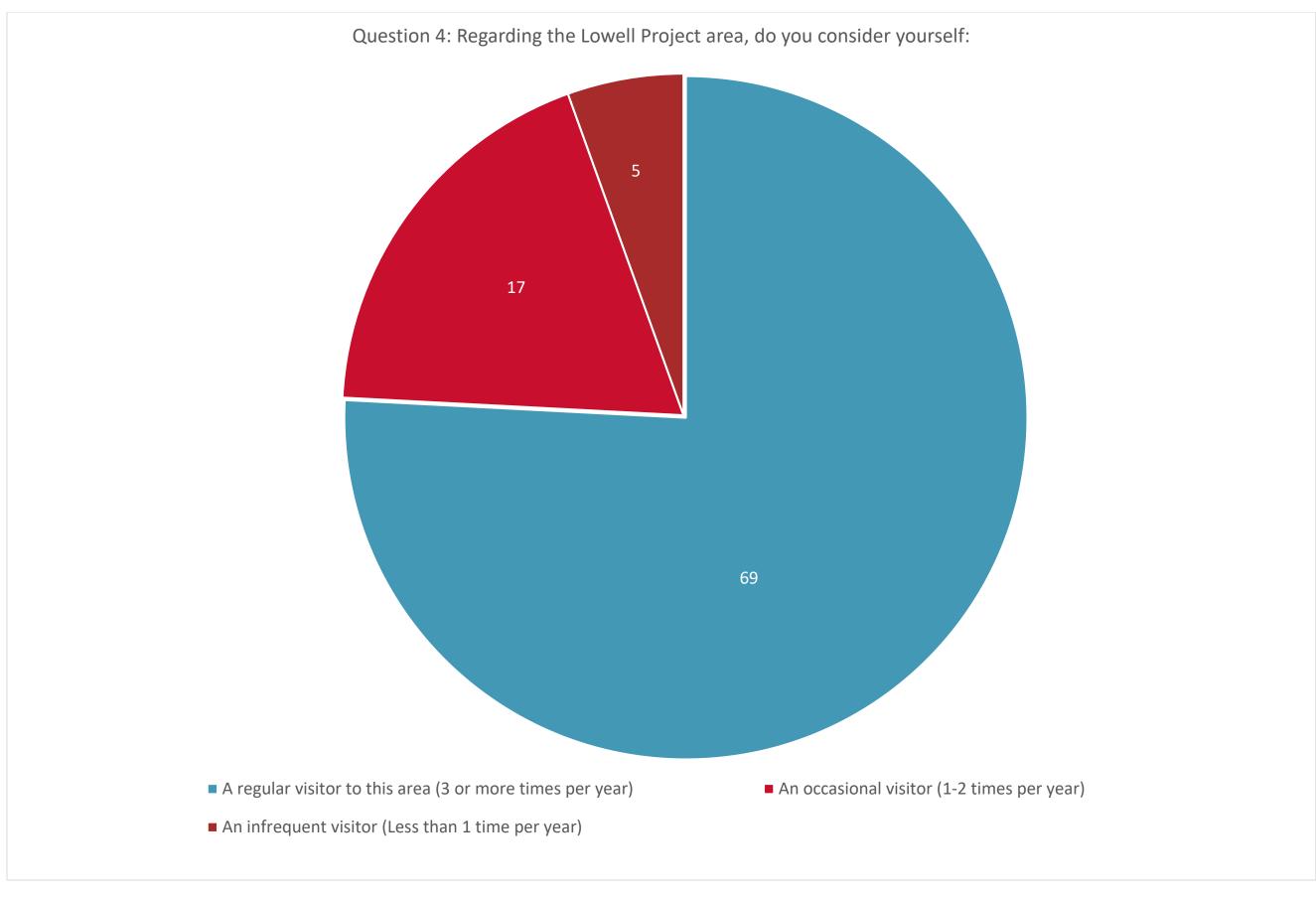
Personal Interviews and Field Reconnaissance Date	Location	Weather Conditions	Time (Military)	Approximate Vehicles Observed	Estimated Number of Recreationists Observed	Observed Recreational Activities
October 15, 2019	Lowell National Historical Park Visitor Center	Sunny, cool, 40-50s	11:49 – 12:49	• 0	32	Park attendance
October 15, 2019	NPS Canal Walkways	Sunny, cool, 40-50s	12:49 - 13:49	• 0	35	 Hiking/walking
October 15, 2019	Chelmsford Boat Access	Sunny, cool, 40-50s	14:39 – 15:39	• 3 cars	3	Boating
October 15, 2019	Rourke Brothers Boat Ramp	Sunny, cool, 40-50s	15:50 – 16:50	• 6 cars	6	Walking/hikingBoating
October 15, 2019	Merrimack Trail System	Sunny, cool, 40-50s	16:53 – 17:53	• 0	65	Running/joggingHiking/walkingBicyclingFishingPicnicking
October 19, 2019	Rourke Brothers Boat Ramp	Sunny, 40-50s	8:00 – 9:00	• 8 cars	8	Not recorded
October 19, 2019	Chelmsford Boat Access	Sunny, 40-50s	9:07 – 10:07	• 2 cars	4	Hiking/walking
October 19, 2019	Merrill Park	Sunny, 40-50s	10:26 – 11:26	• 1 car	3	Hiking/walkingFishing
October 19, 2019	Merrimack Trail System	Sunny, 40-50s	11:49 – 12:49	• 0	64	Running/joggingHiking/walking
October 19, 2019	Lowell National Historical Park Visitor Center	Sunny, 40-50s	13:23 – 14:23	• 0	47	Park attendance
October 19, 2019	Pawtucket Falls Overlook	Sunny, 40-50s	14:32 – 15:32	• 0	2	• Fishing
October 19, 2019	NPS Canal Walkways	Sunny, 40-50s	15:35 –16:35	• 0	58	BicyclingHiking/walking
October 19, 2019	Lowell Heritage State Park	Sunny, 40-50s	16:48 – 17:58	• 0	75	Running/joggingHiking/walkingBicyclingPicnickingBoating
October 27, 2019	Pawtucket Falls Overlook	Rainy, cloudy, 50s	8:21 – 9:21	• 0		Hiking/walking
October 27, 2019	Merrill Park	Rainy, cloudy, 50s	9:49 - 10:49	• 1 car		 Hiking/walking
October 27, 2019	Chelmsford Boat Access	Rainy, cloudy, 50s	11:27 – 12:17	• 1 car		 Boating

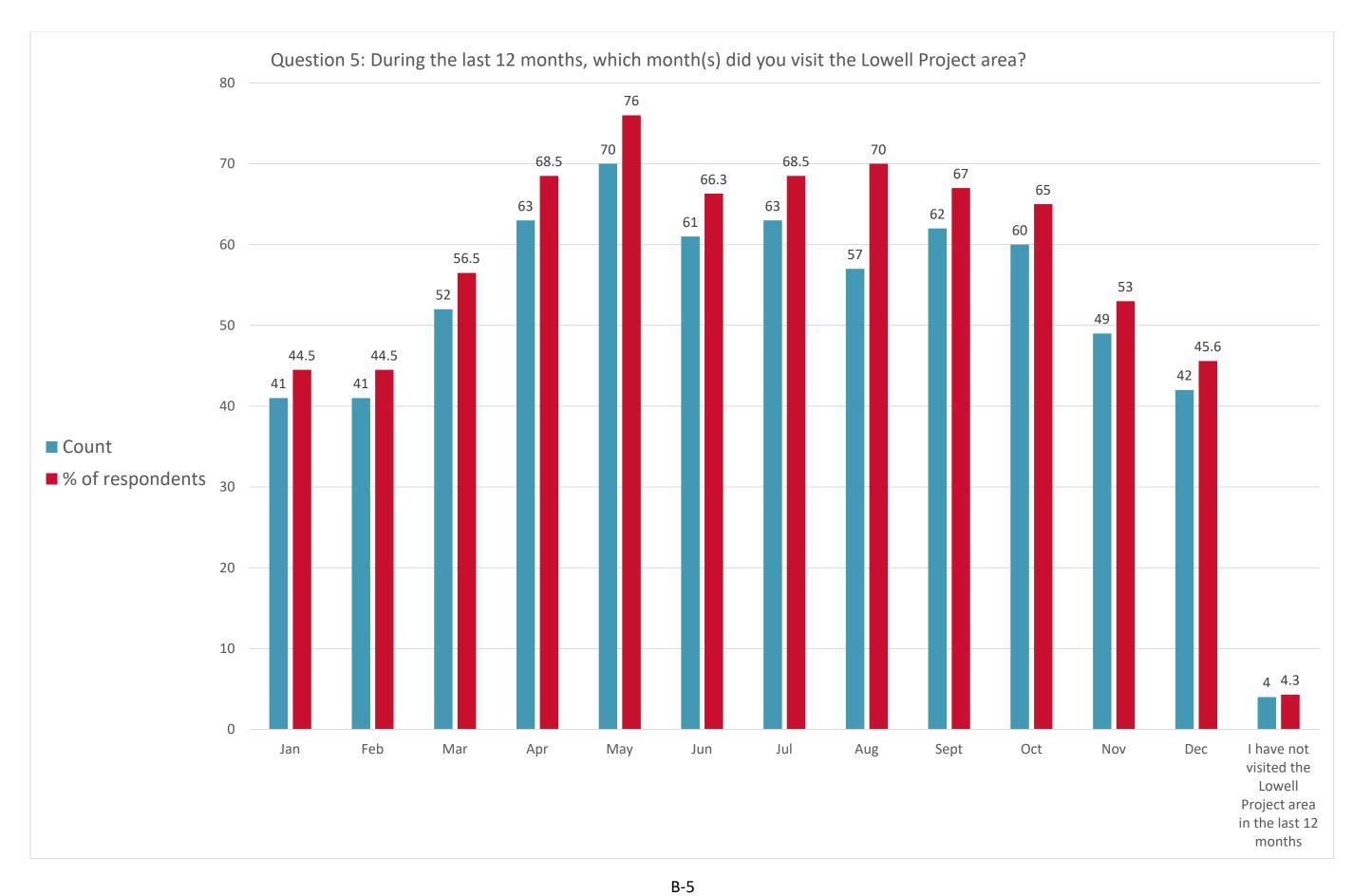
Personal Interviews and Field Reconnaissance Date	Location	Weather Conditions	Time (Military)	Approximate Vehicles Observed	Estimated Number of Recreationists Observed	Observed Recreational Activities
October 27, 2019	Lowell National Historical Park Visitor Center	Rainy, cloudy, 50s	12:31 – 13:31	• 0	13	Park attendance
October 27, 2019	NPS Canal Walkways	Rainy, cloudy, 50s	14:03 - 15:03	• 0		 Hiking/walking
October 27, 2019	Rourke Brothers Boat Ramp	Rainy, cloudy, 50s	15:20 – 16:20	• 0	0	• N/A
October 27, 2019	Merrimack Trail System	Rainy, cloudy, 50s	16:30 – 17:30	• 4 cars	2	Hiking/walking
October 27, 2019	Lowell Heritage State Park	Rainy, cloudy, 50s	17:32 – 18:00	• 0	0	• N/A

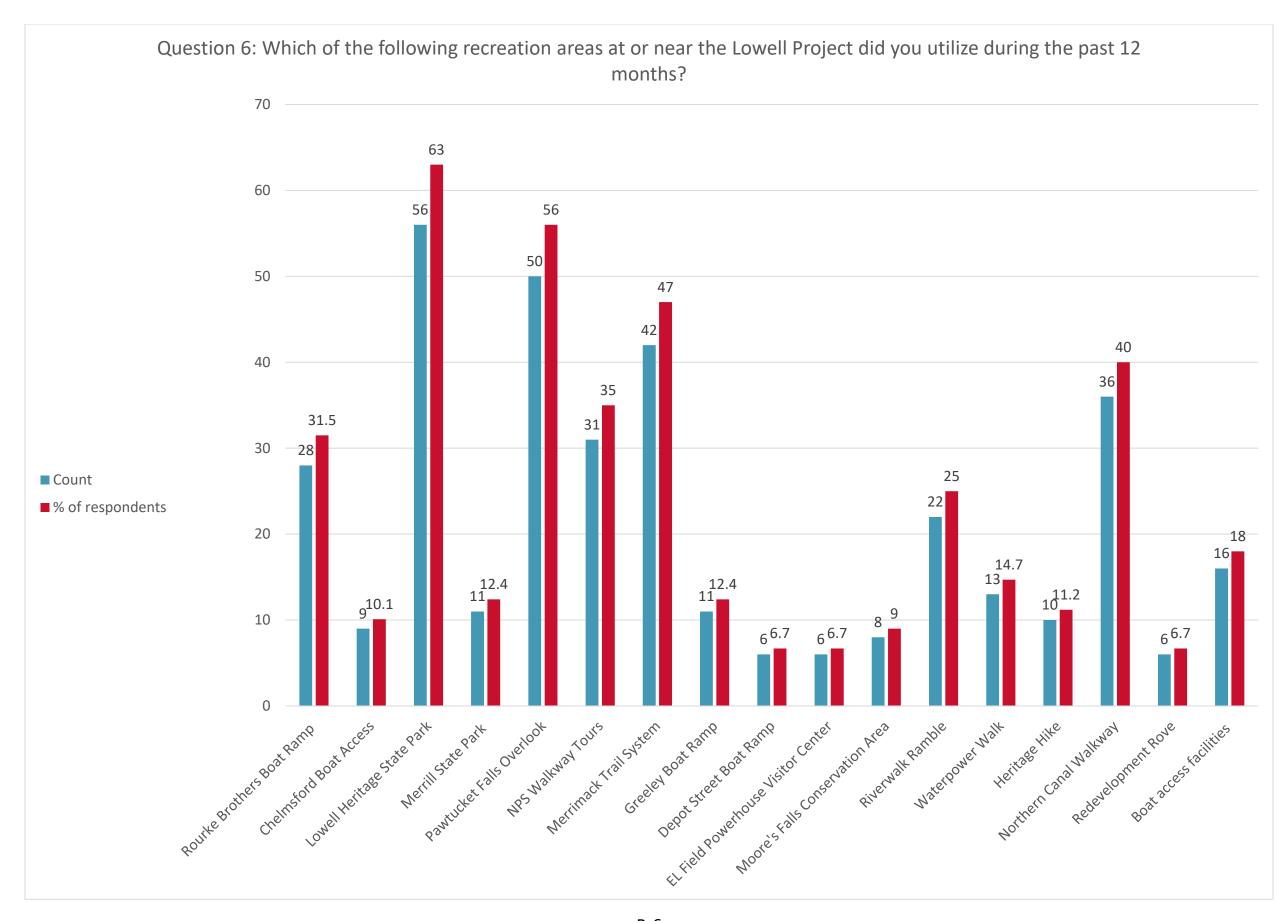


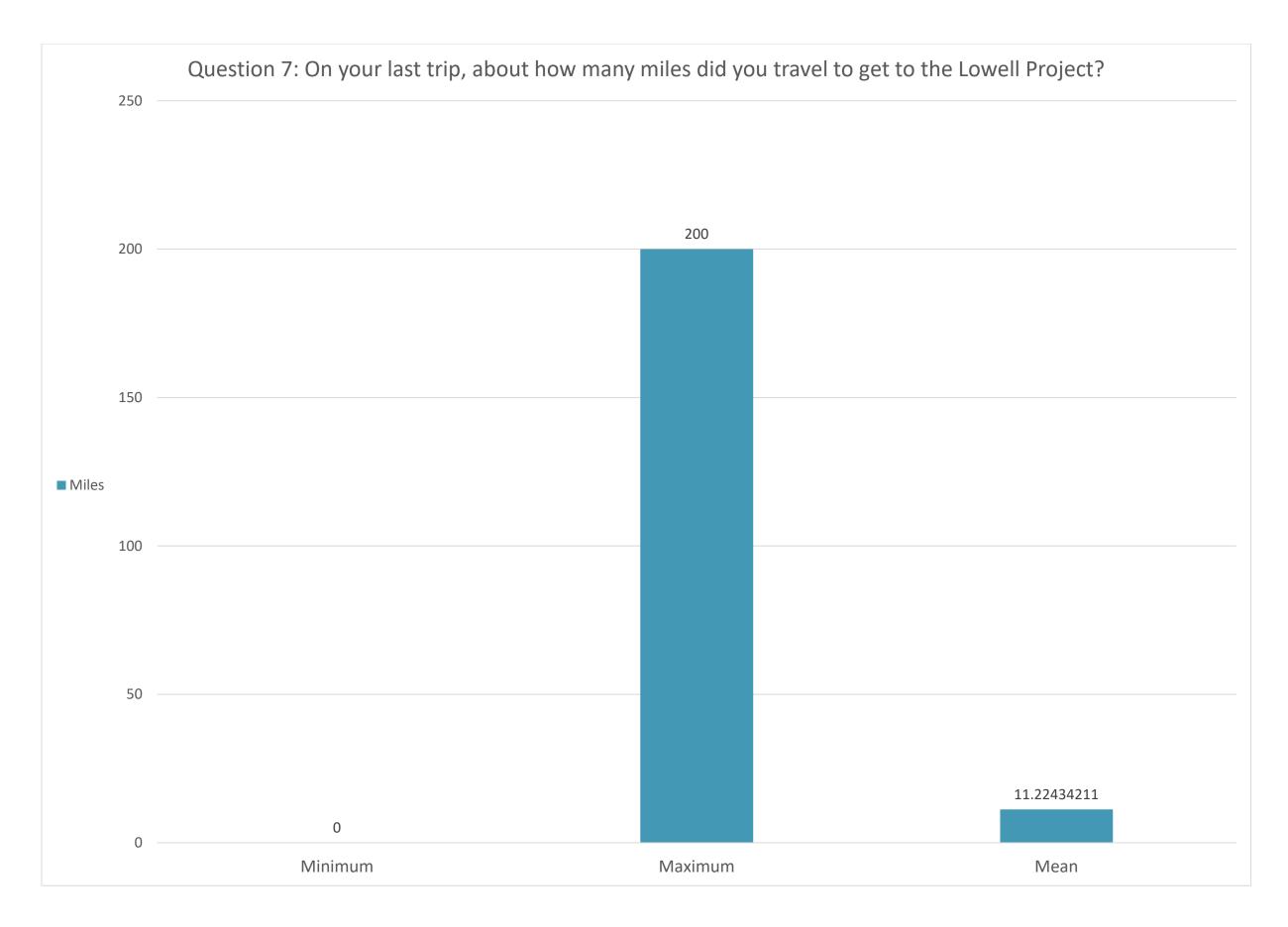


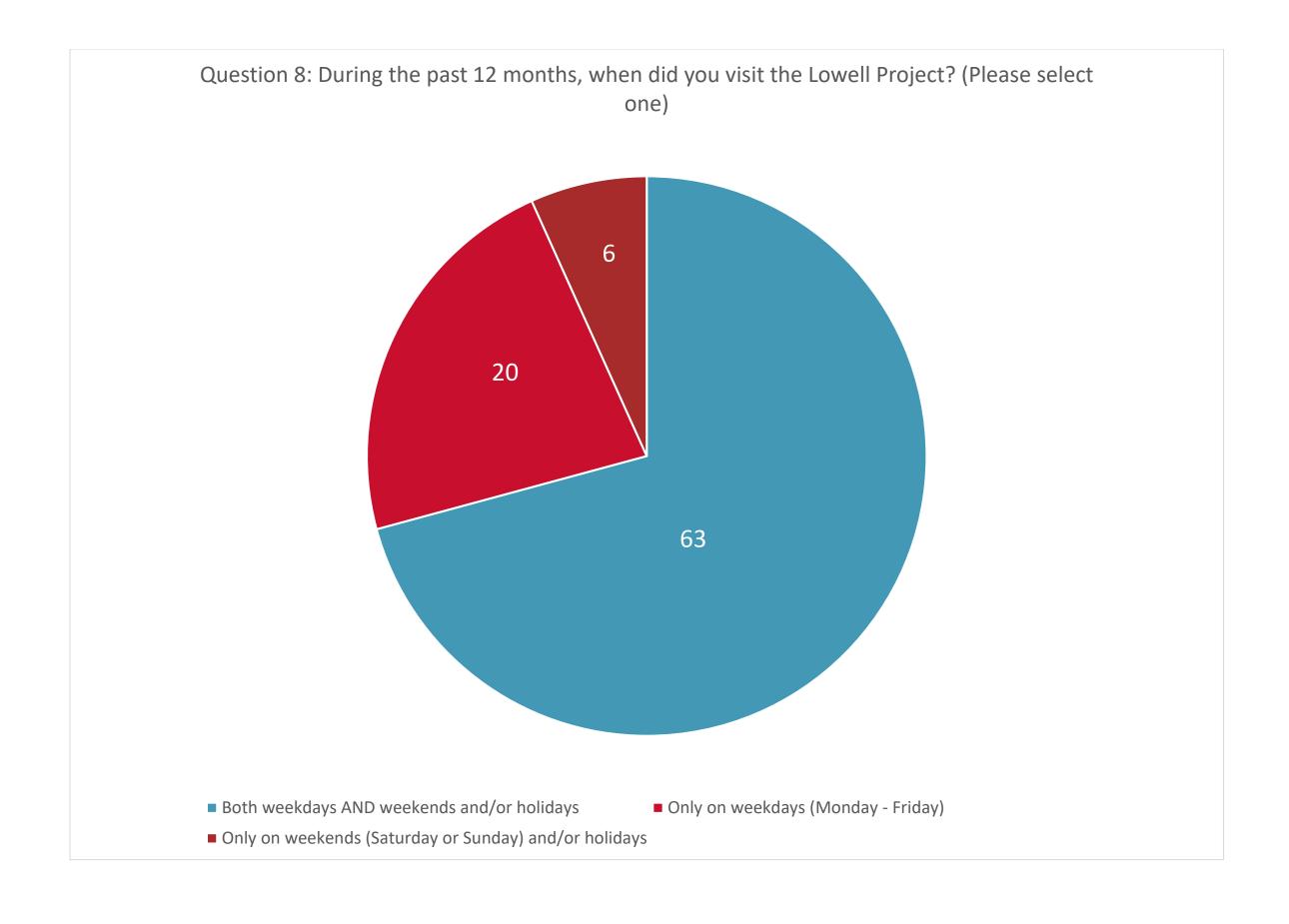


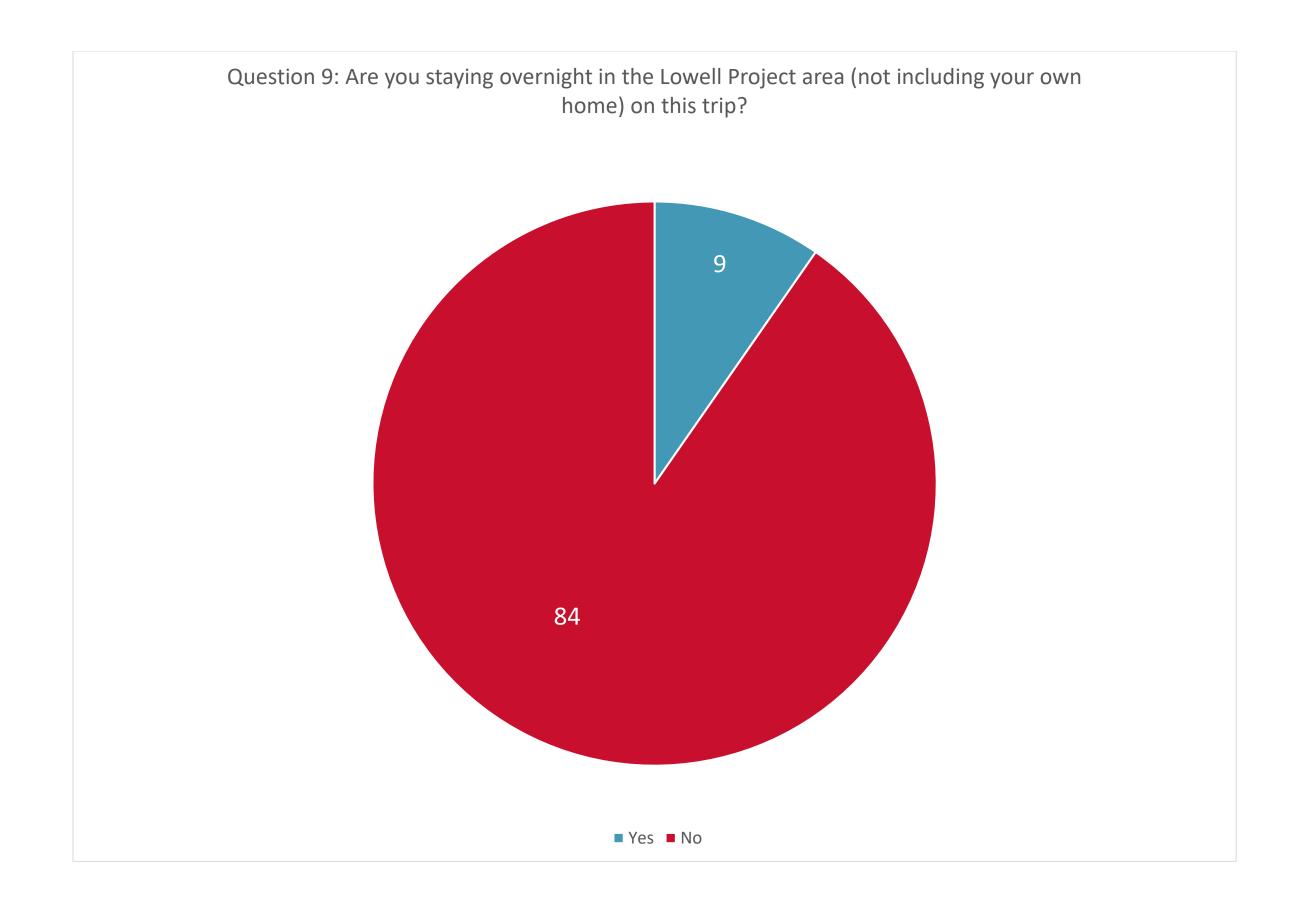


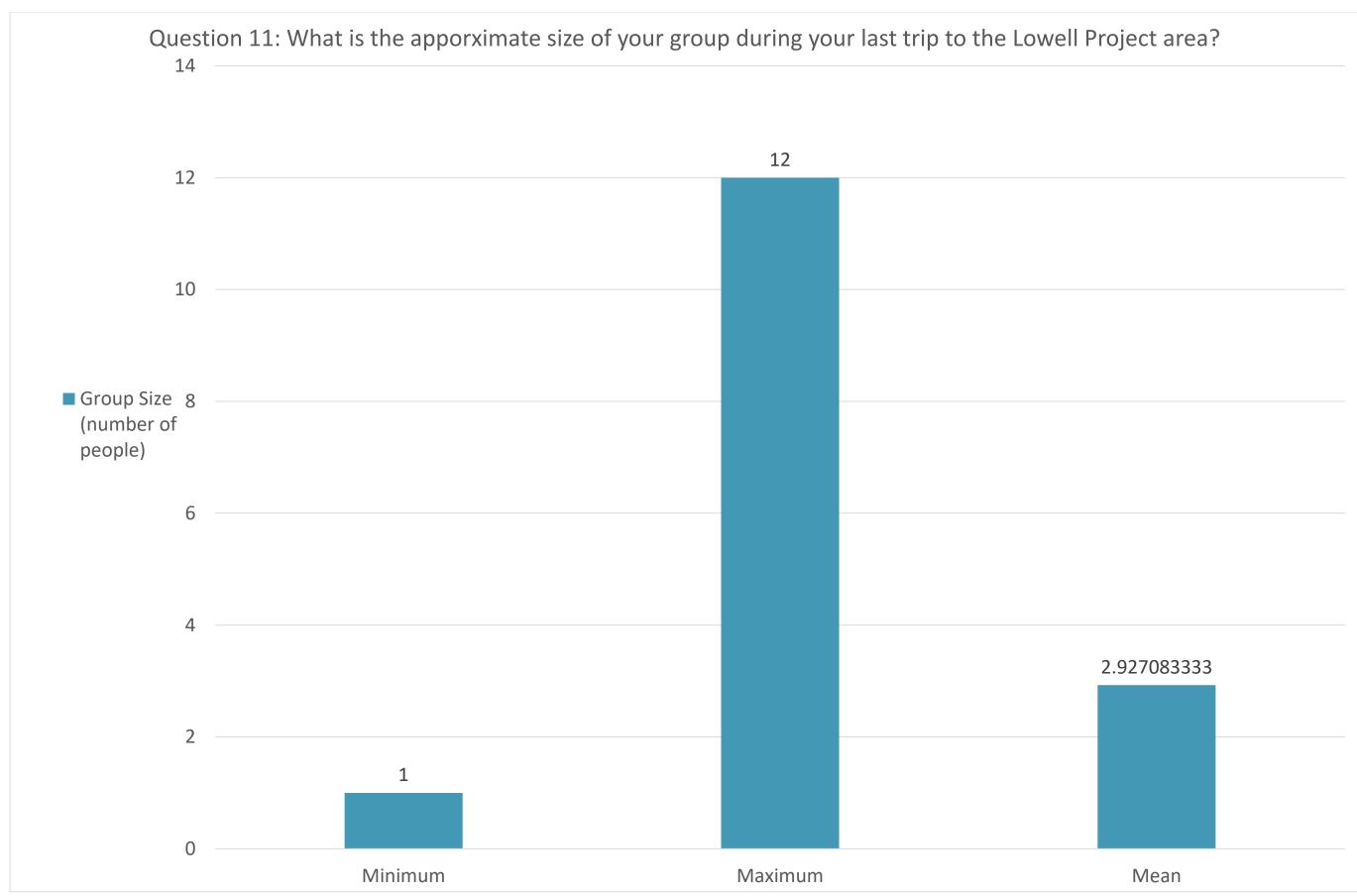


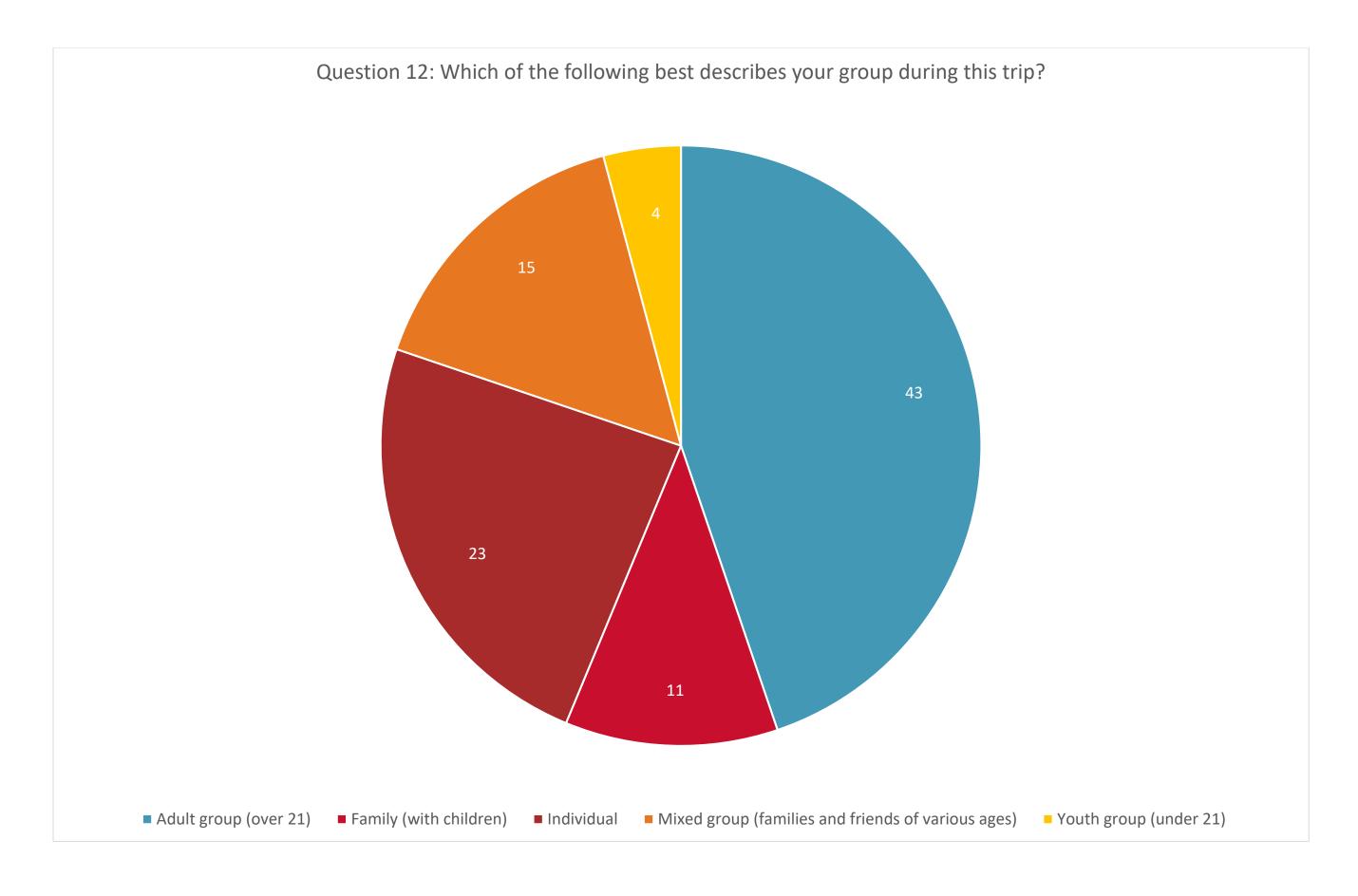


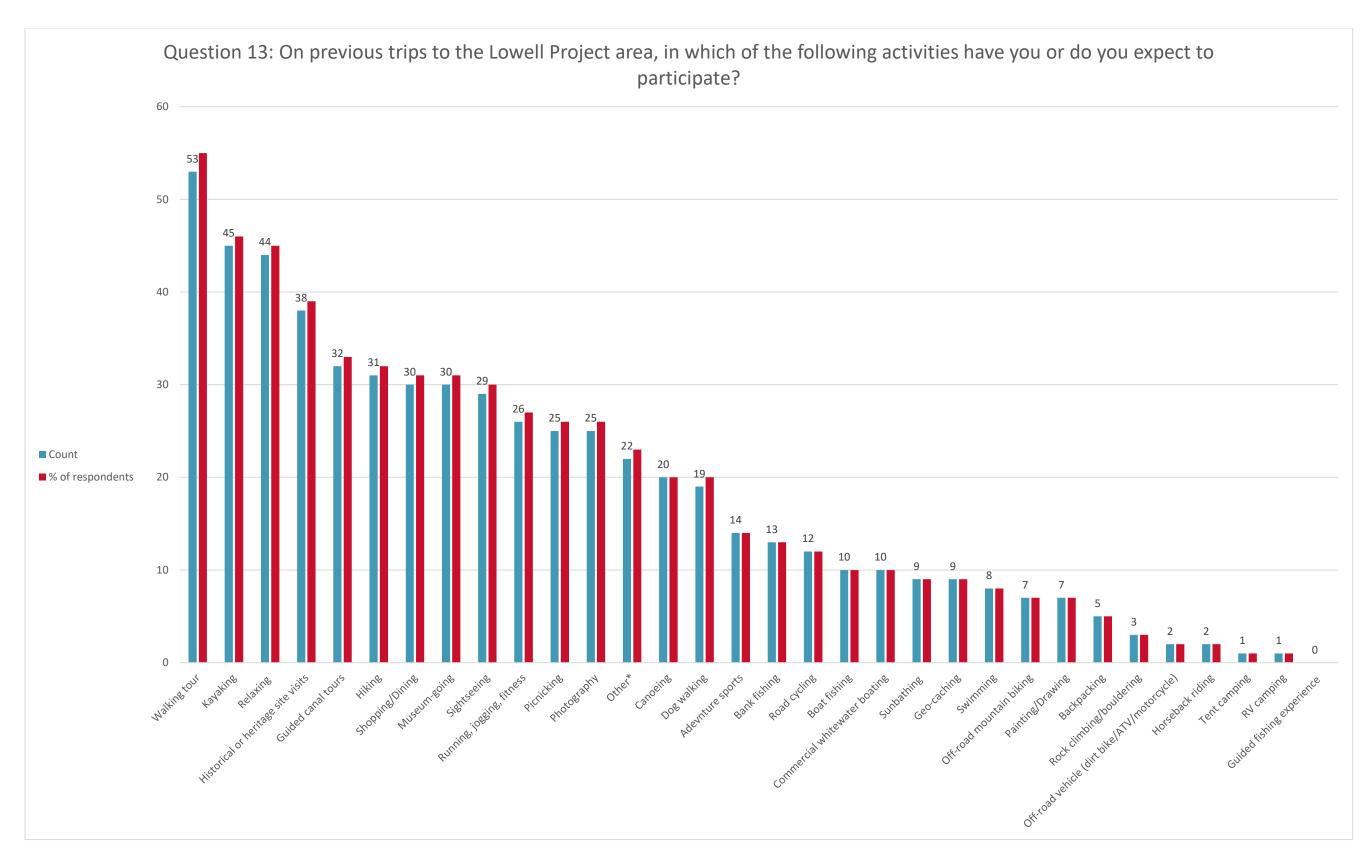




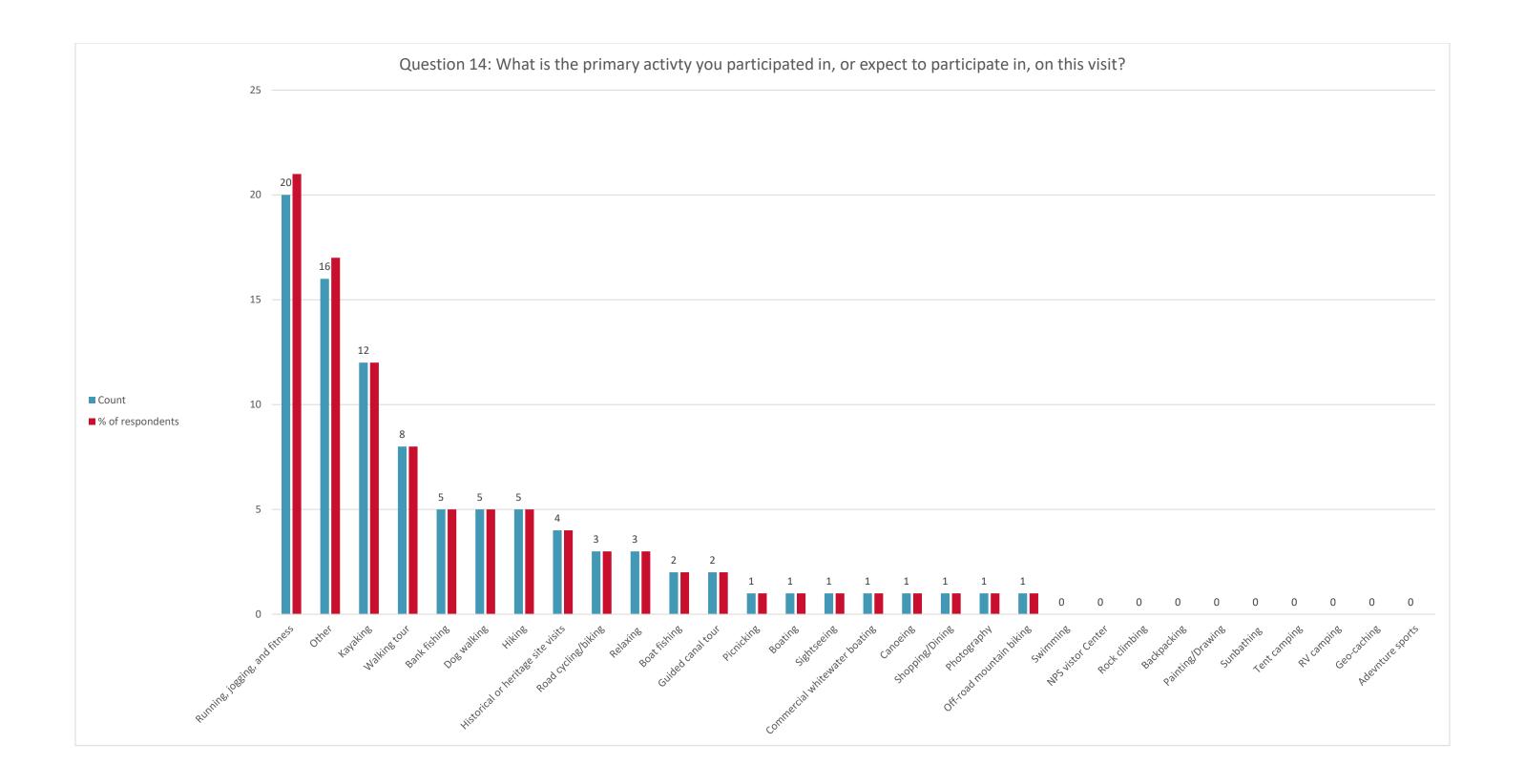


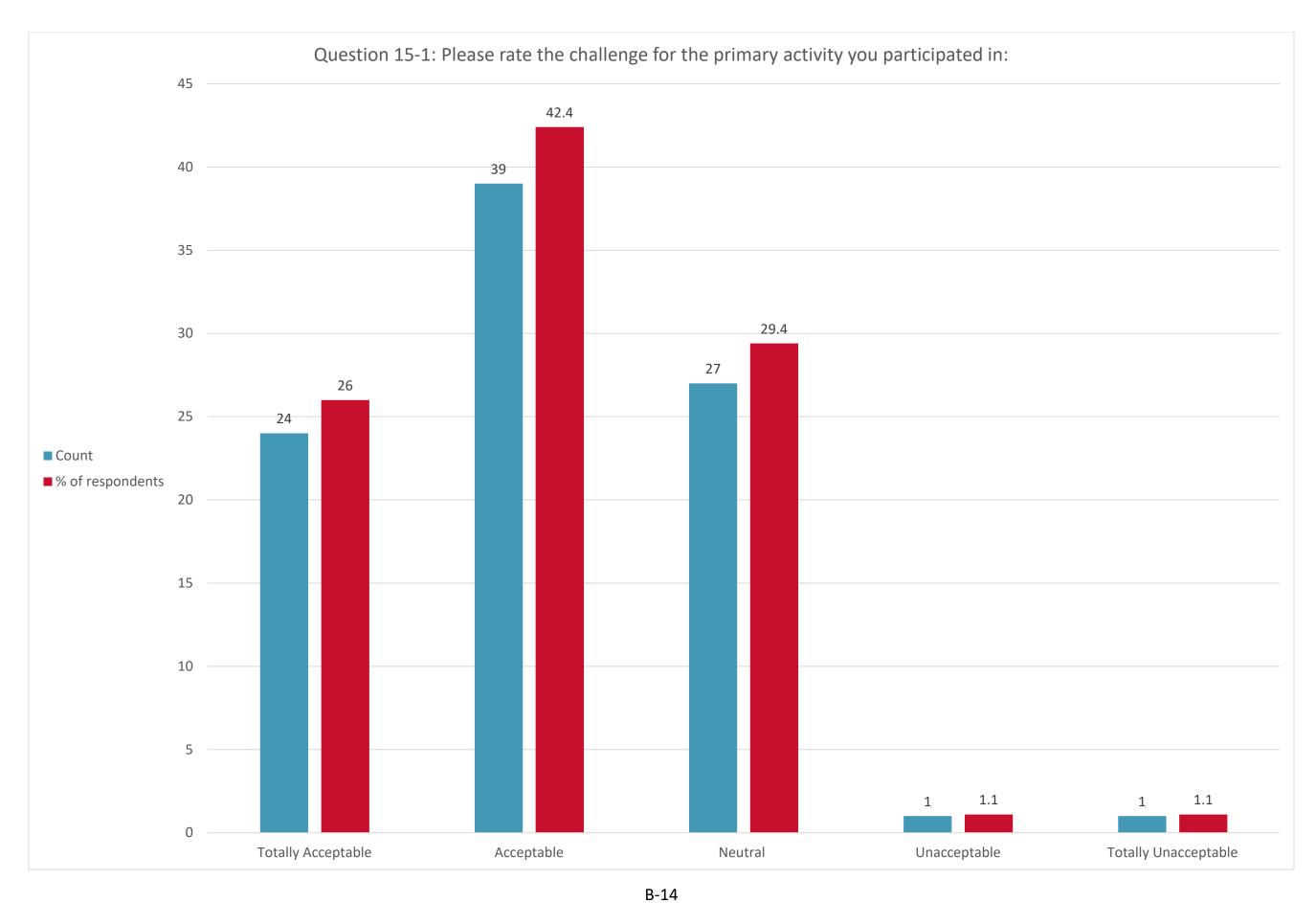


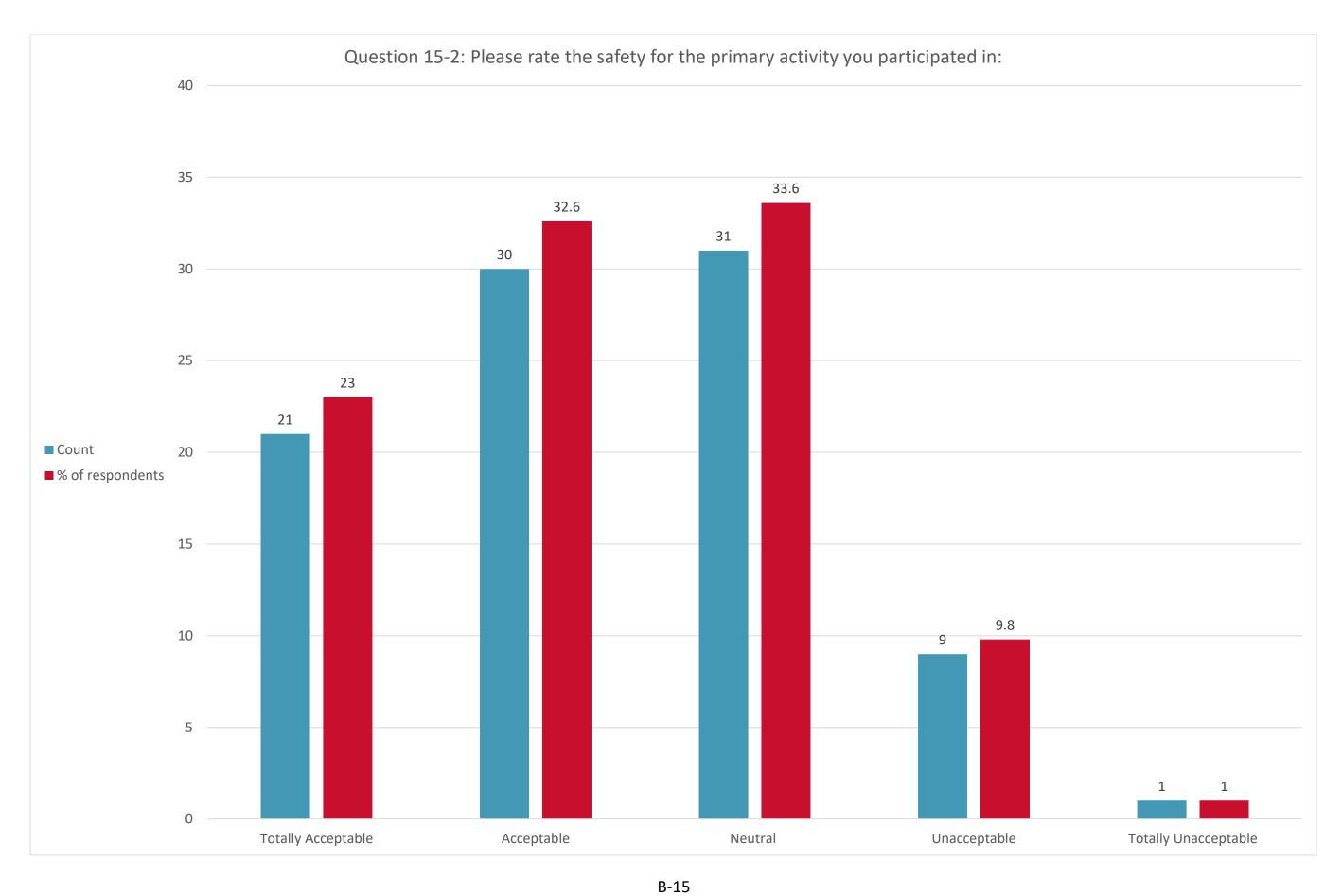


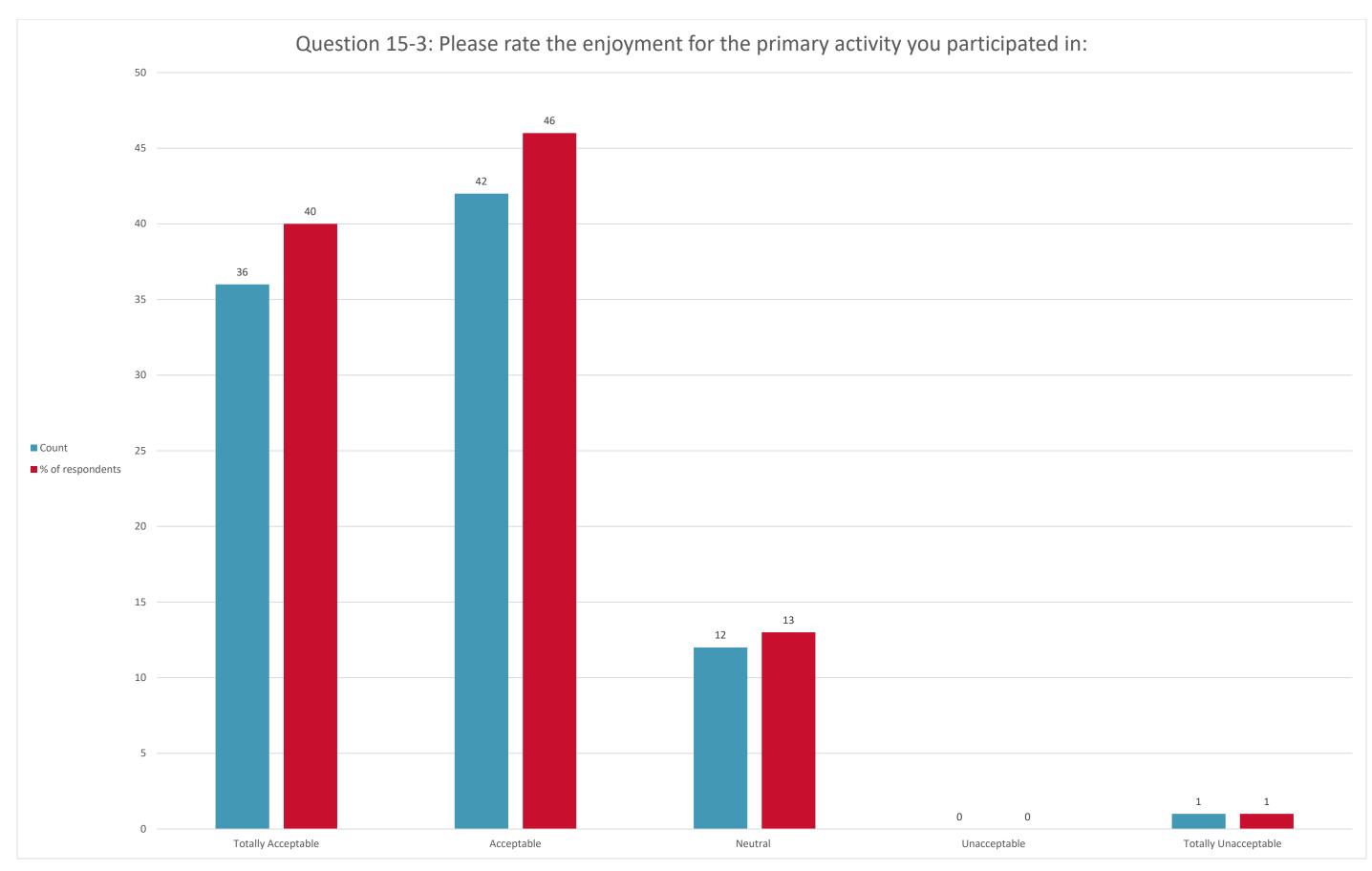


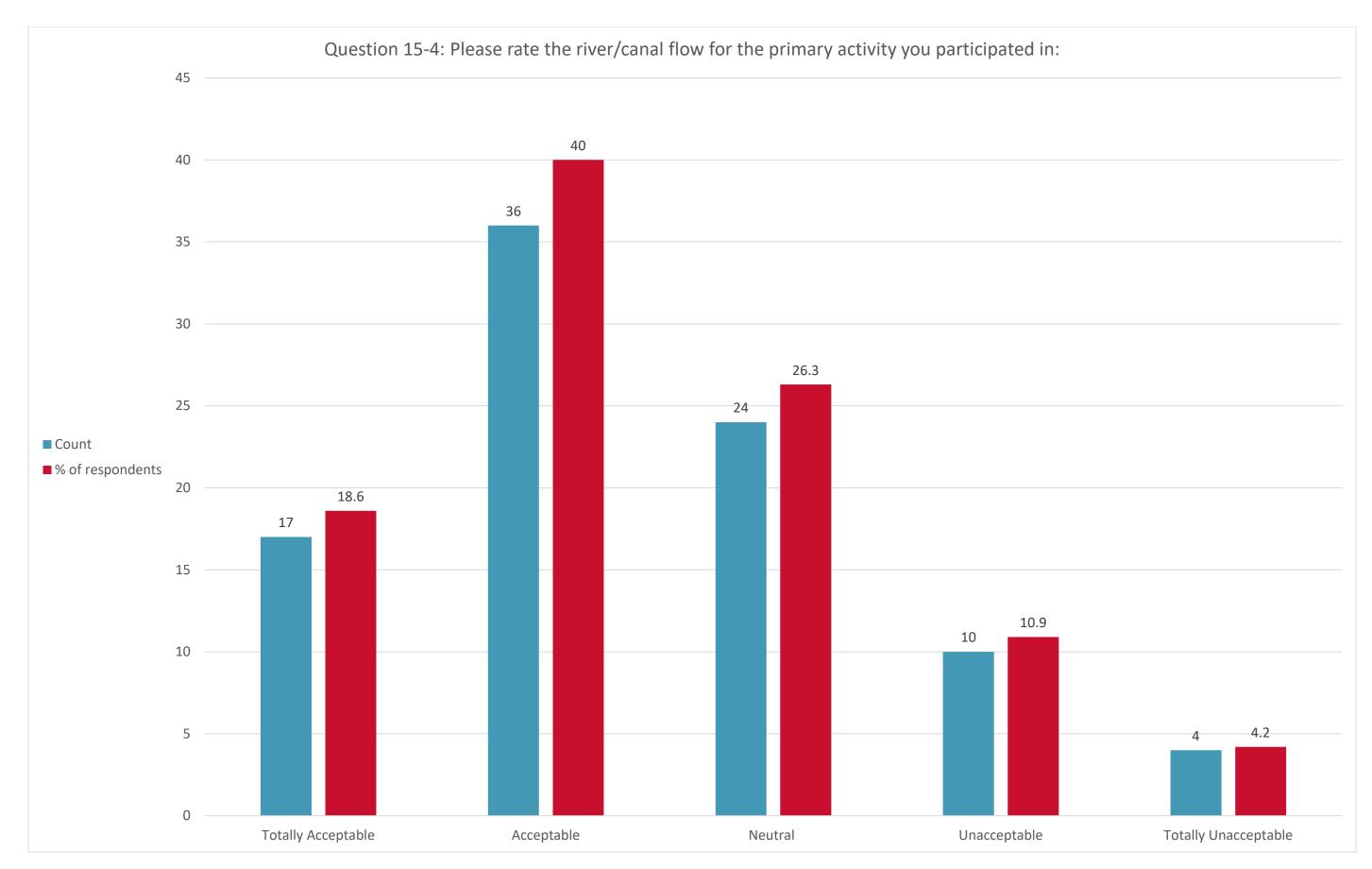
^{*}Other responses included personal whitewater rafting or canoeing, hammocking, birding, attending festivals, and sport boating.

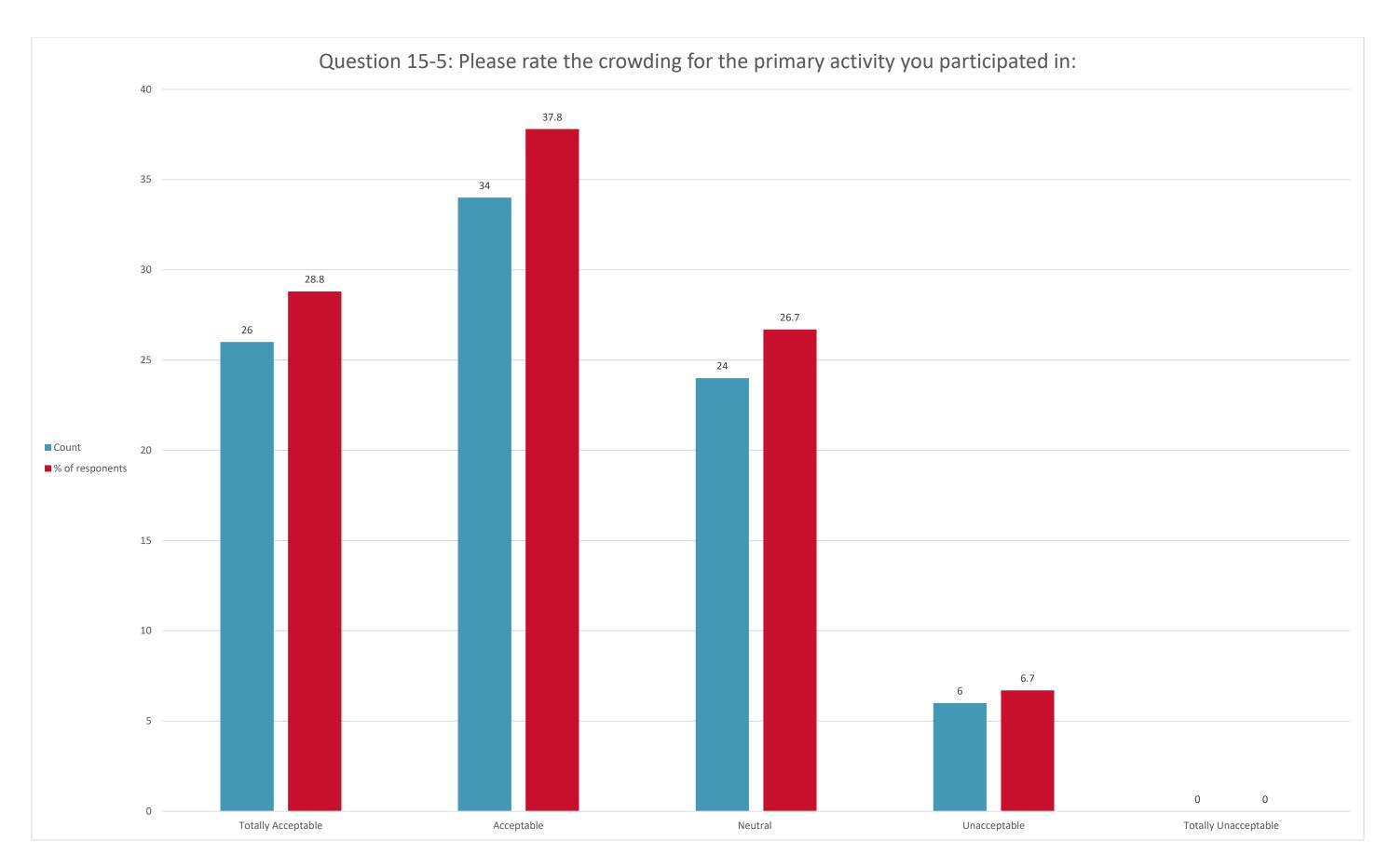


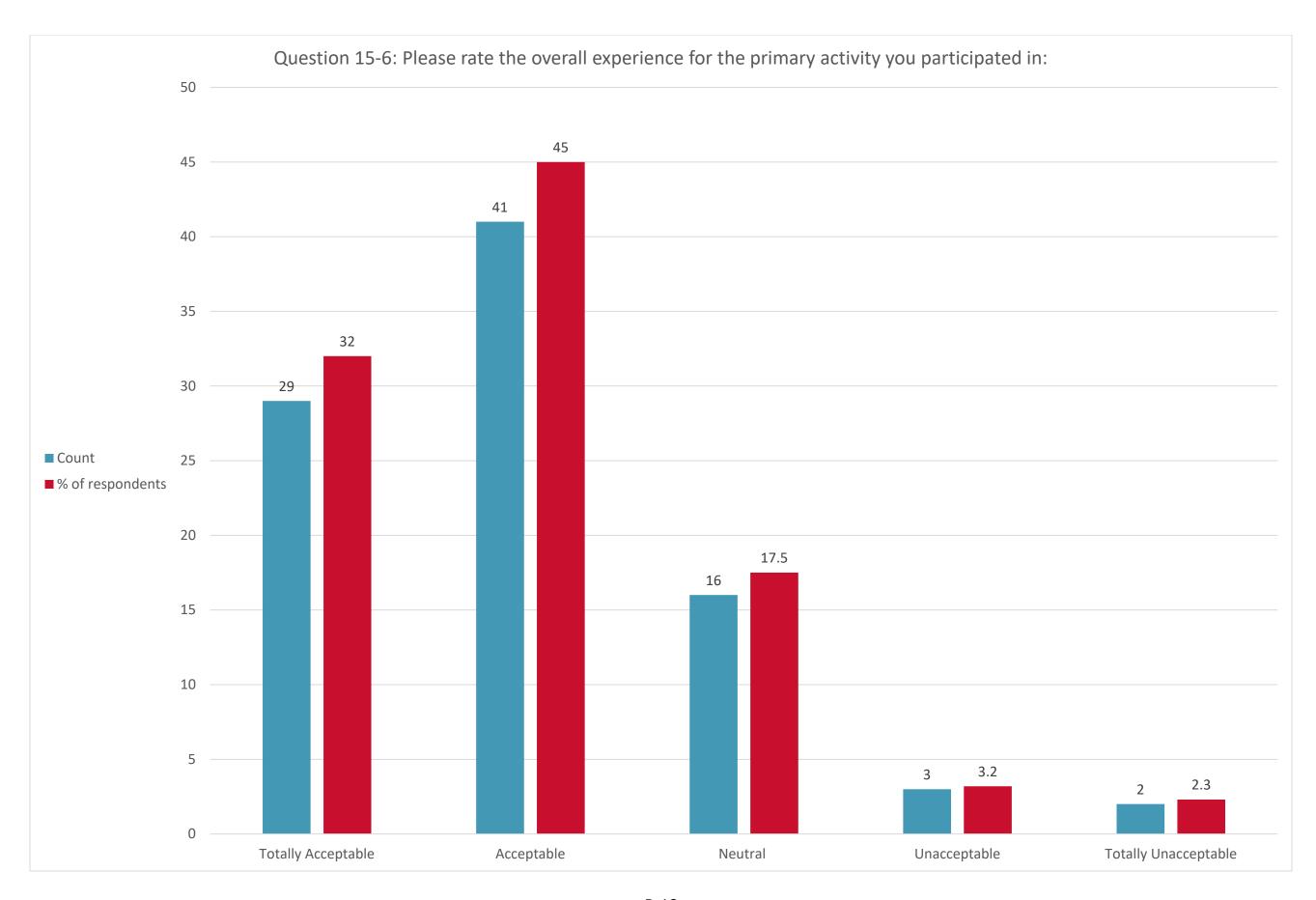


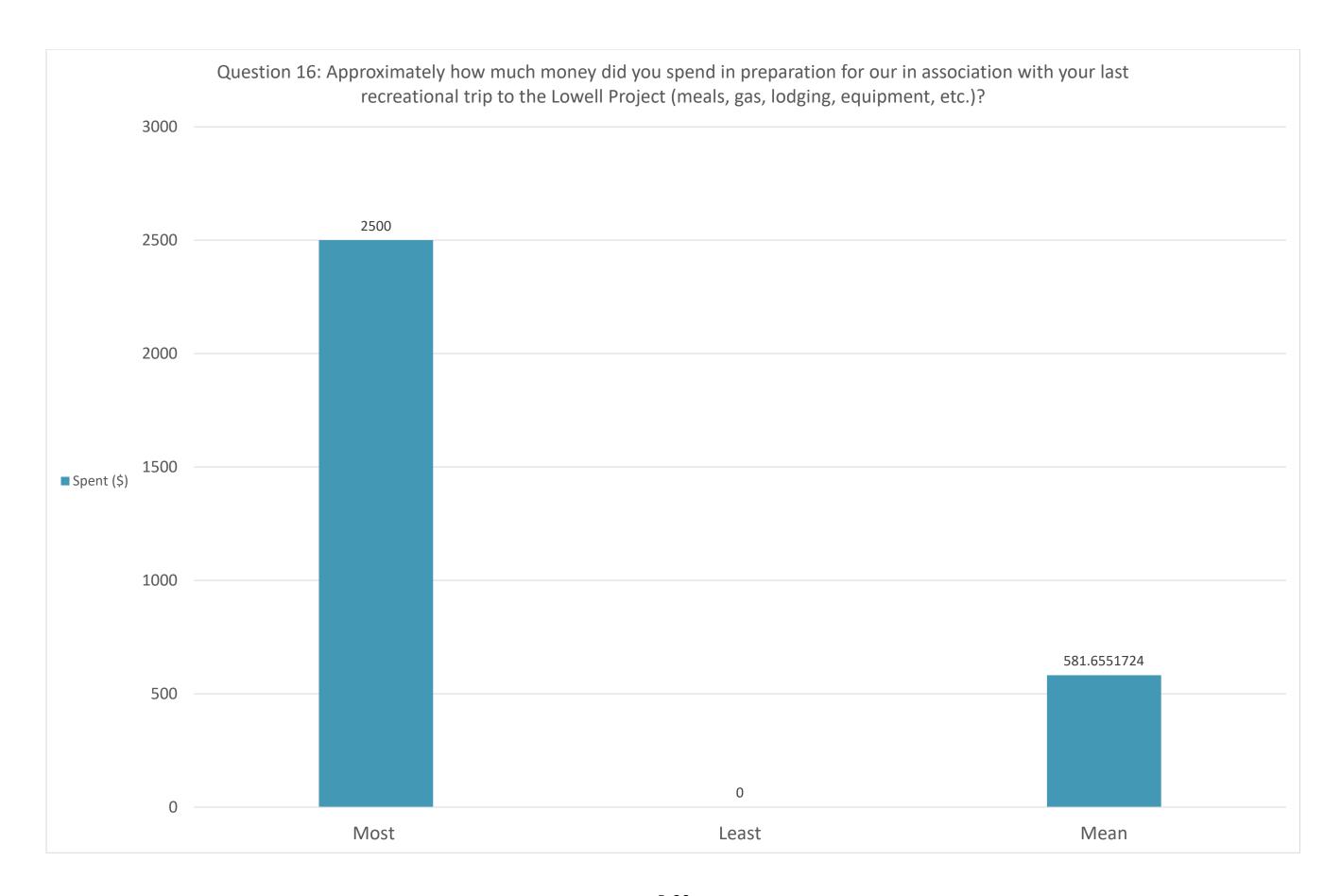


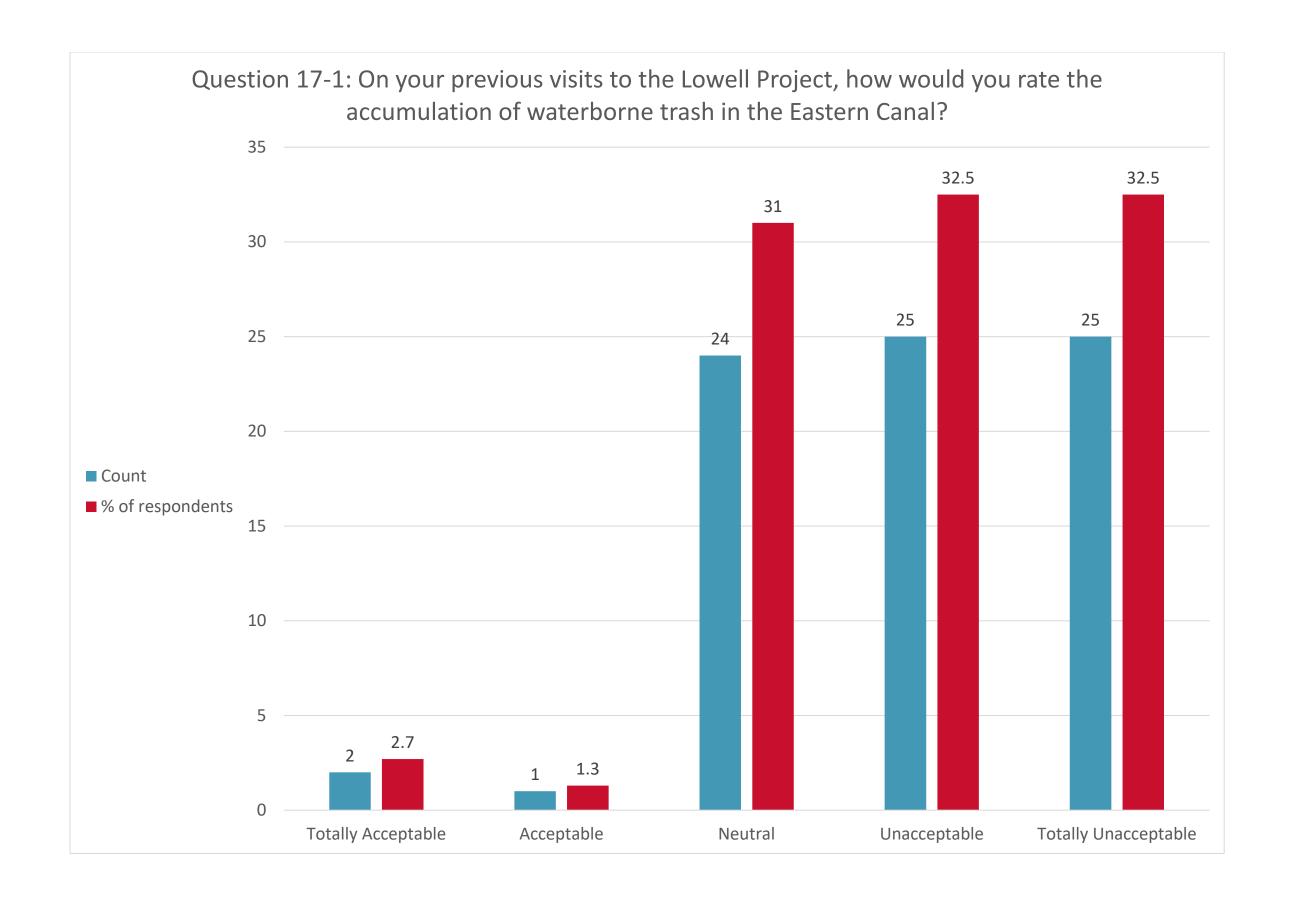


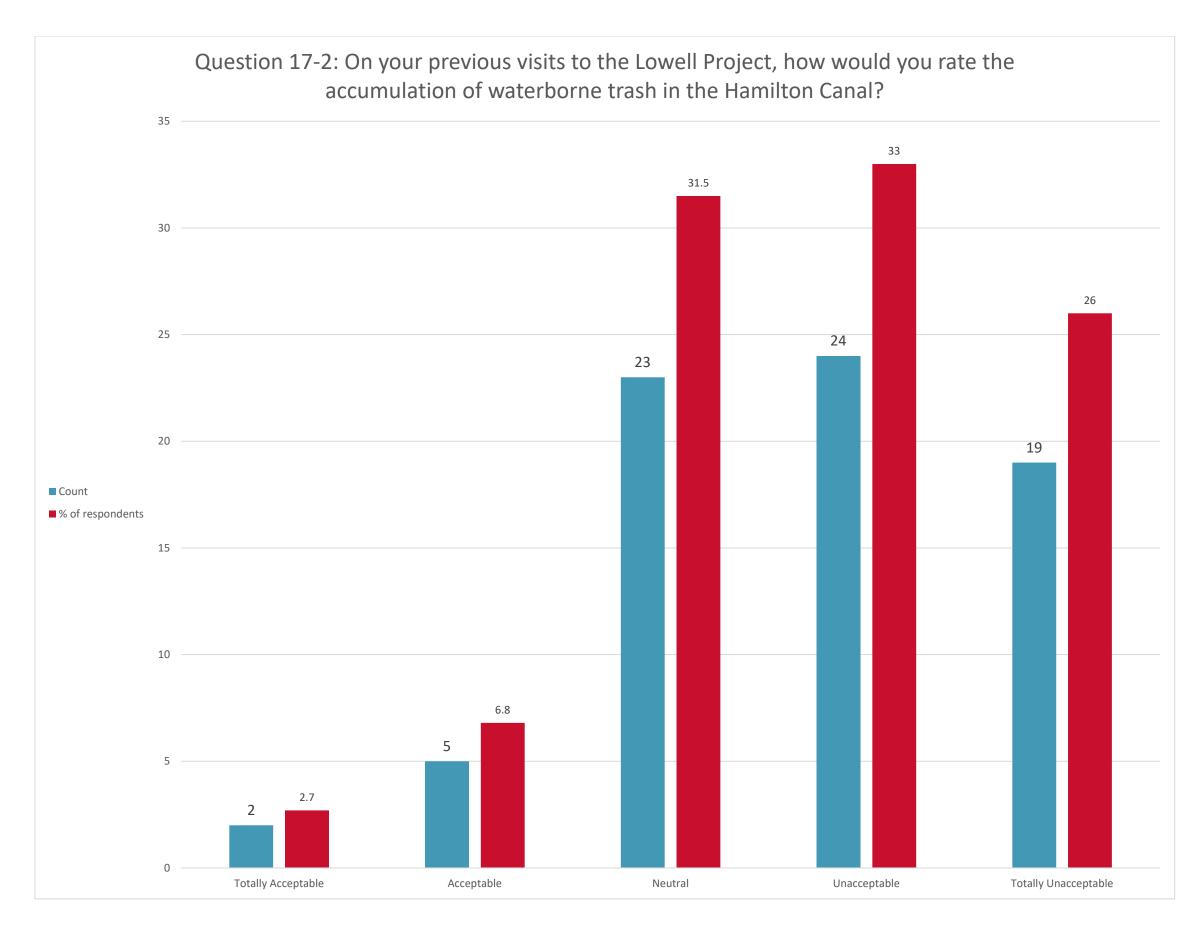


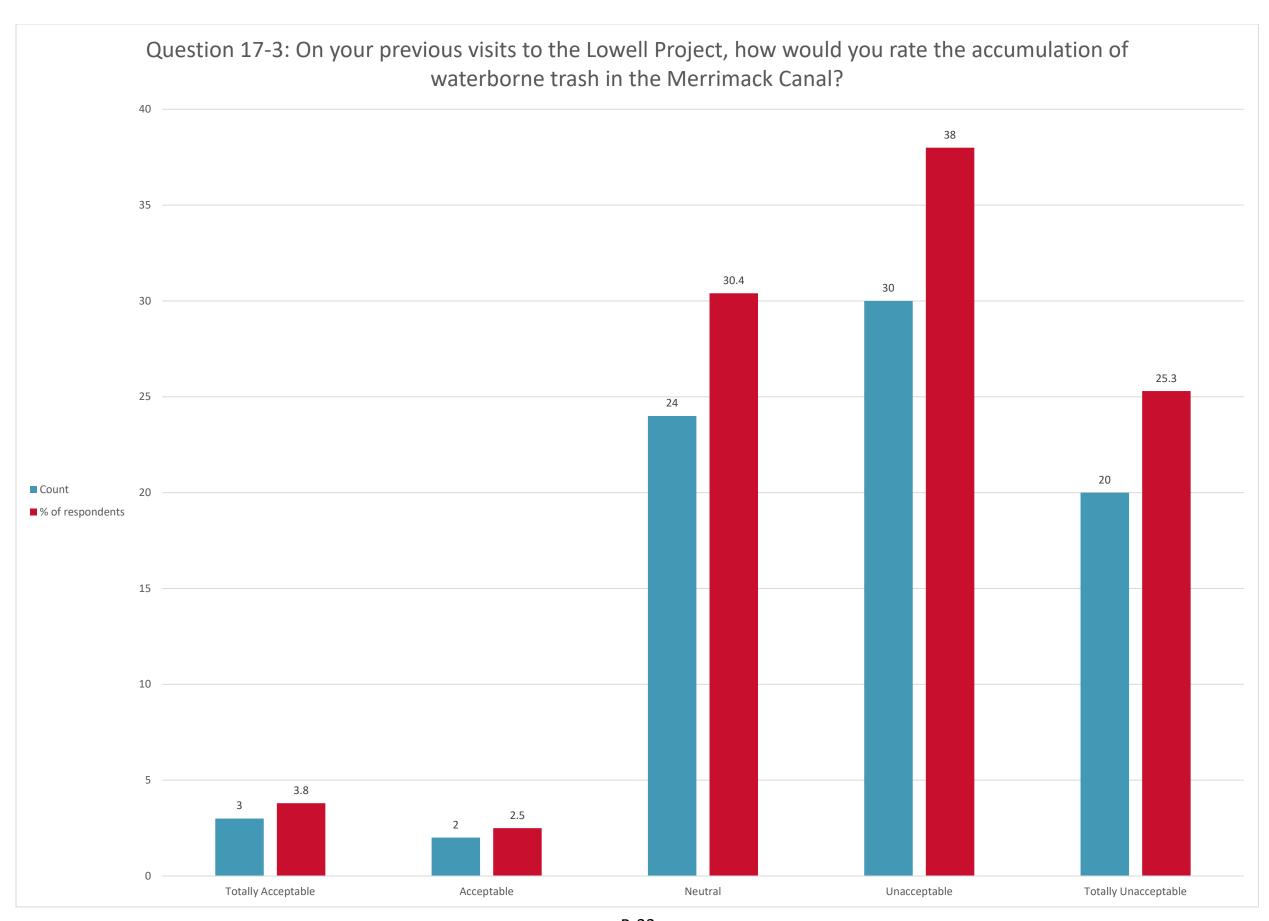


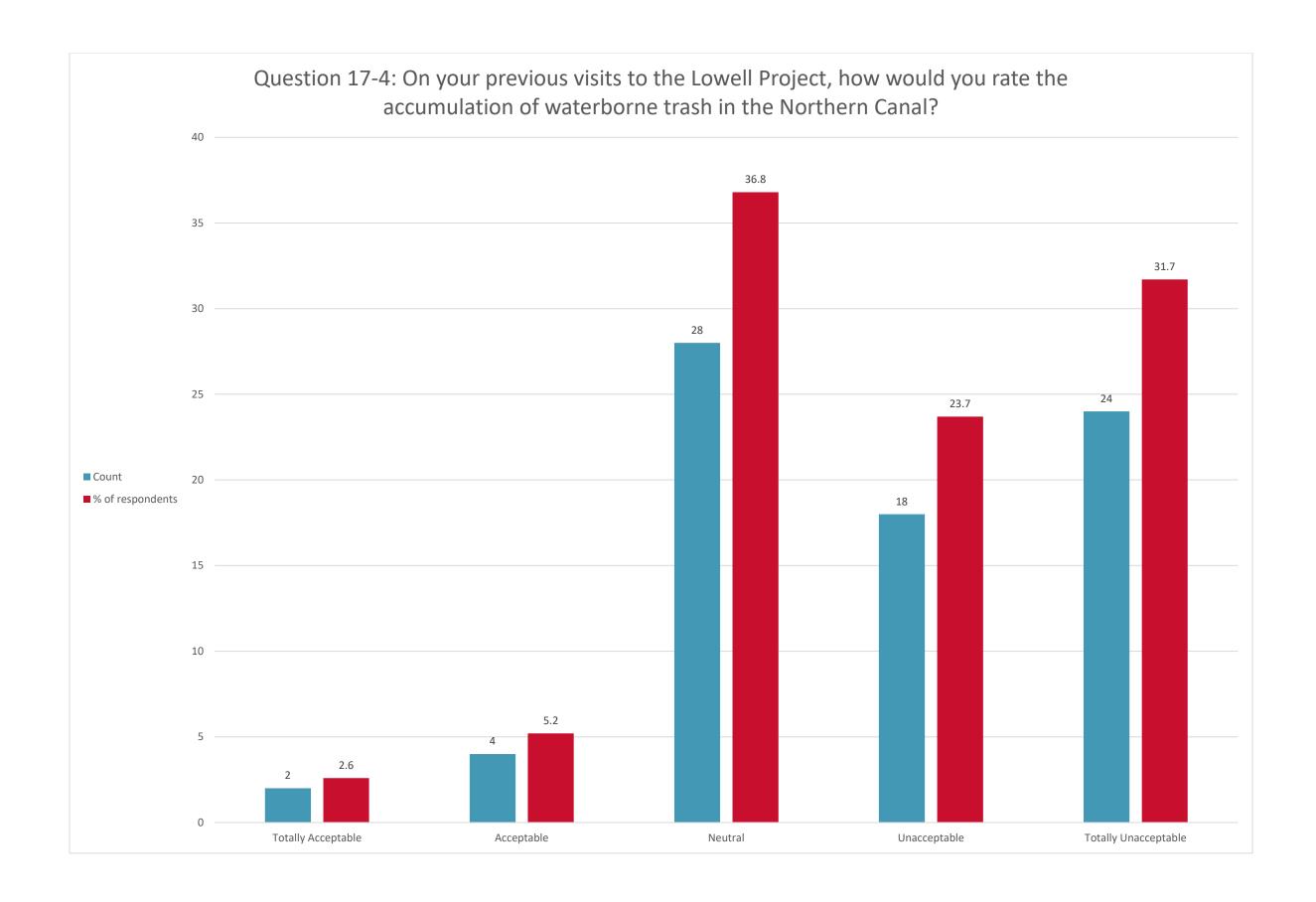


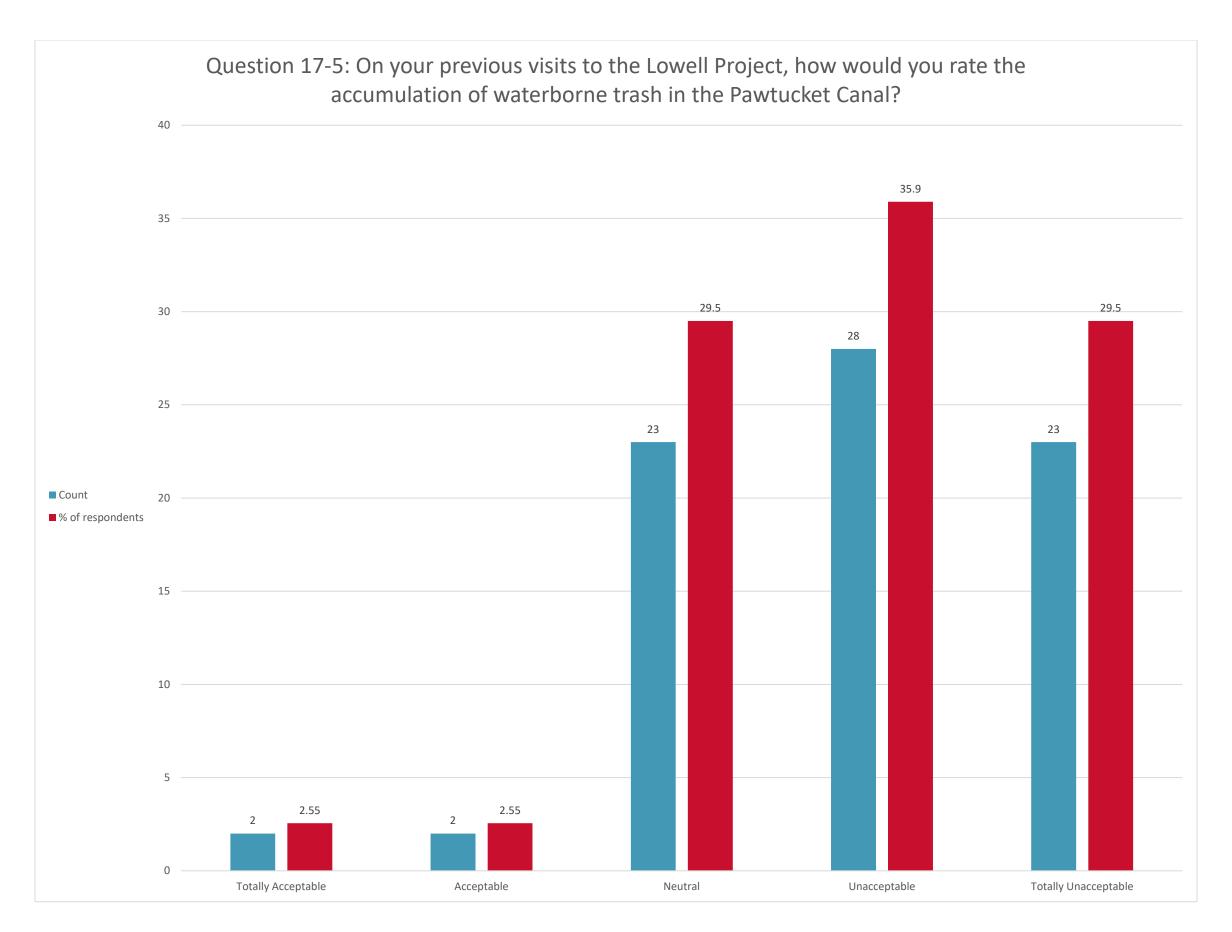


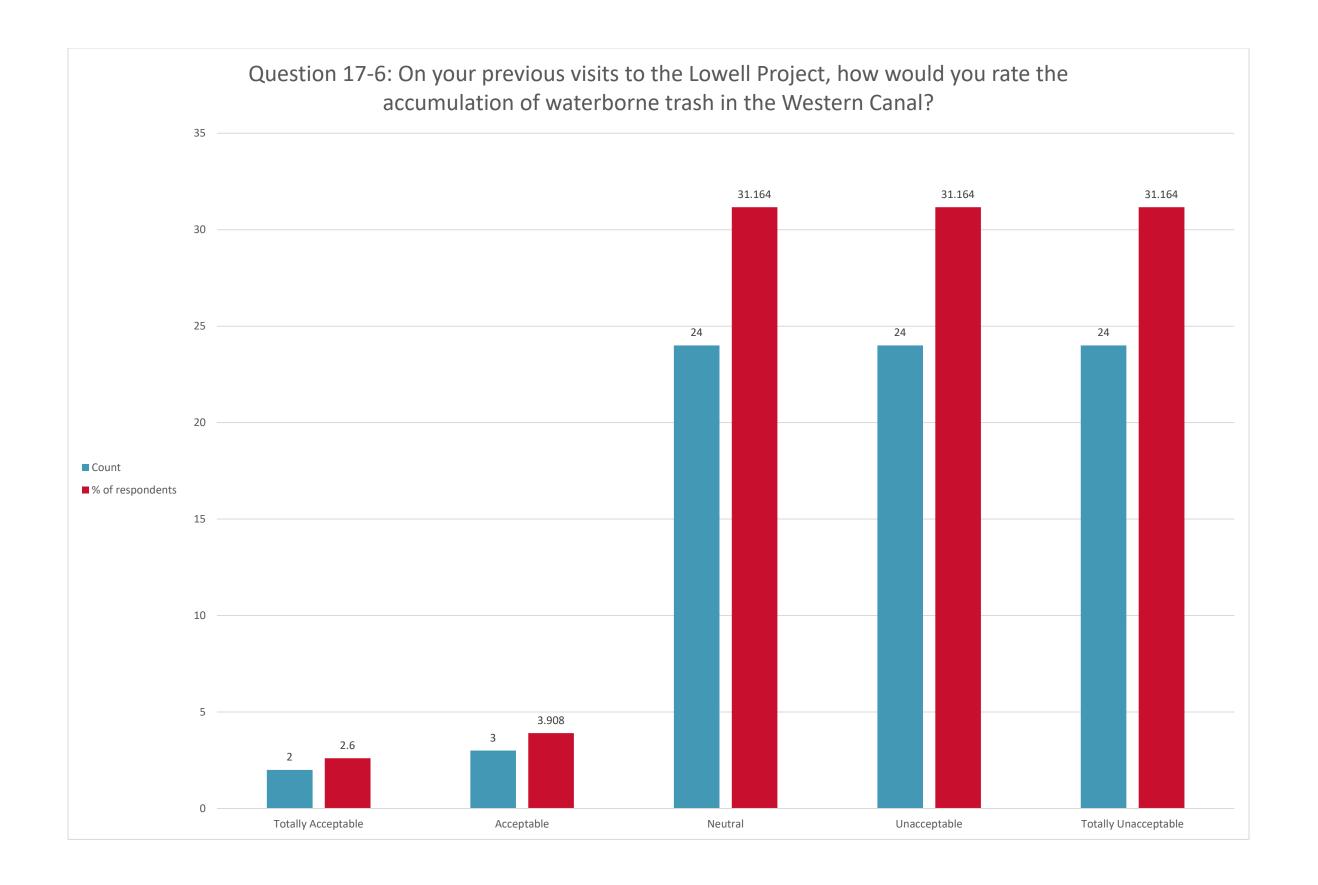


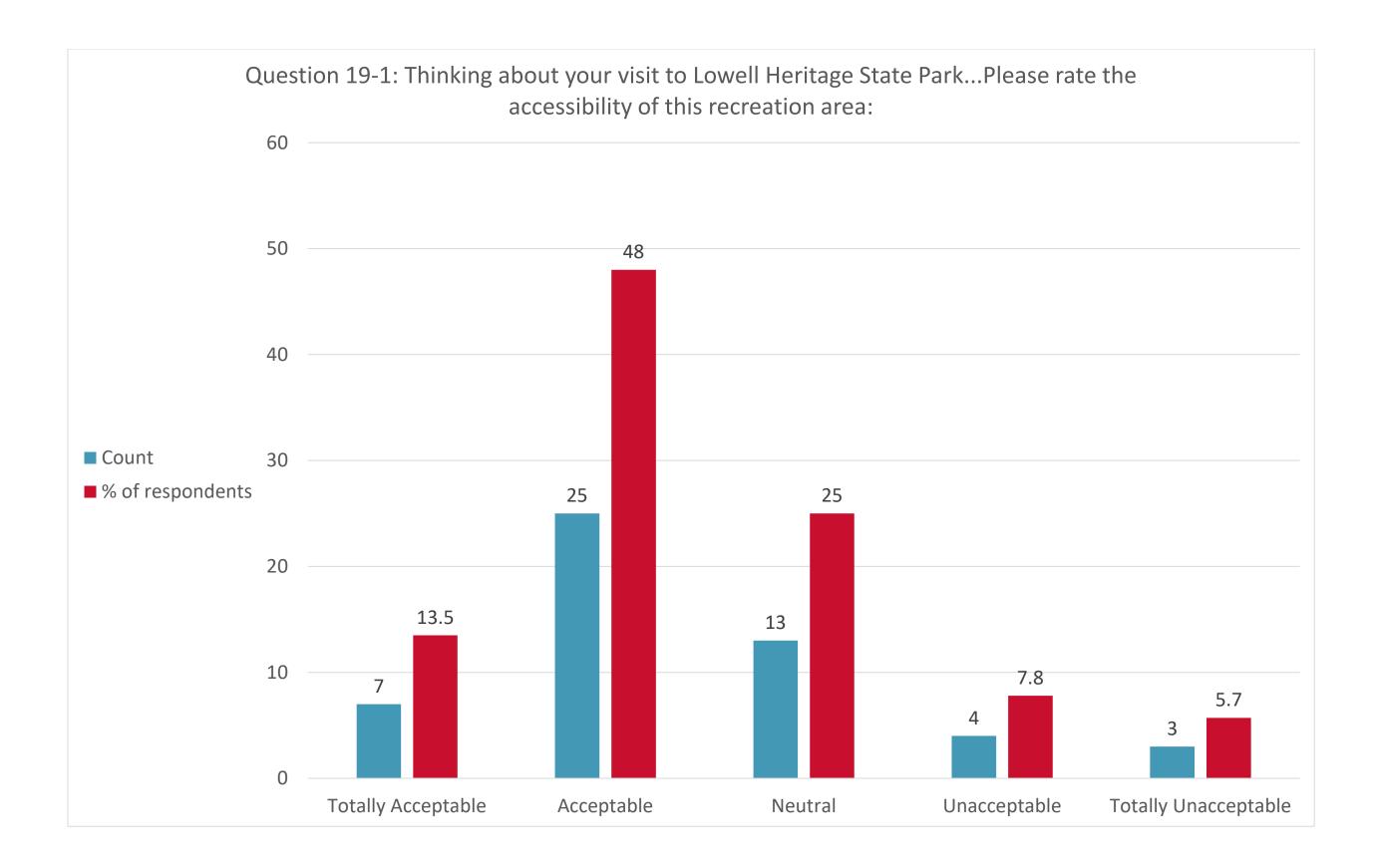


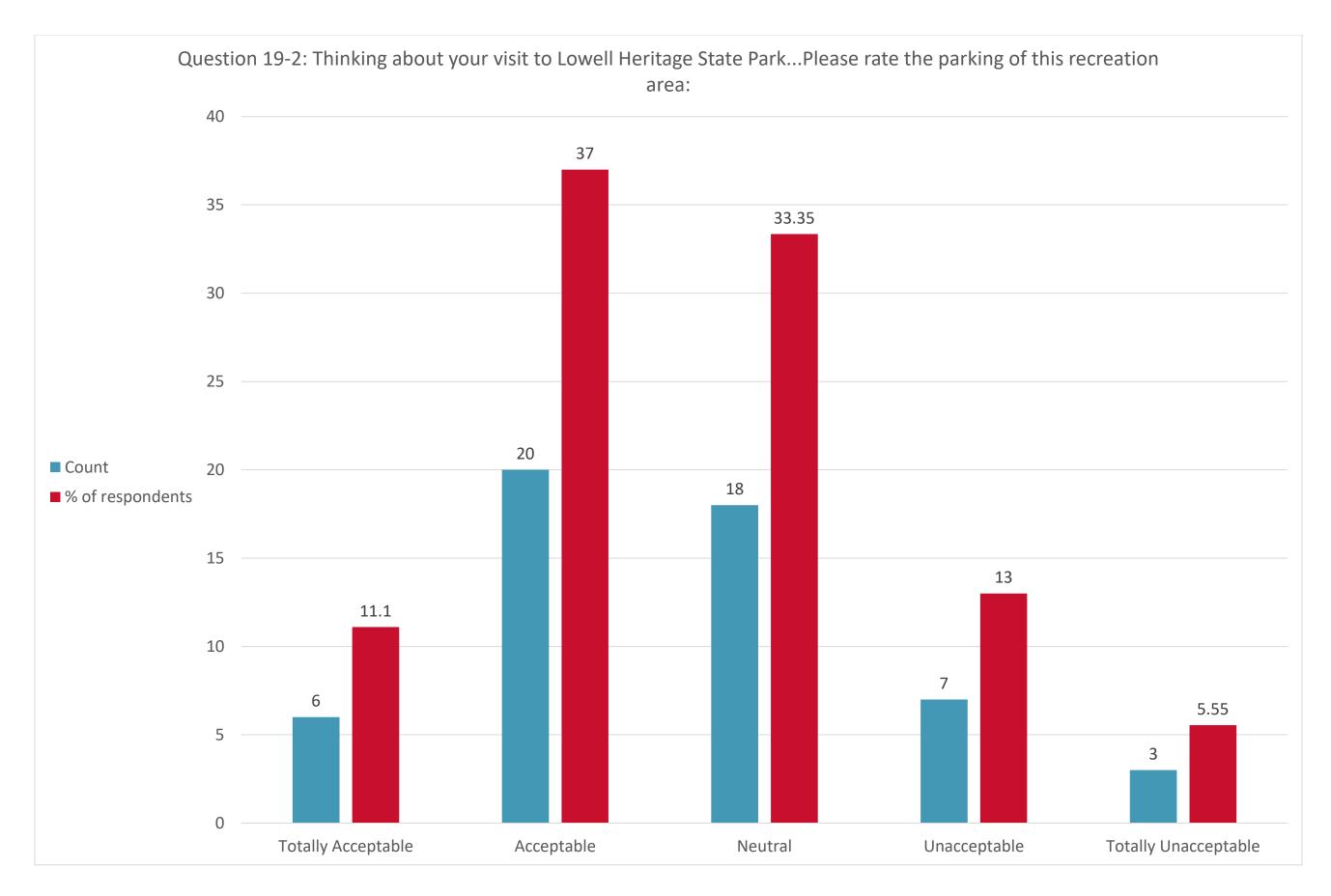


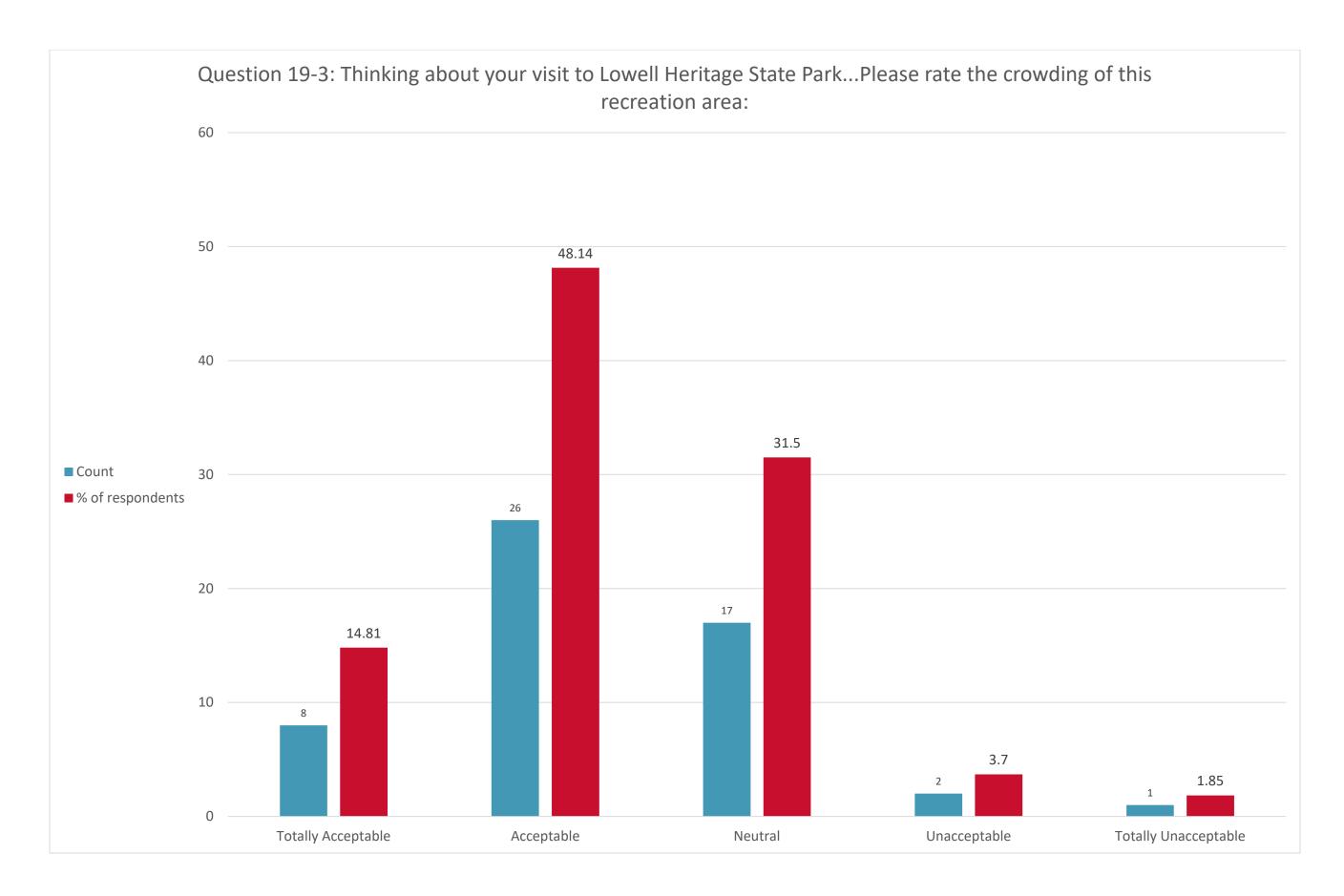




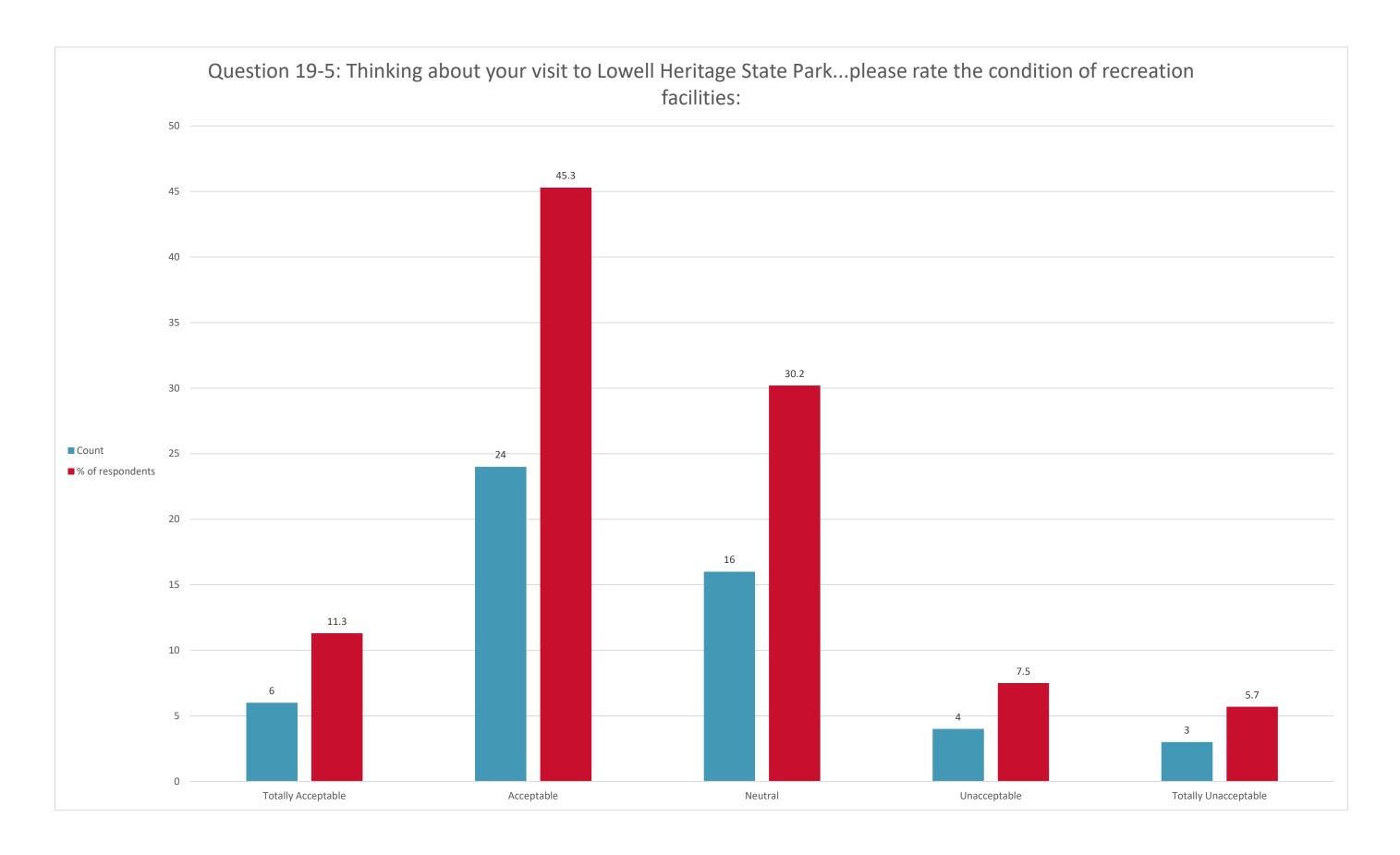


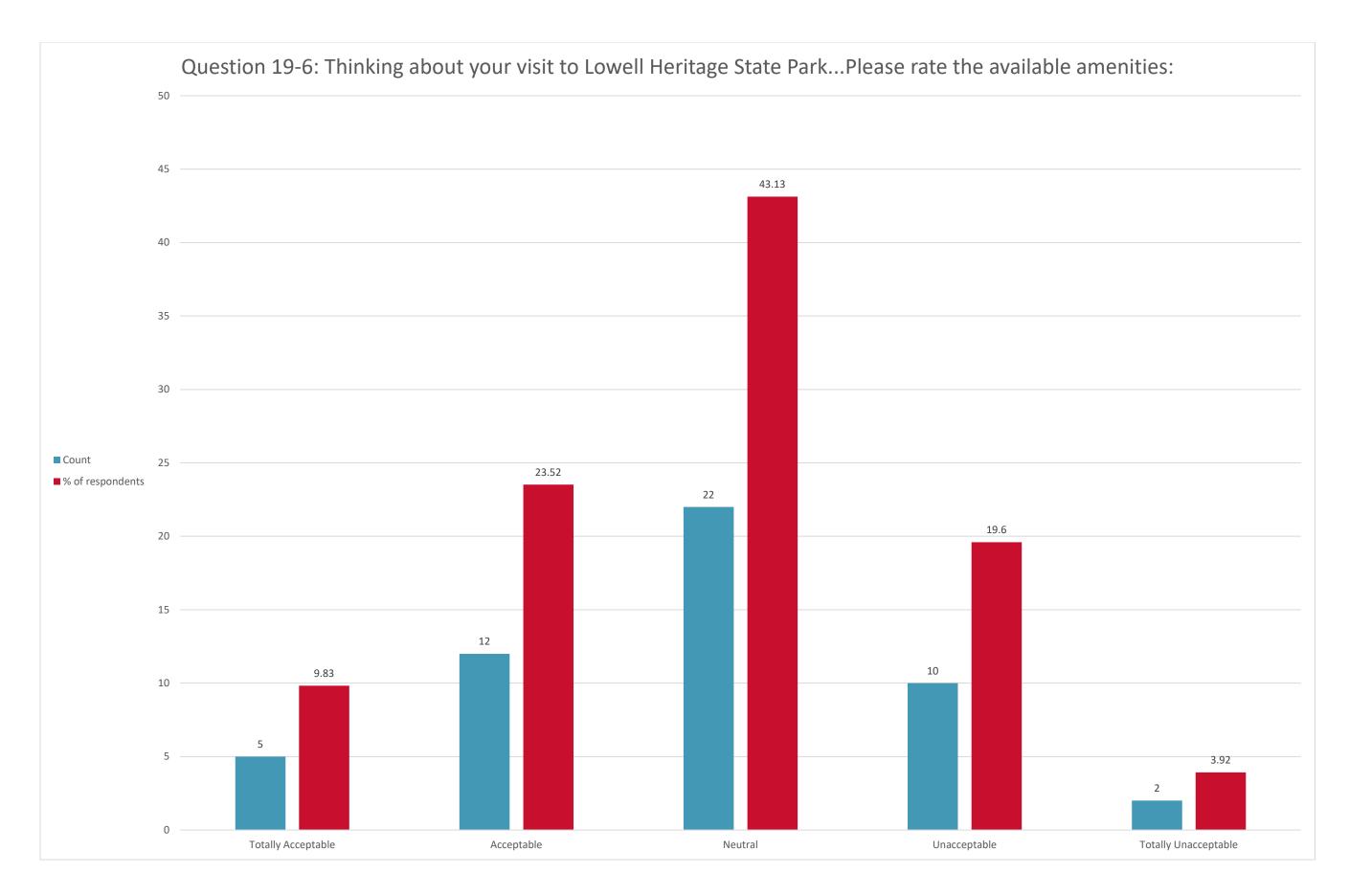


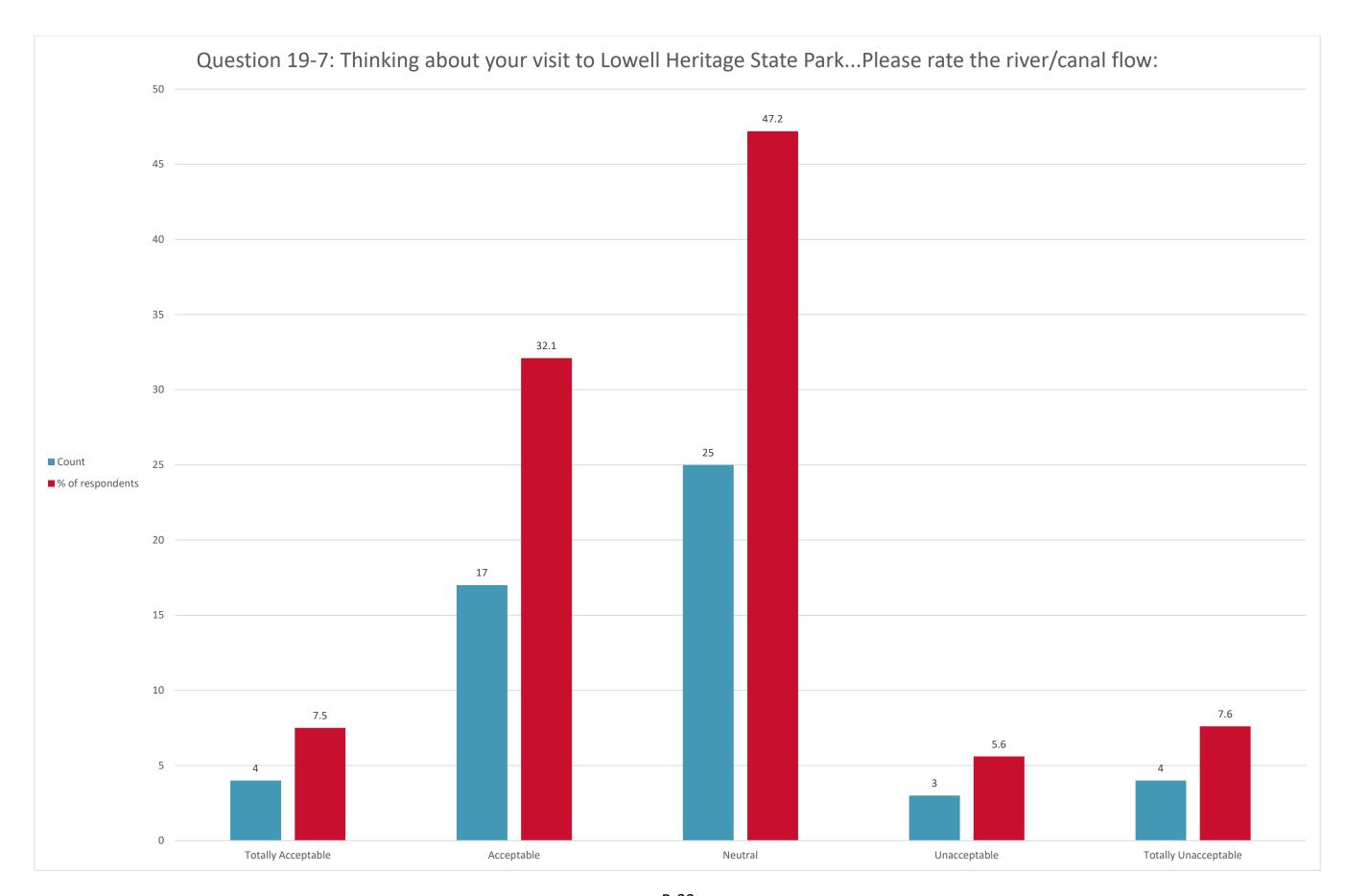


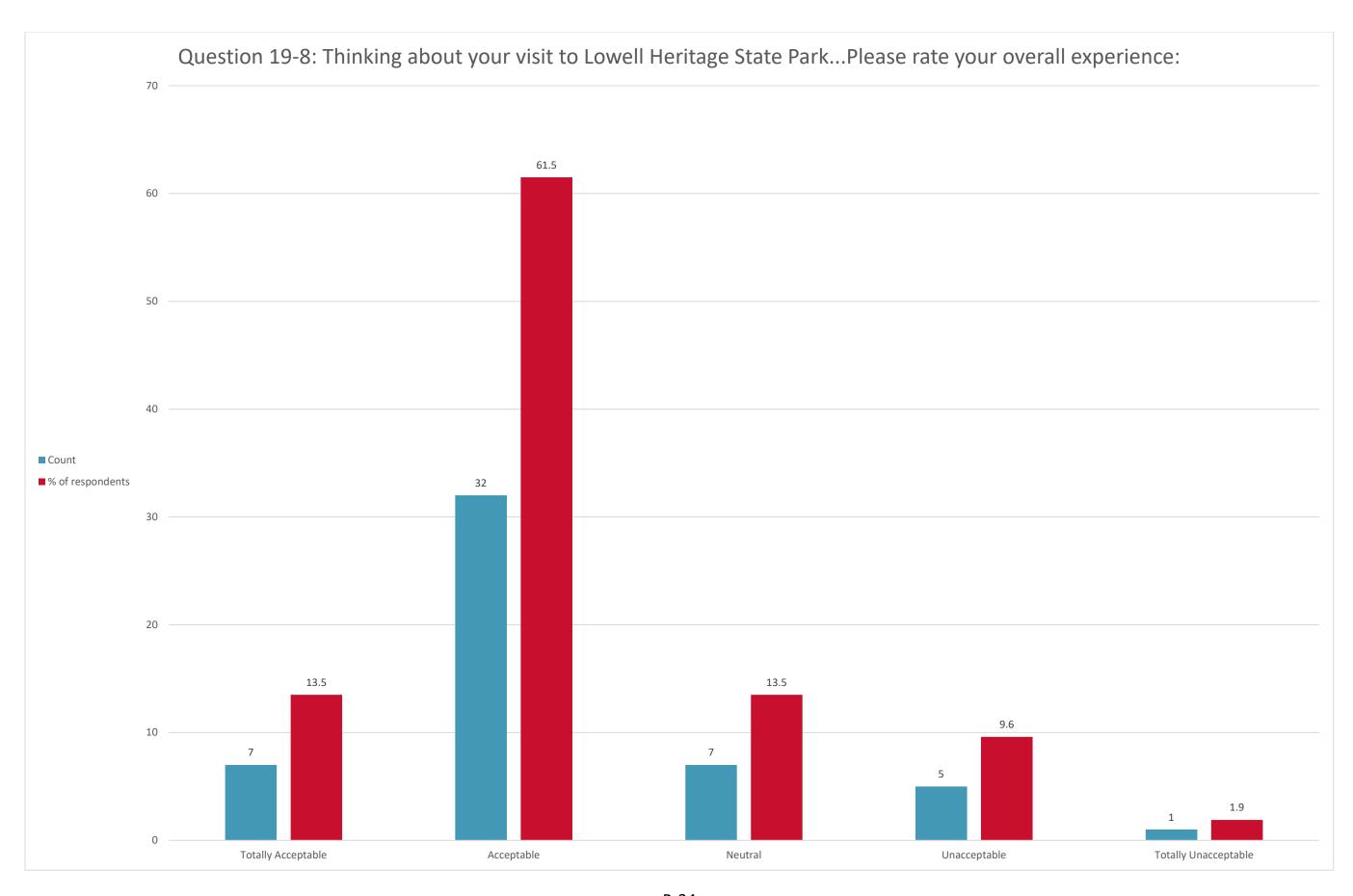


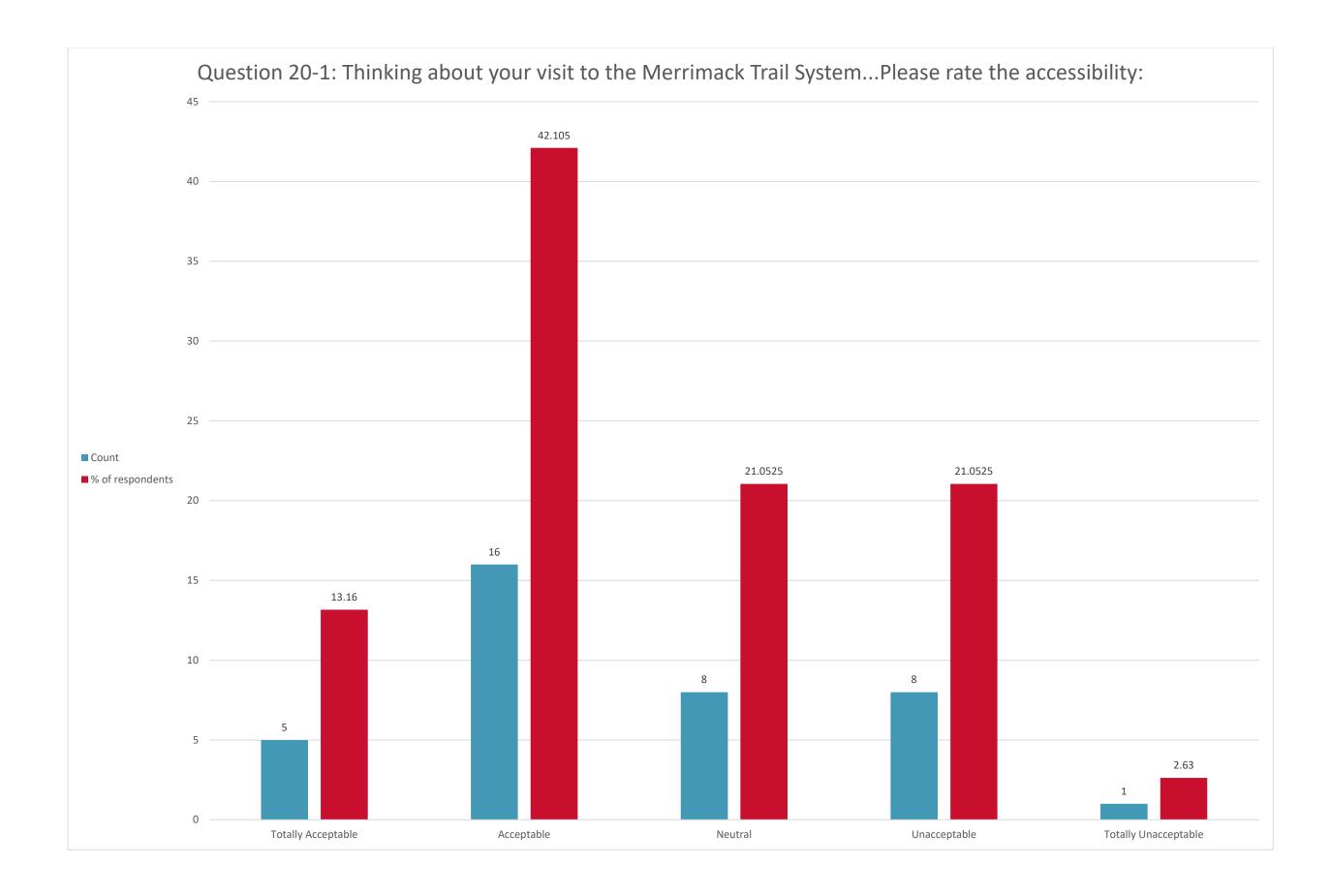
Question 19-4: Thinking about your visit to Lowell Heritage State Park...please rate the safety of this recreation area: 50 45.3 45 40 35 30.2 30 Count 25 ■ % of respondents 20 16 15 11.3 10 7.5 5.7 3 Acceptable Neutral Totally Acceptable Unacceptable Totally Unacceptable

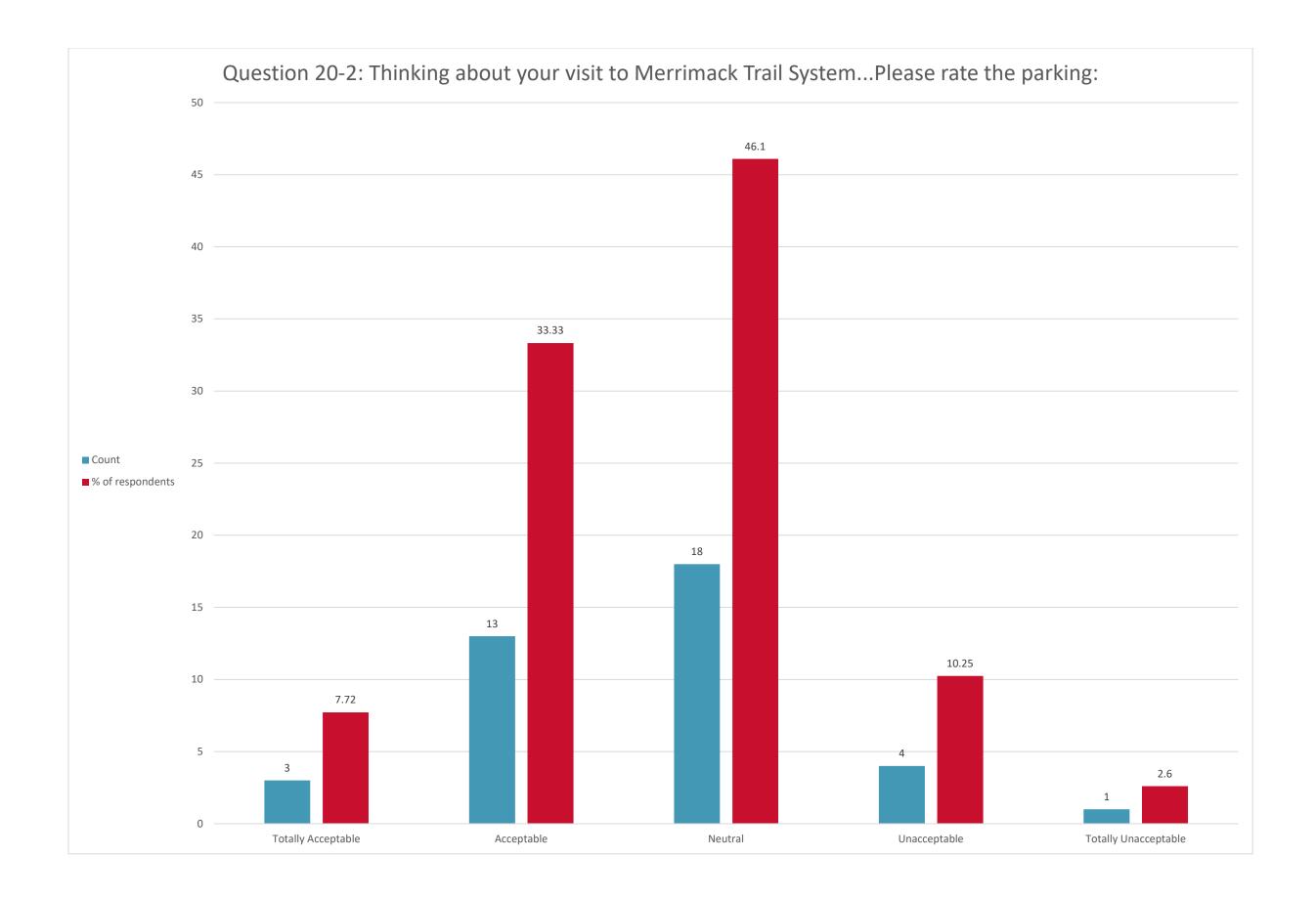


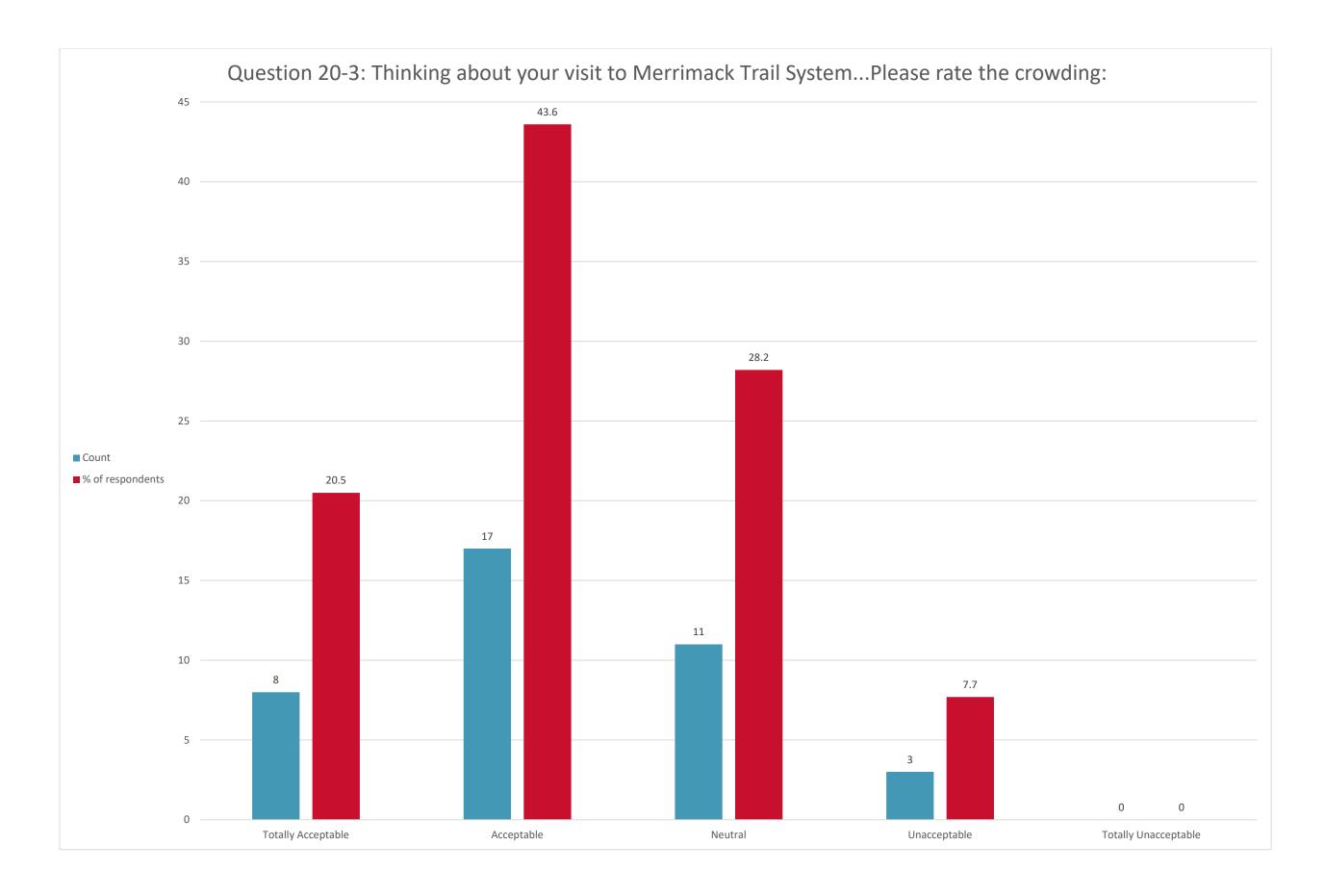


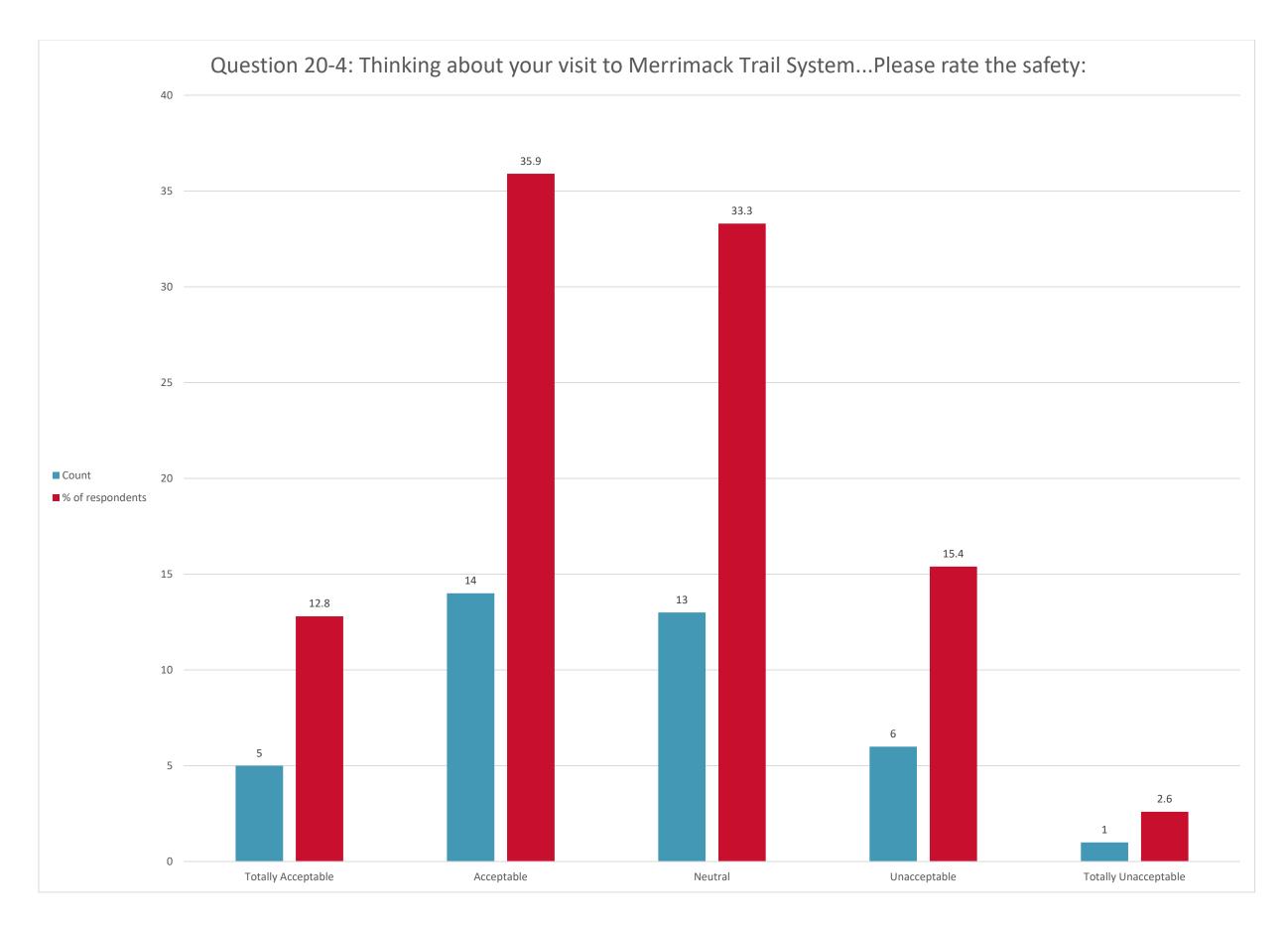


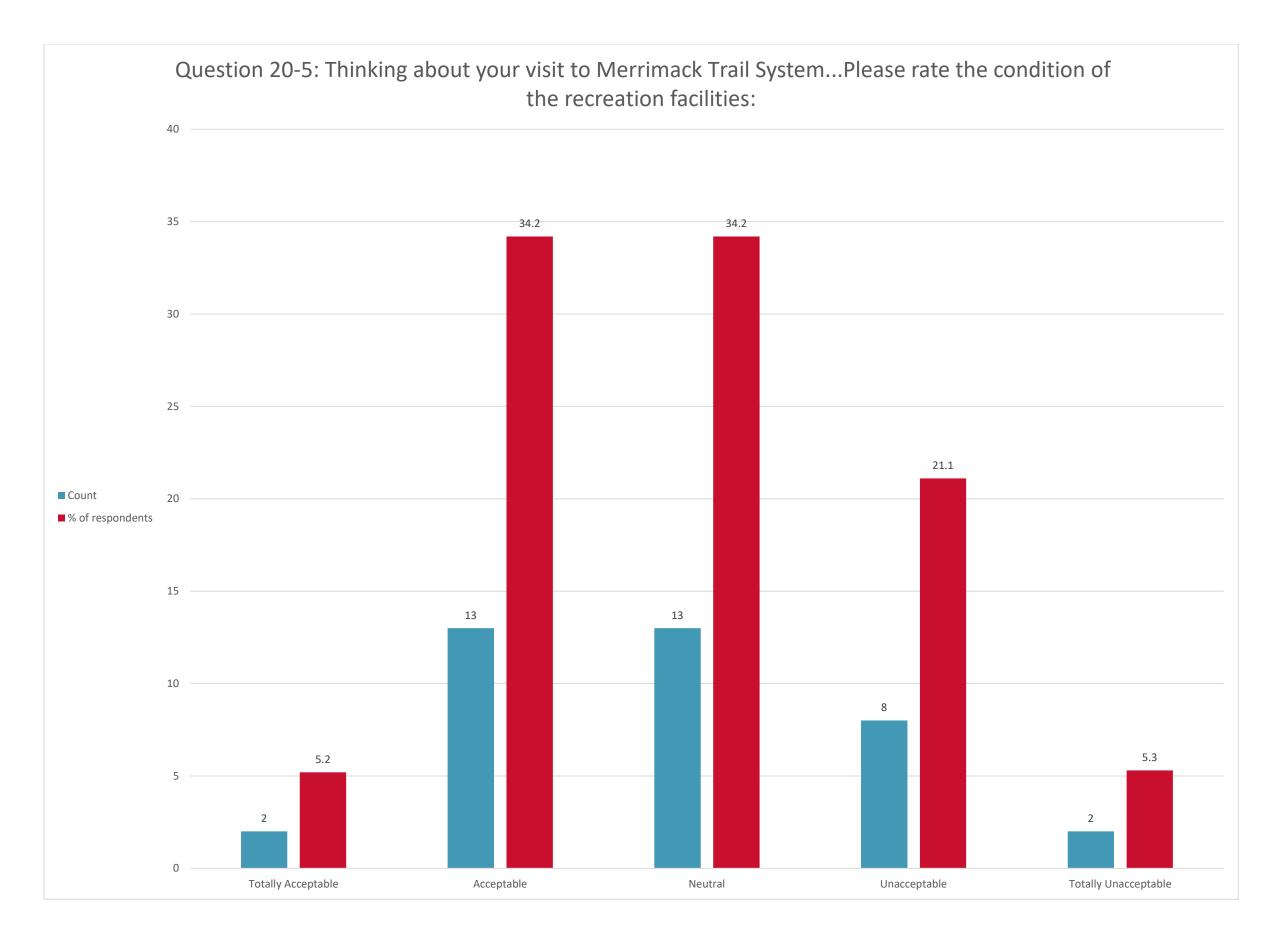


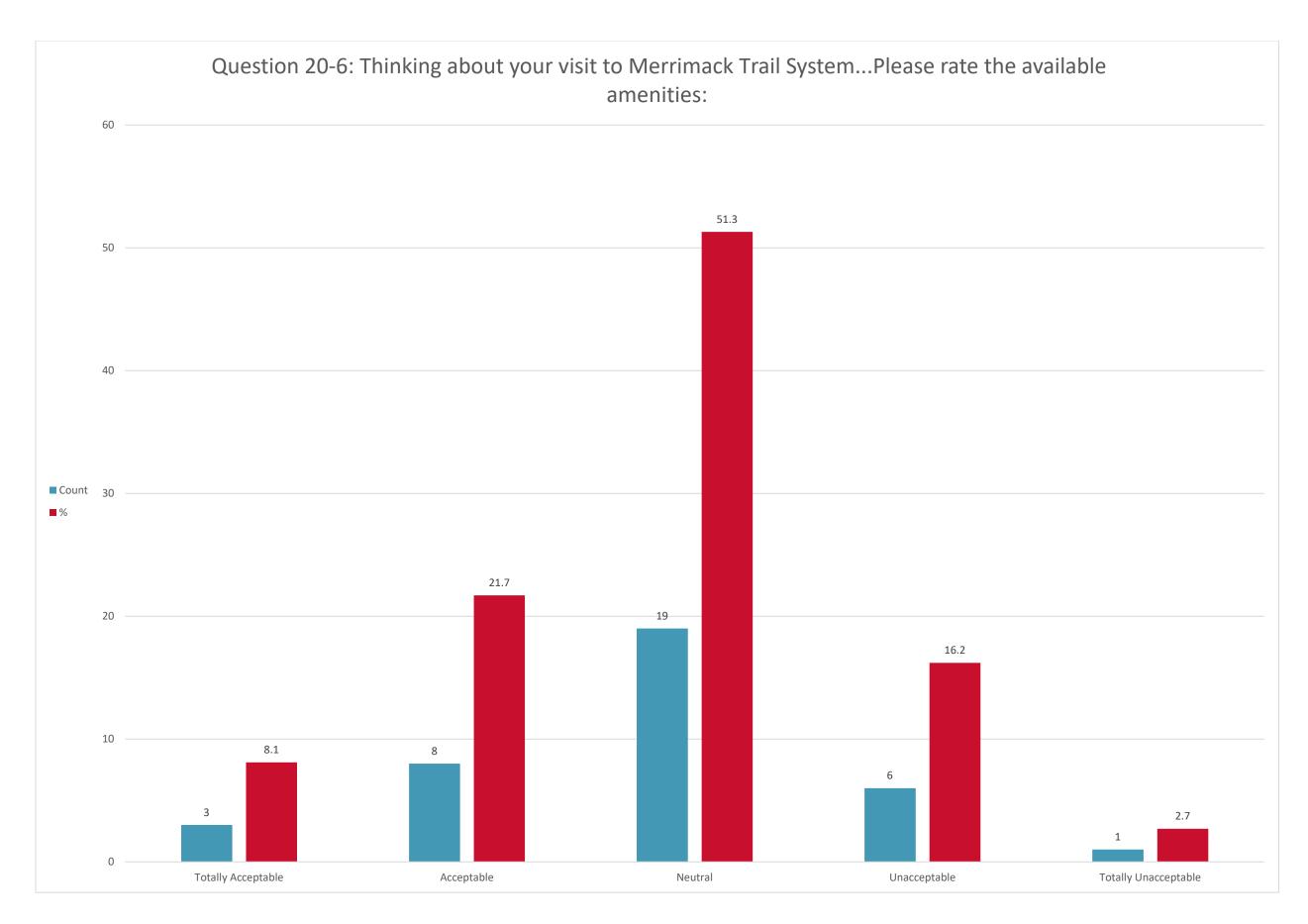


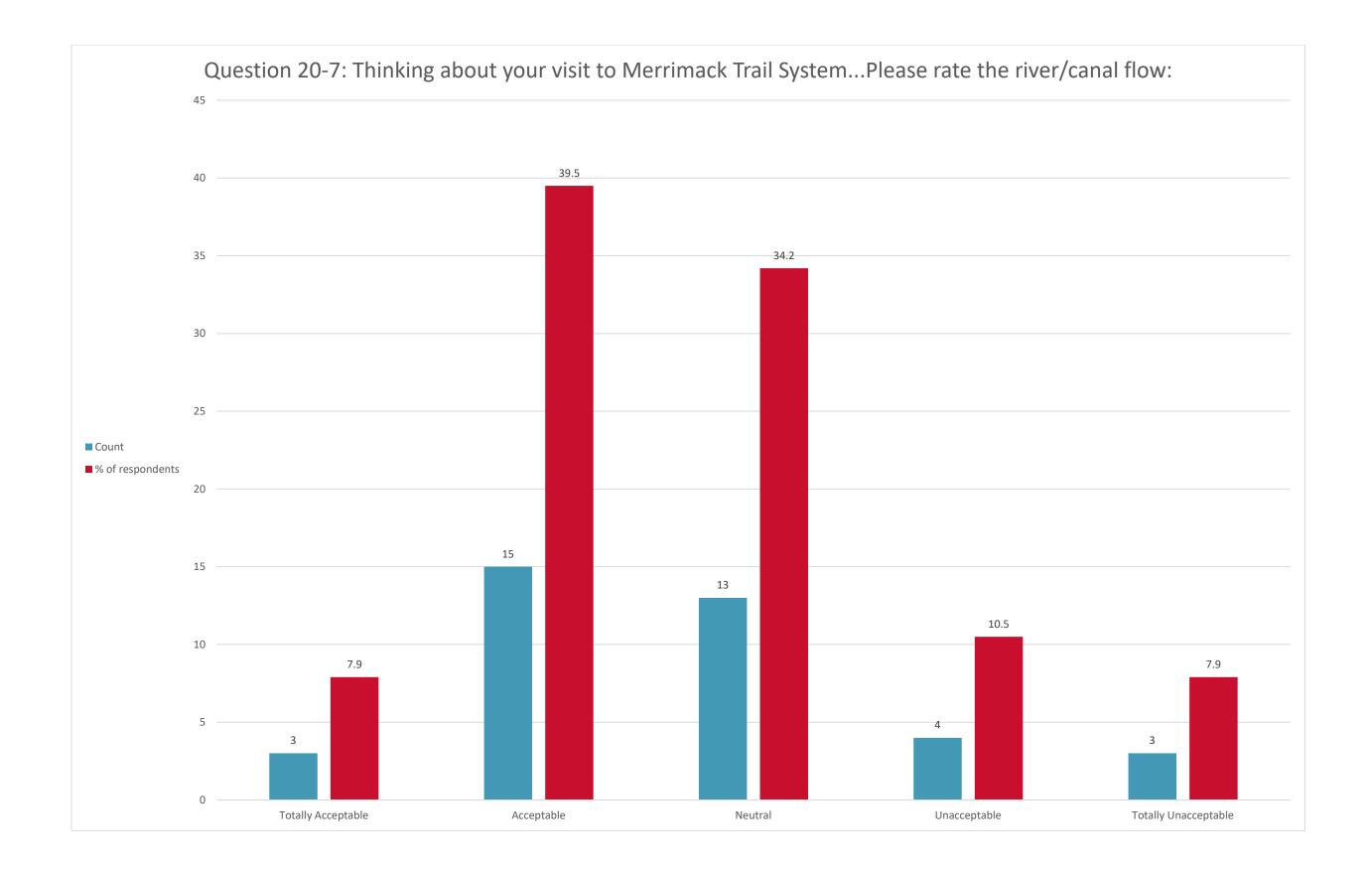


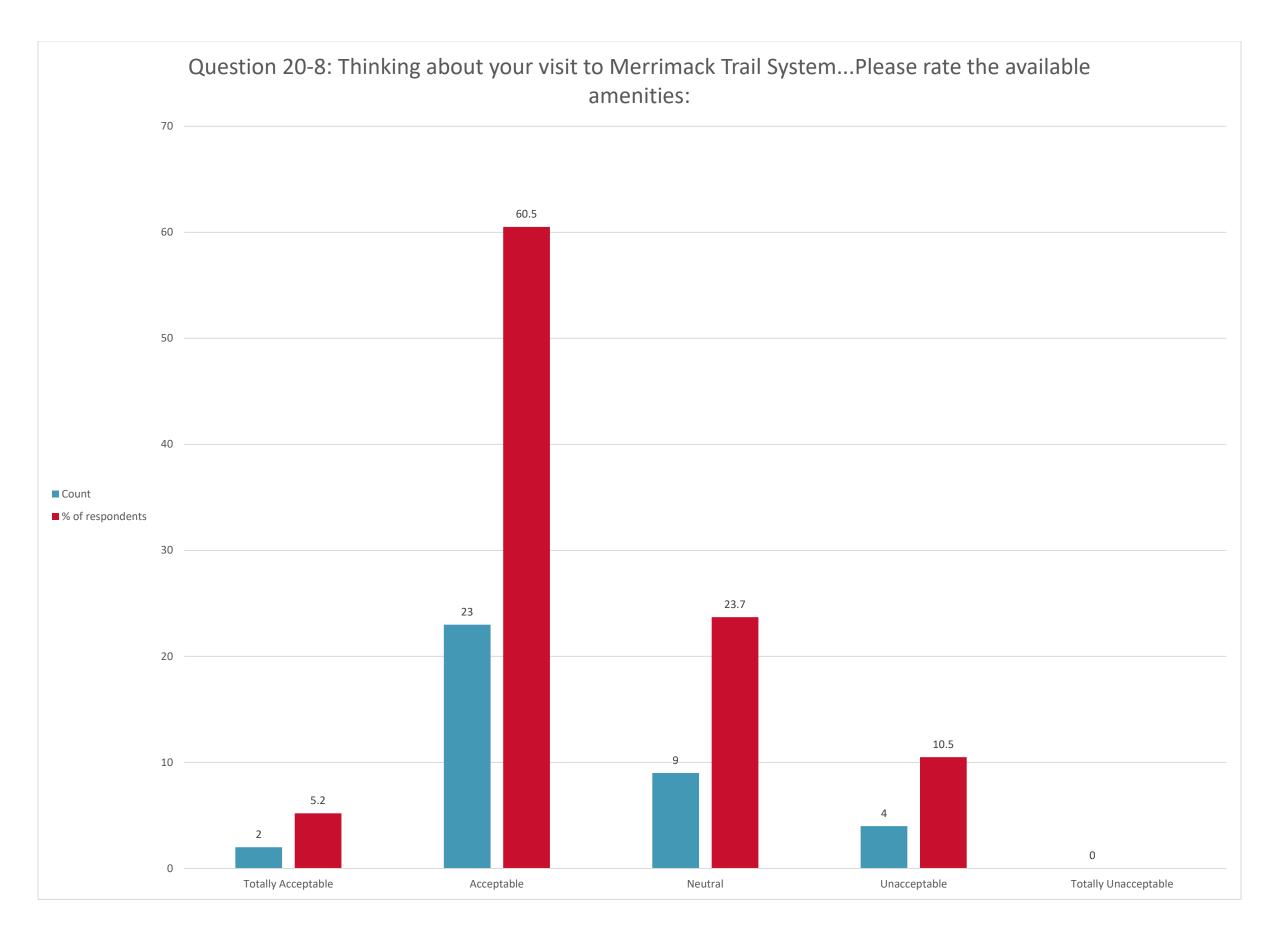


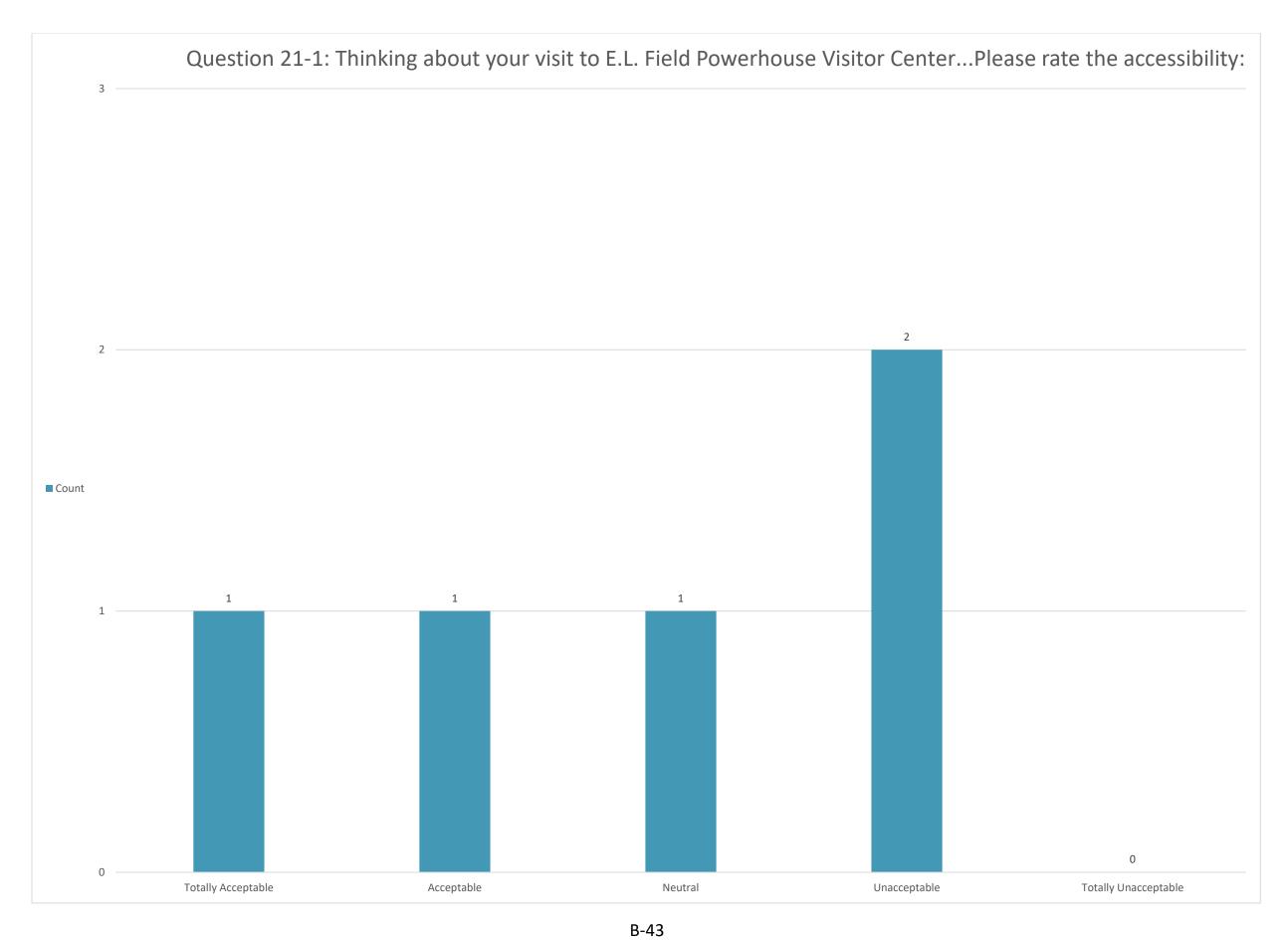


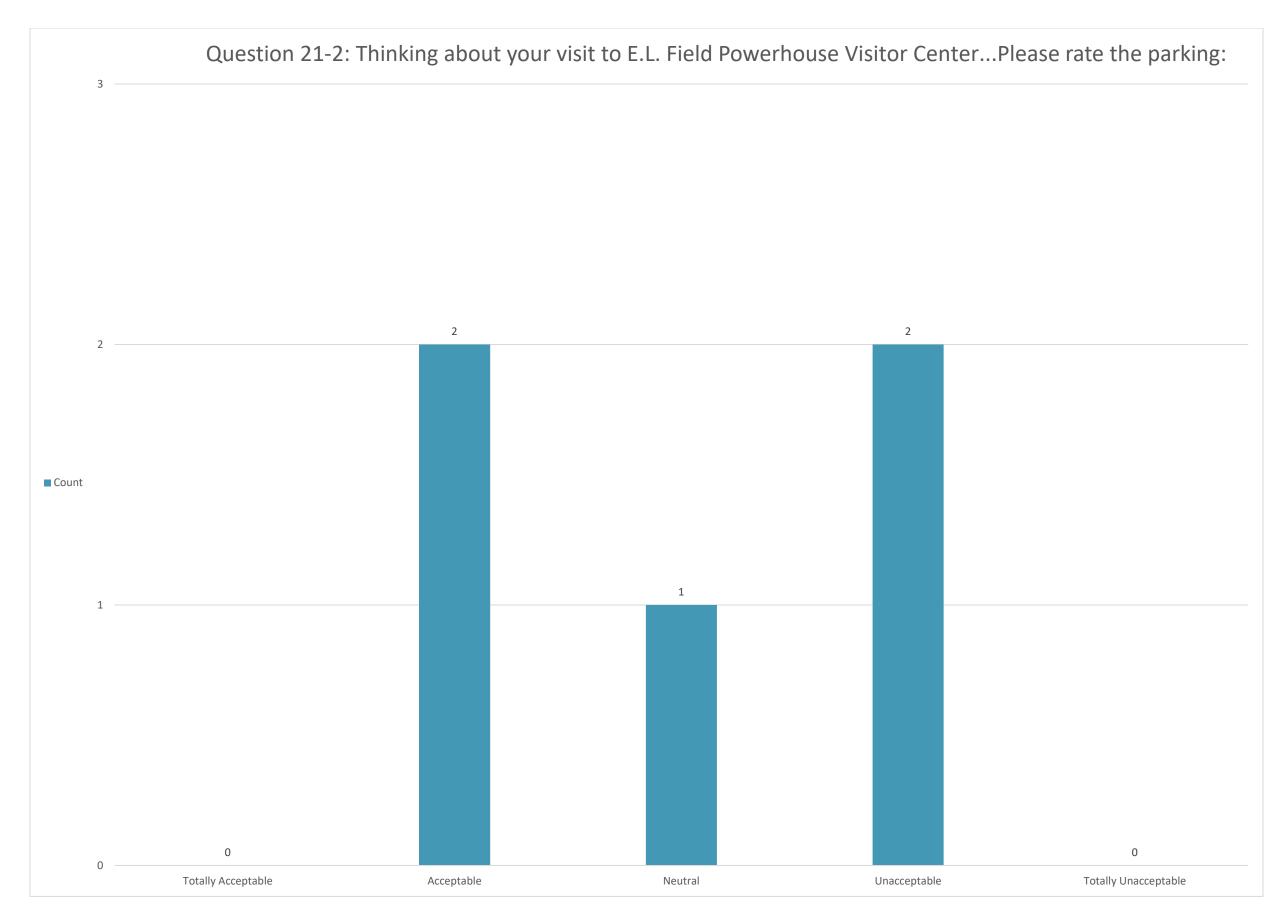


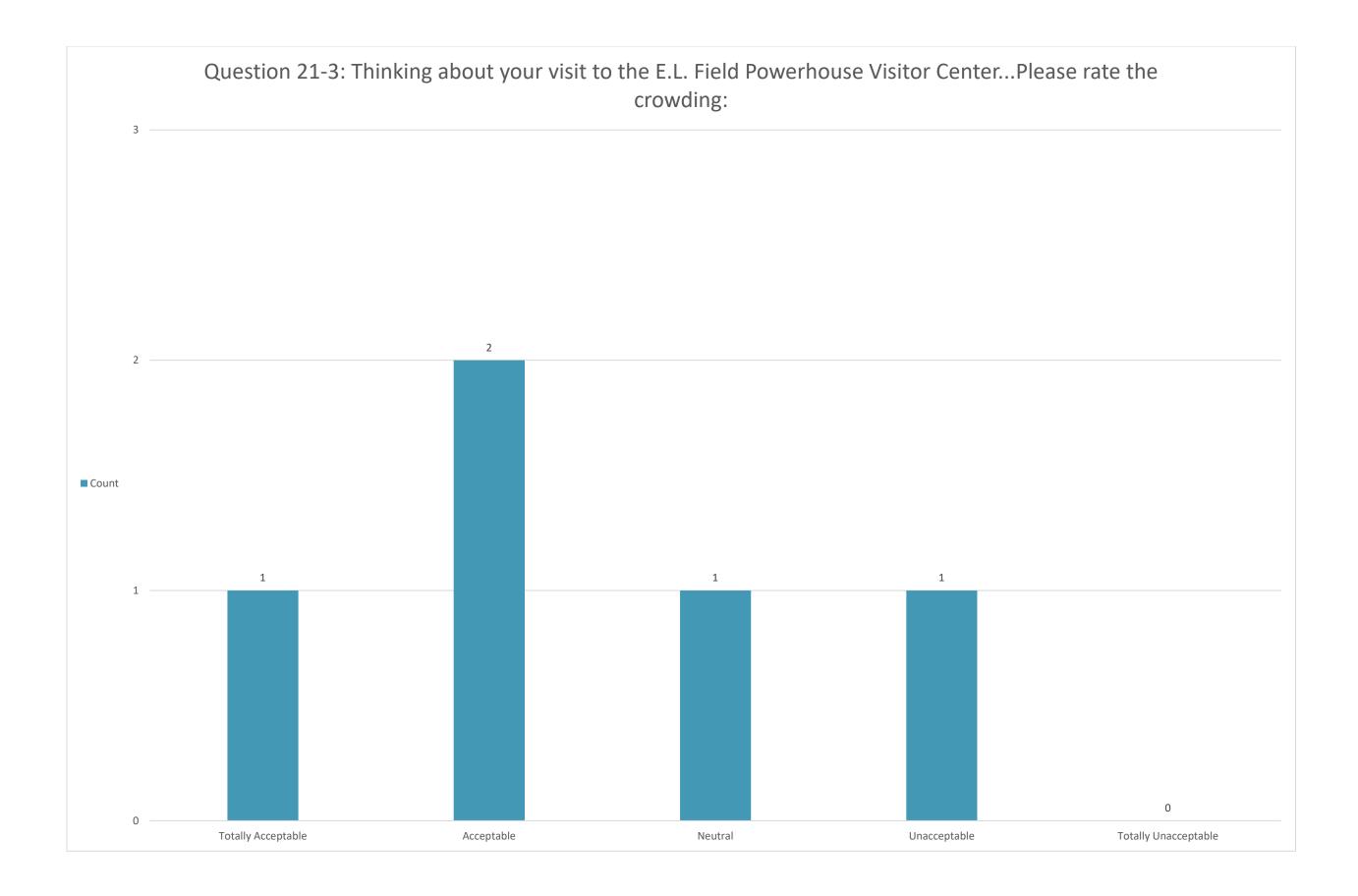


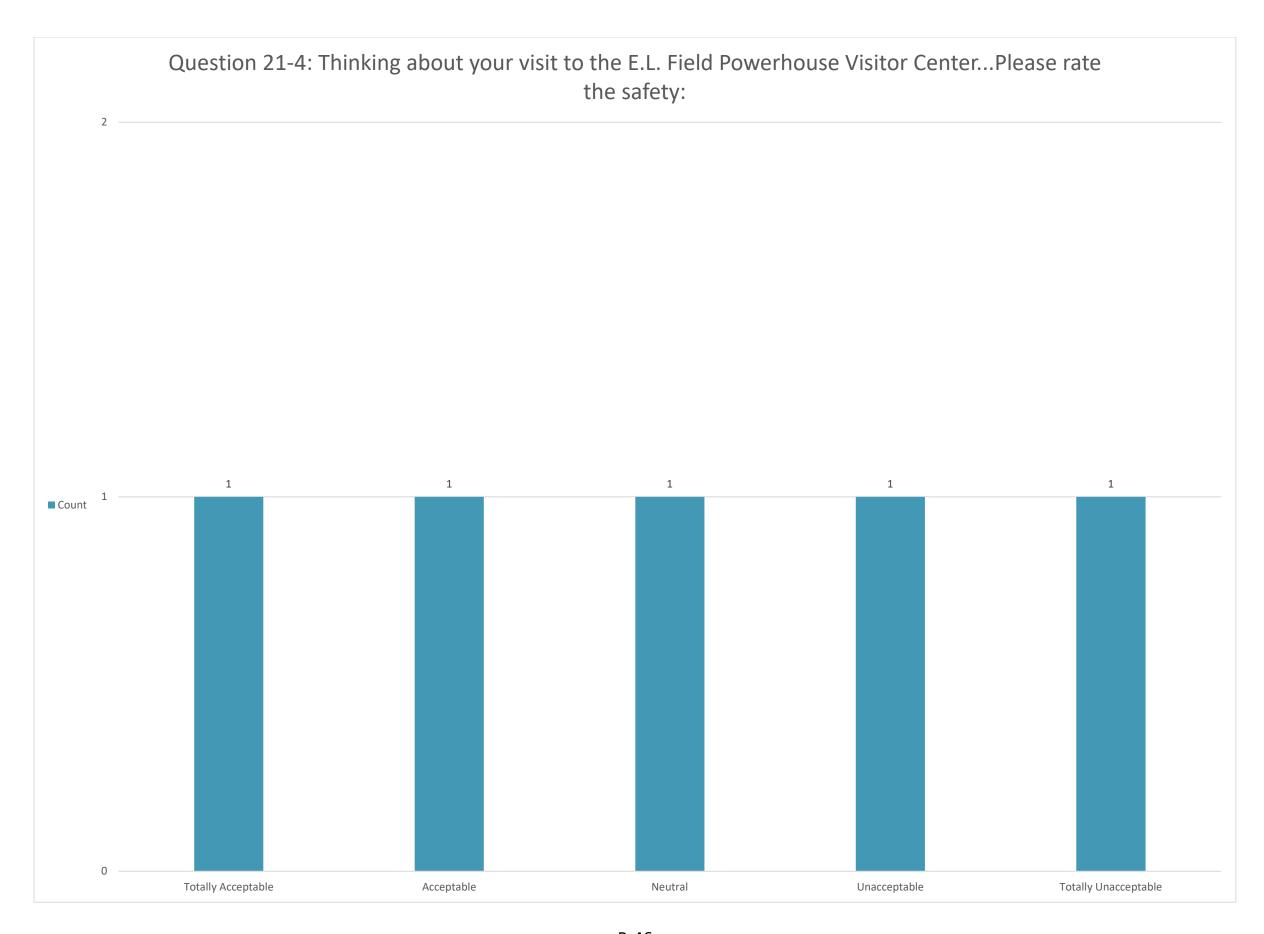


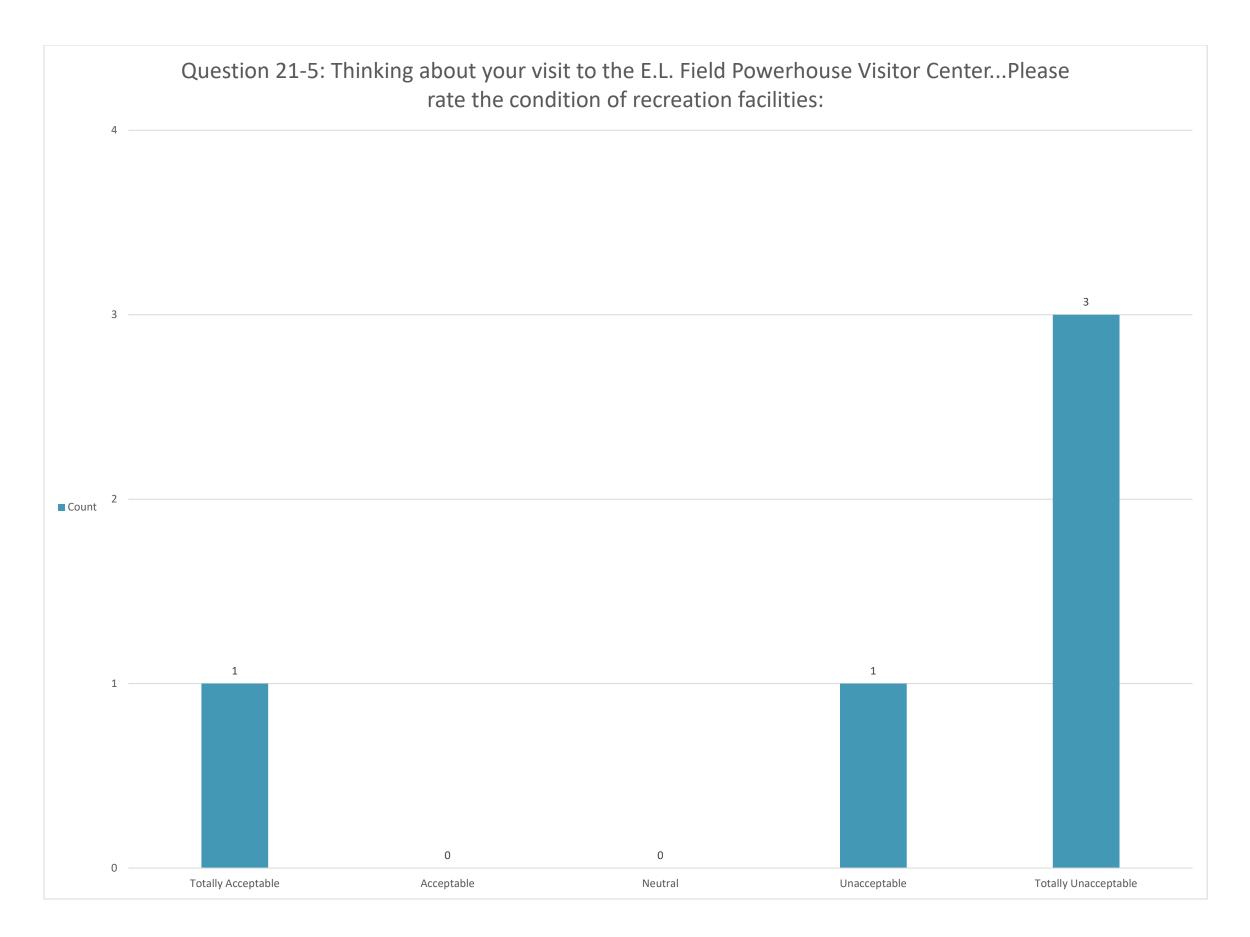


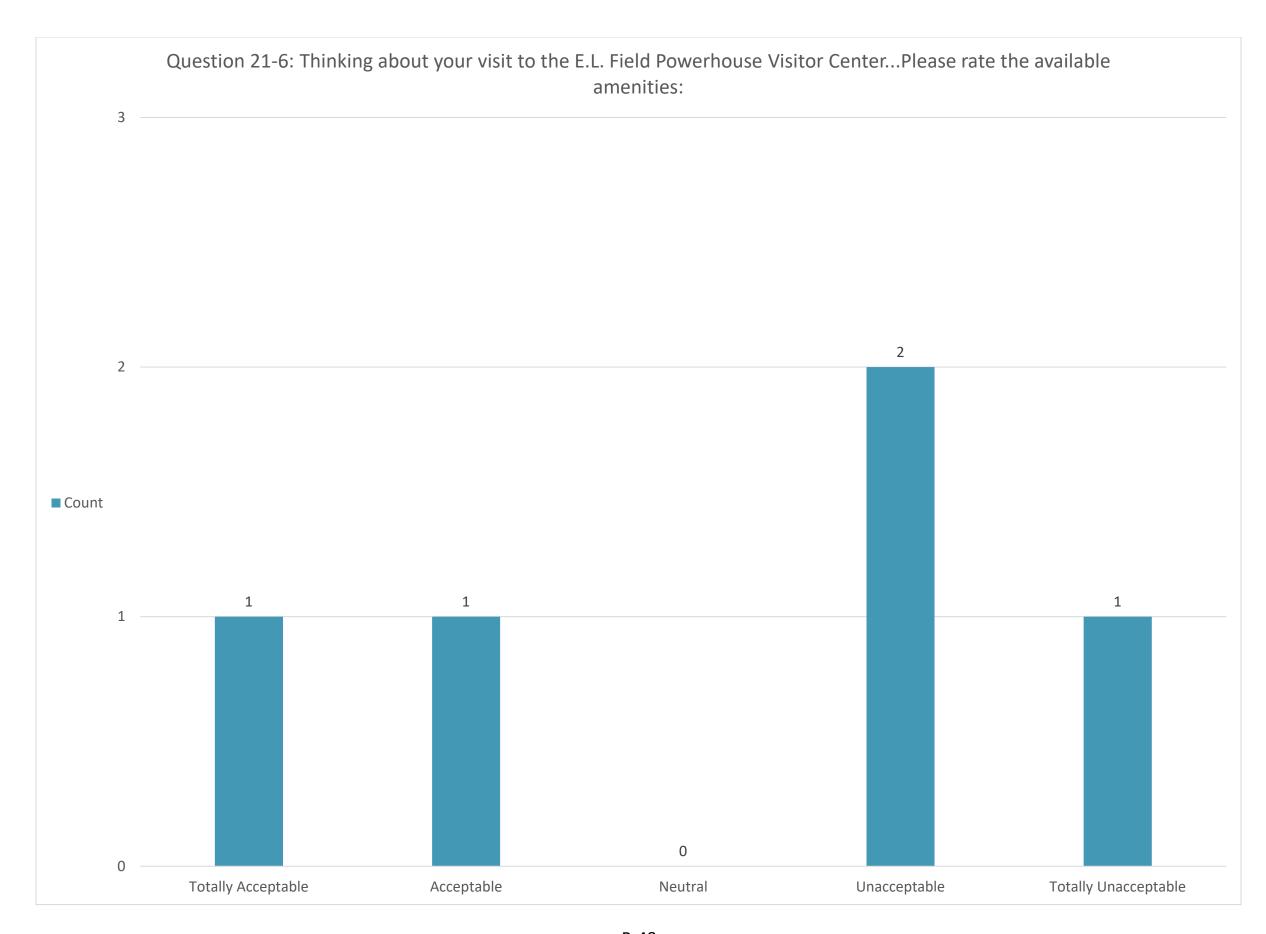


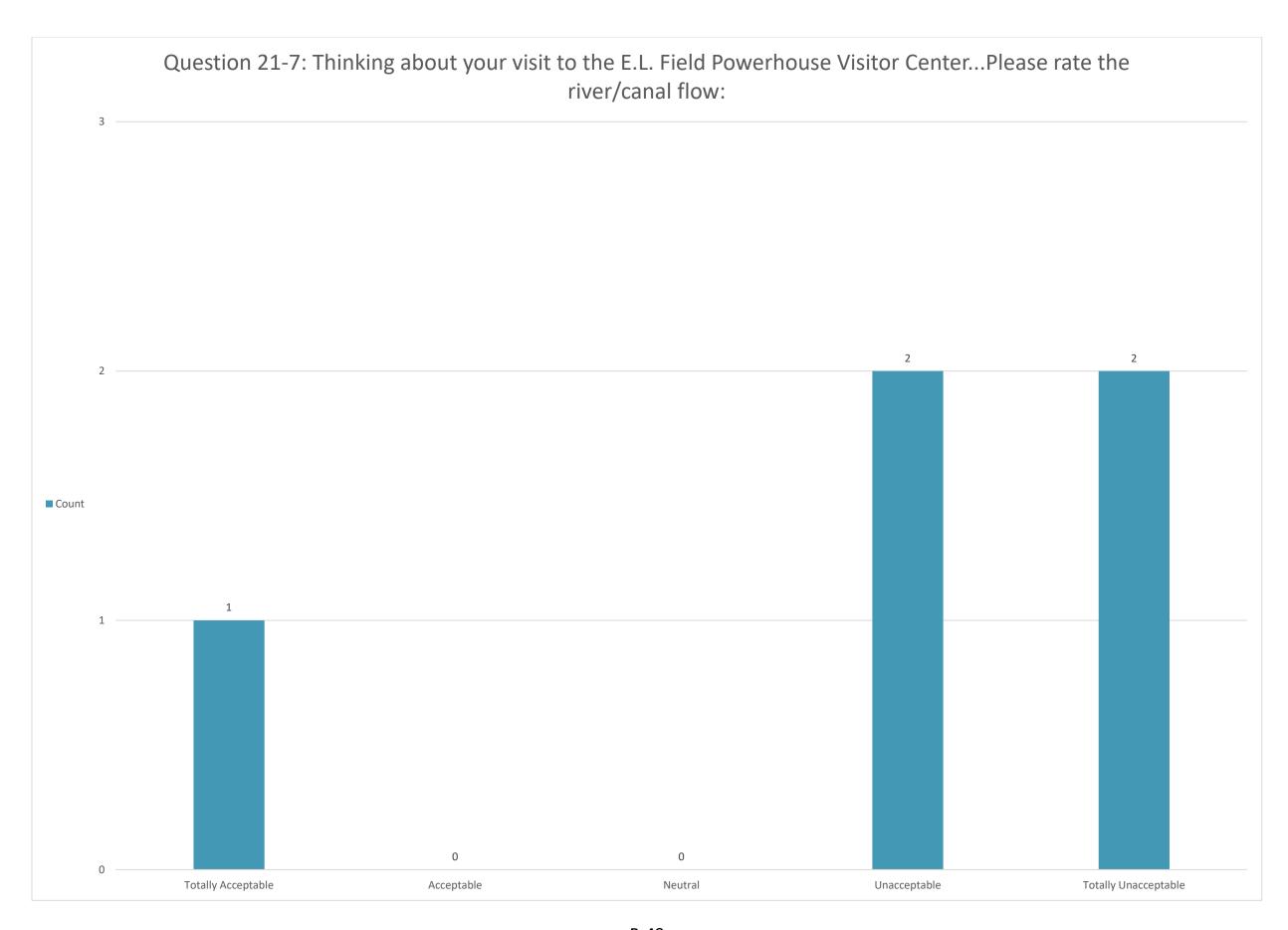


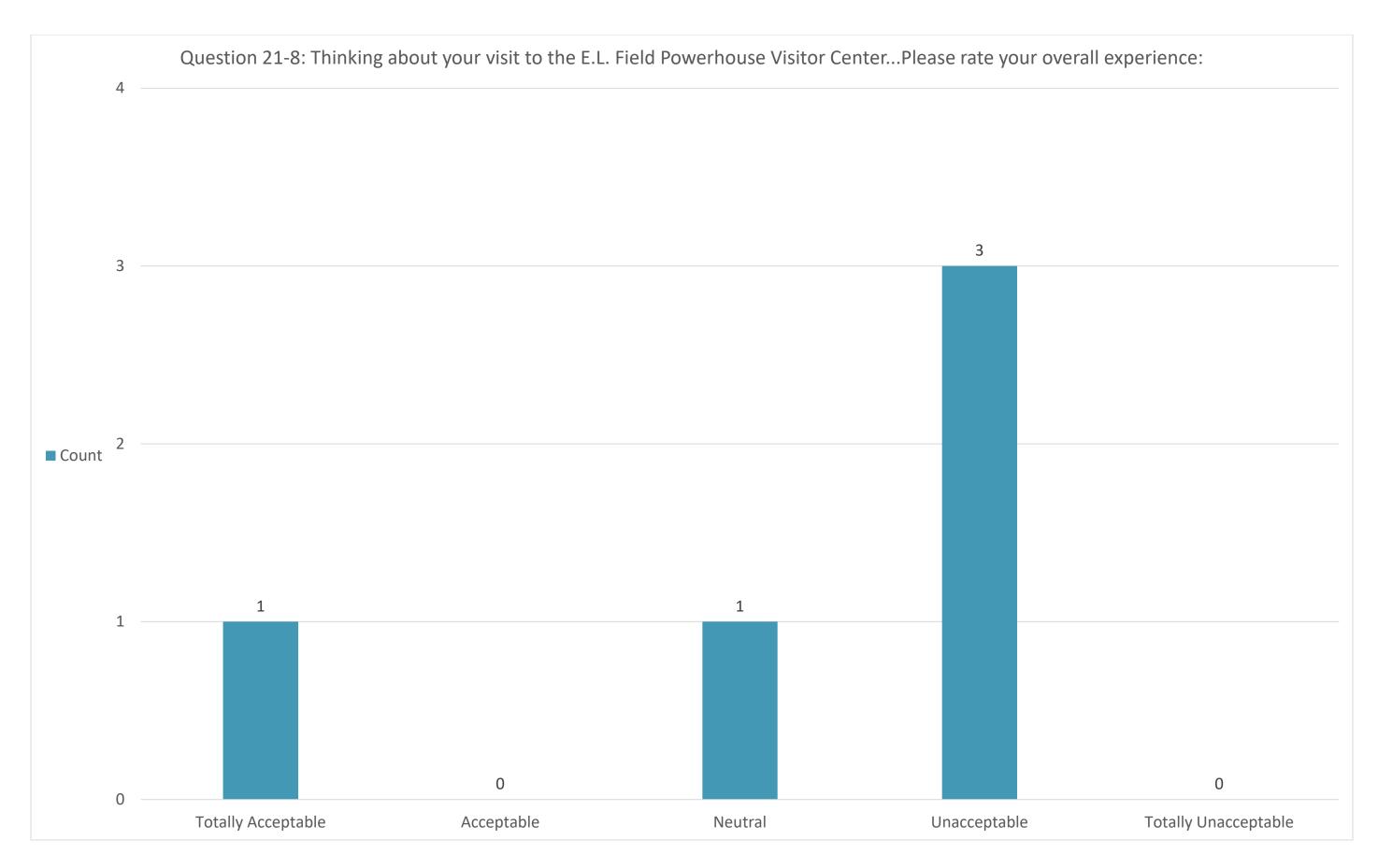


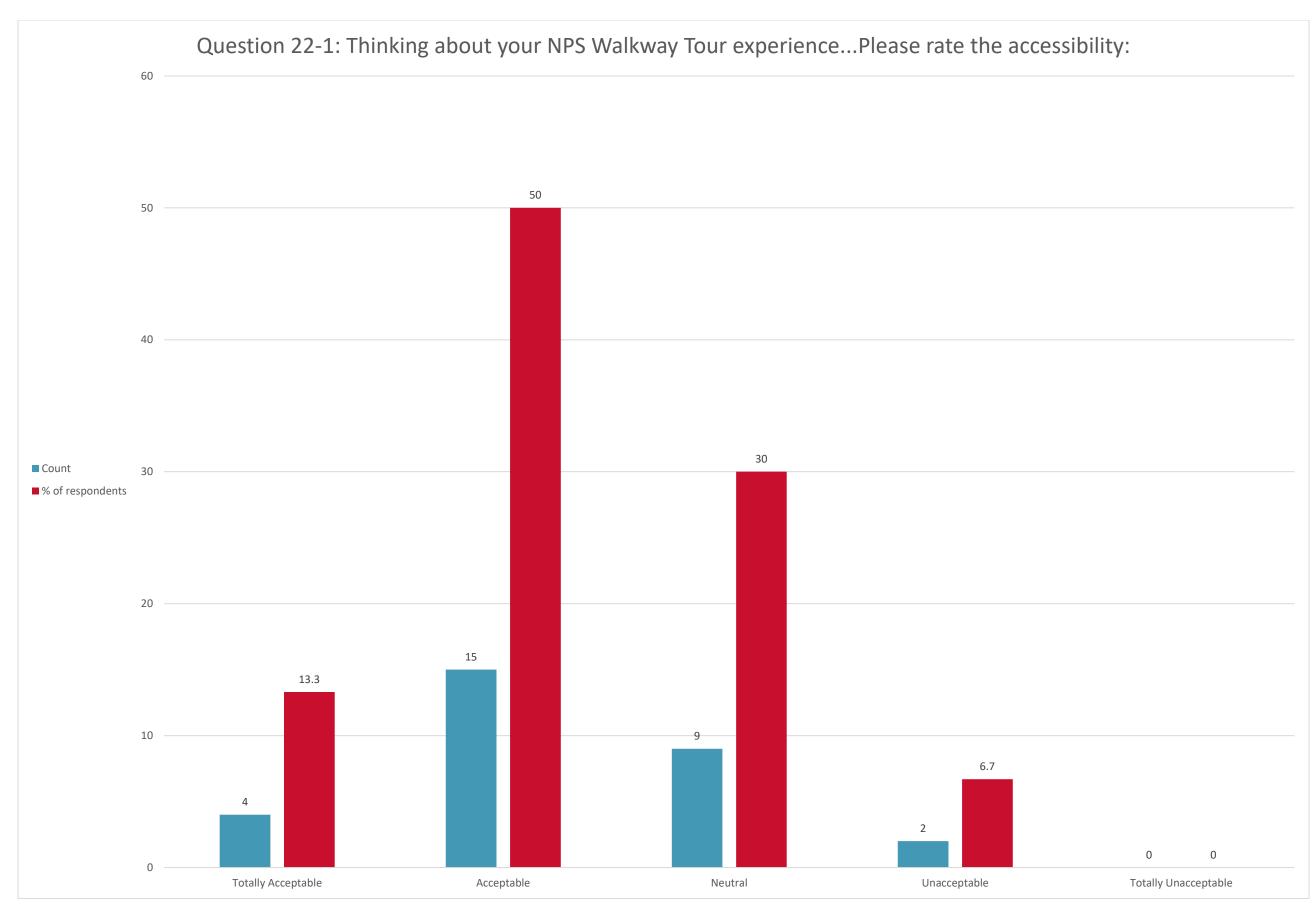


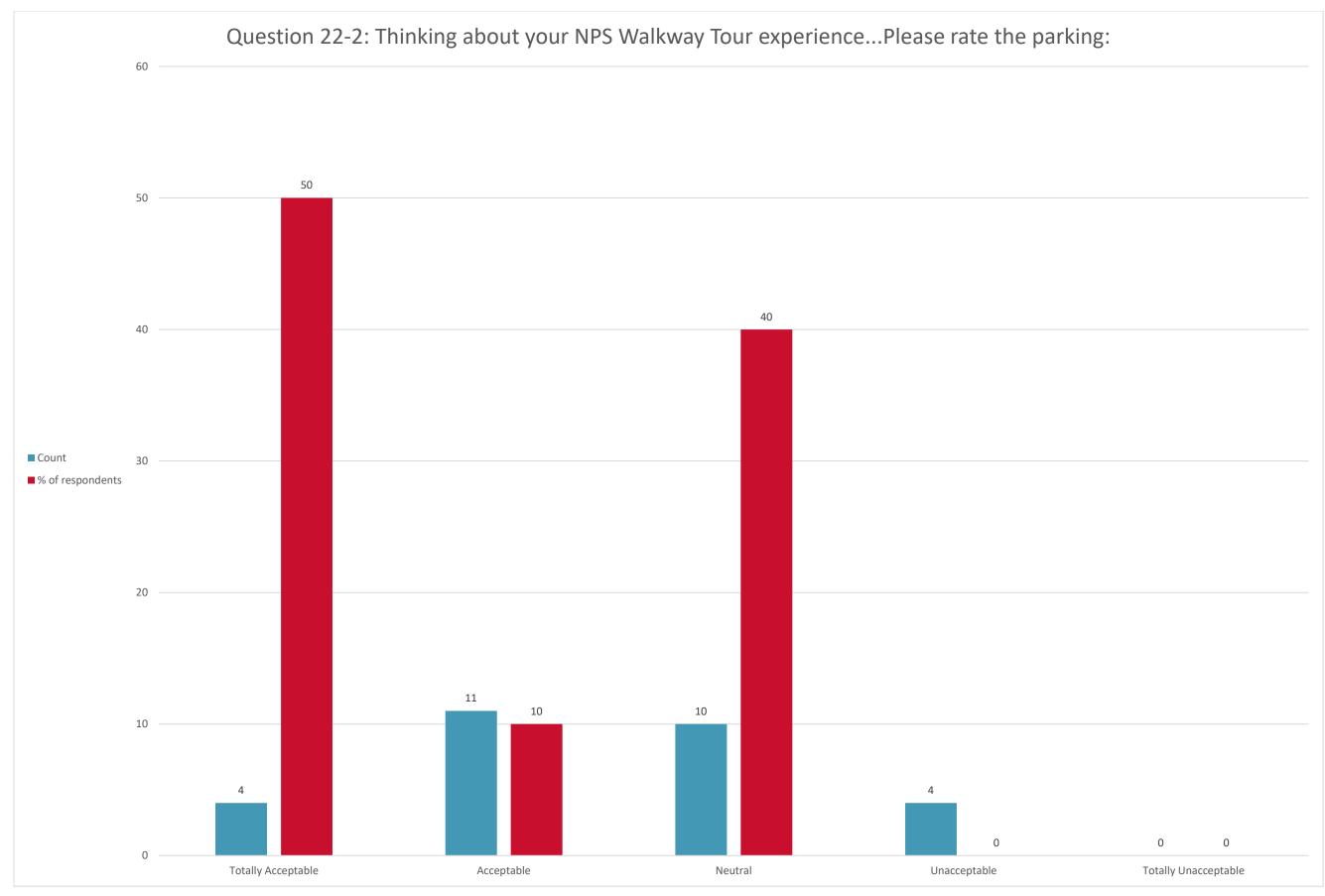


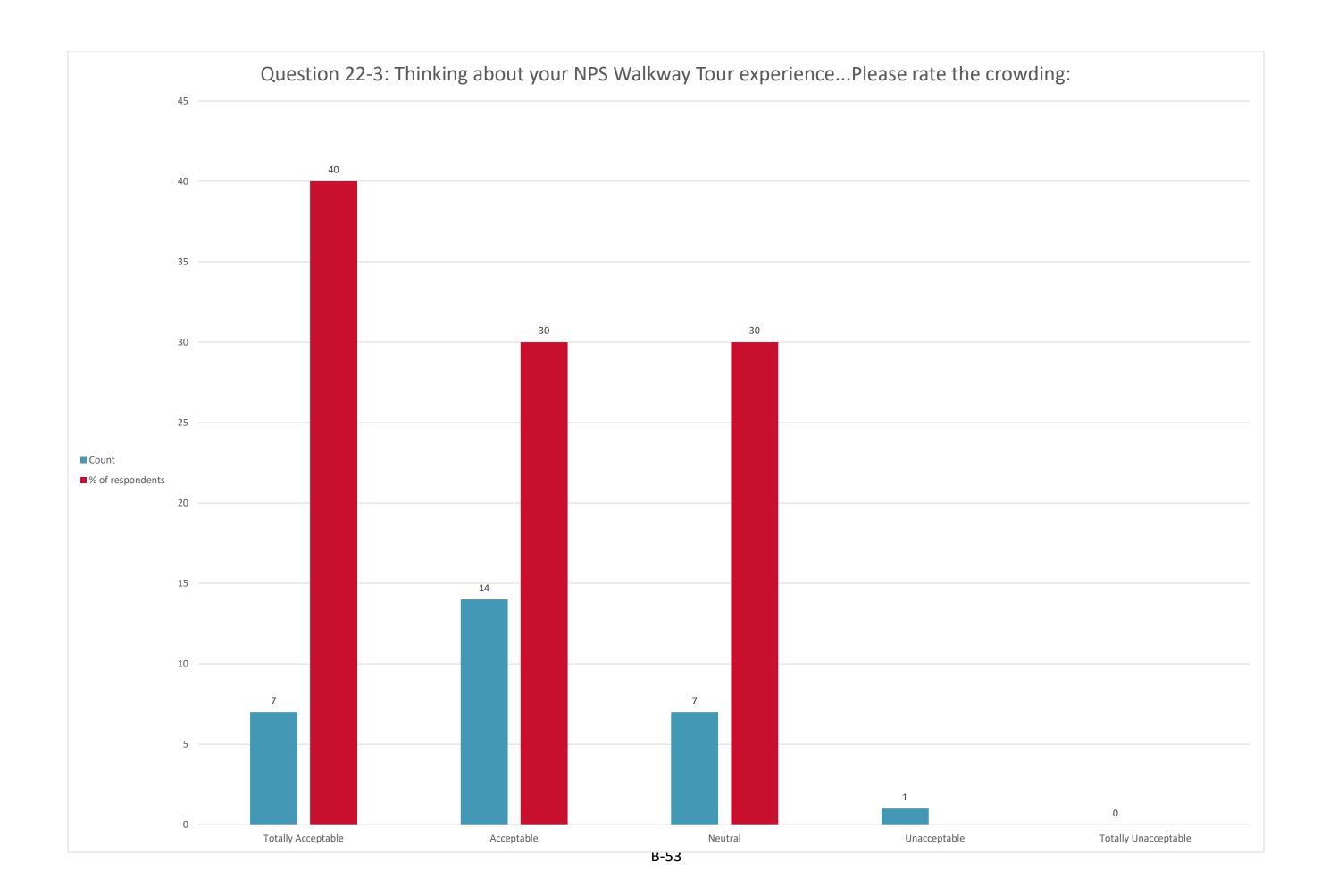


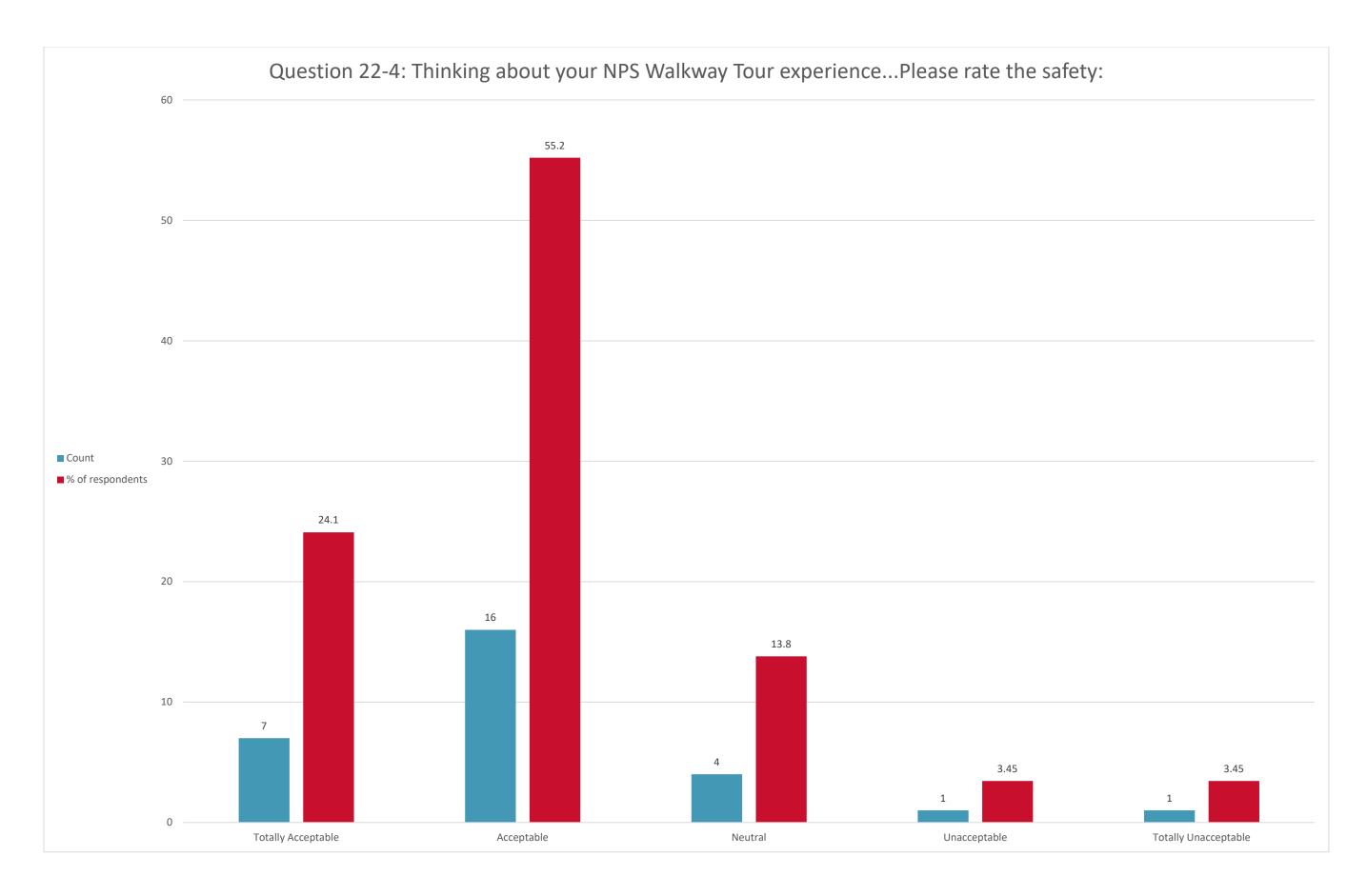


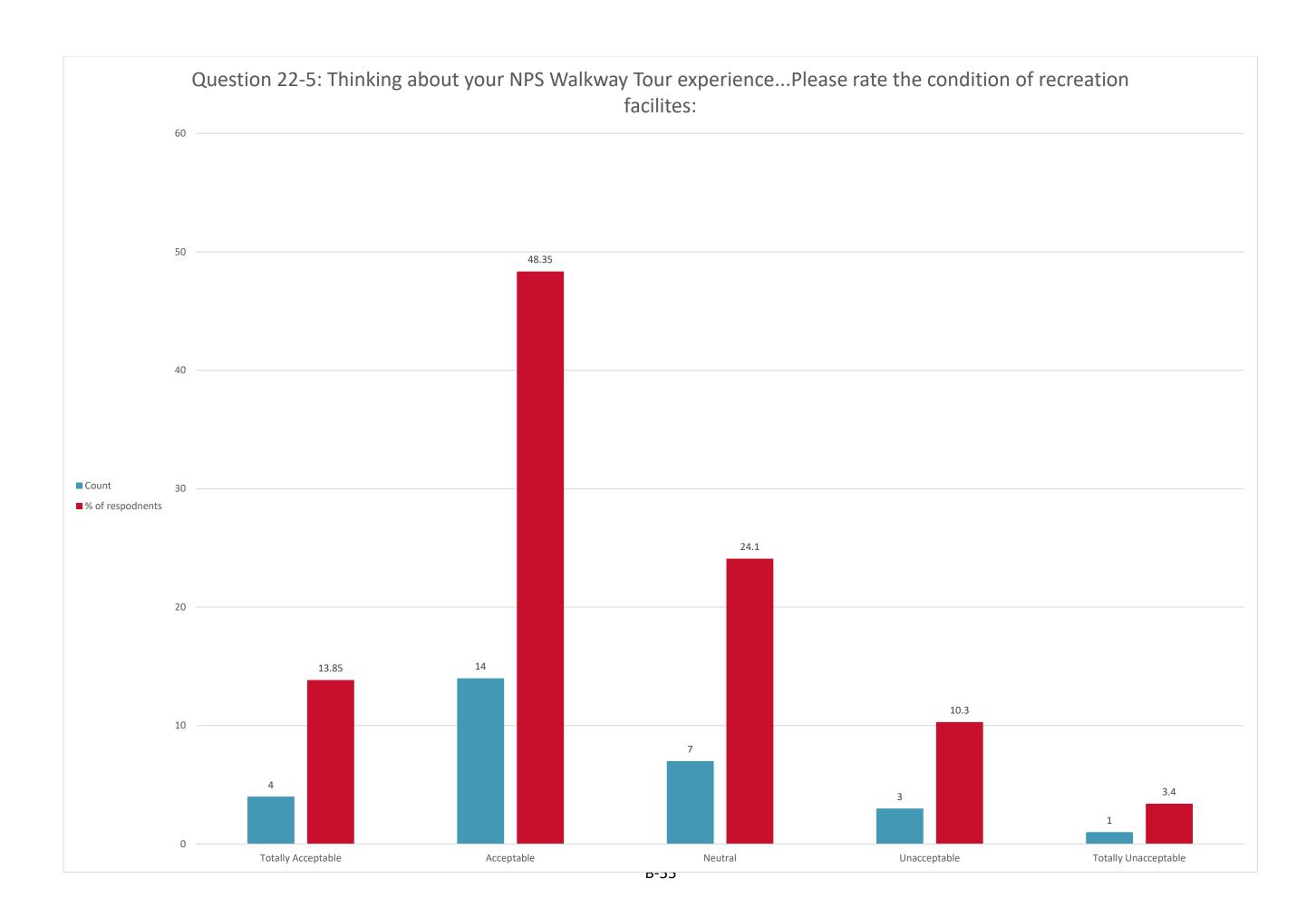


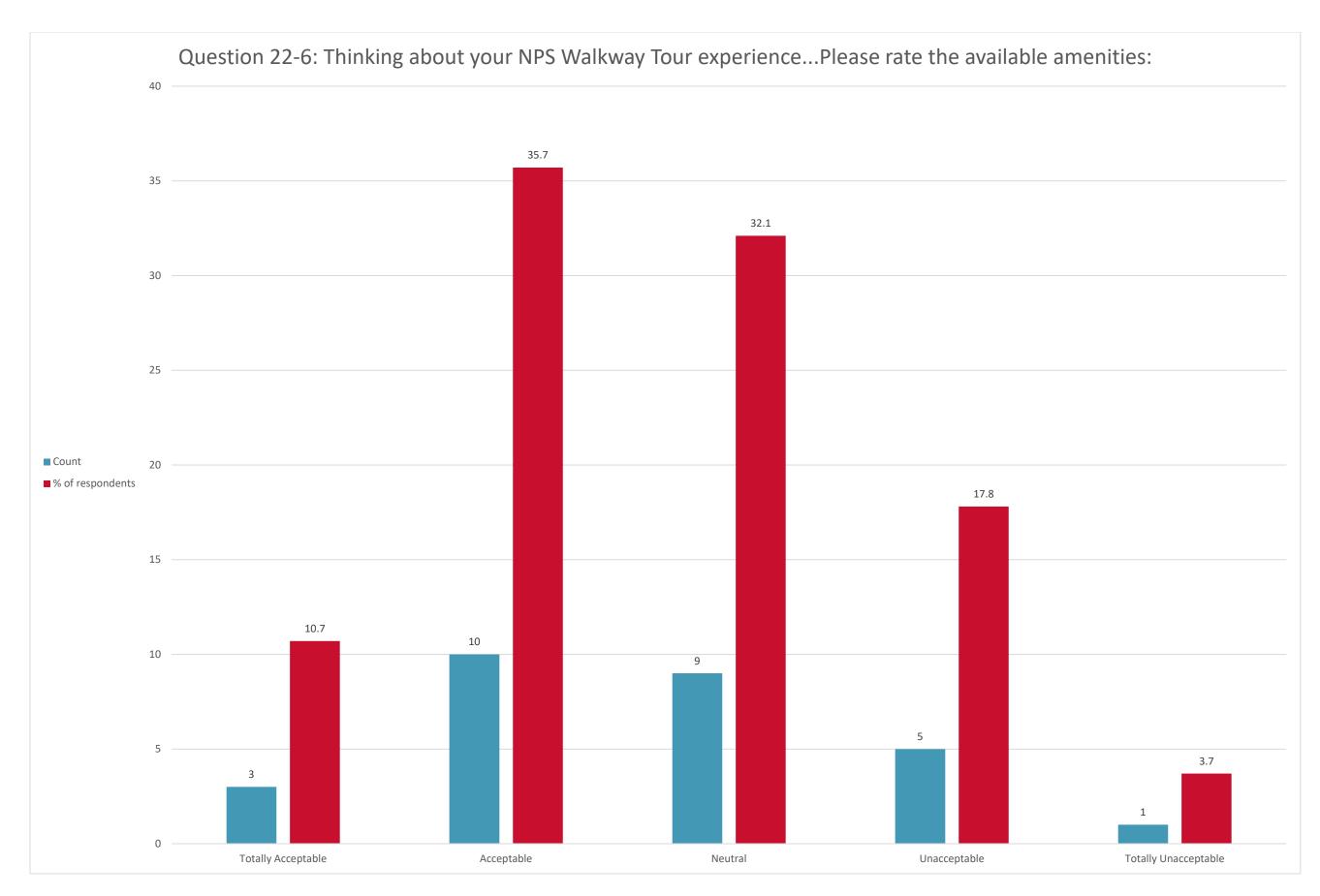


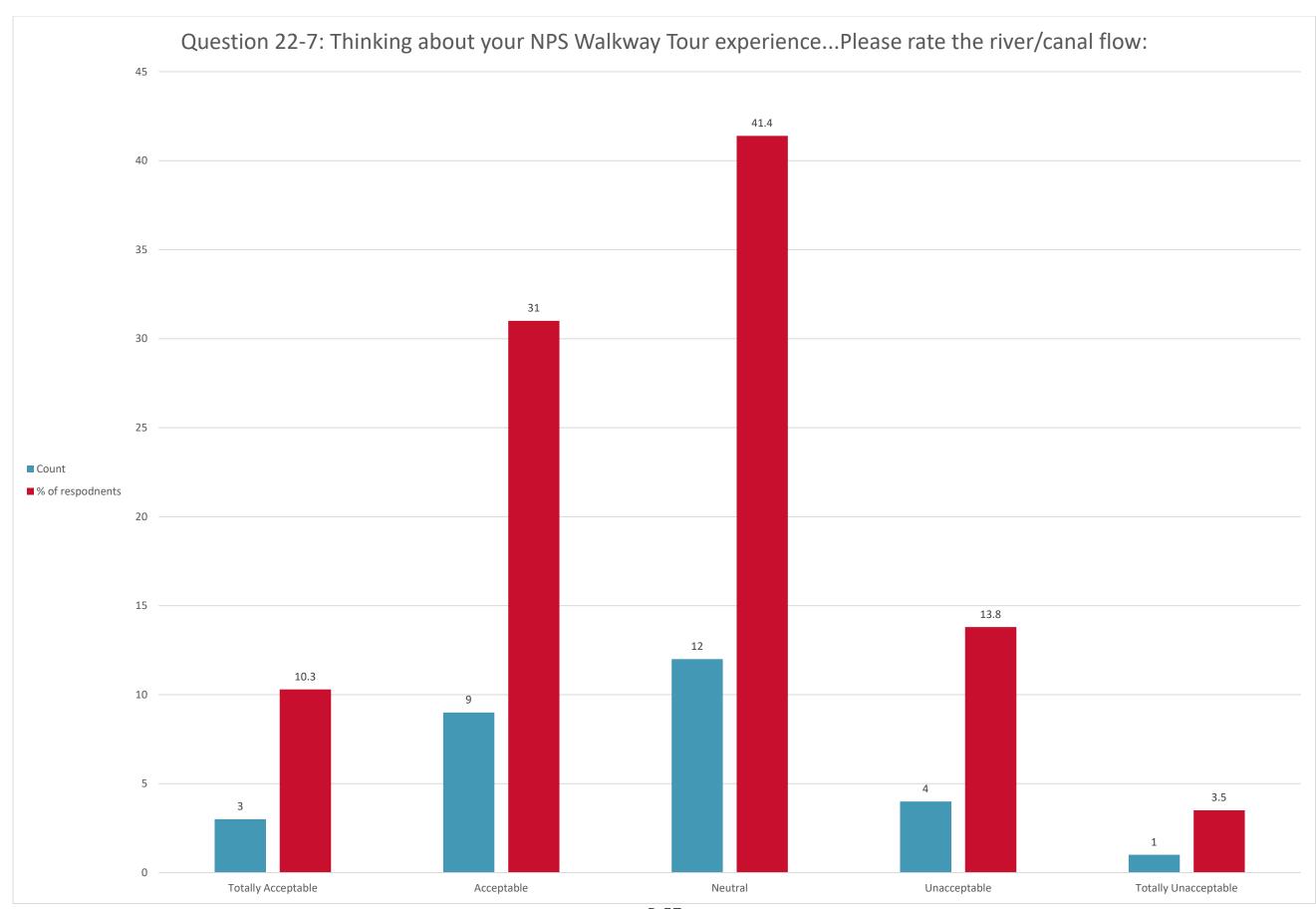


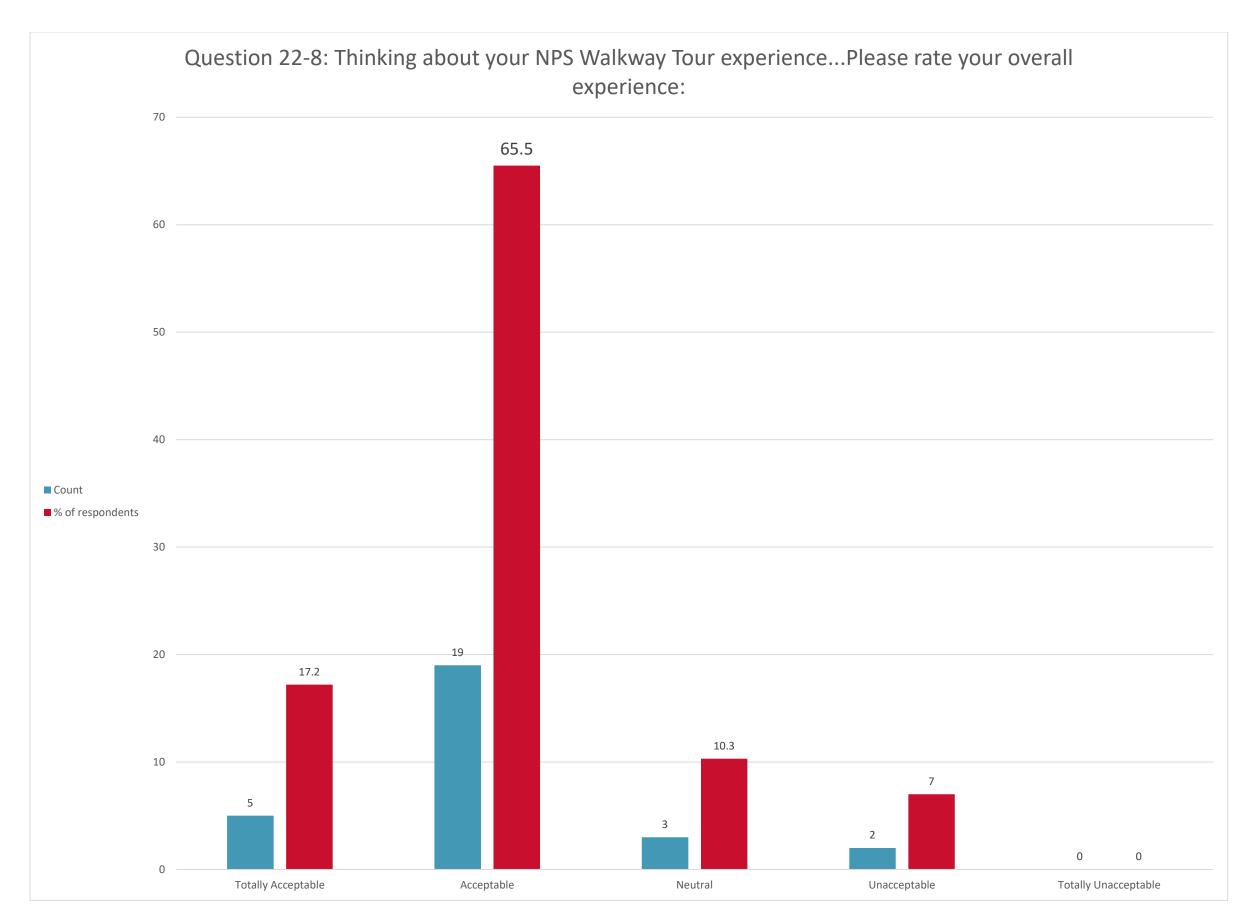


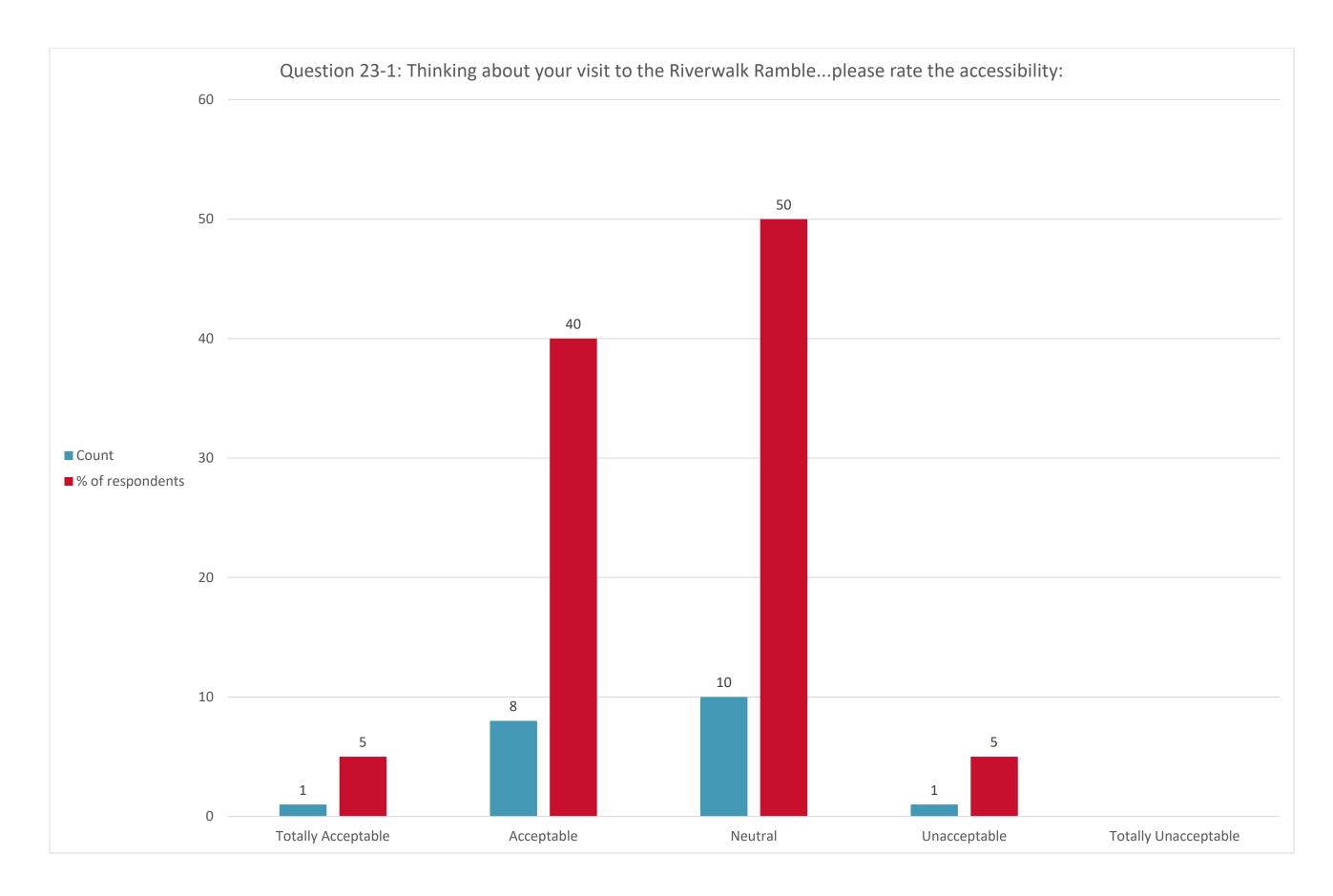


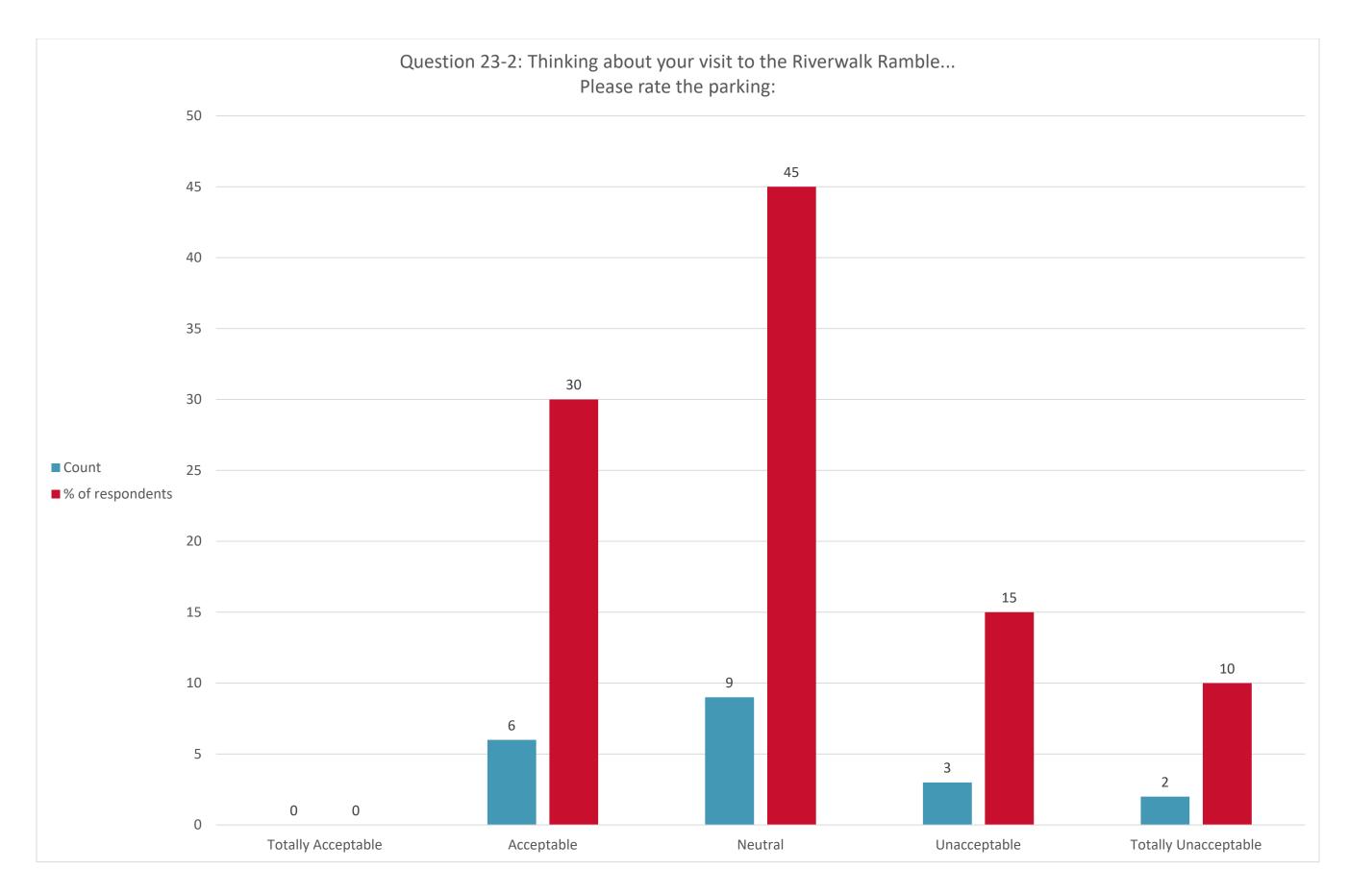


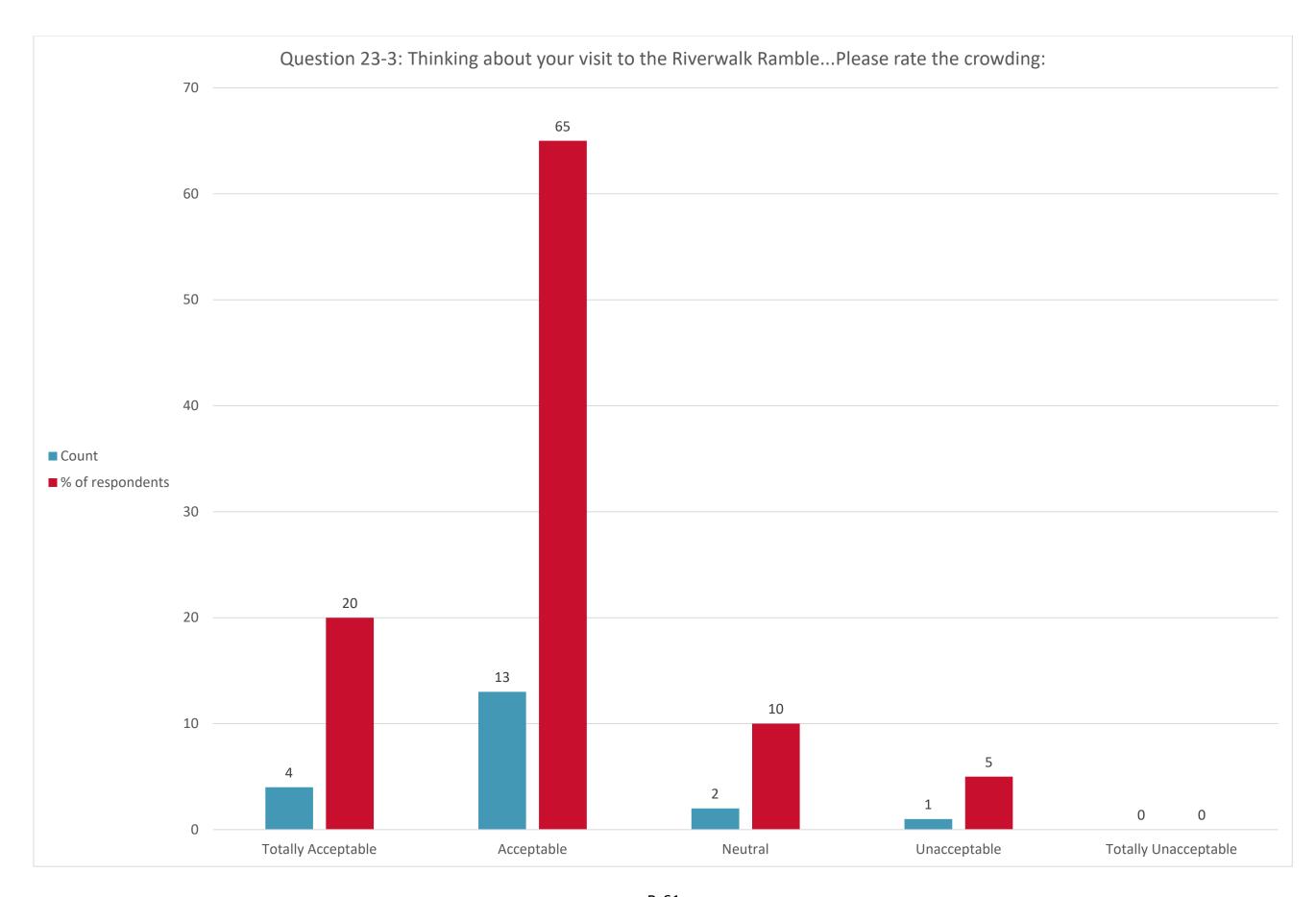


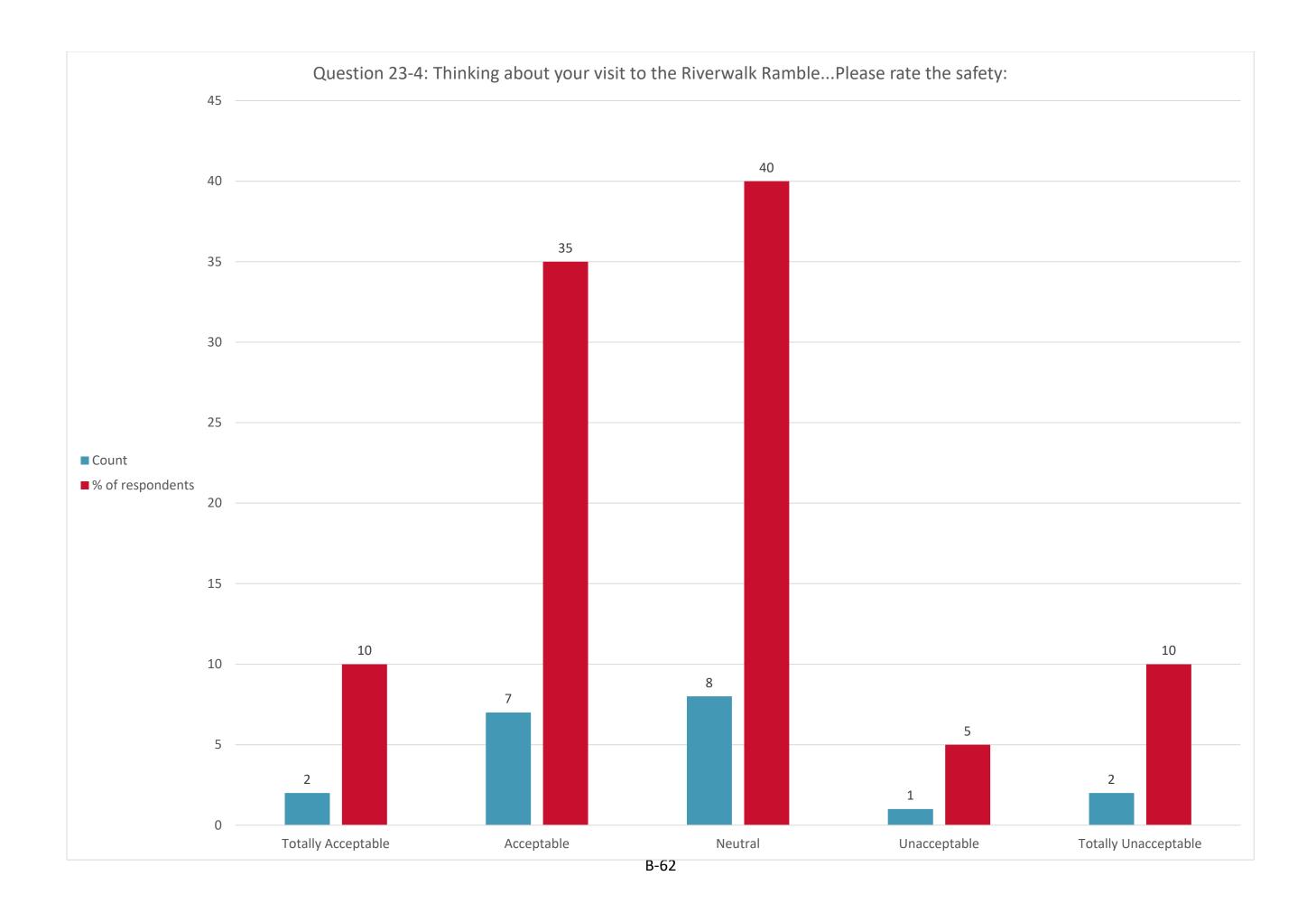


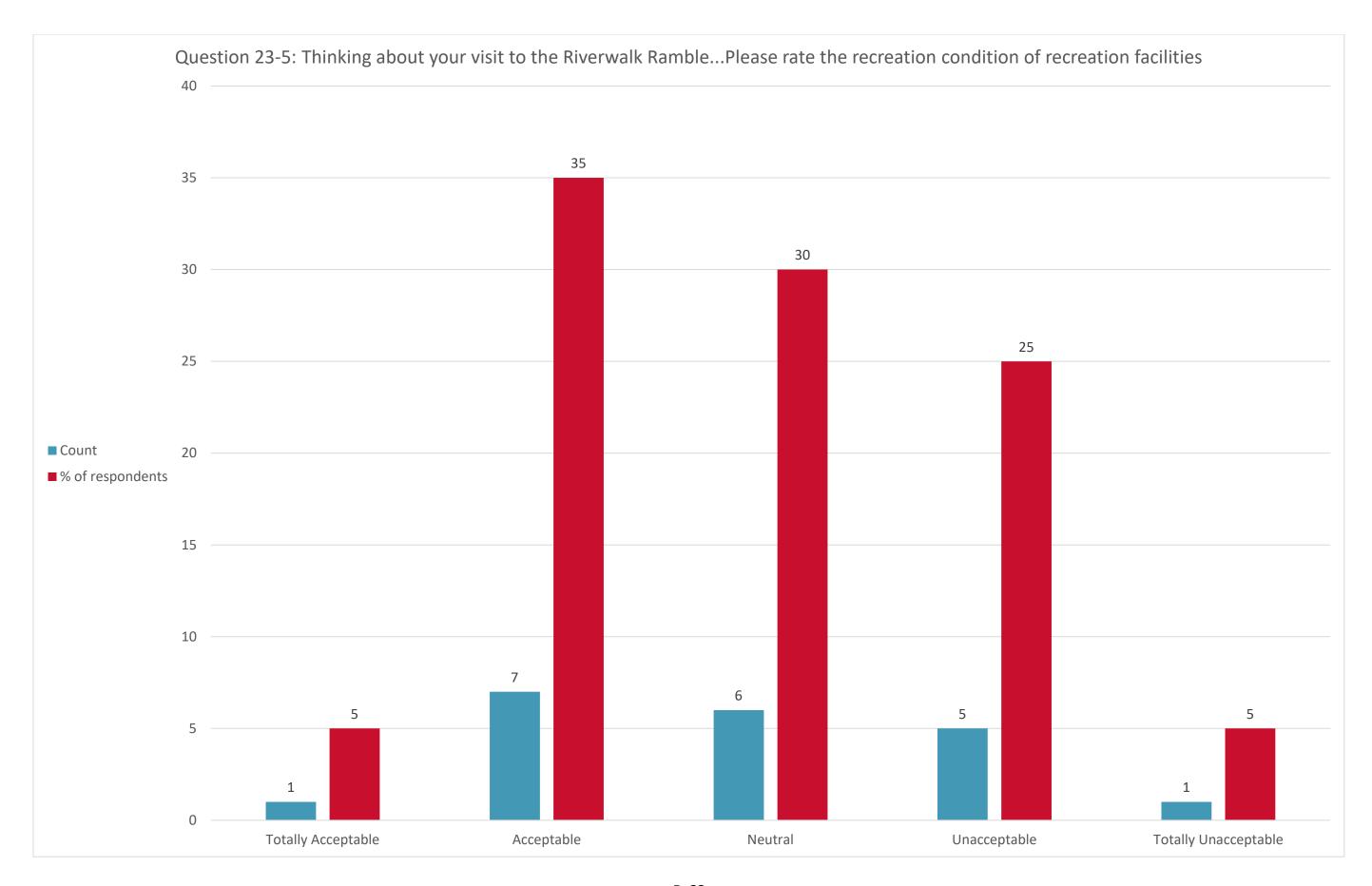


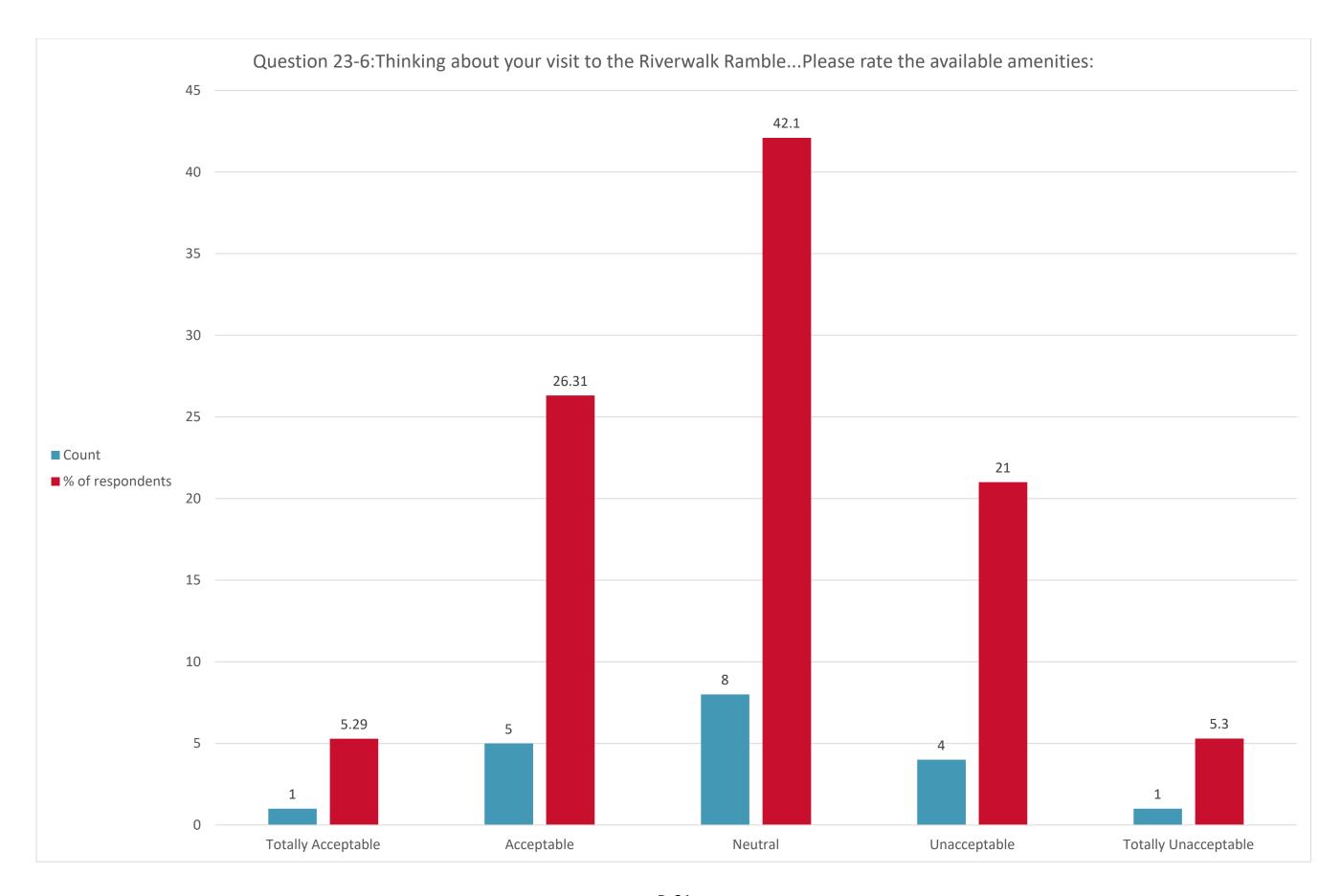


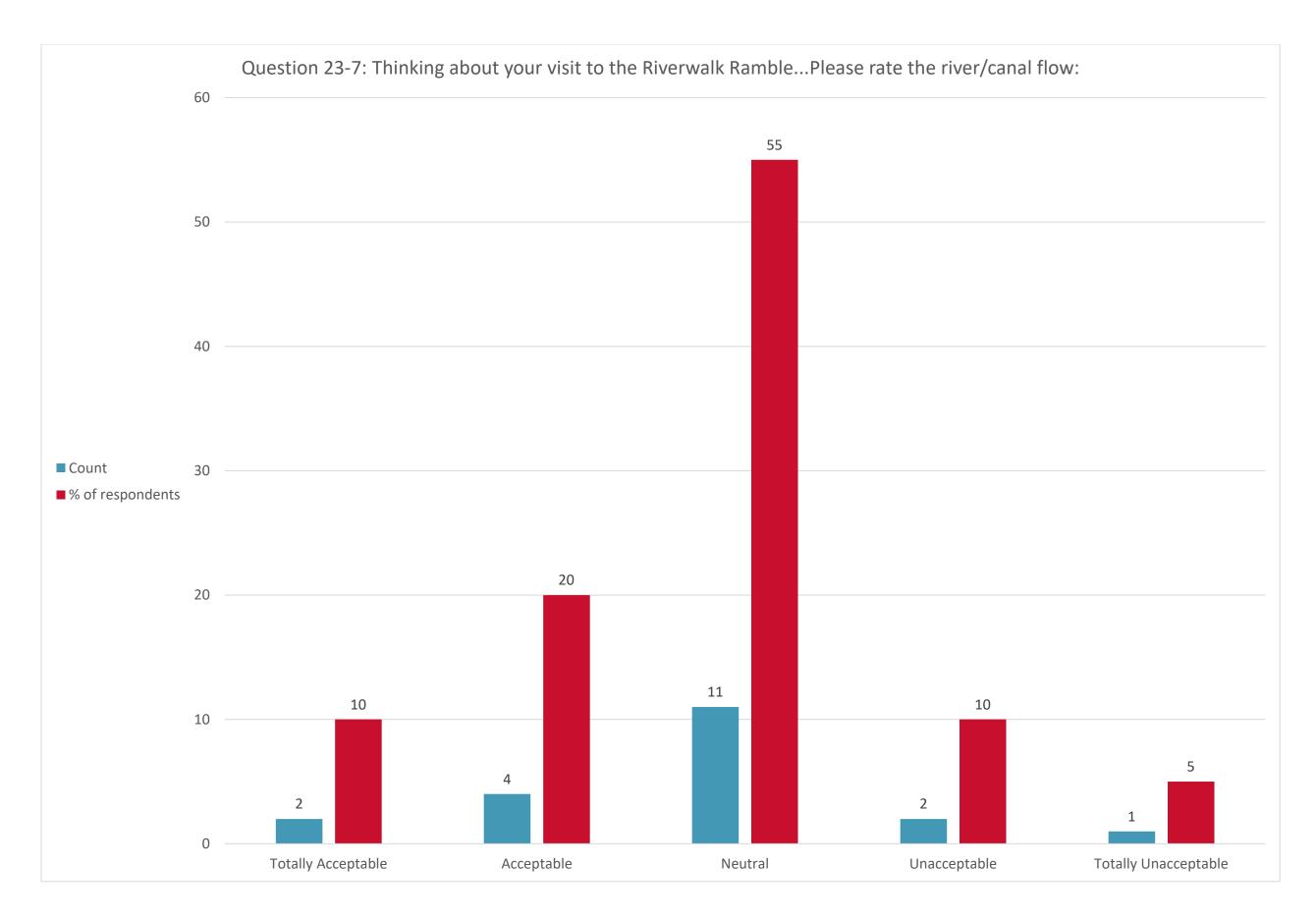


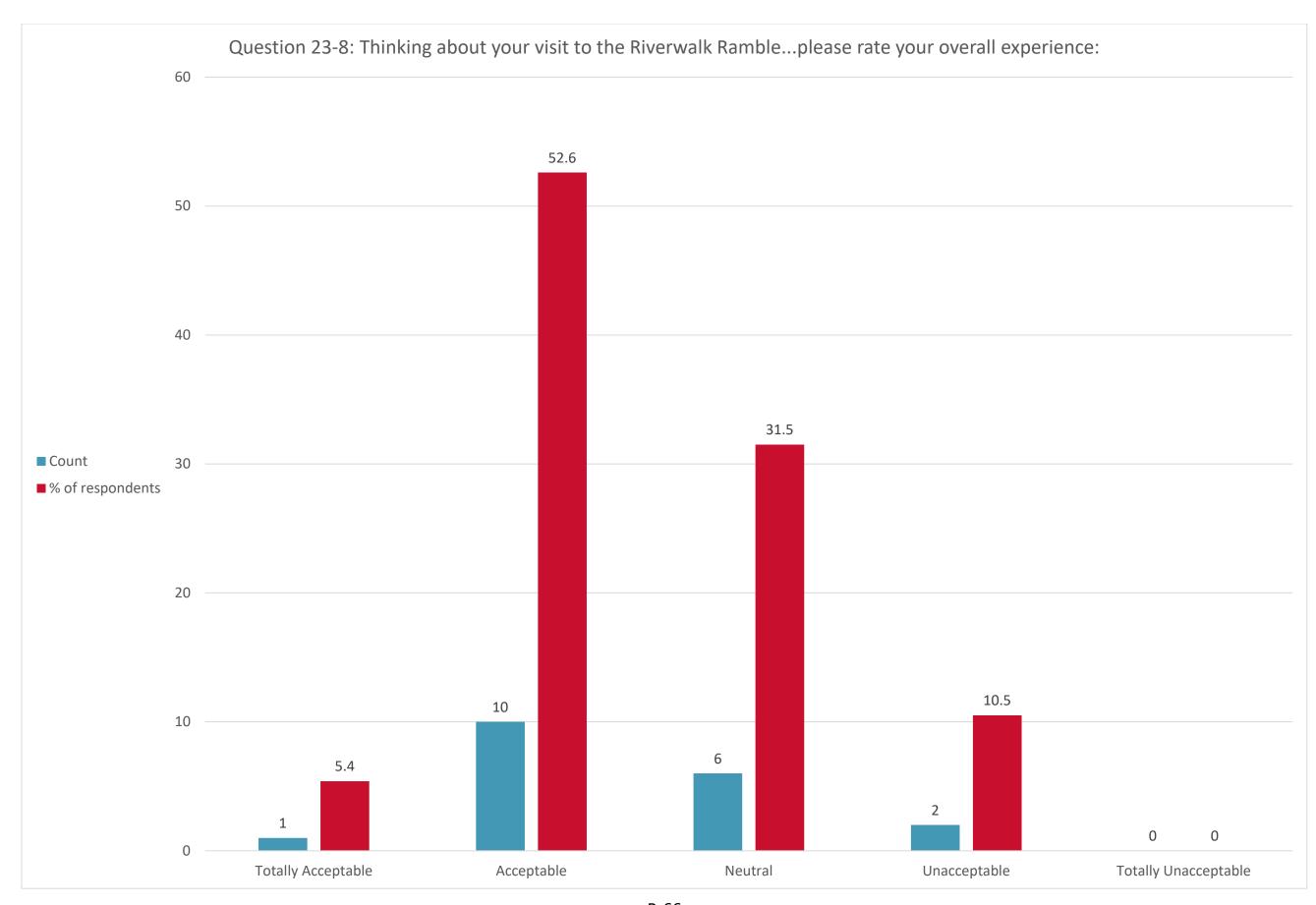


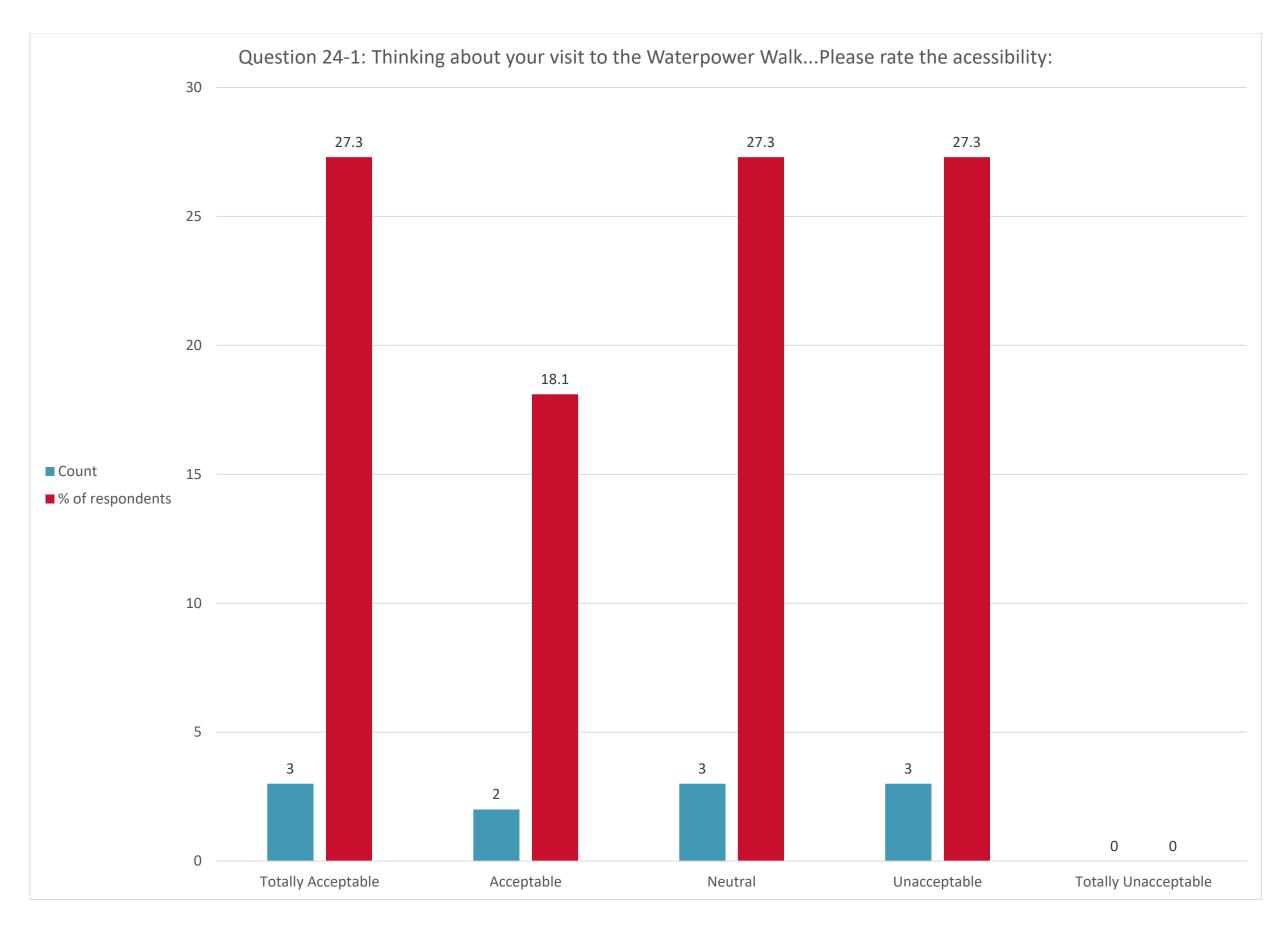


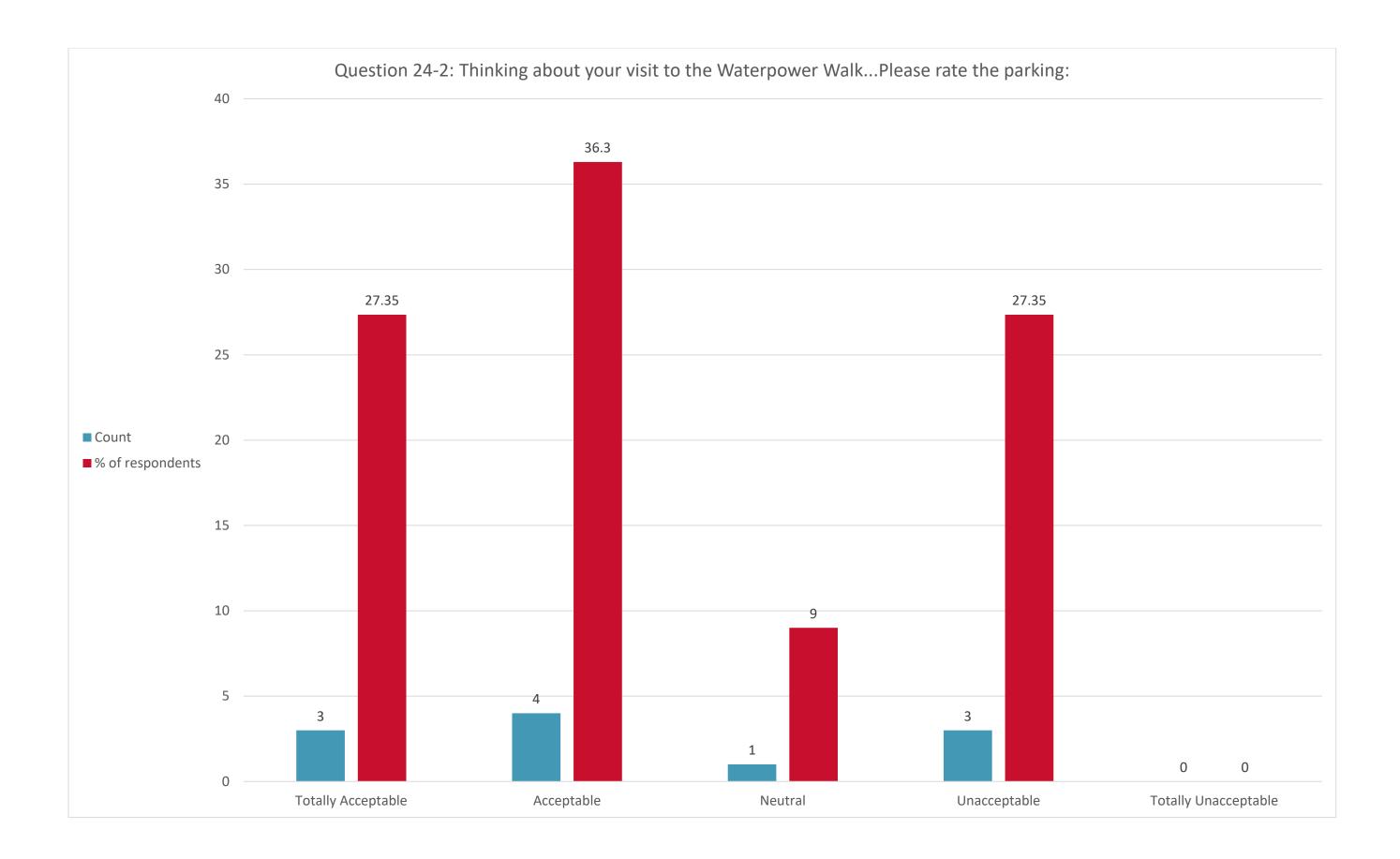


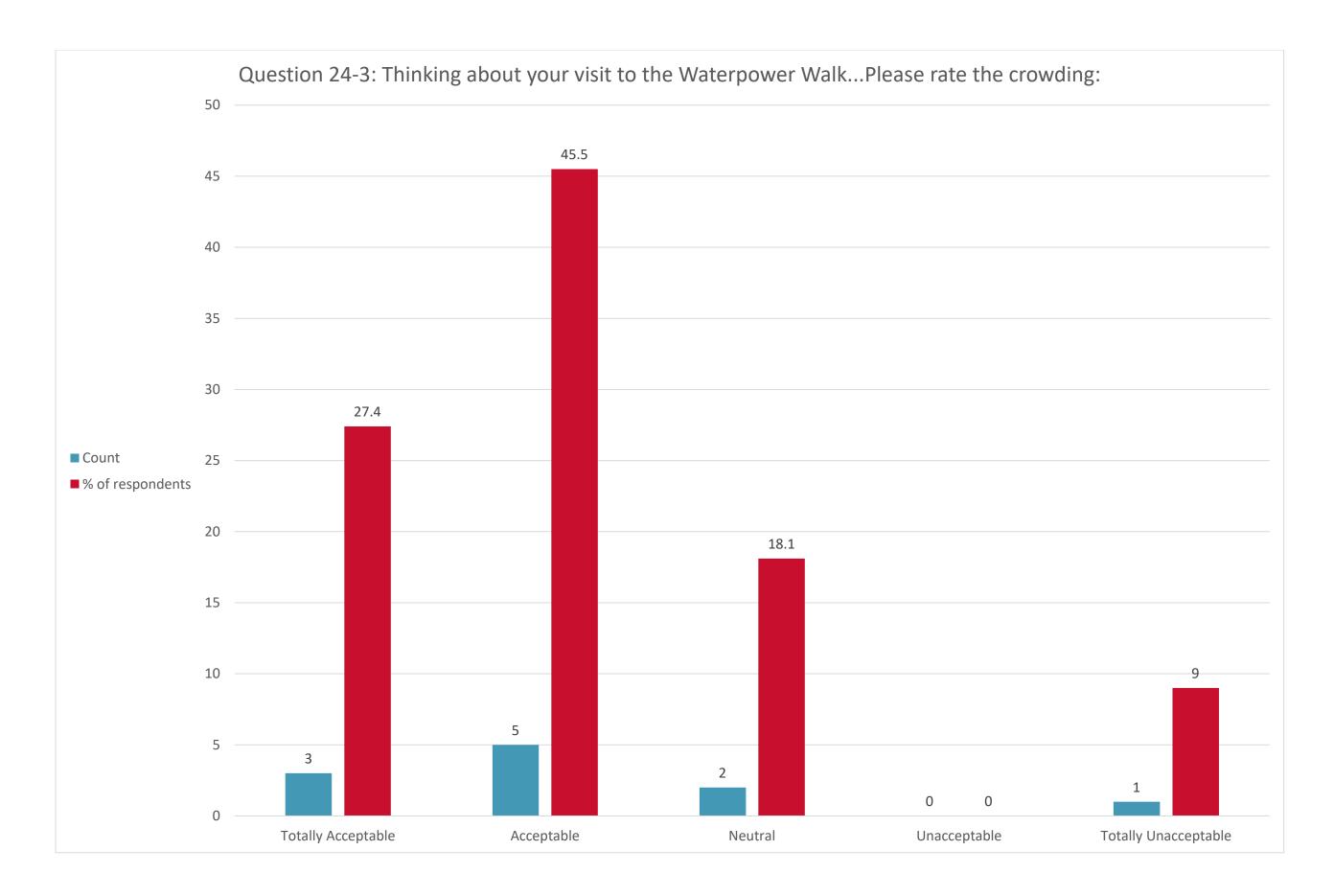


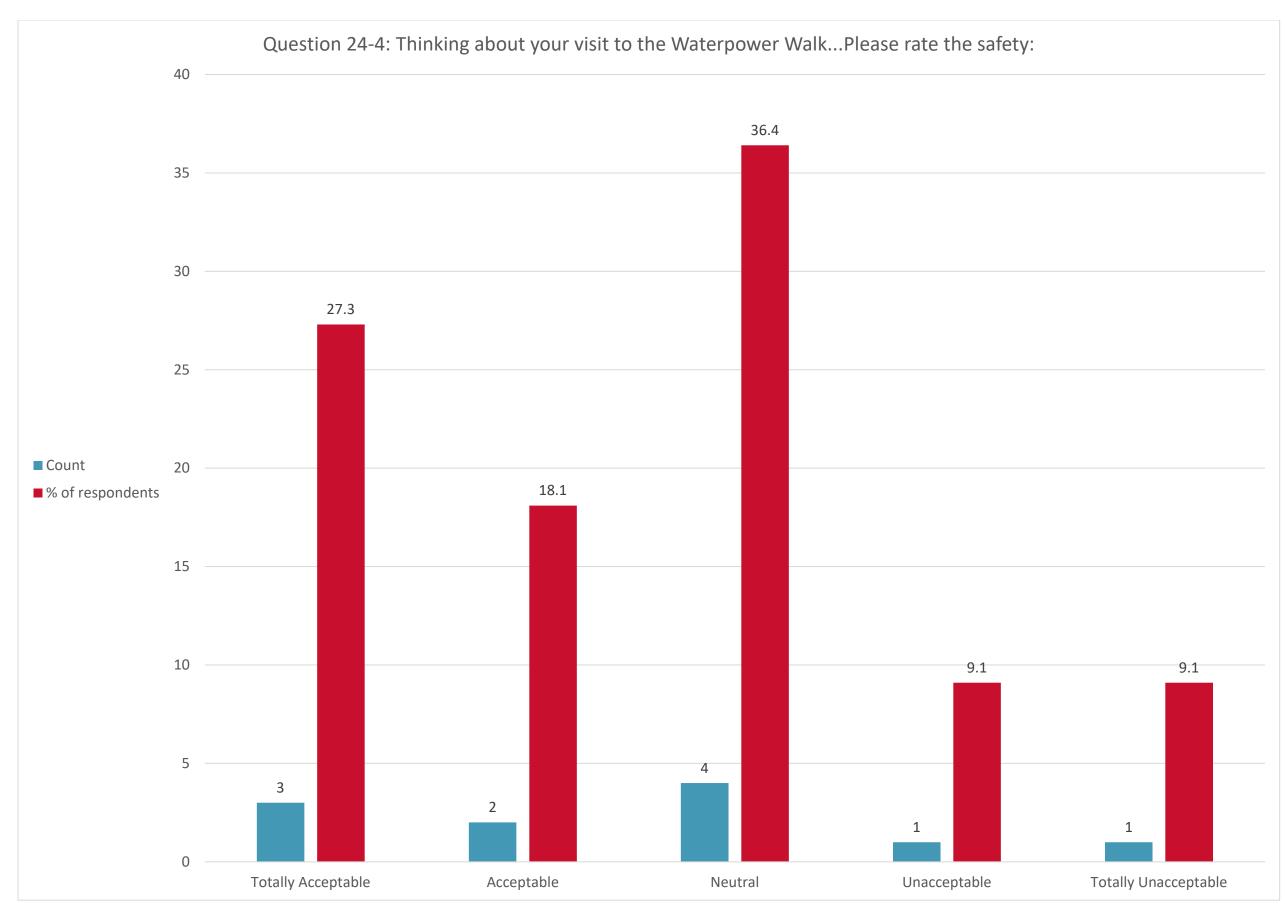


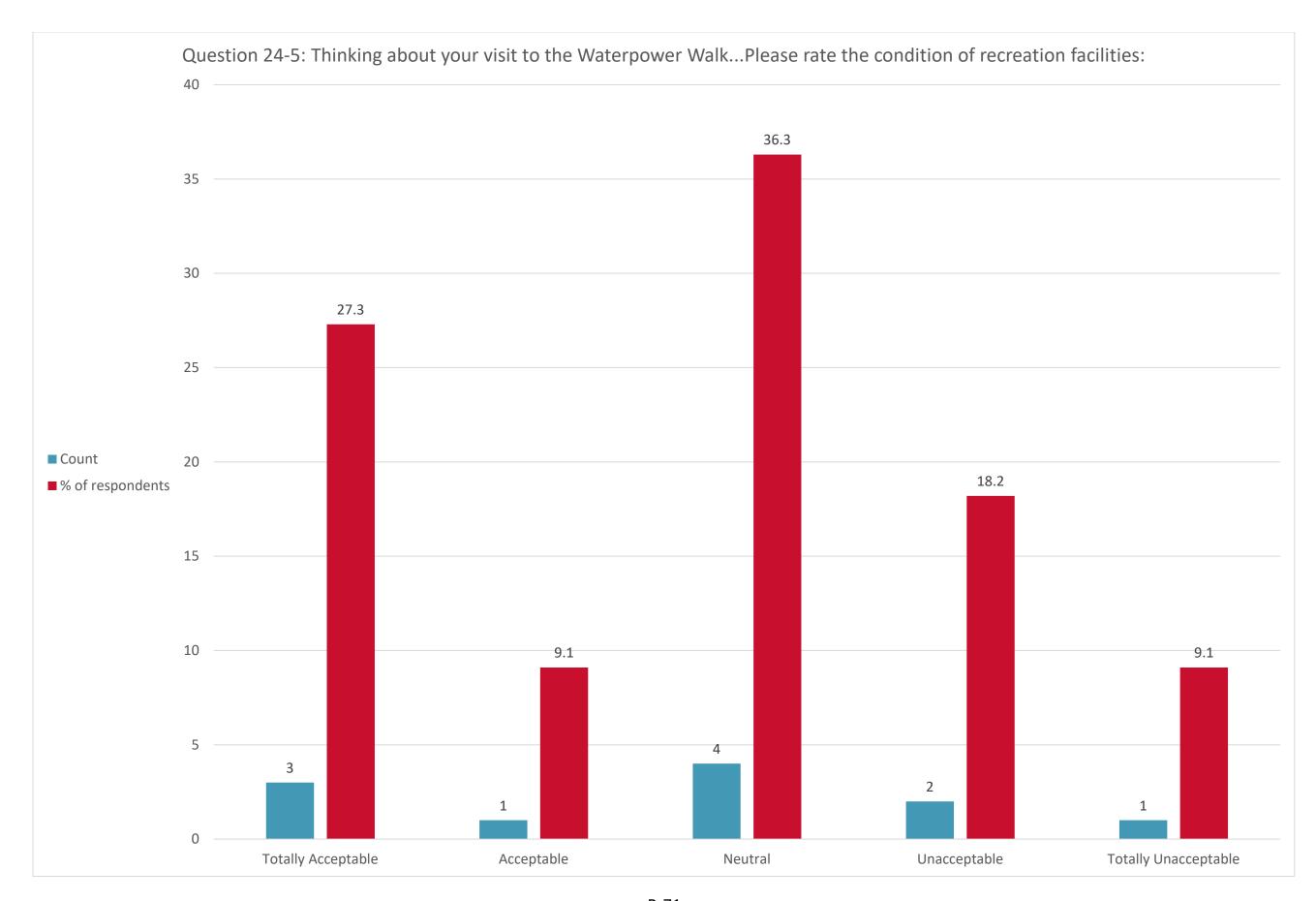


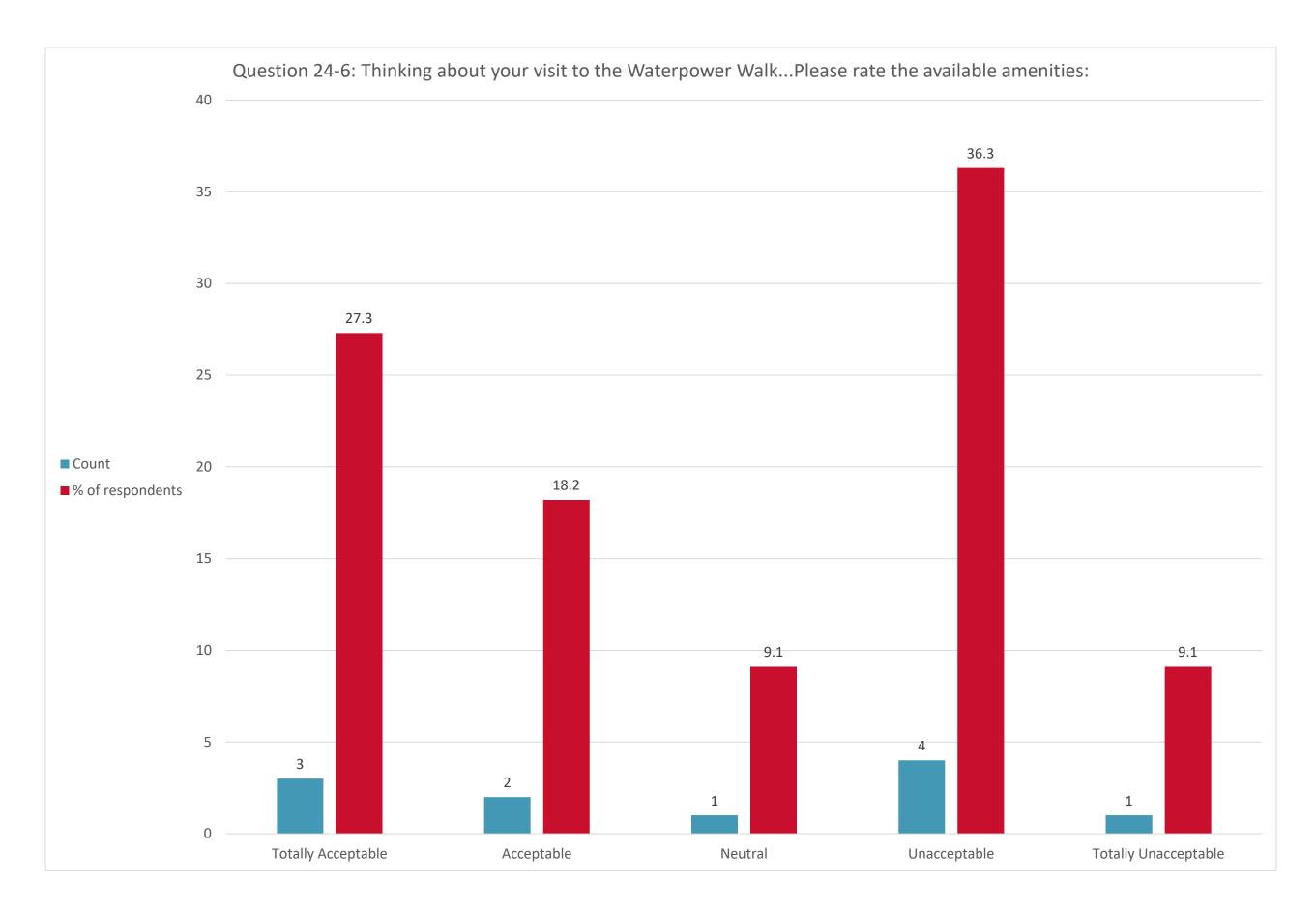


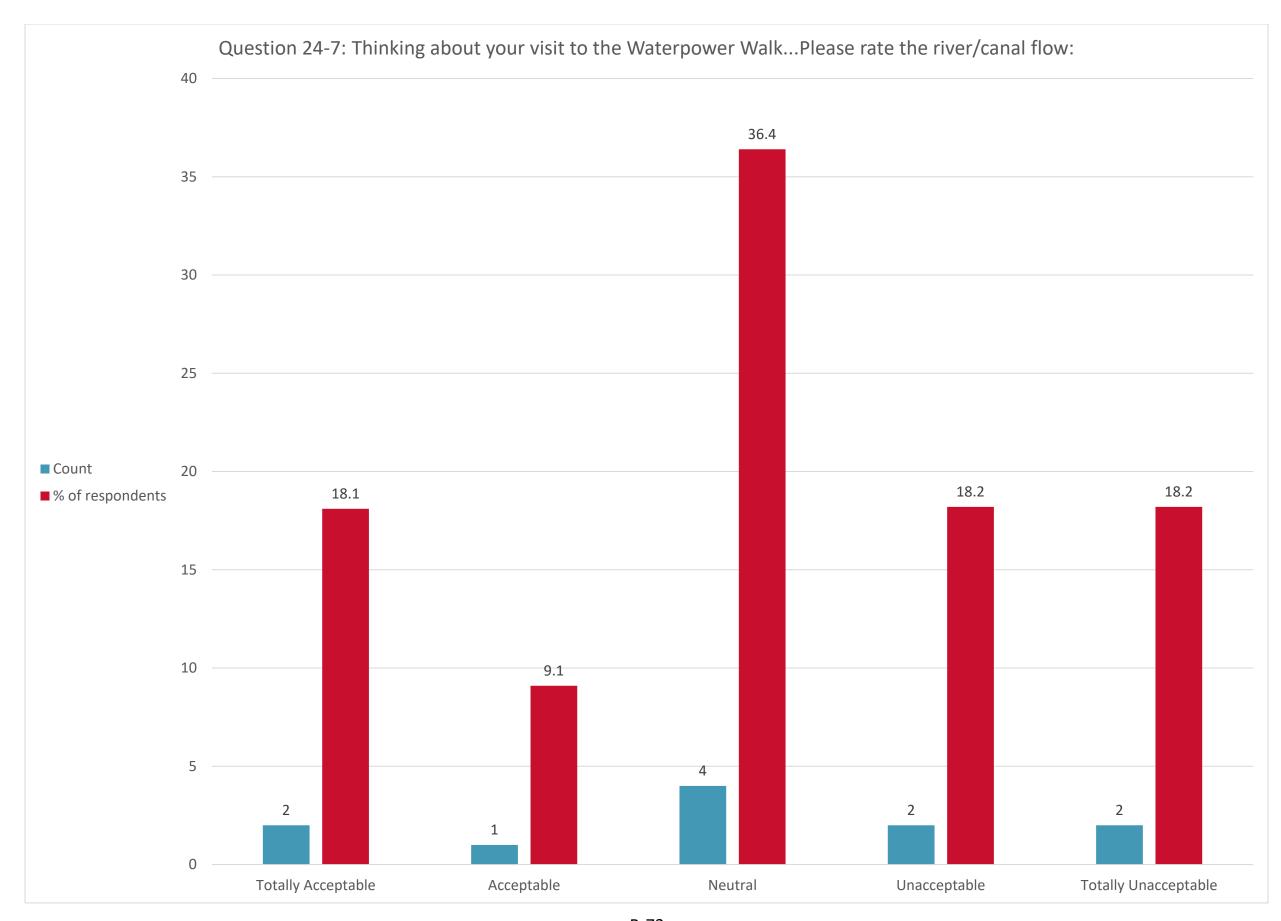


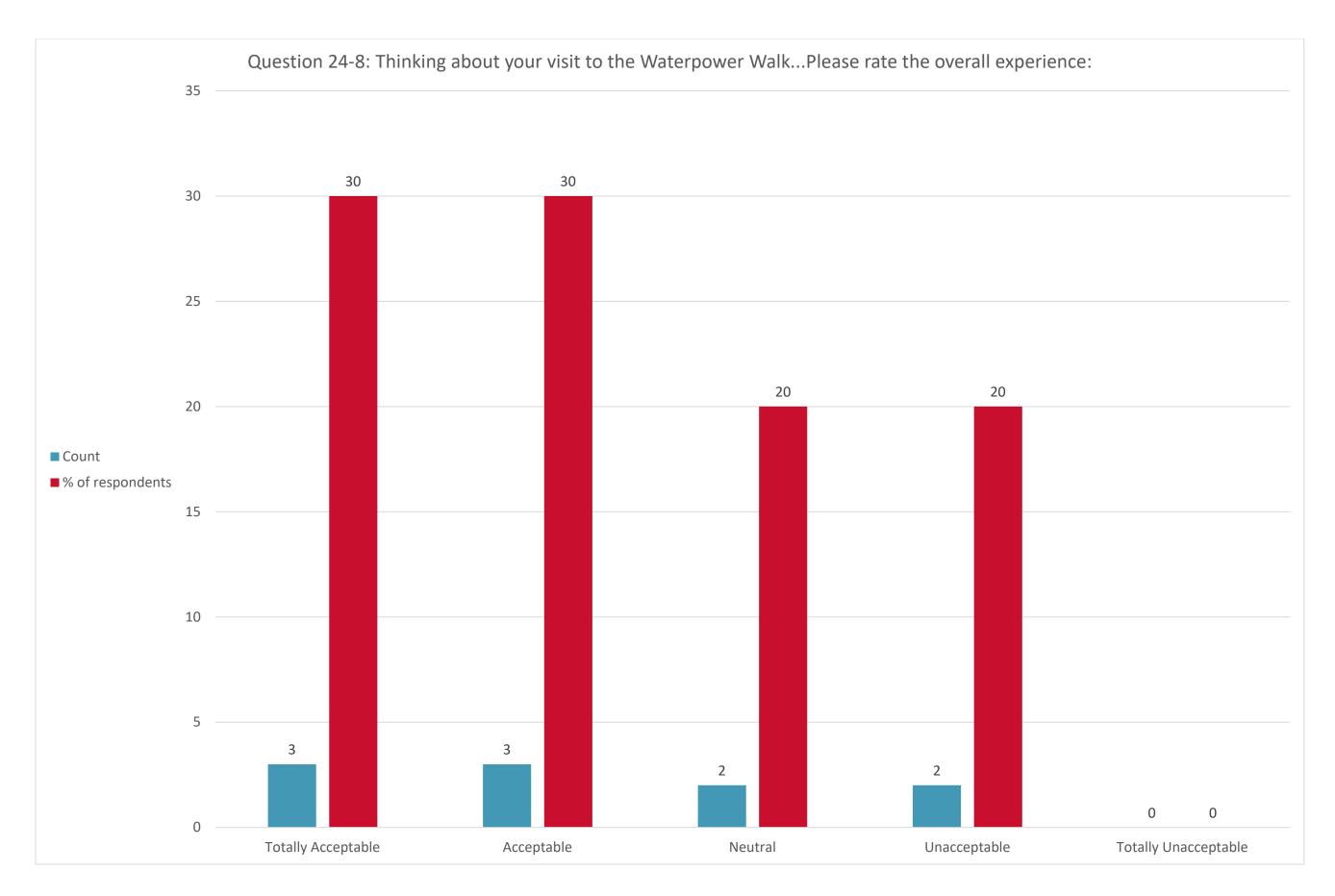


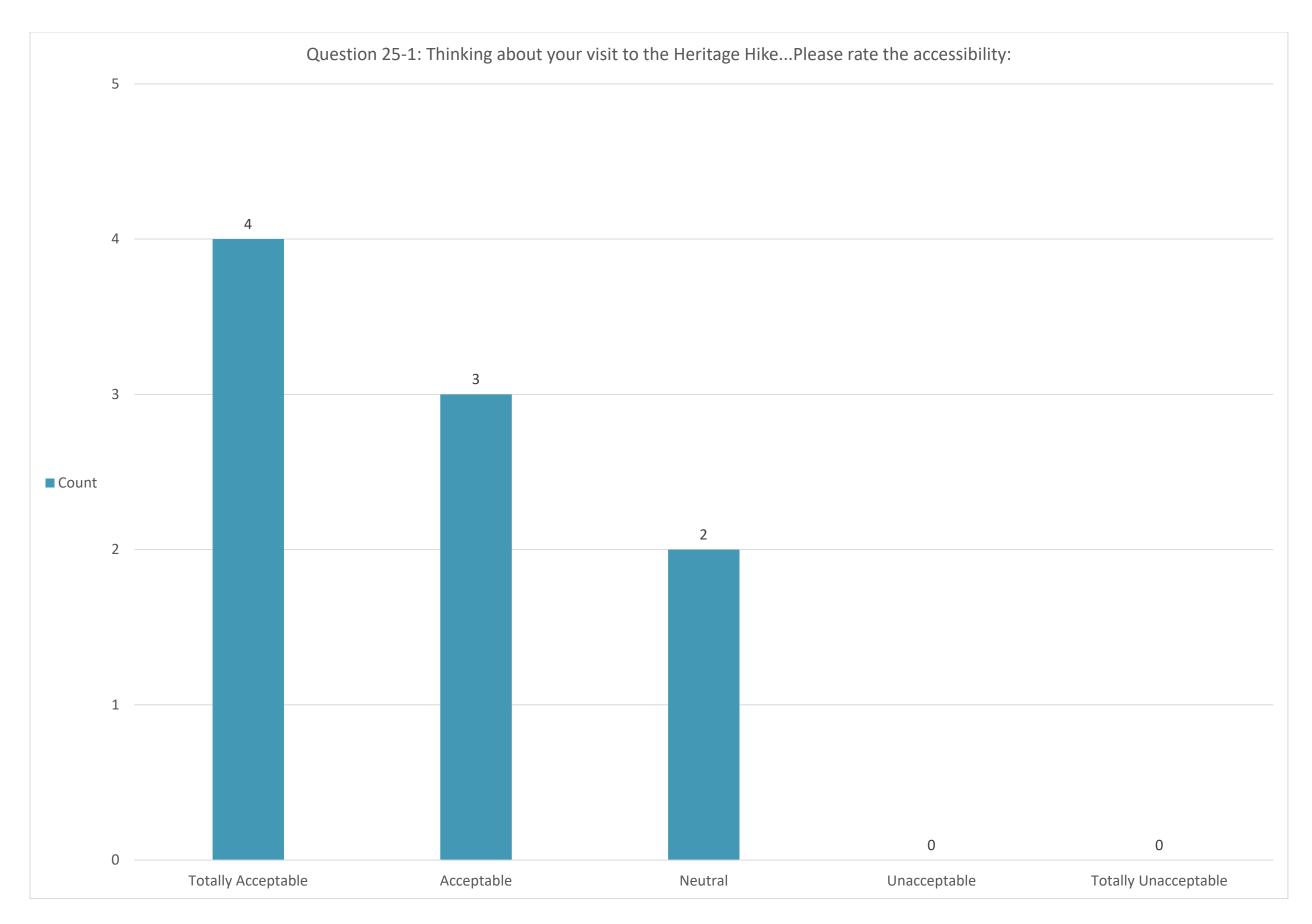


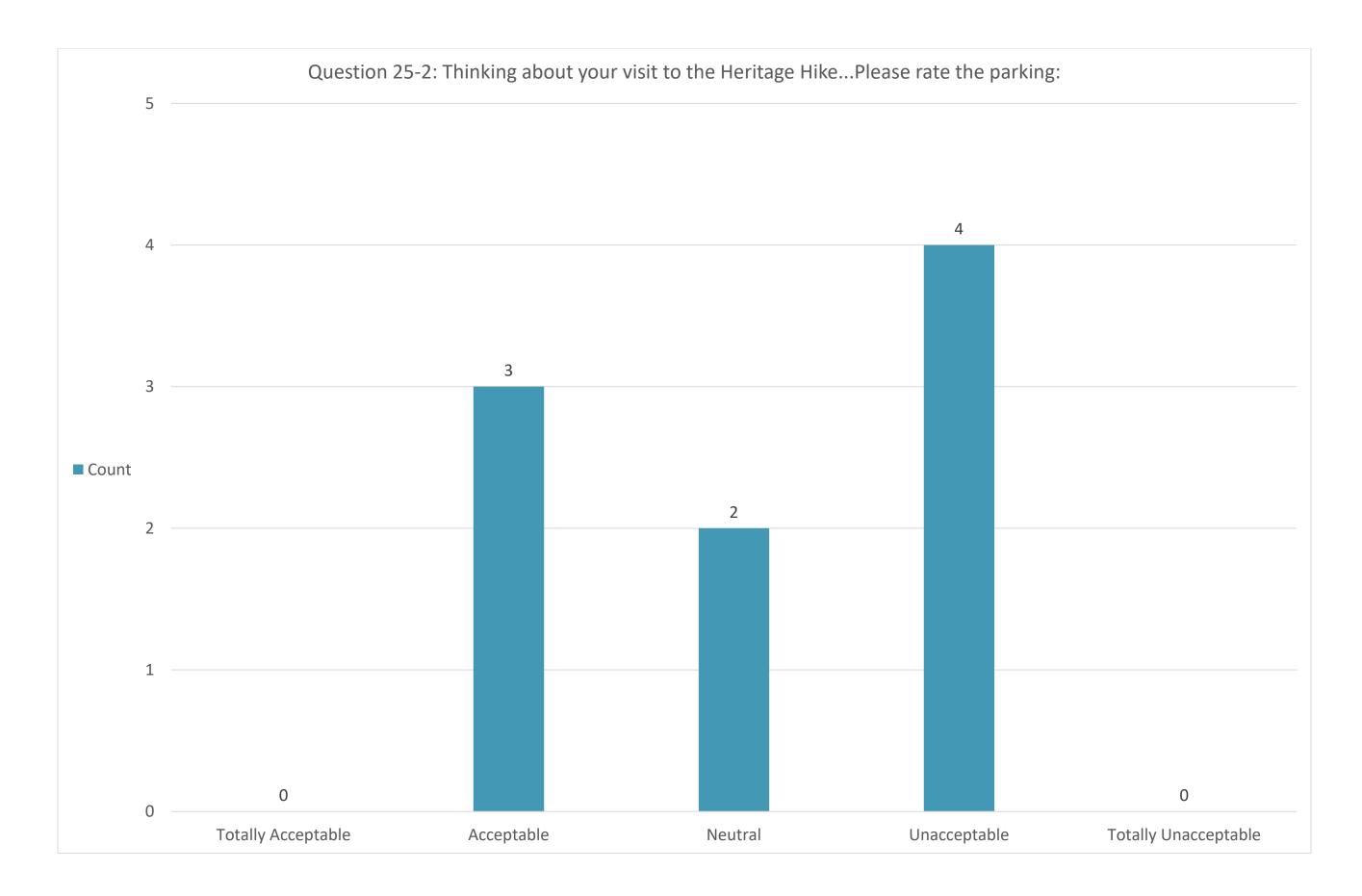


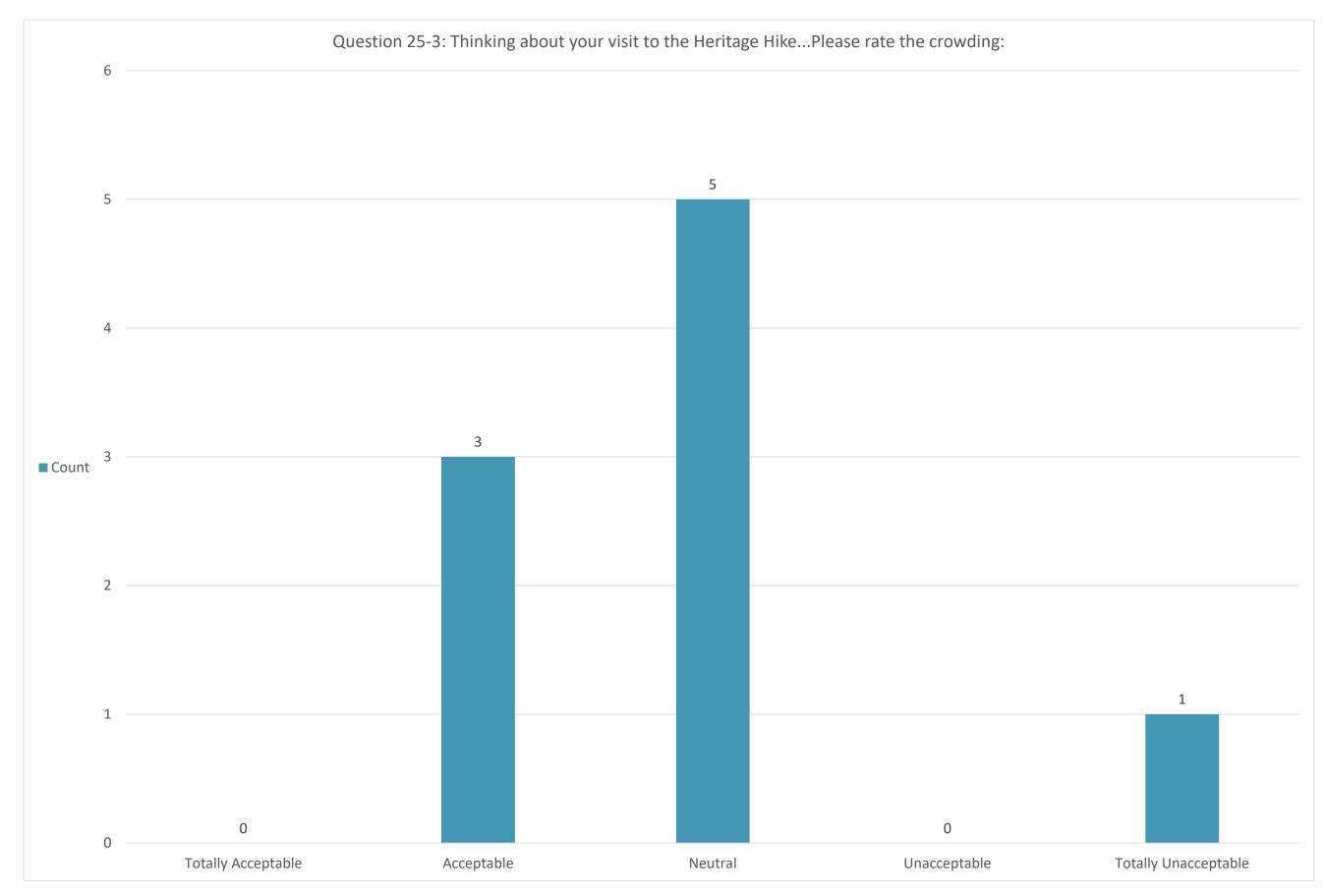


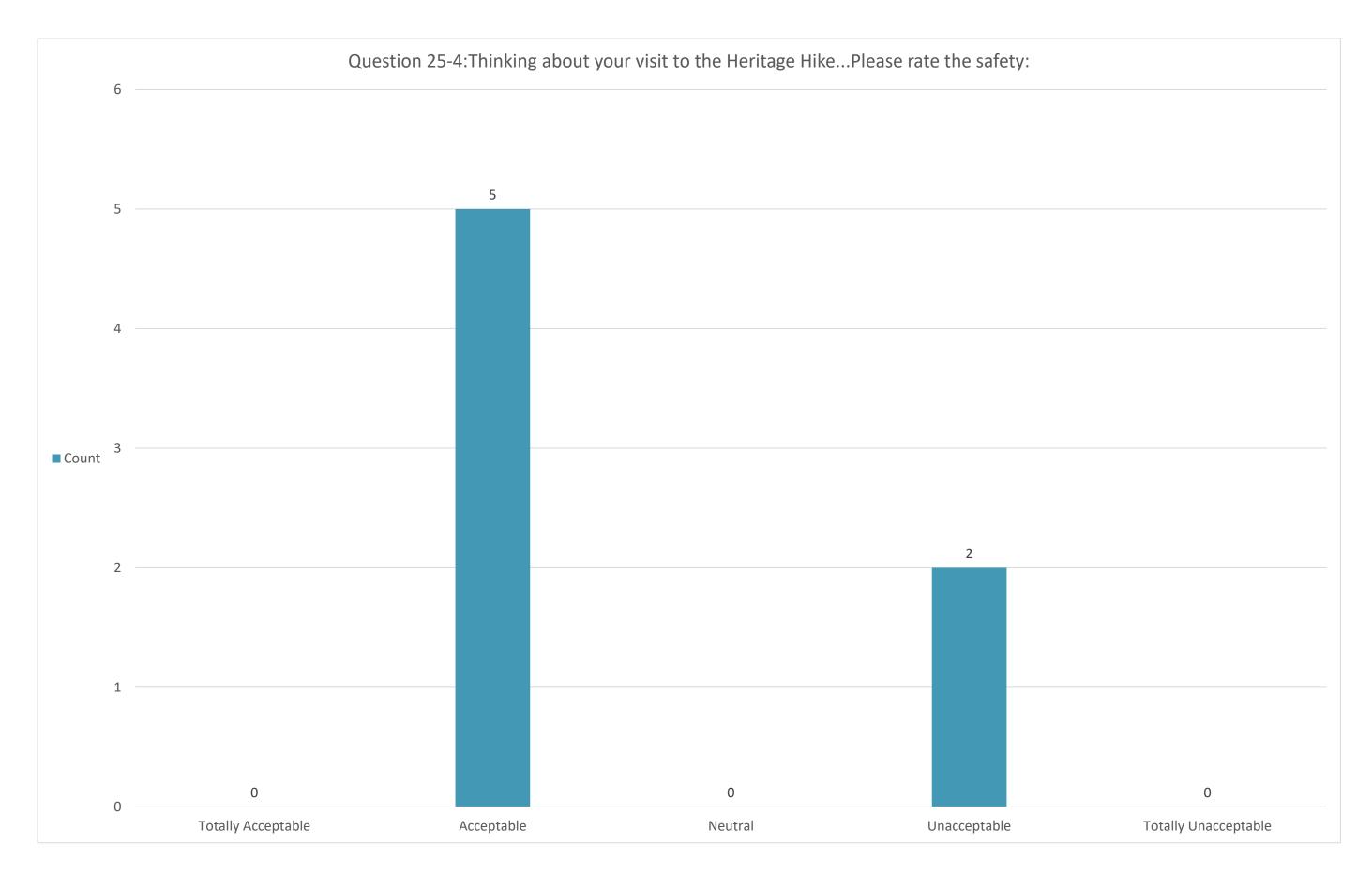


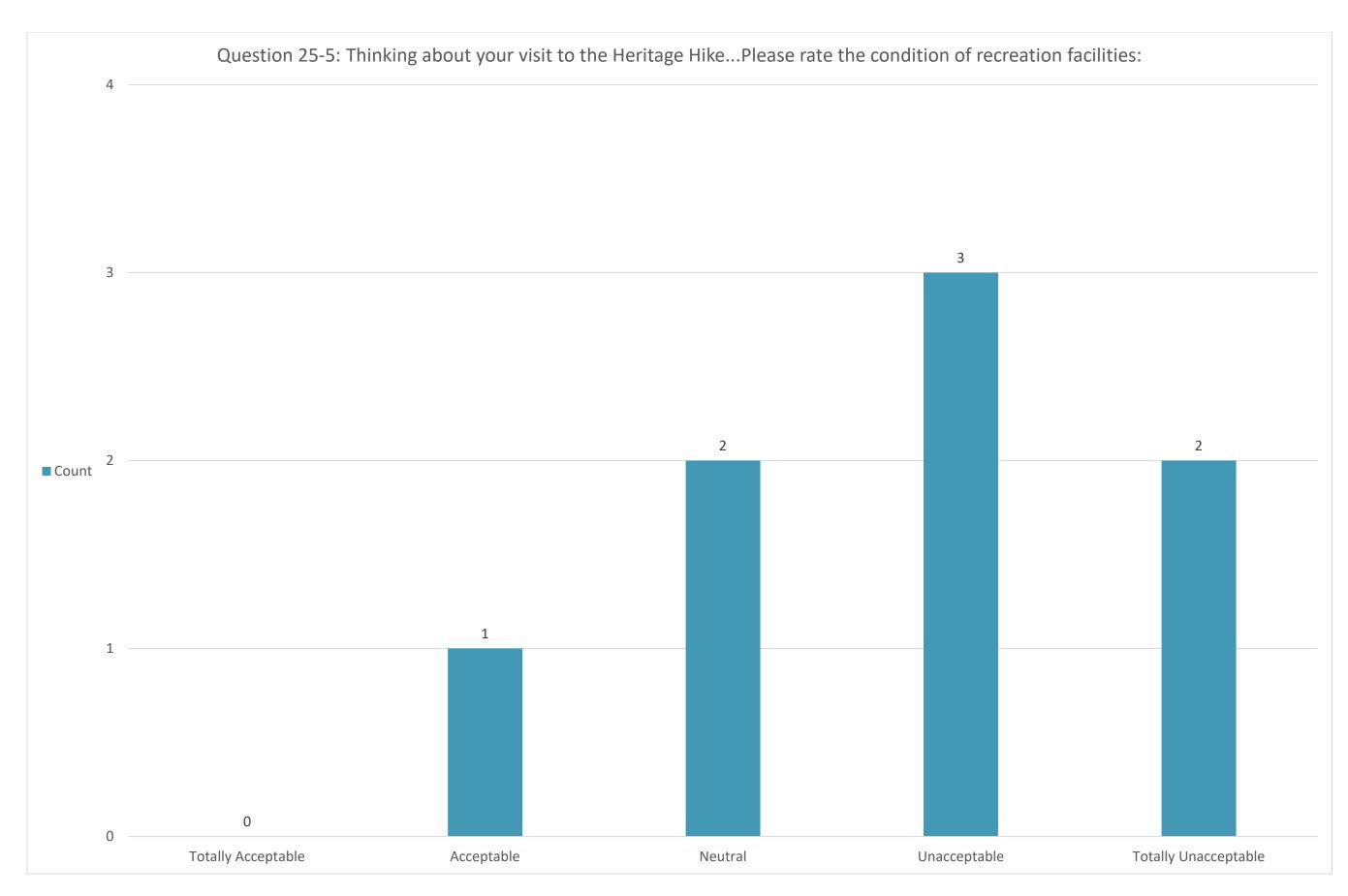


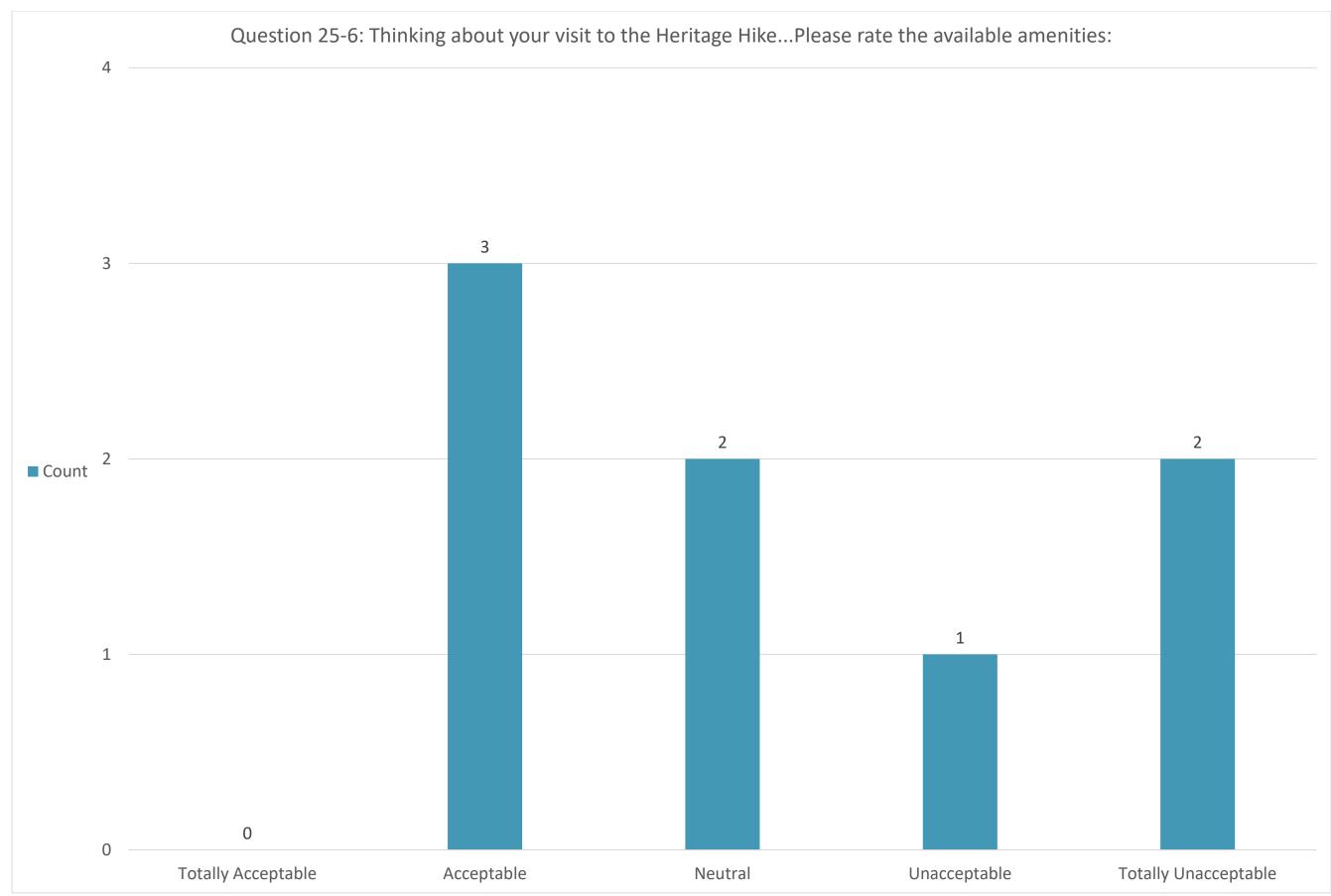


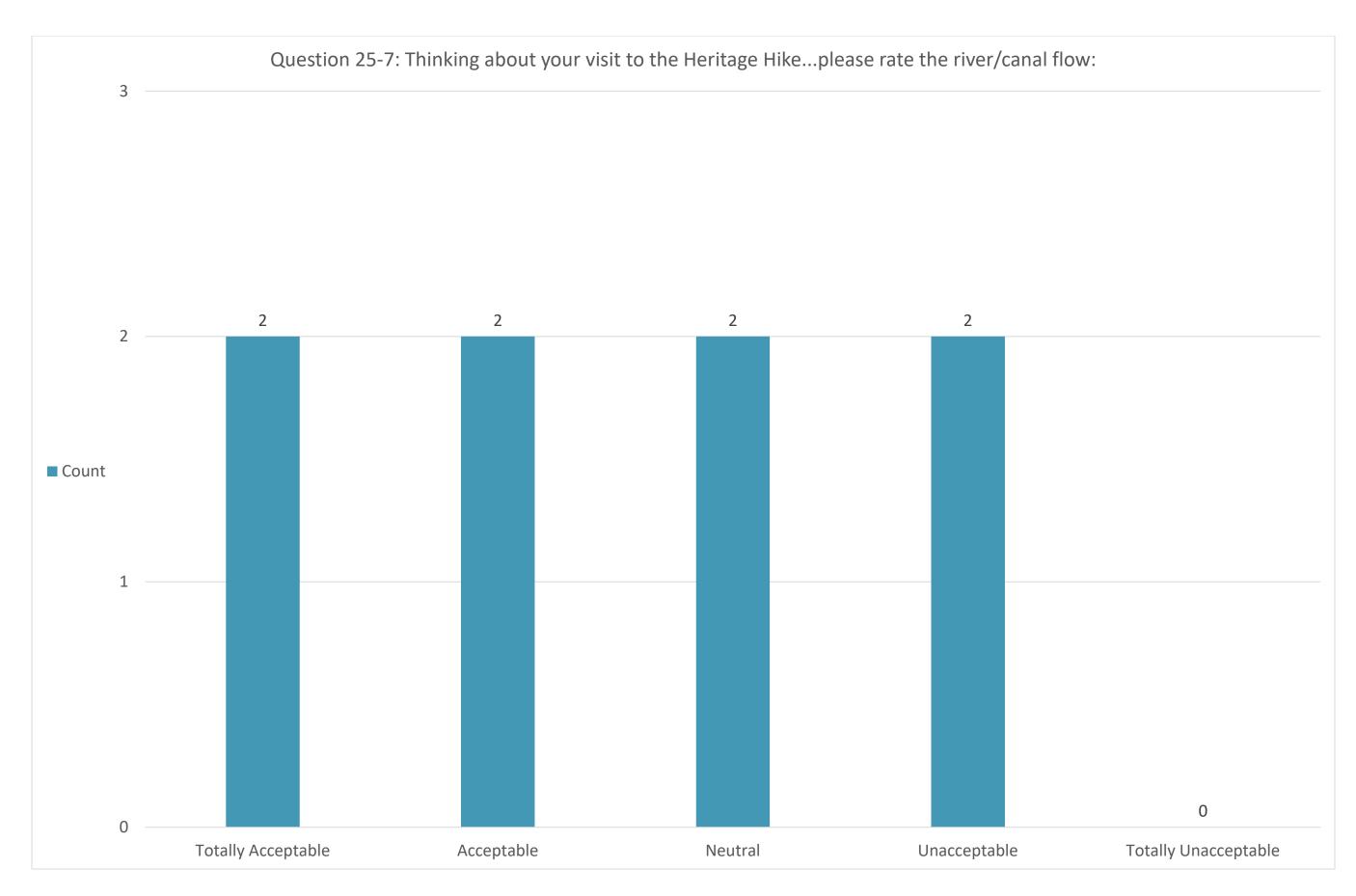


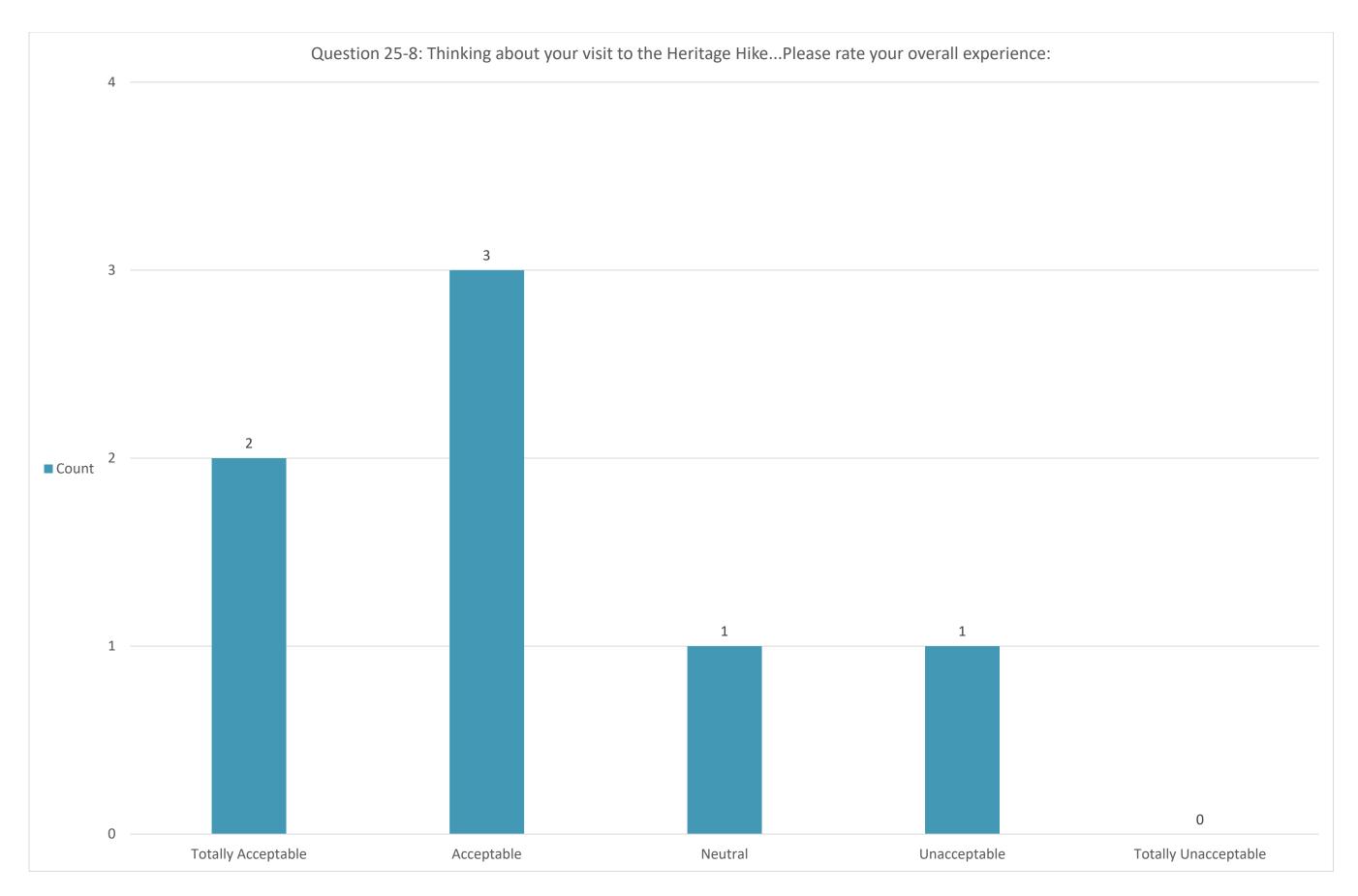


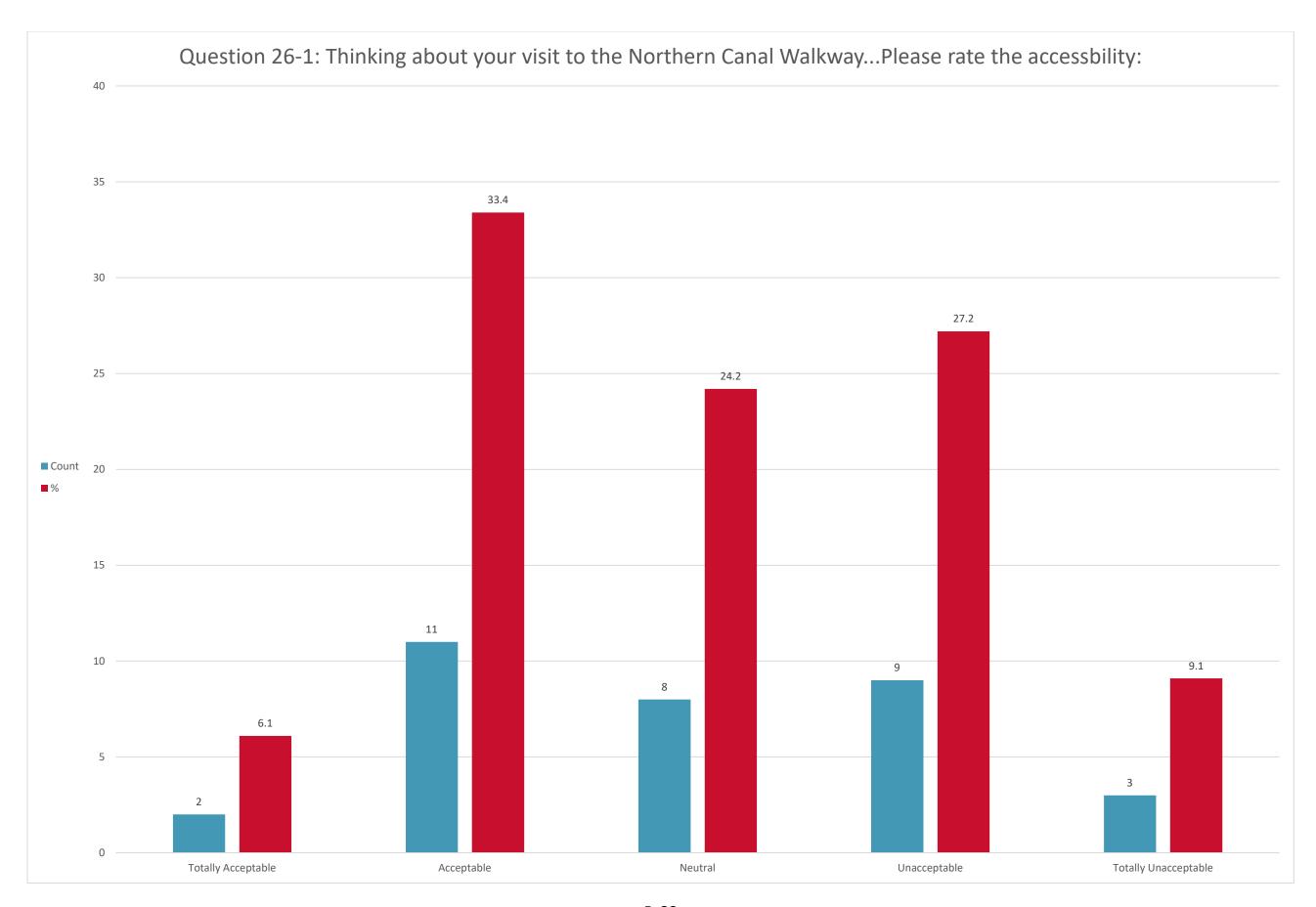


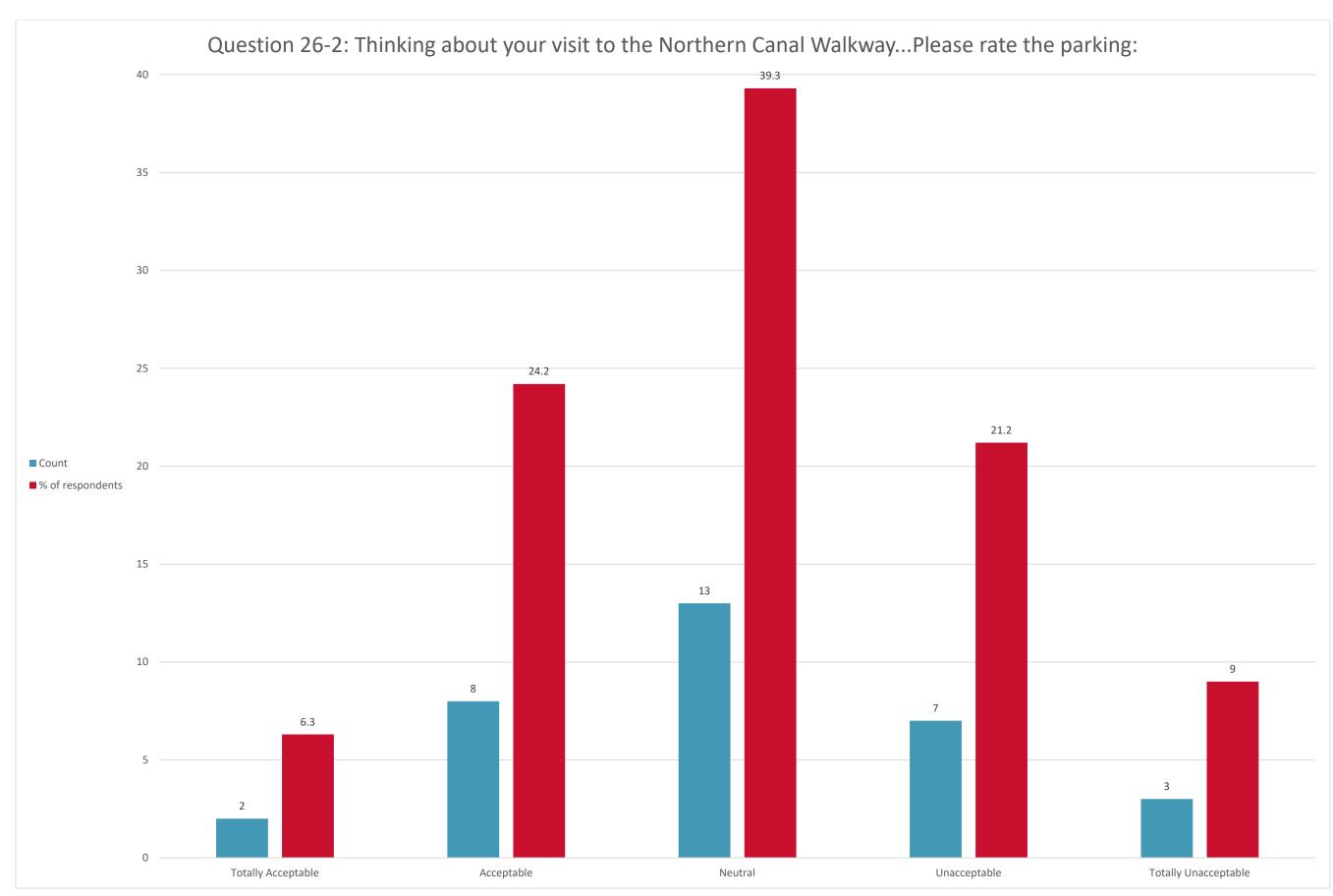


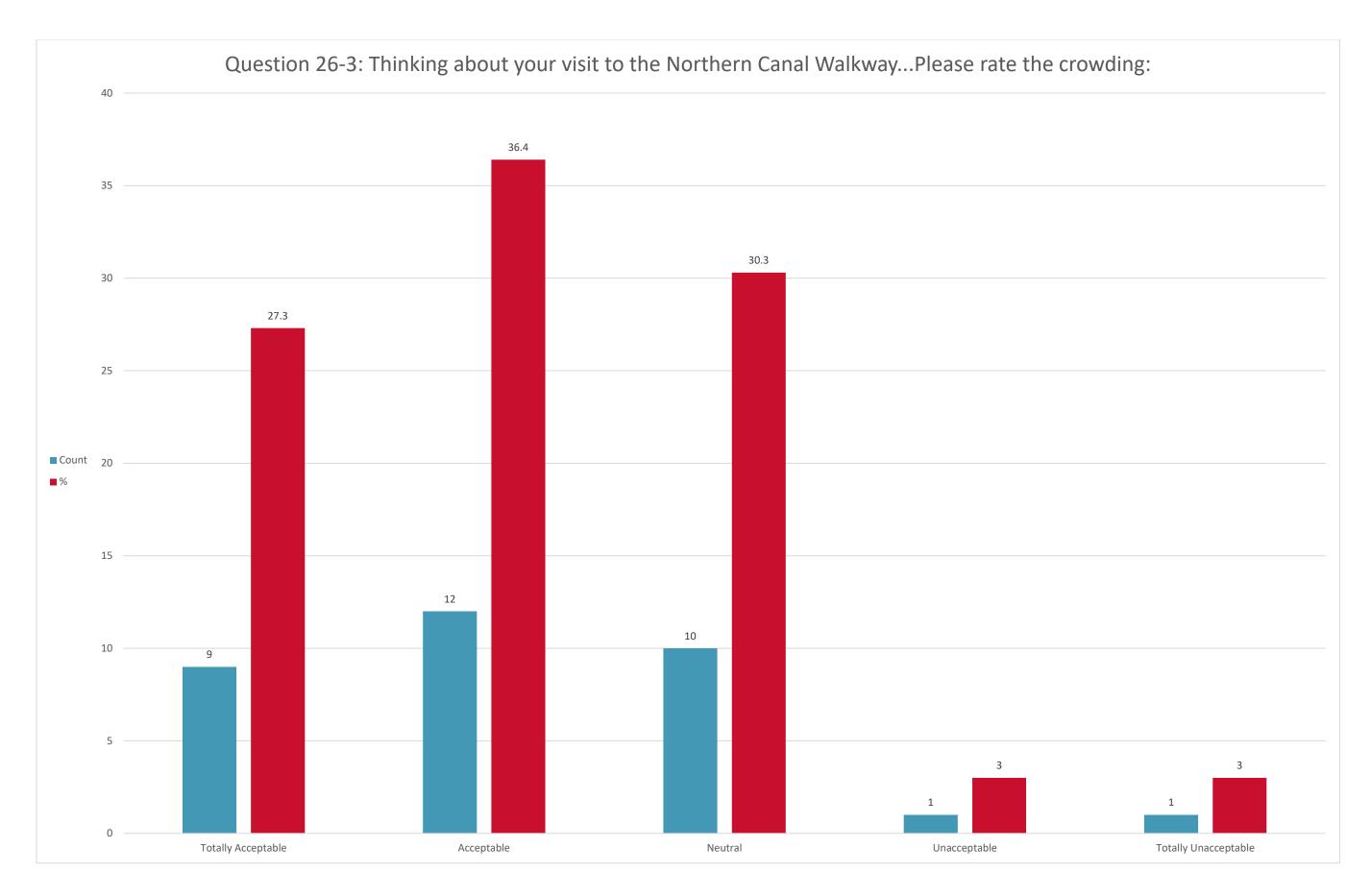


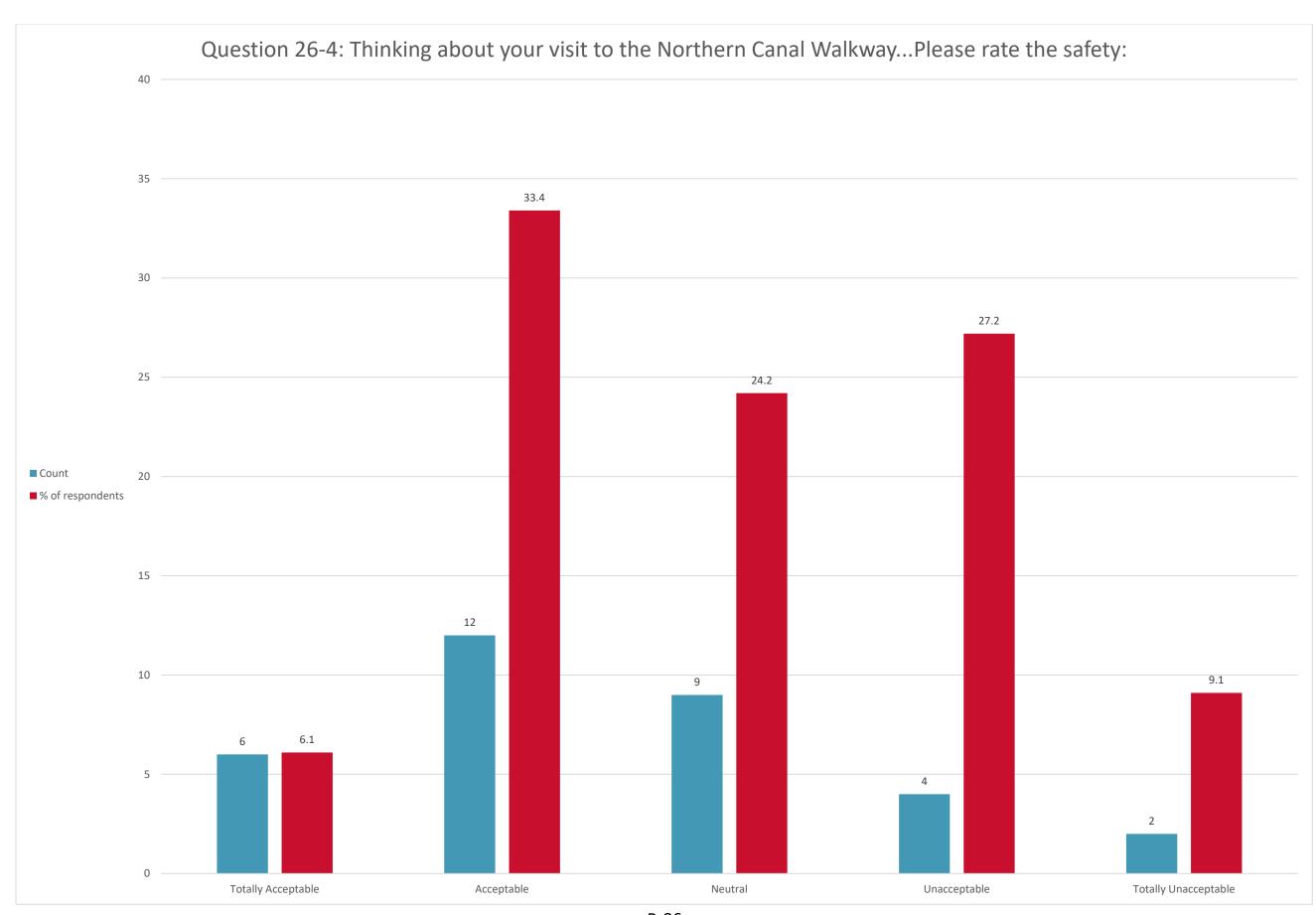




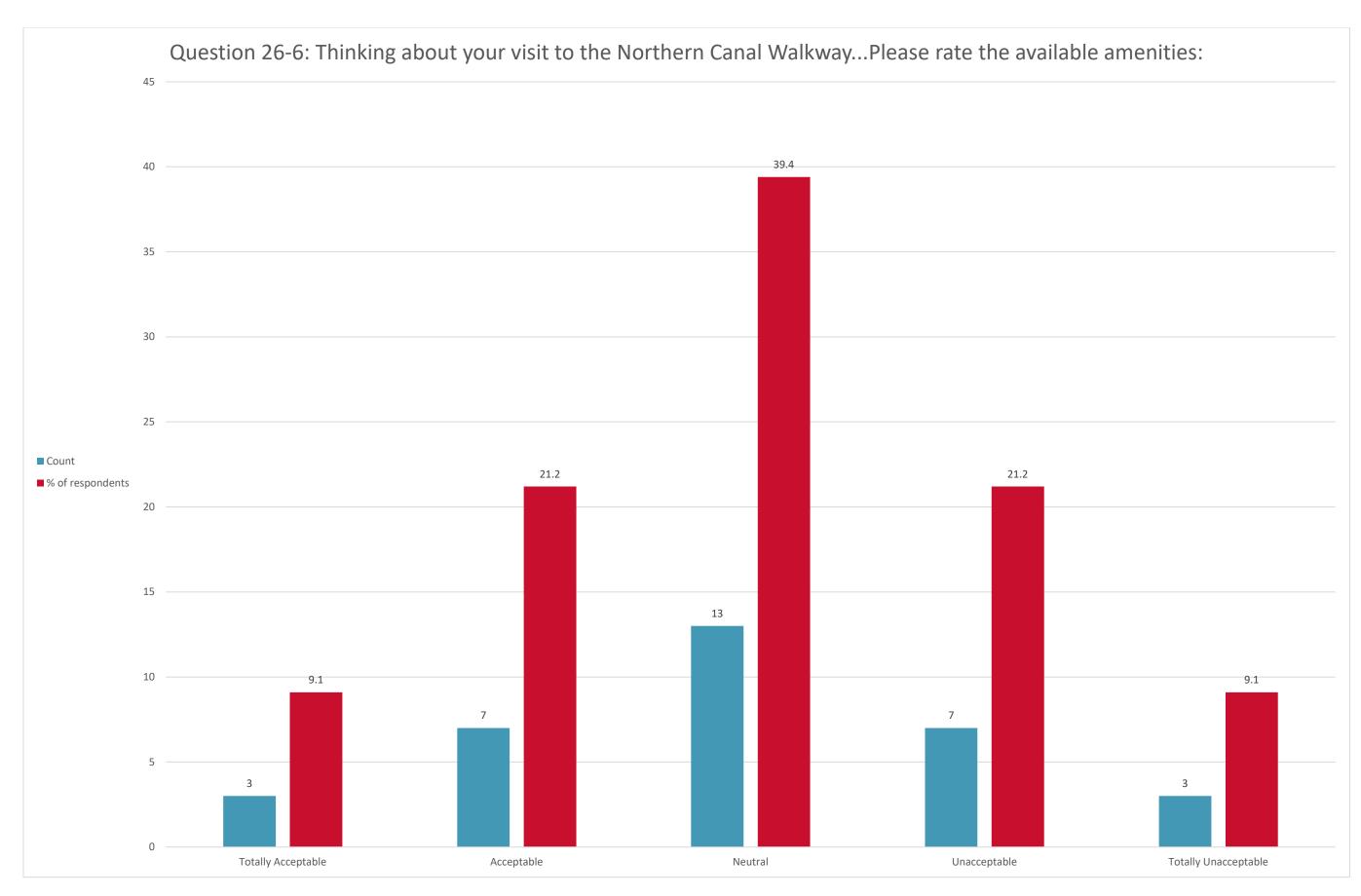


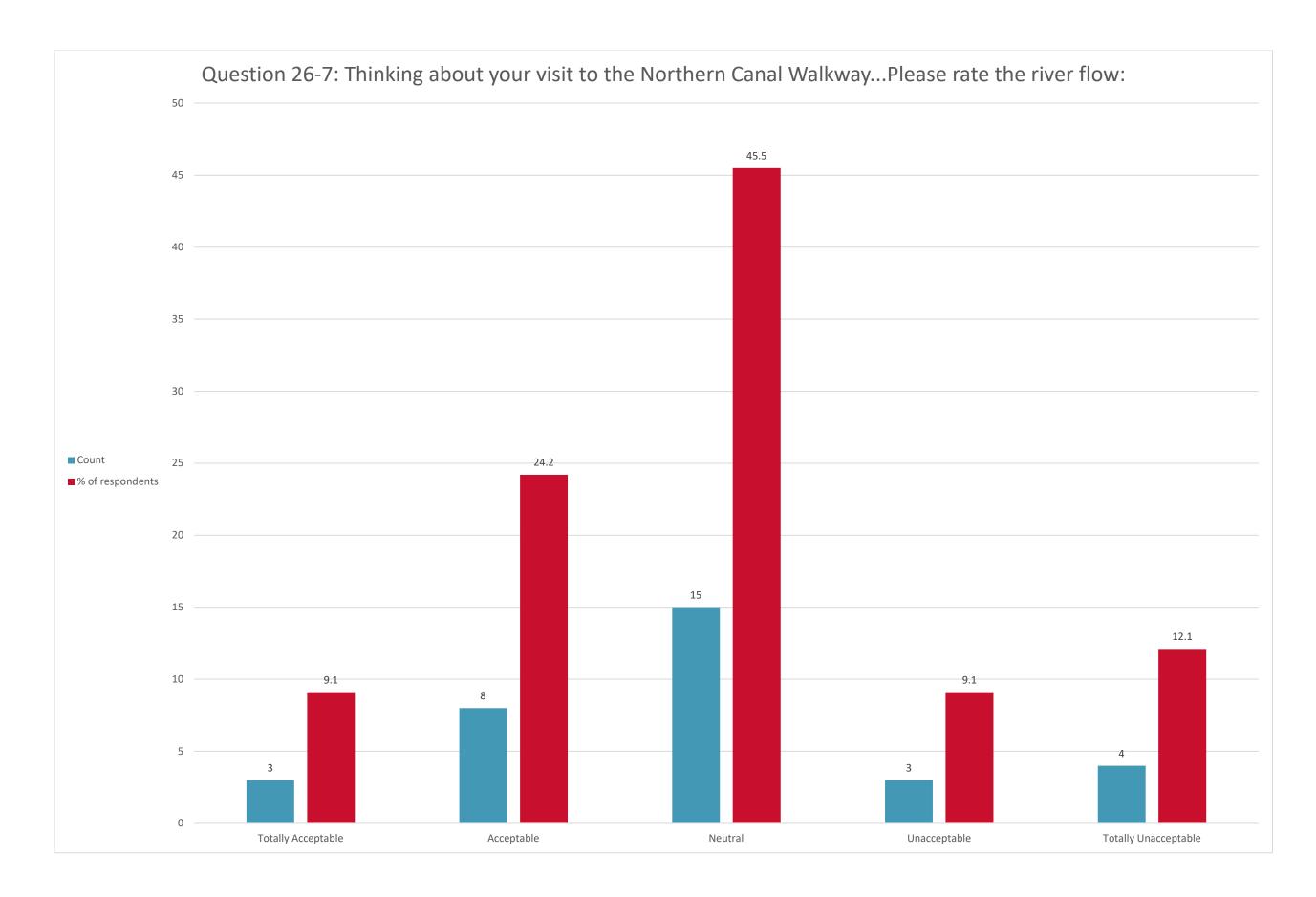


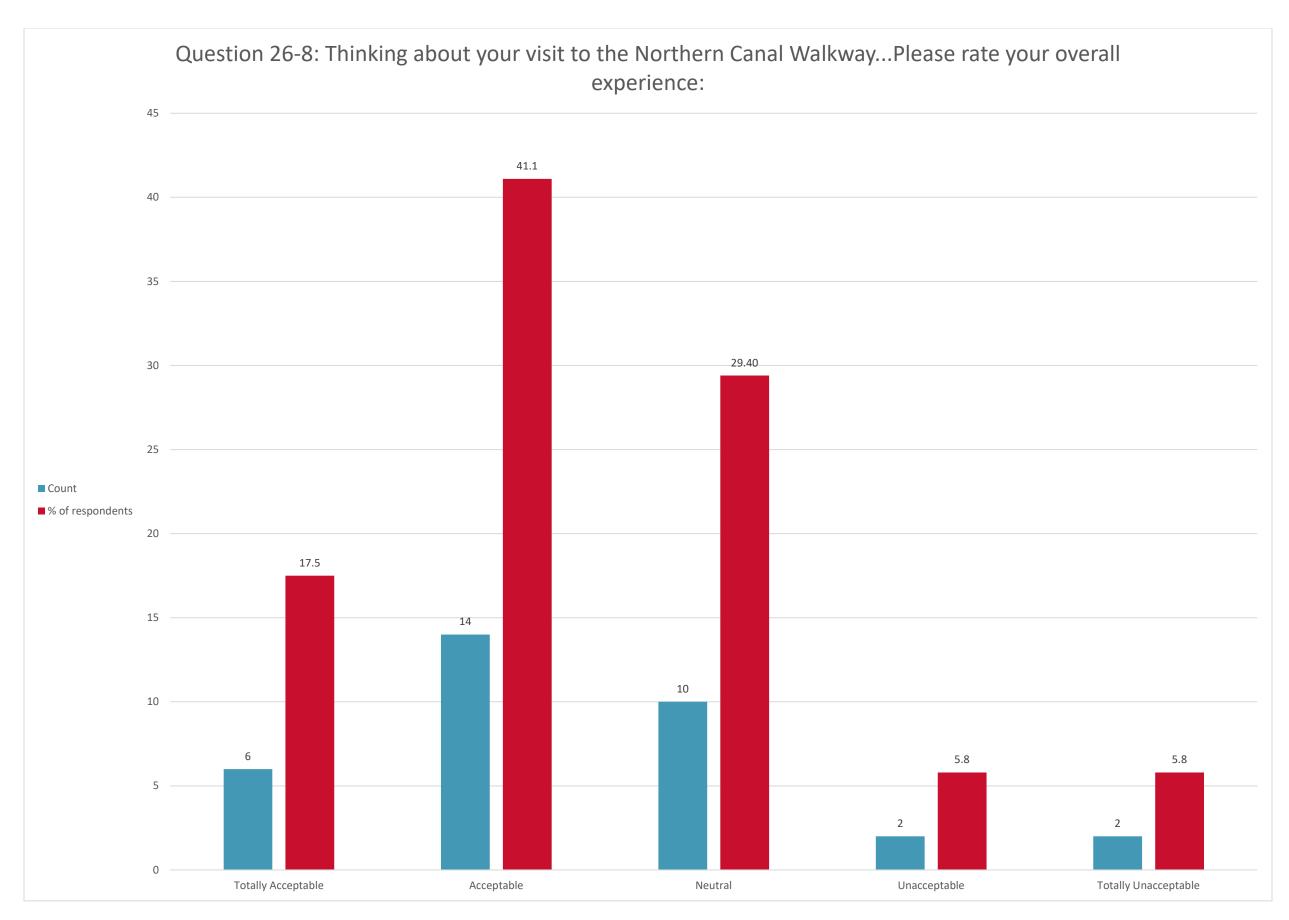


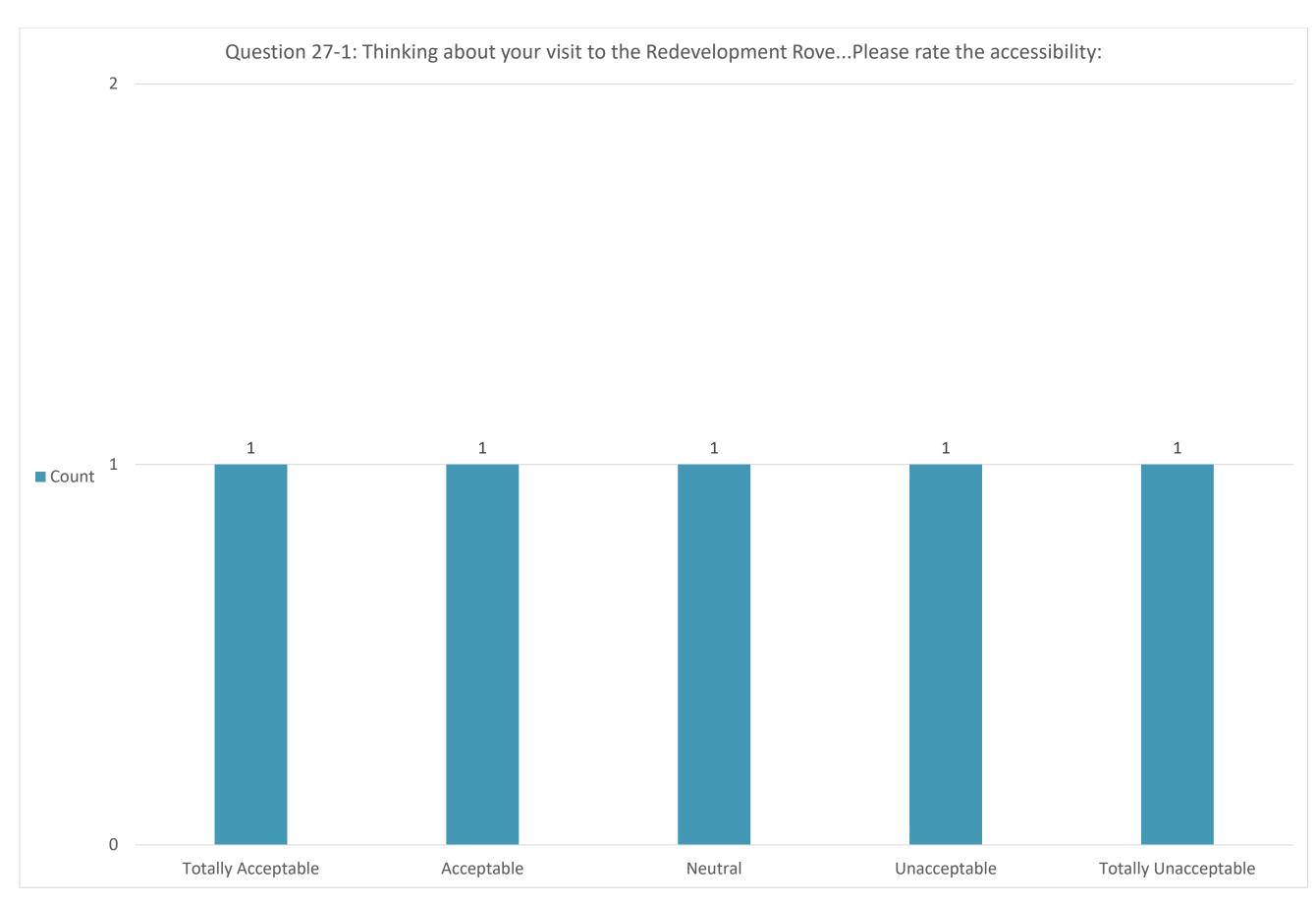


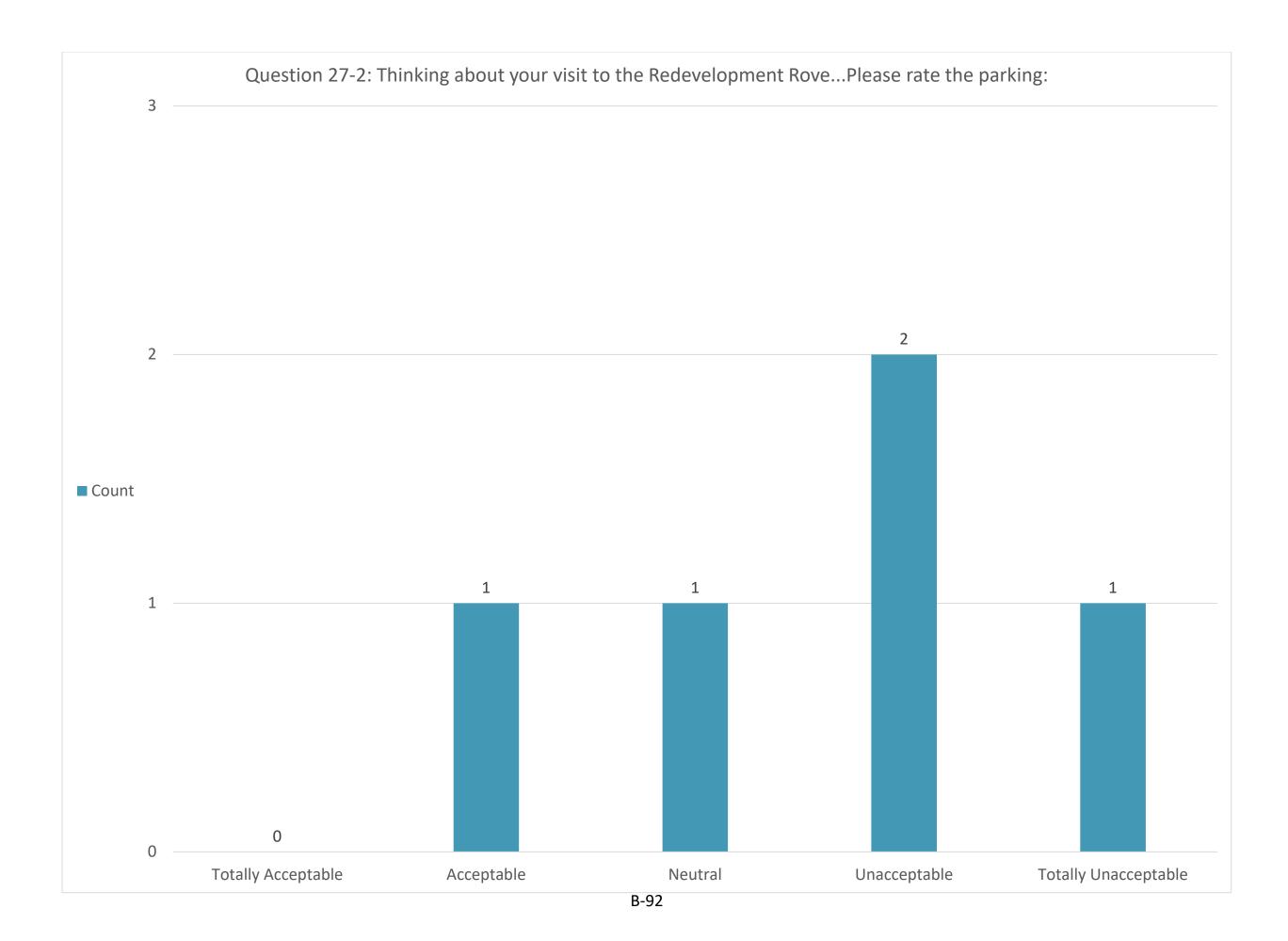
Question 26-5: Thinking about your visit to the Northern Canal Walkway...Please rate the condition of recreation facilities: 39.4 30.3 Count ■ % o respondents 15.1 Totally Acceptable Acceptable Neutral Unacceptable Totally Unacceptable

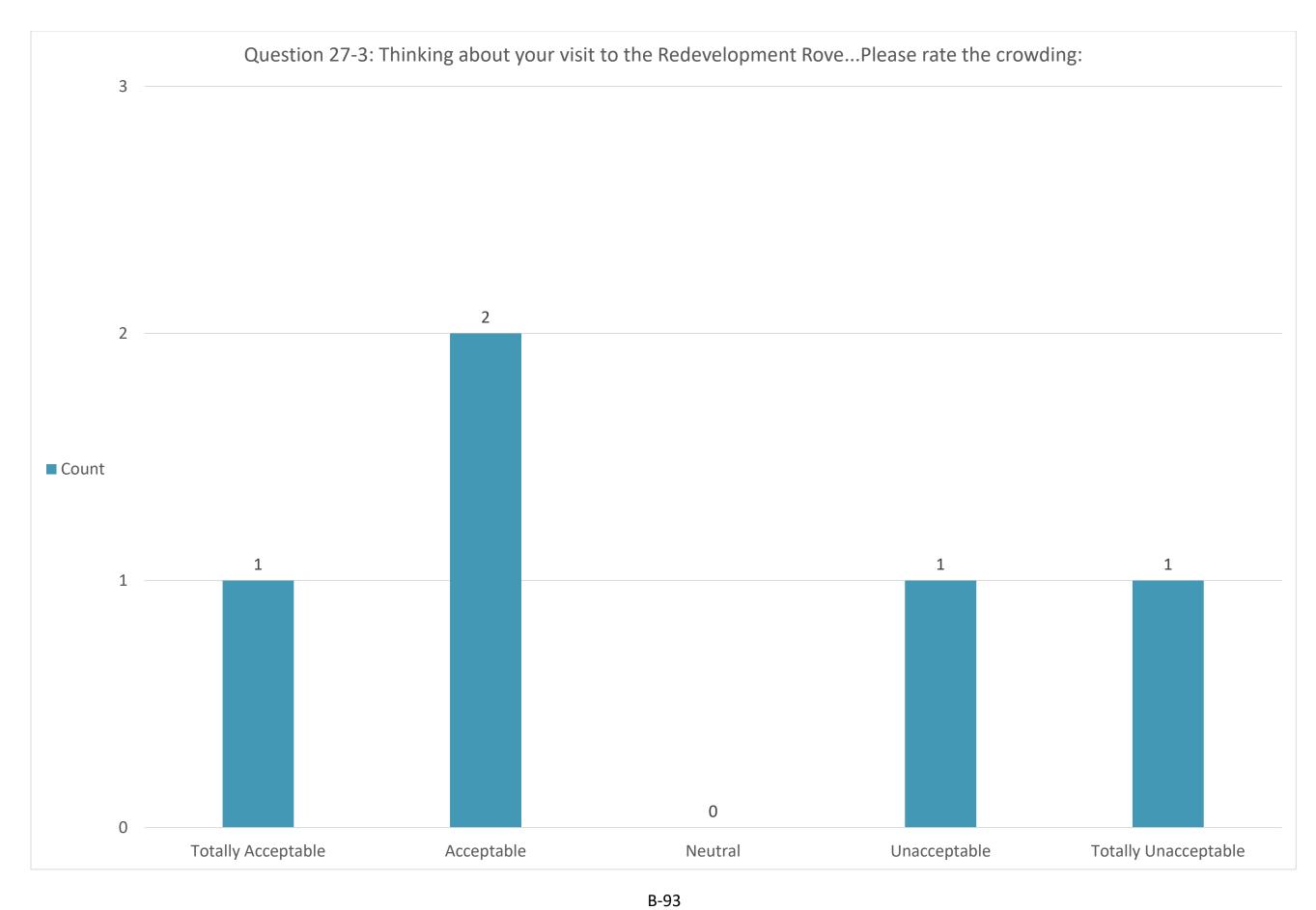


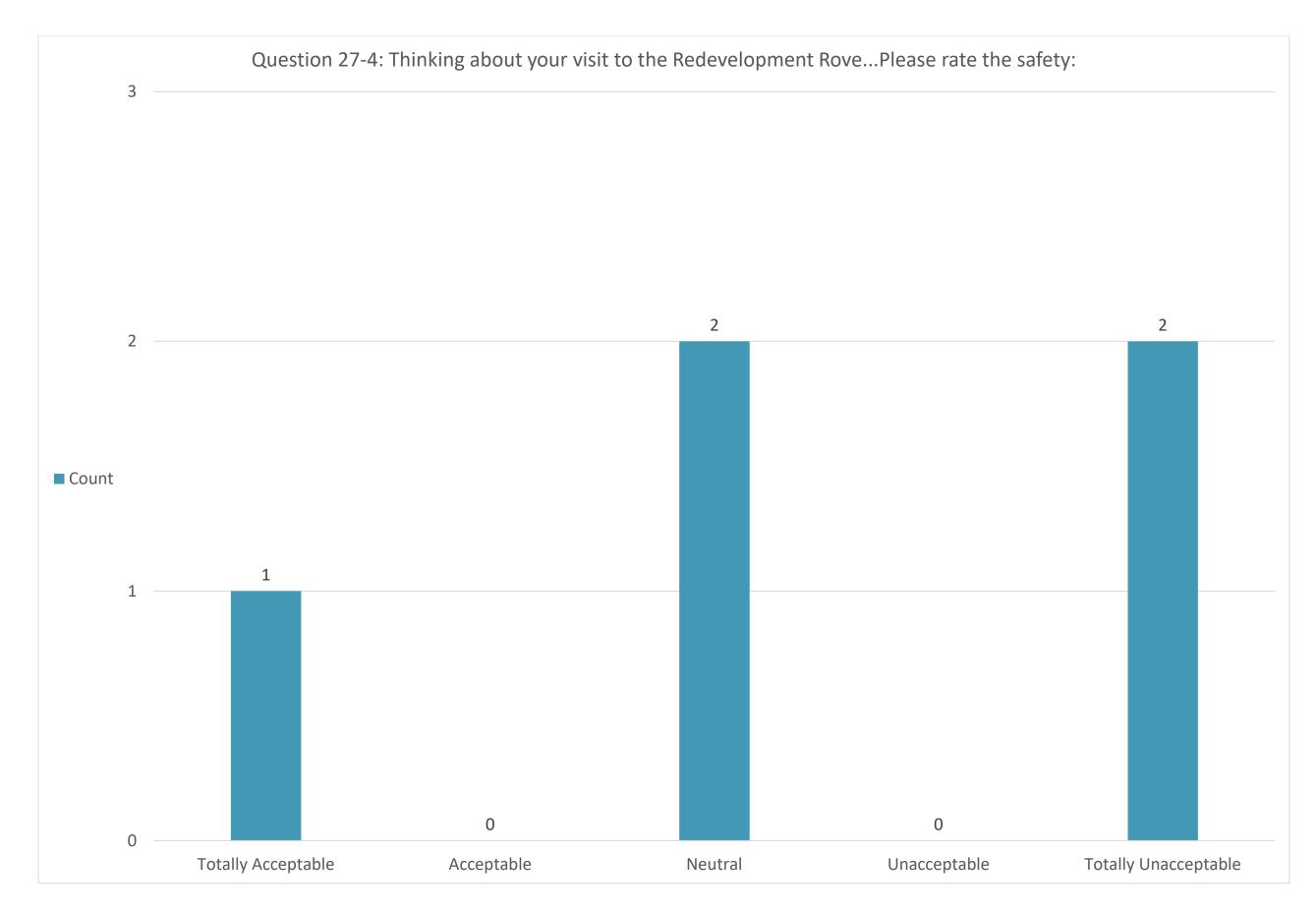


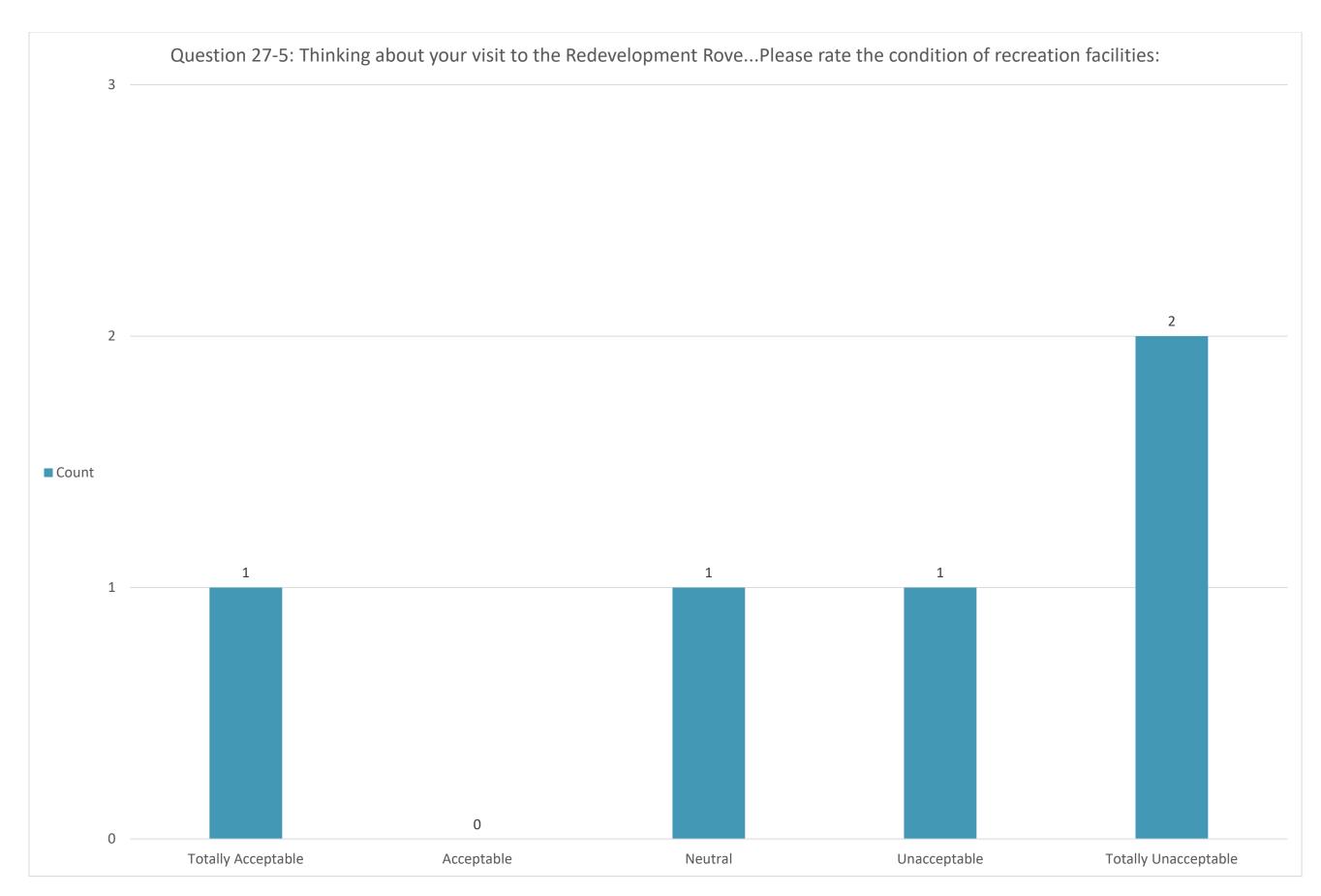


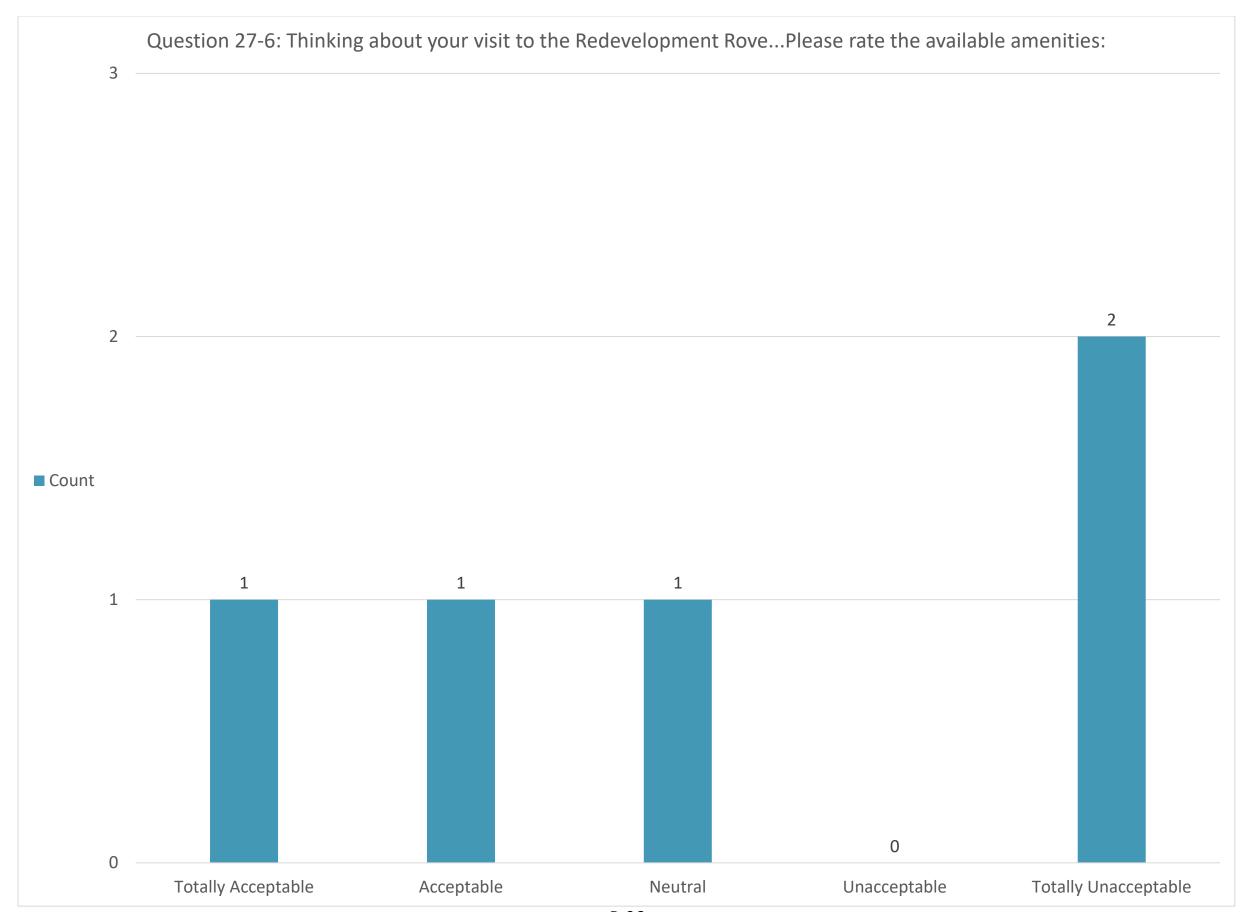


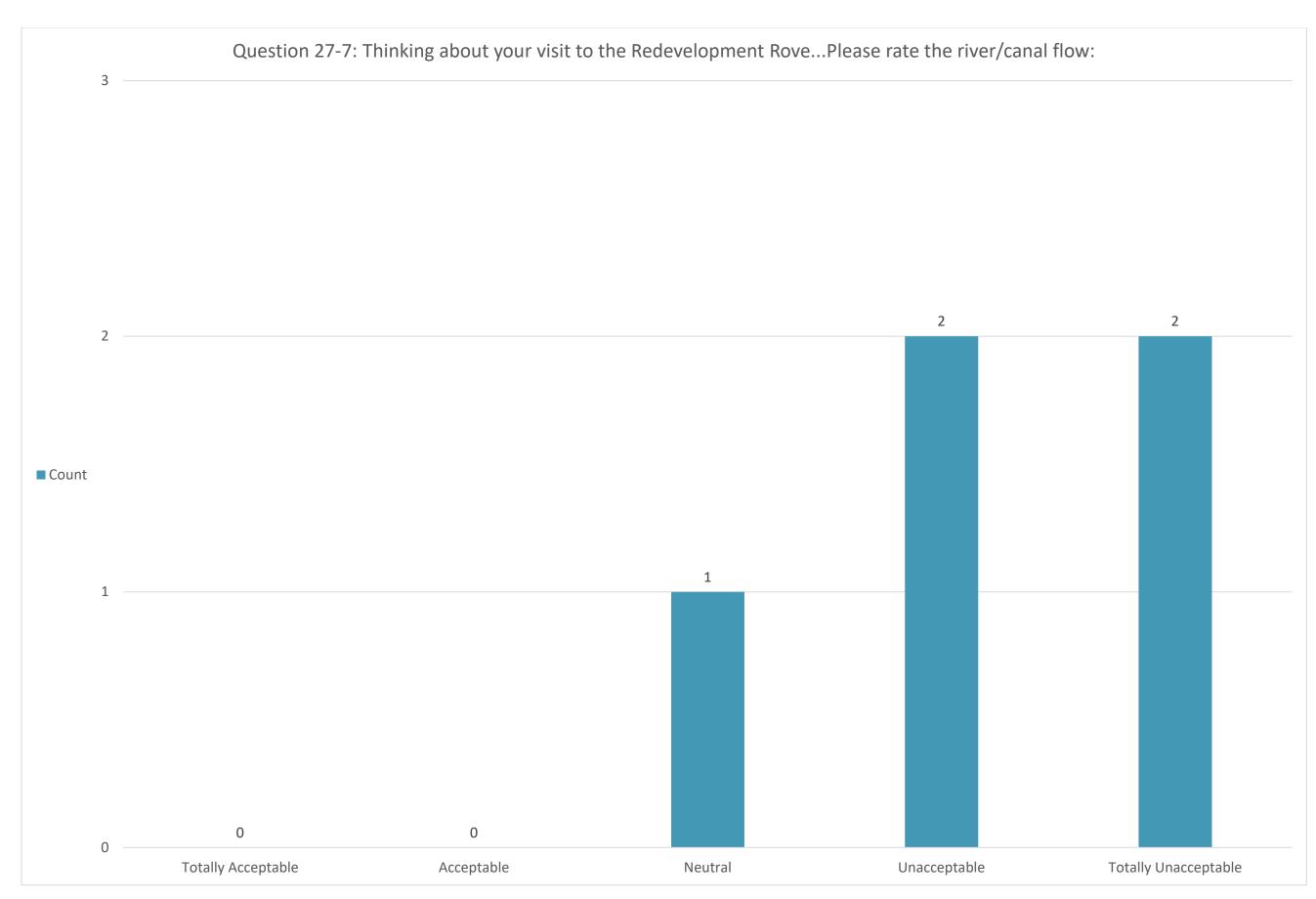


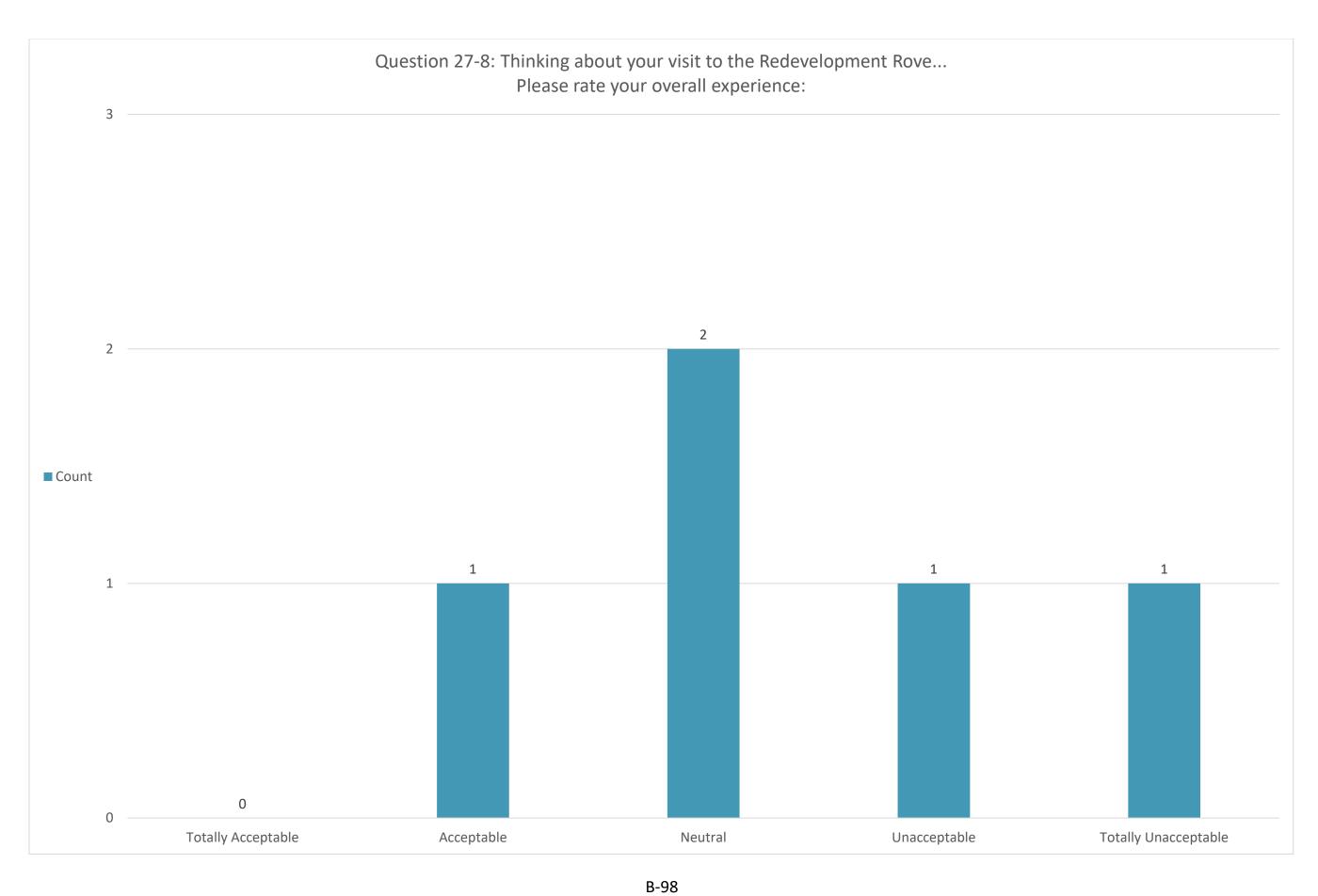


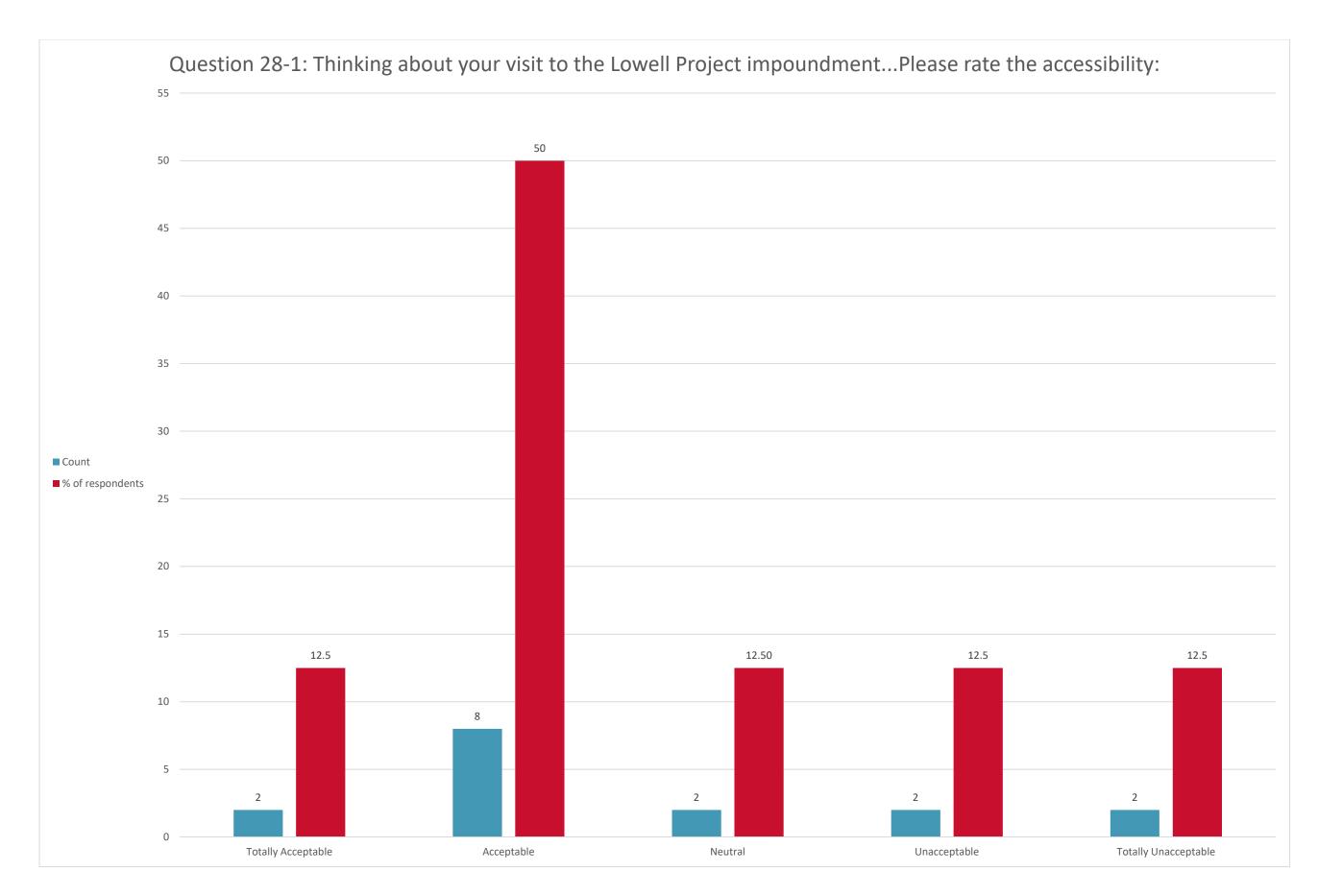


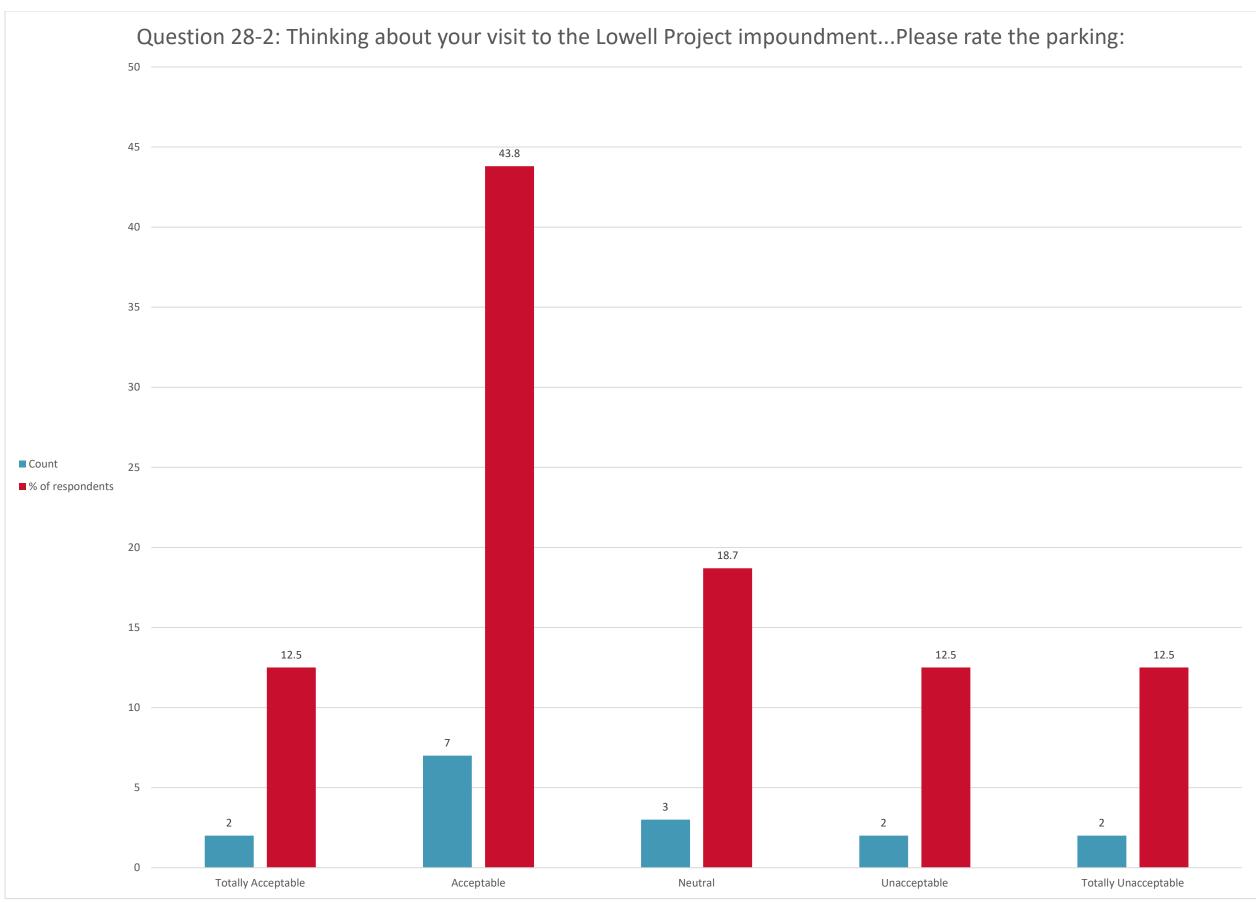


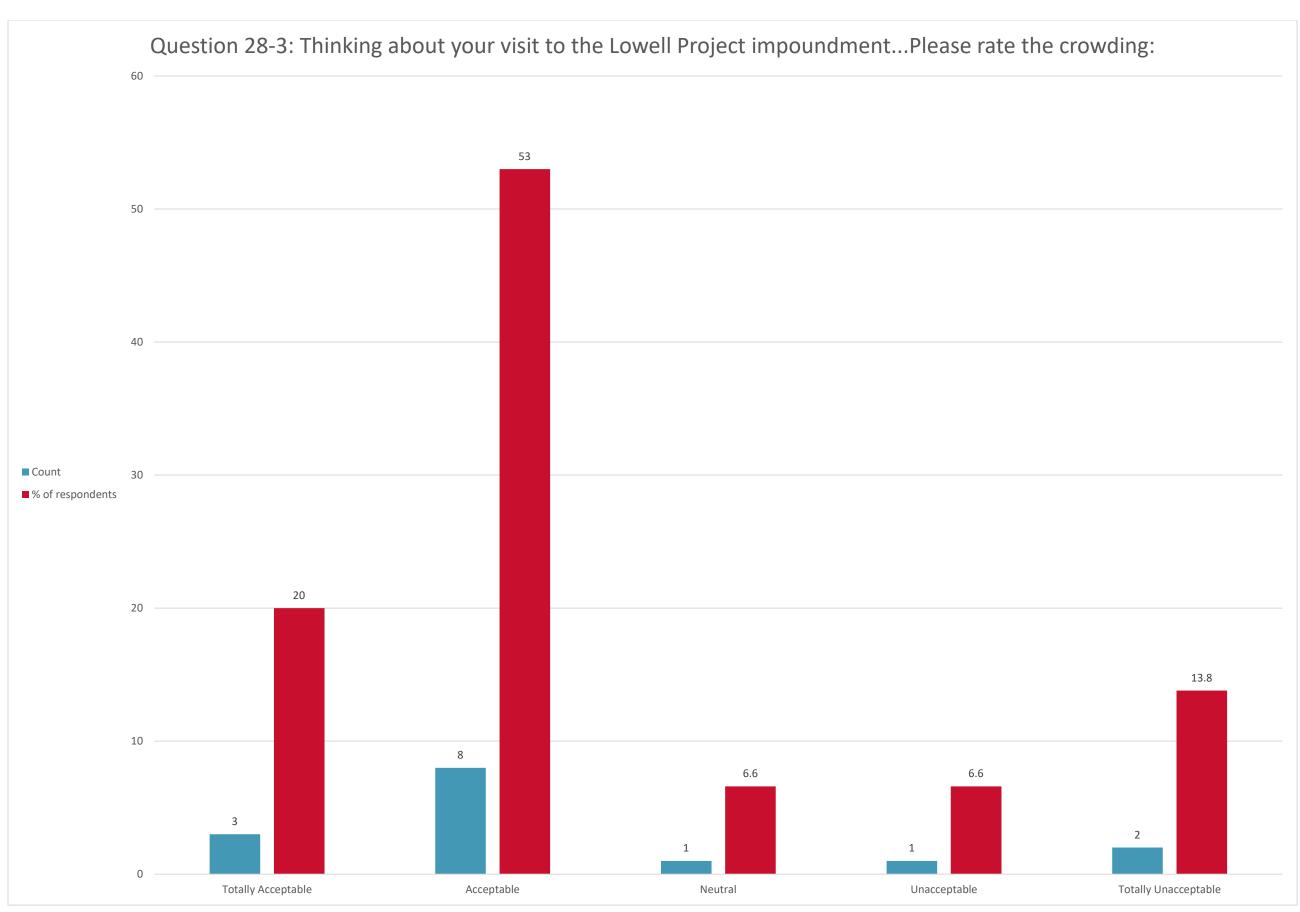


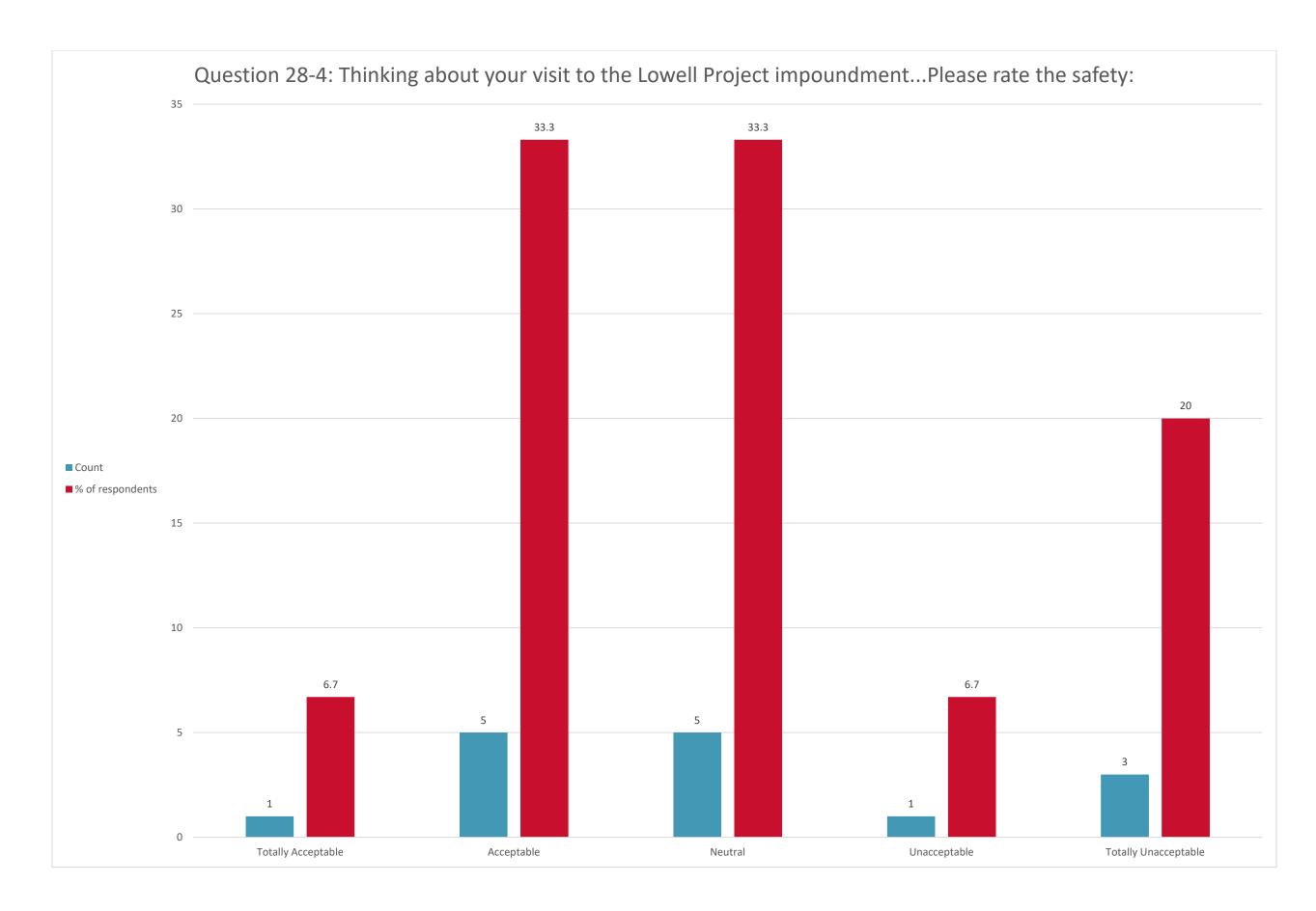


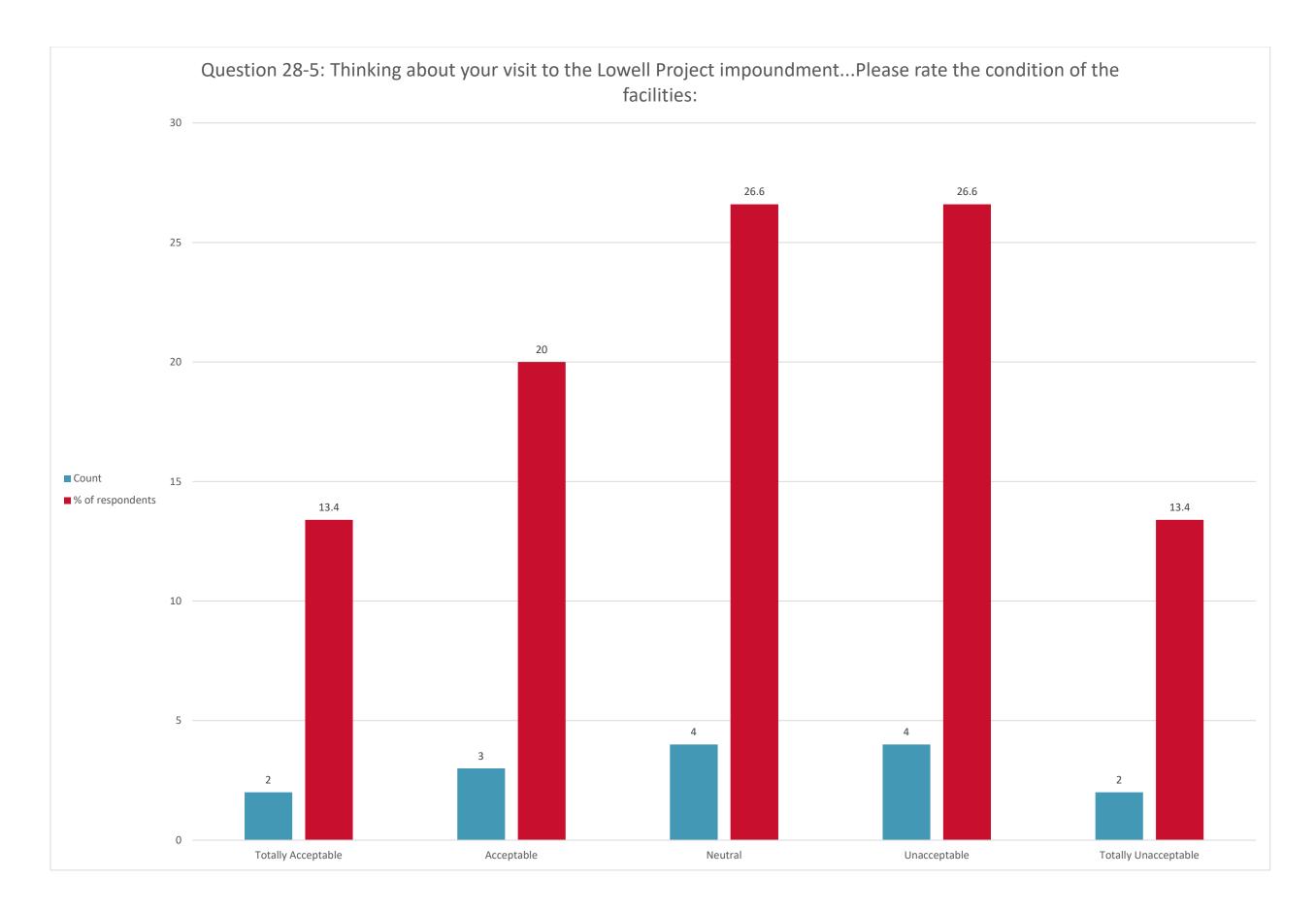


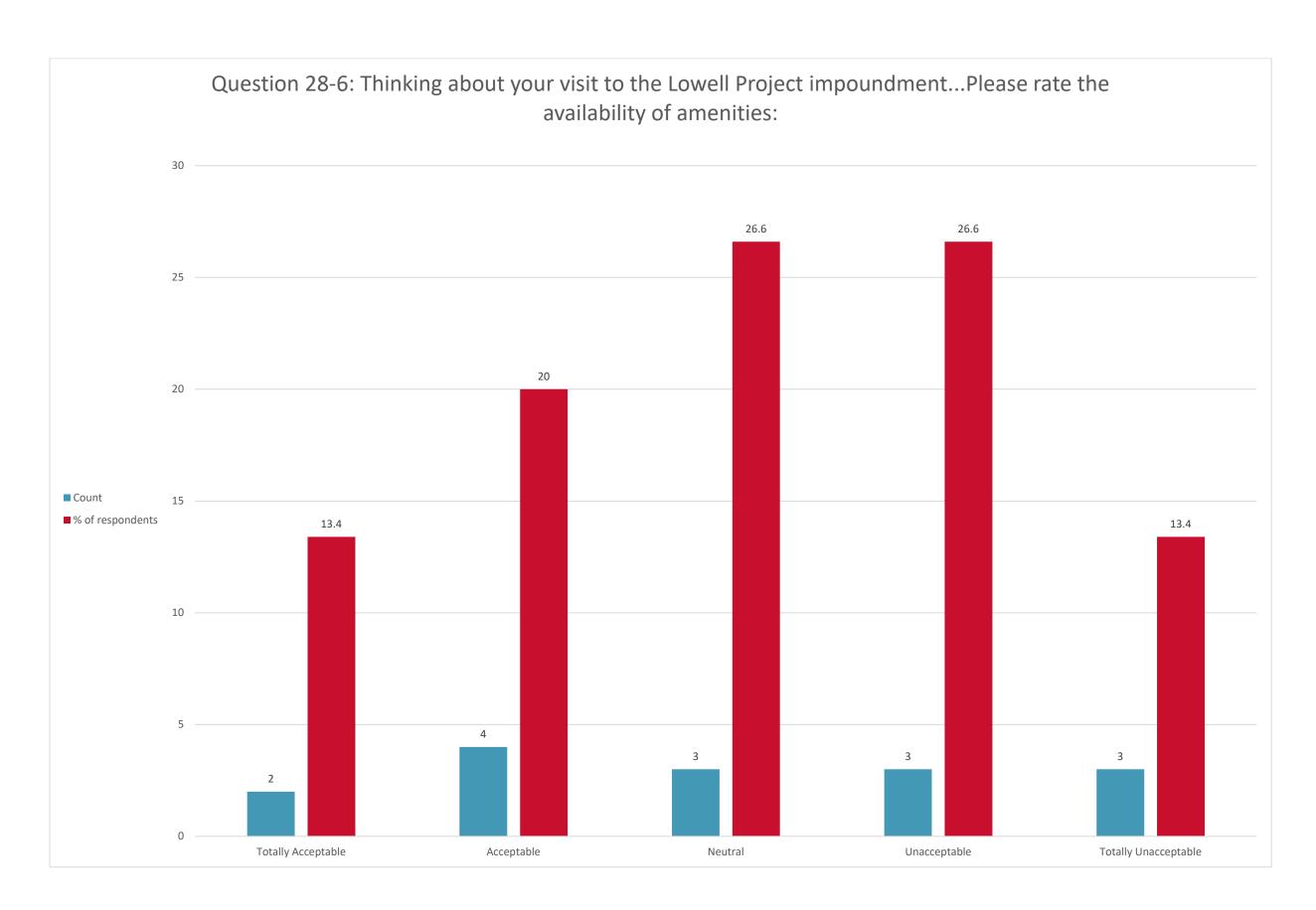


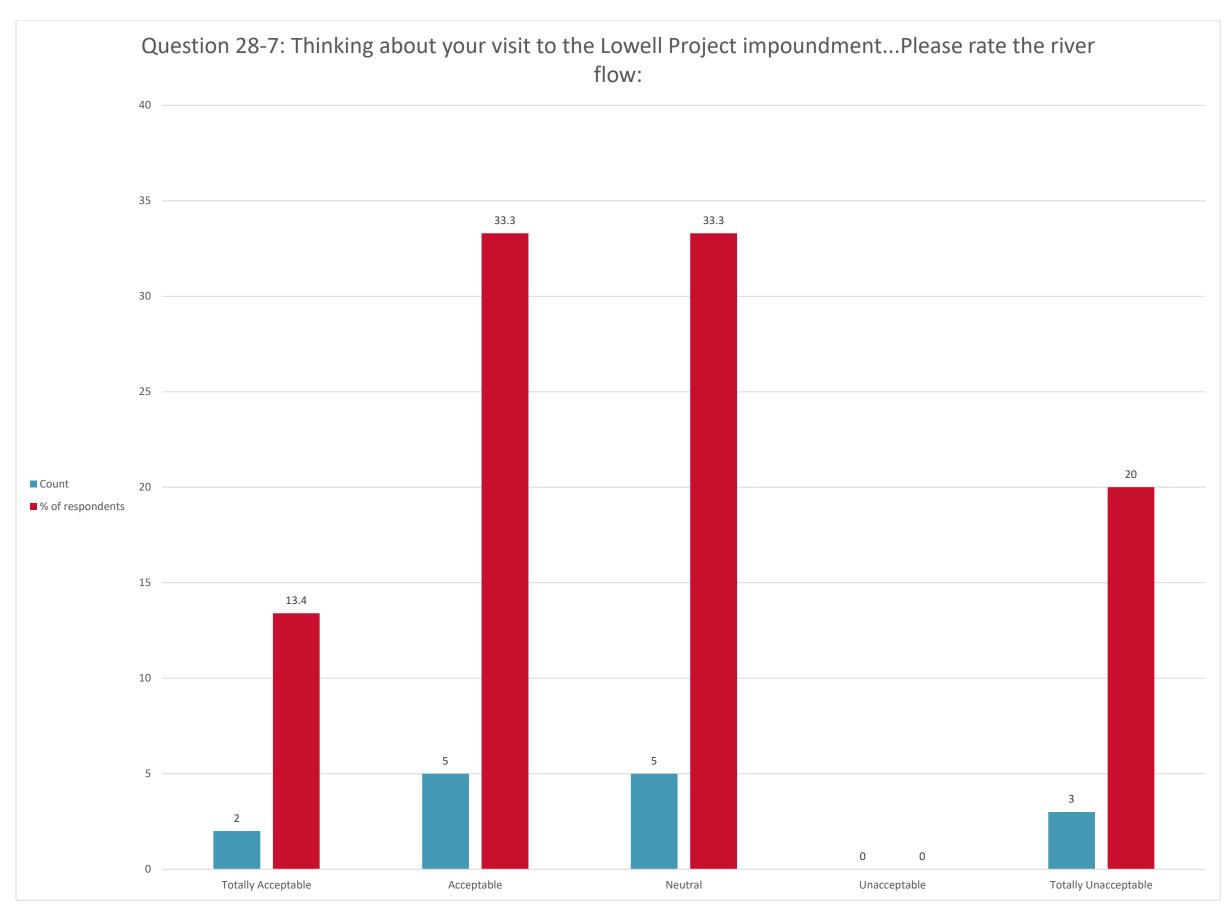




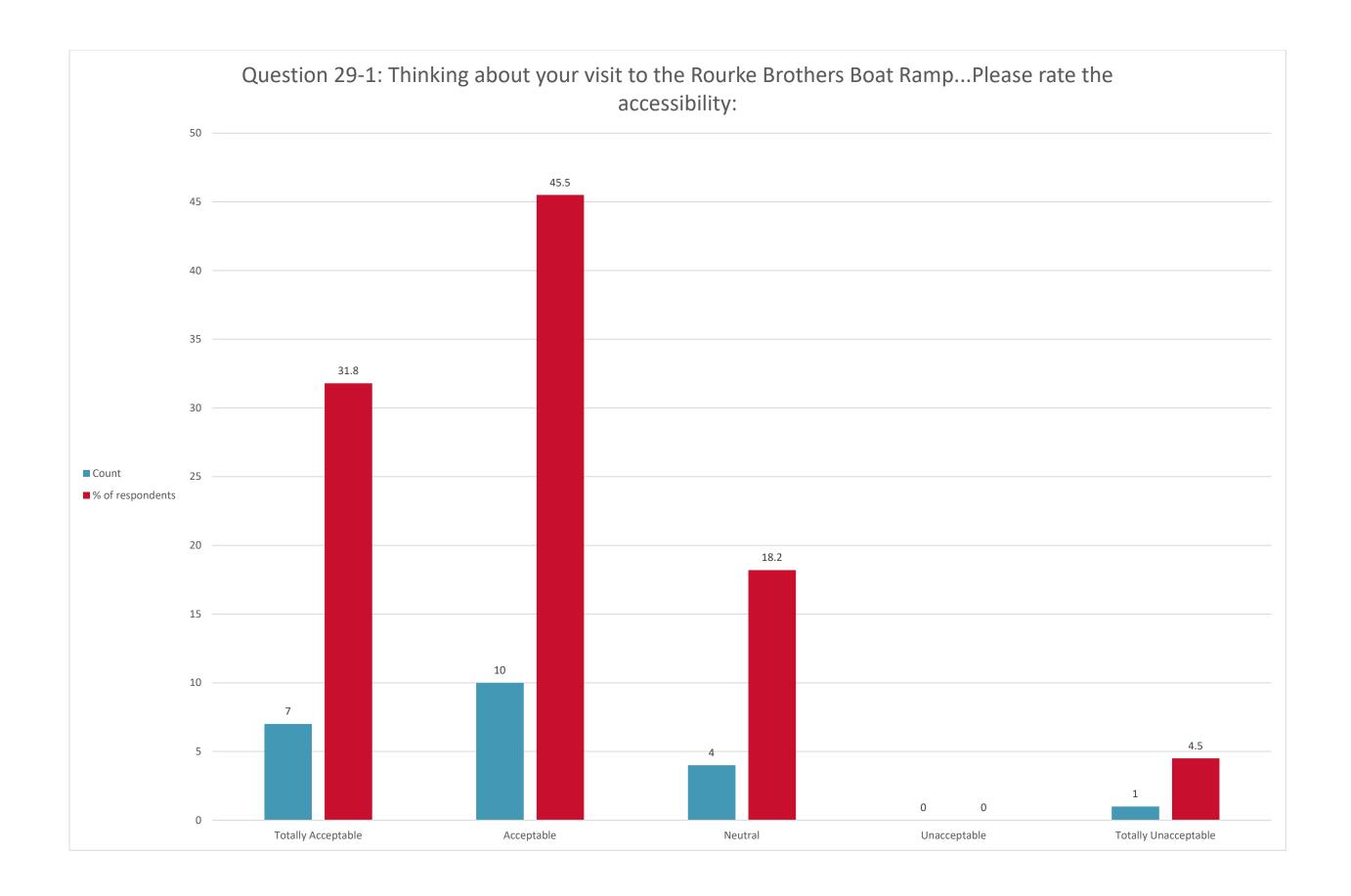


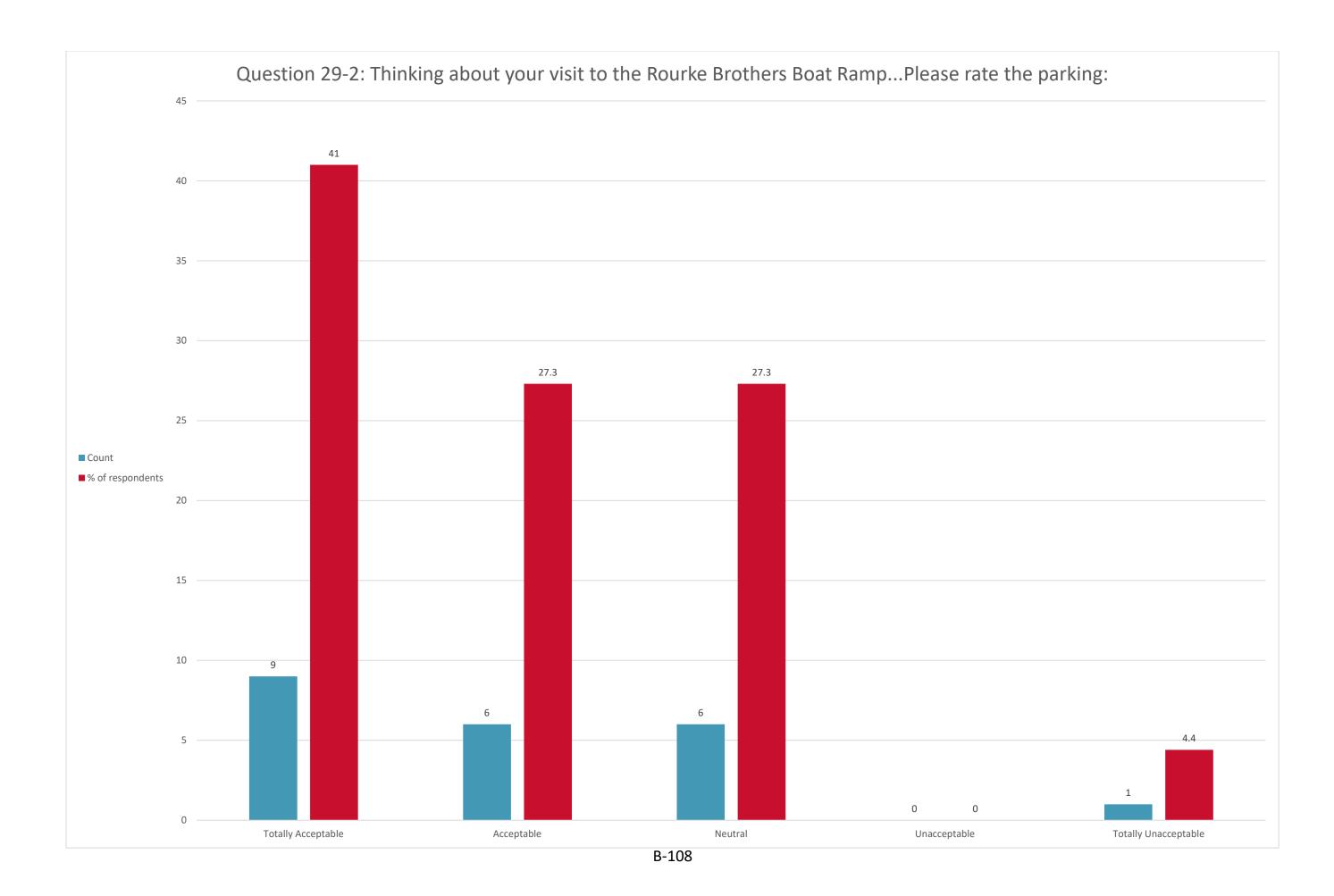


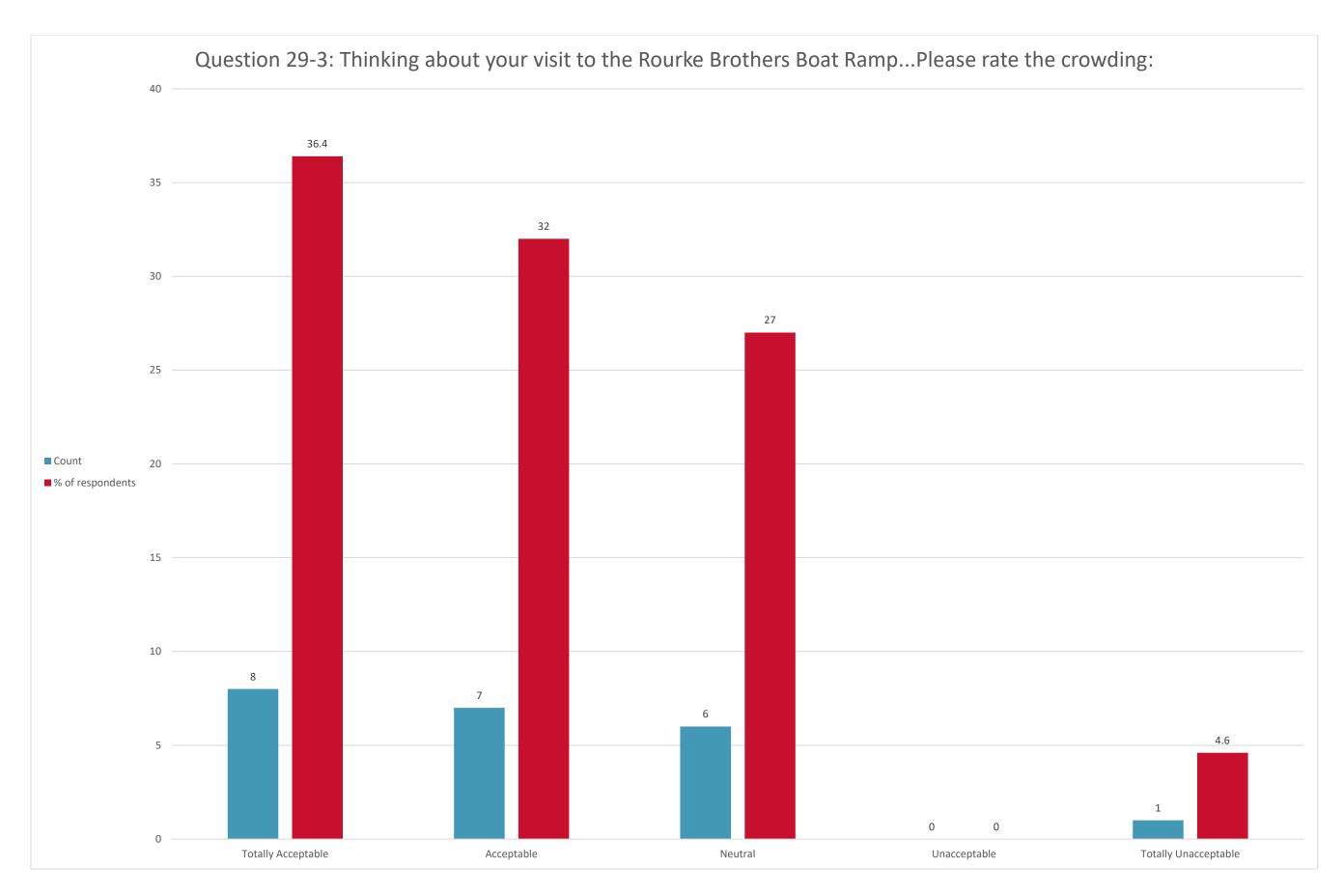


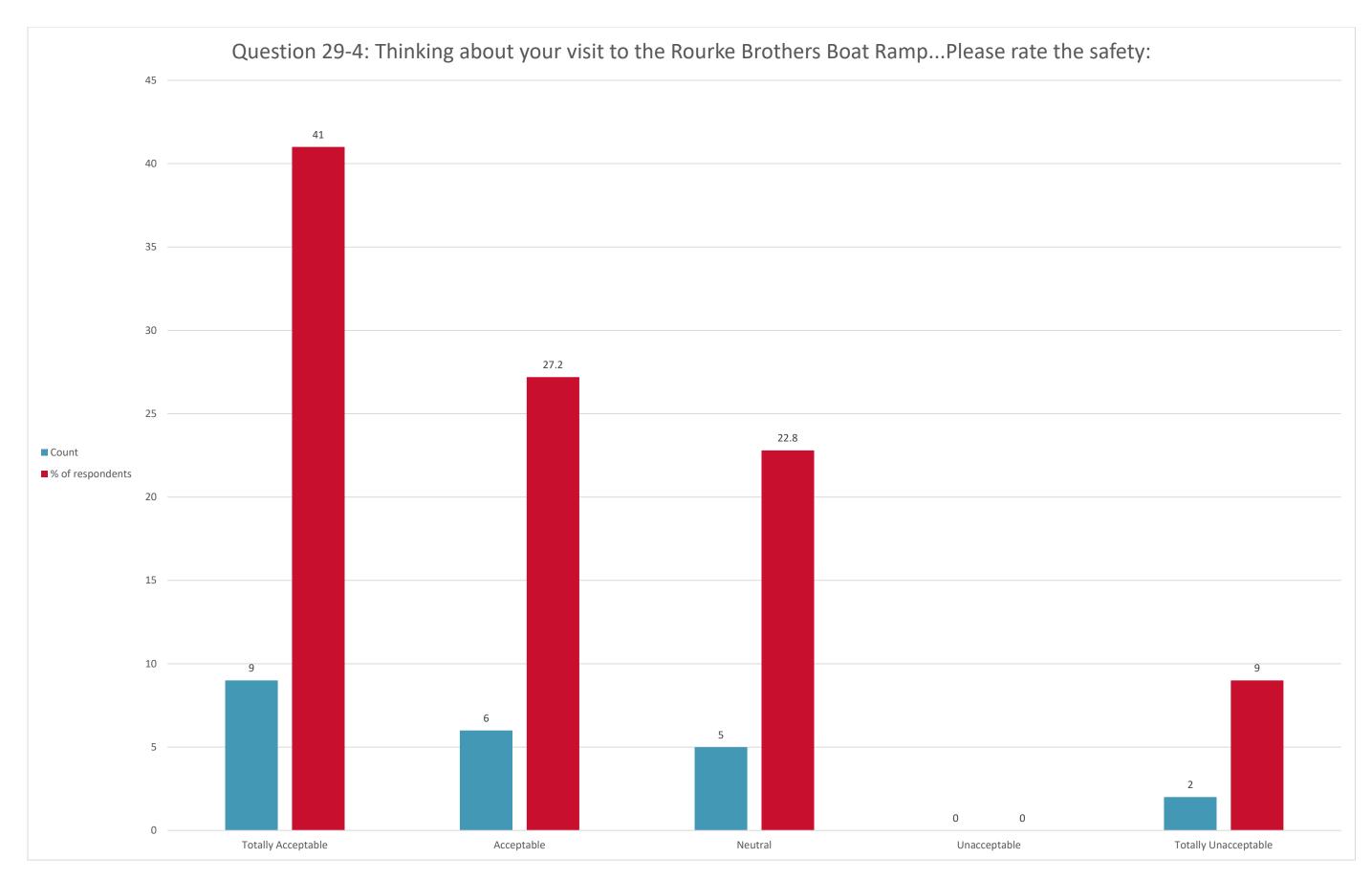




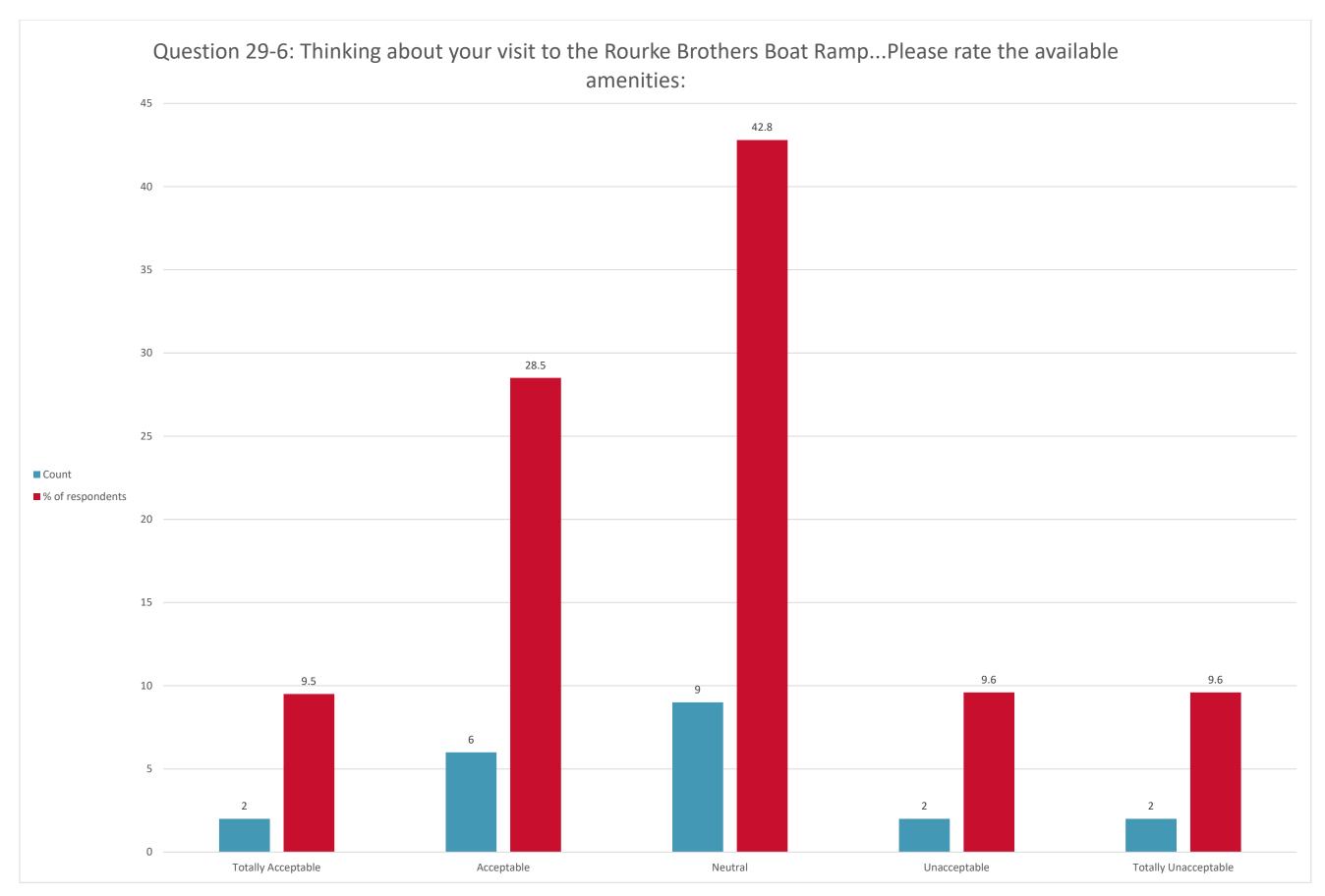


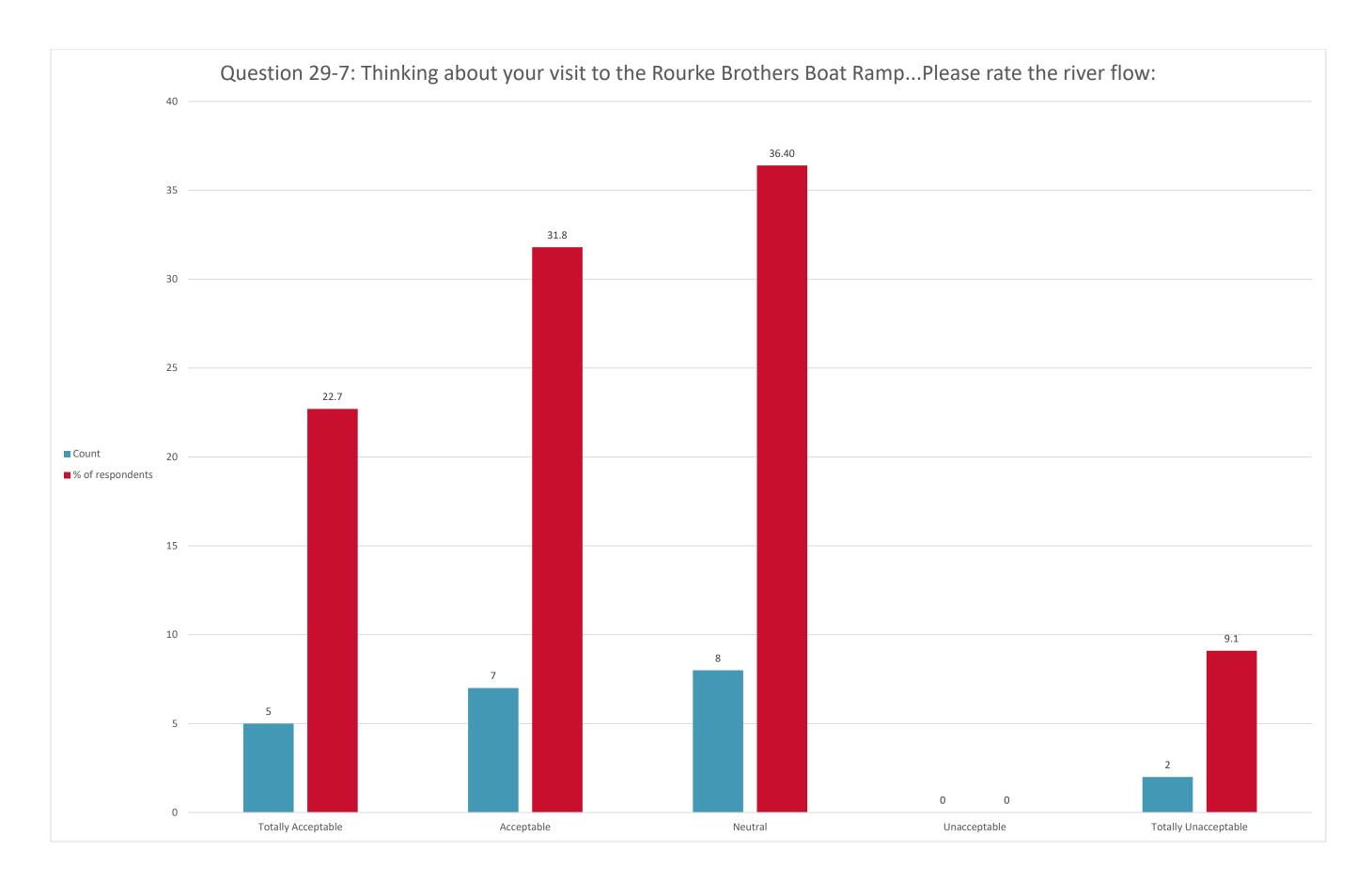


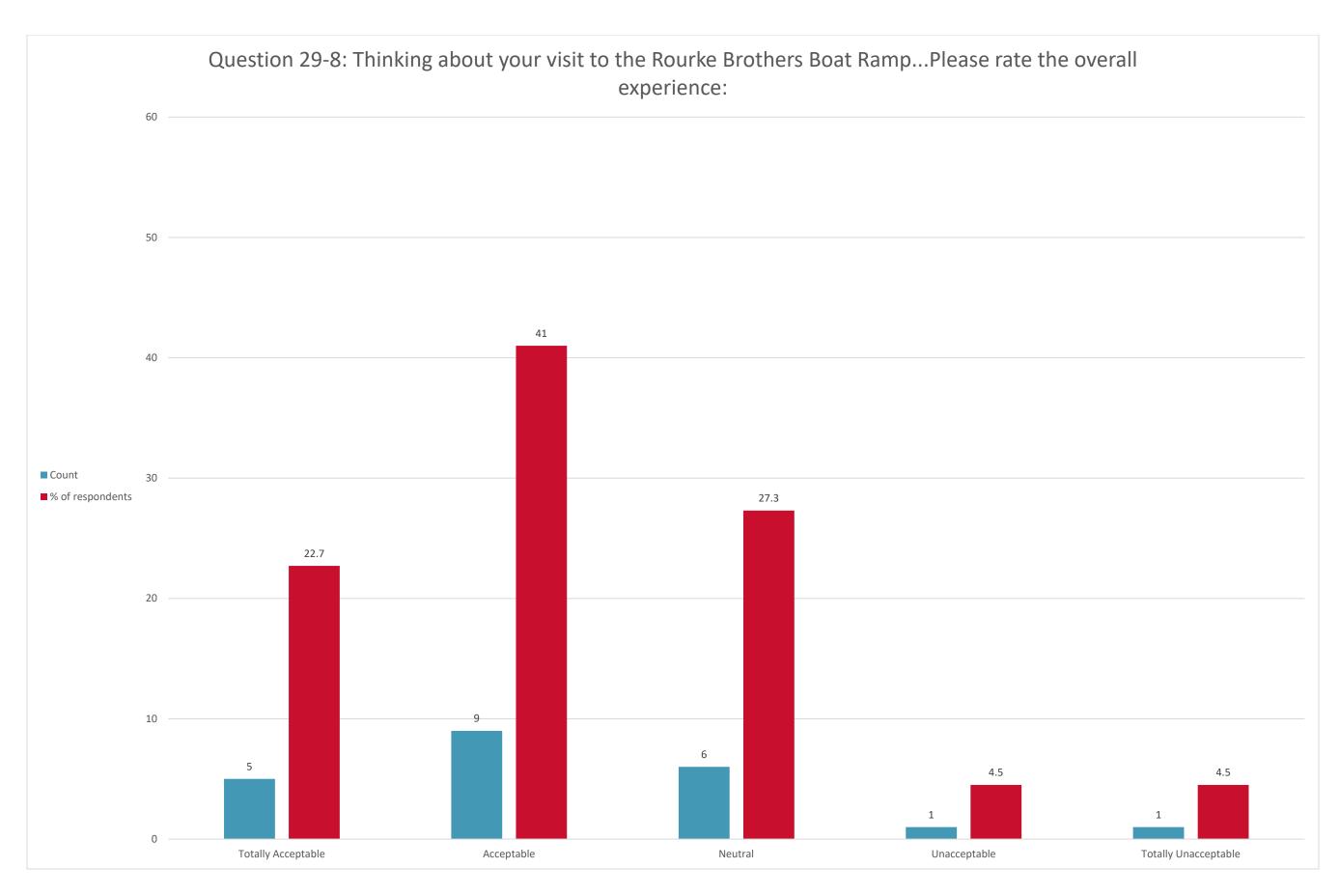


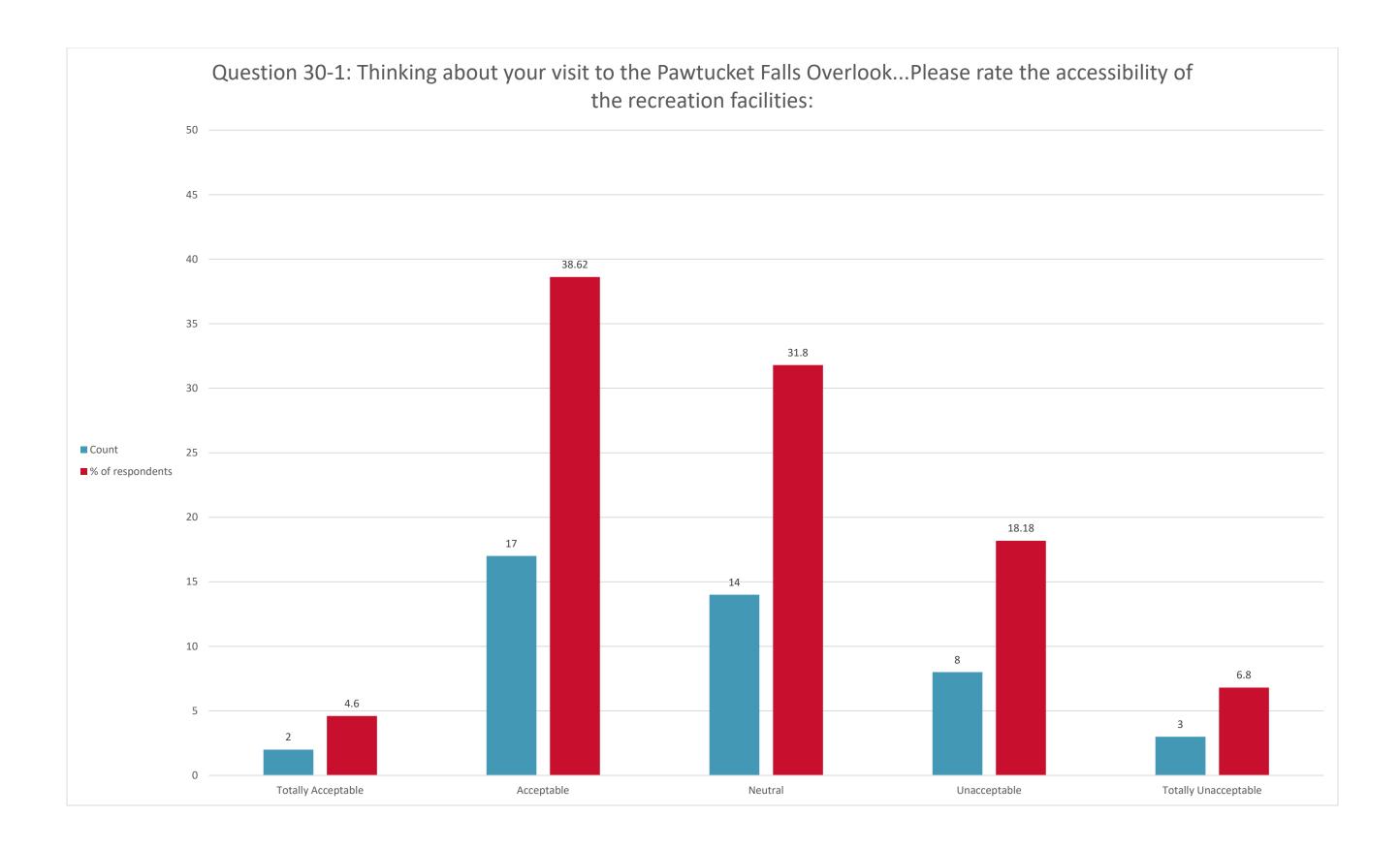


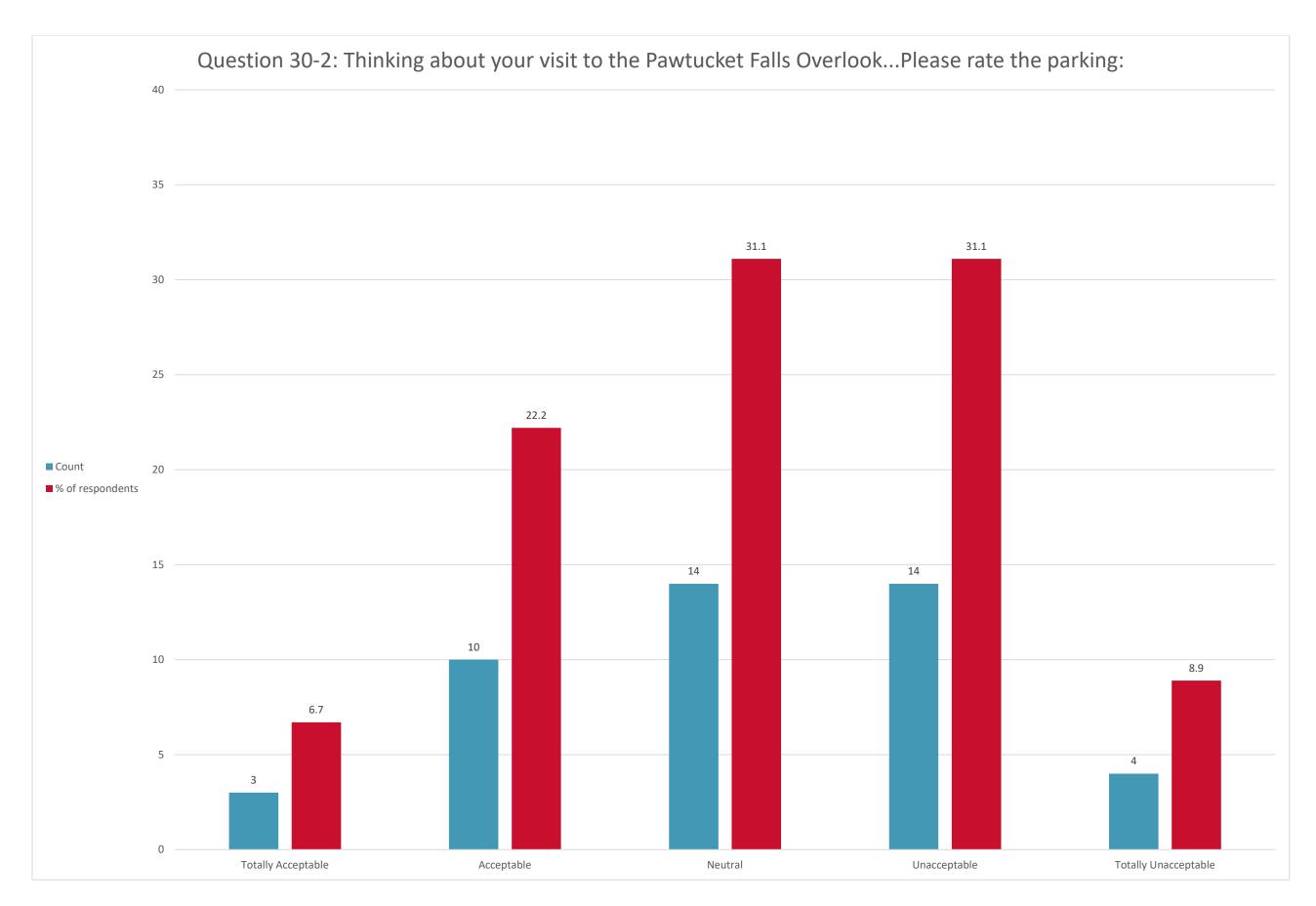
Question 29-5: Thinking about your visit to the Rourke Brothers Boat Ramp...Please rate the condition of the recreation facilities: 45 40.90 35 31.9 30 Count ■ % of respondents 20 15 13.6 10 Totally Acceptable Acceptable Neutral Unacceptable Totally Unacceptable

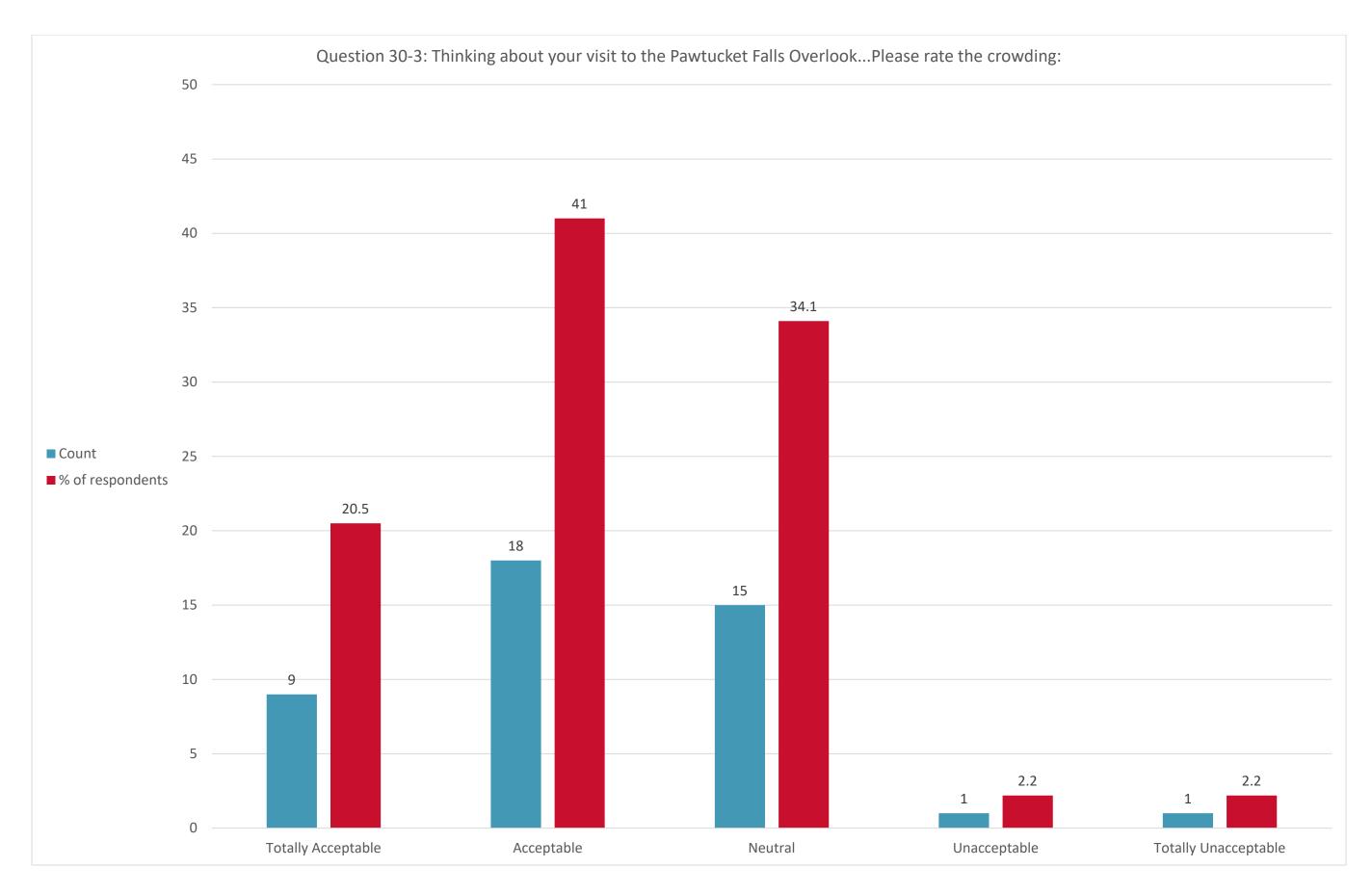


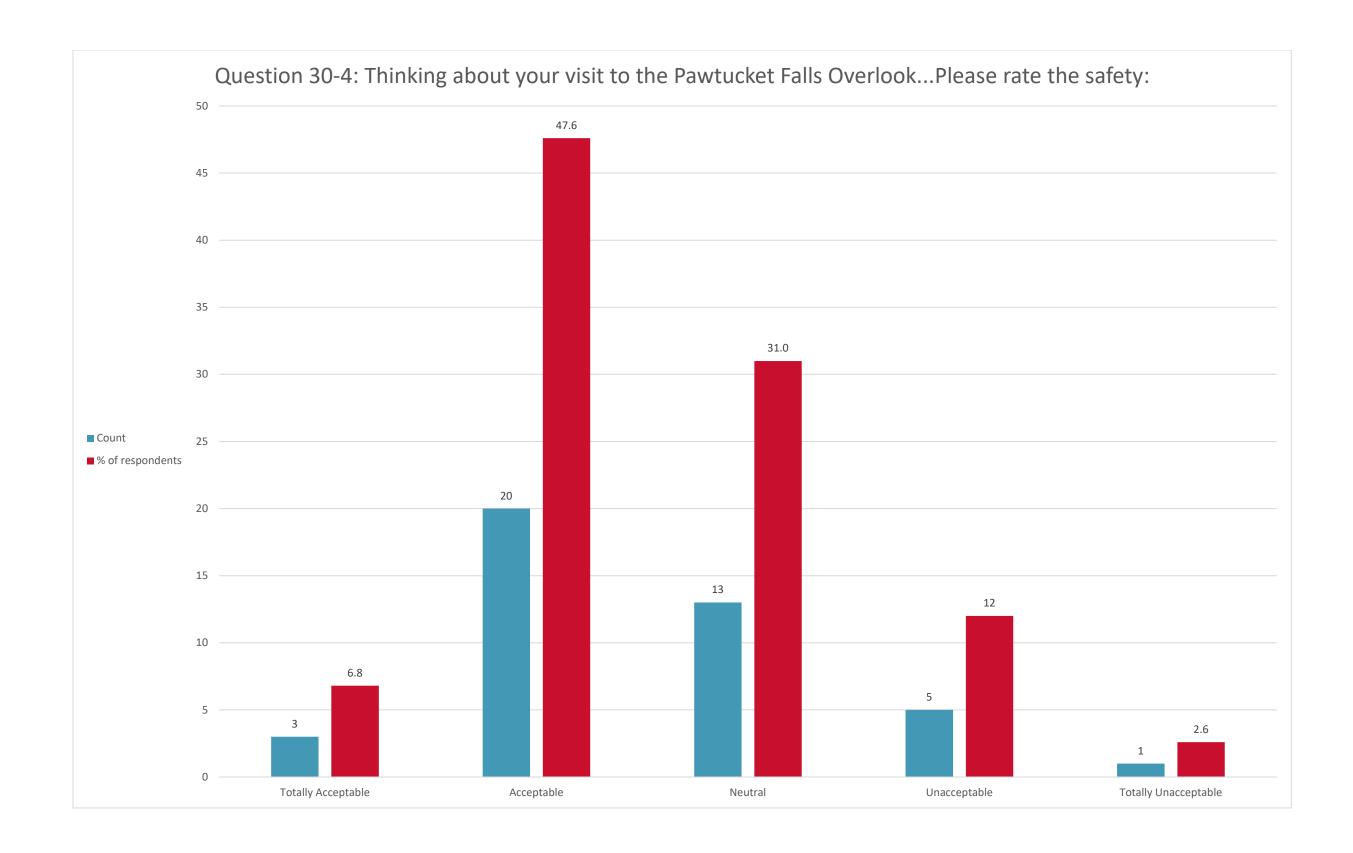


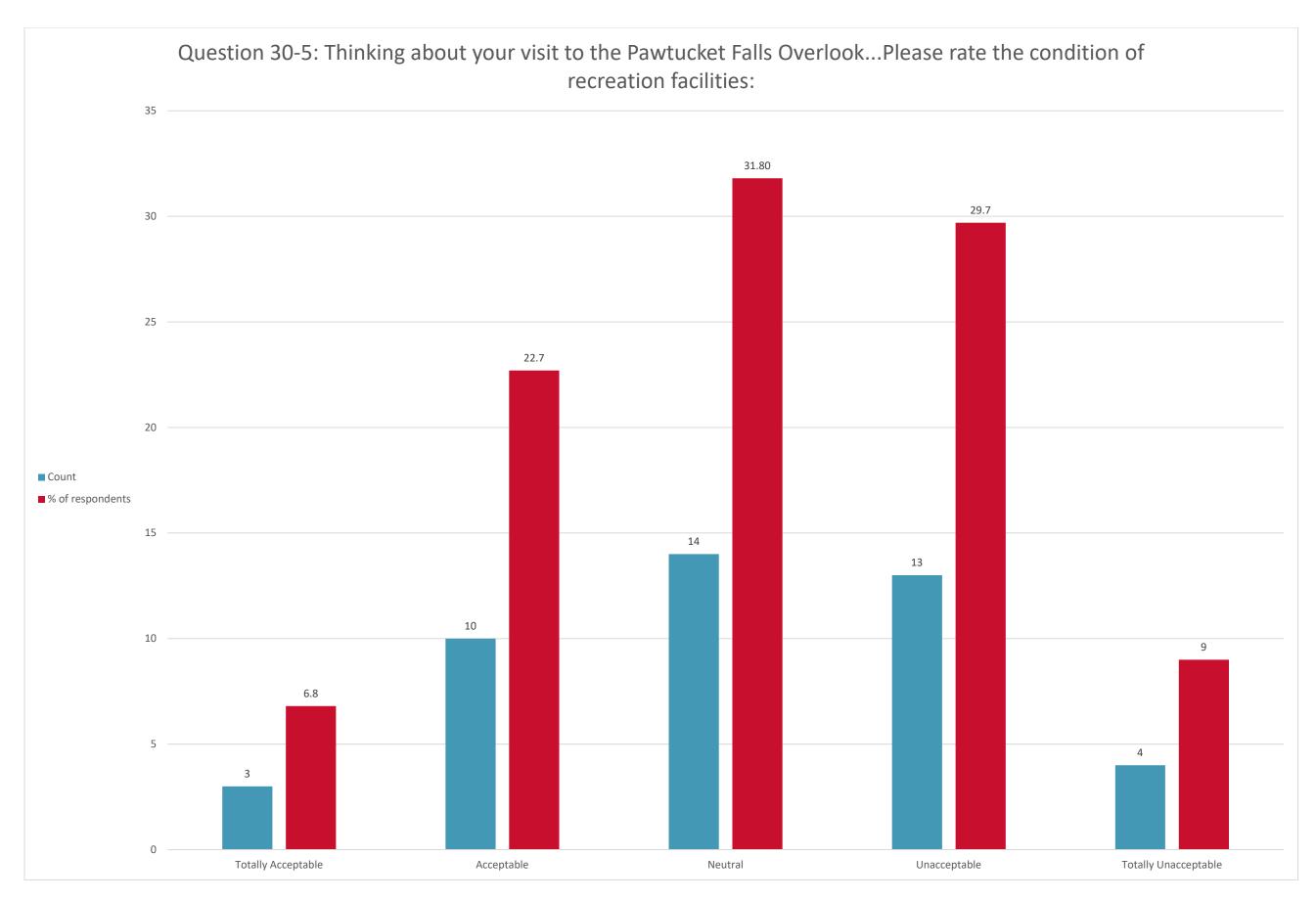


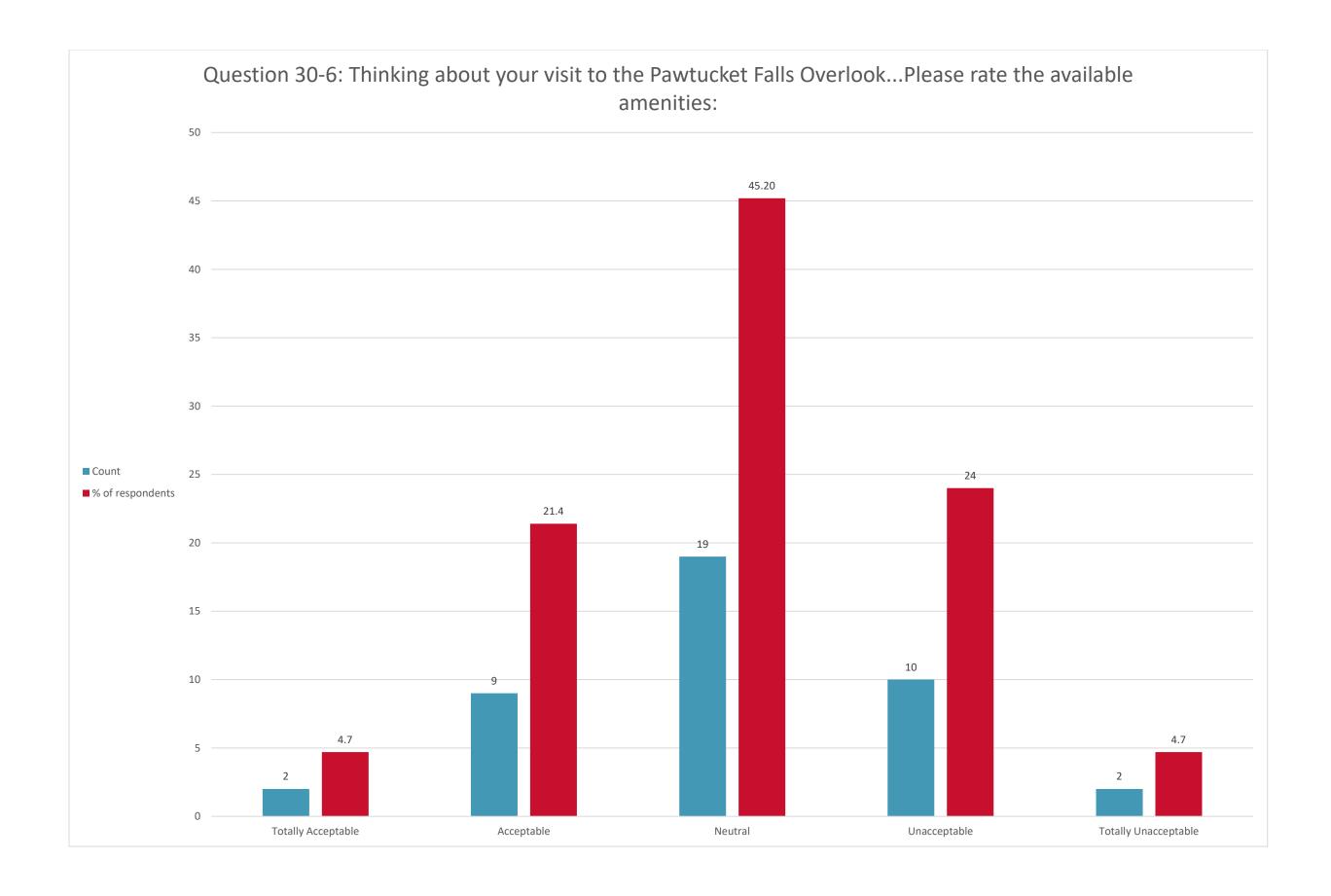


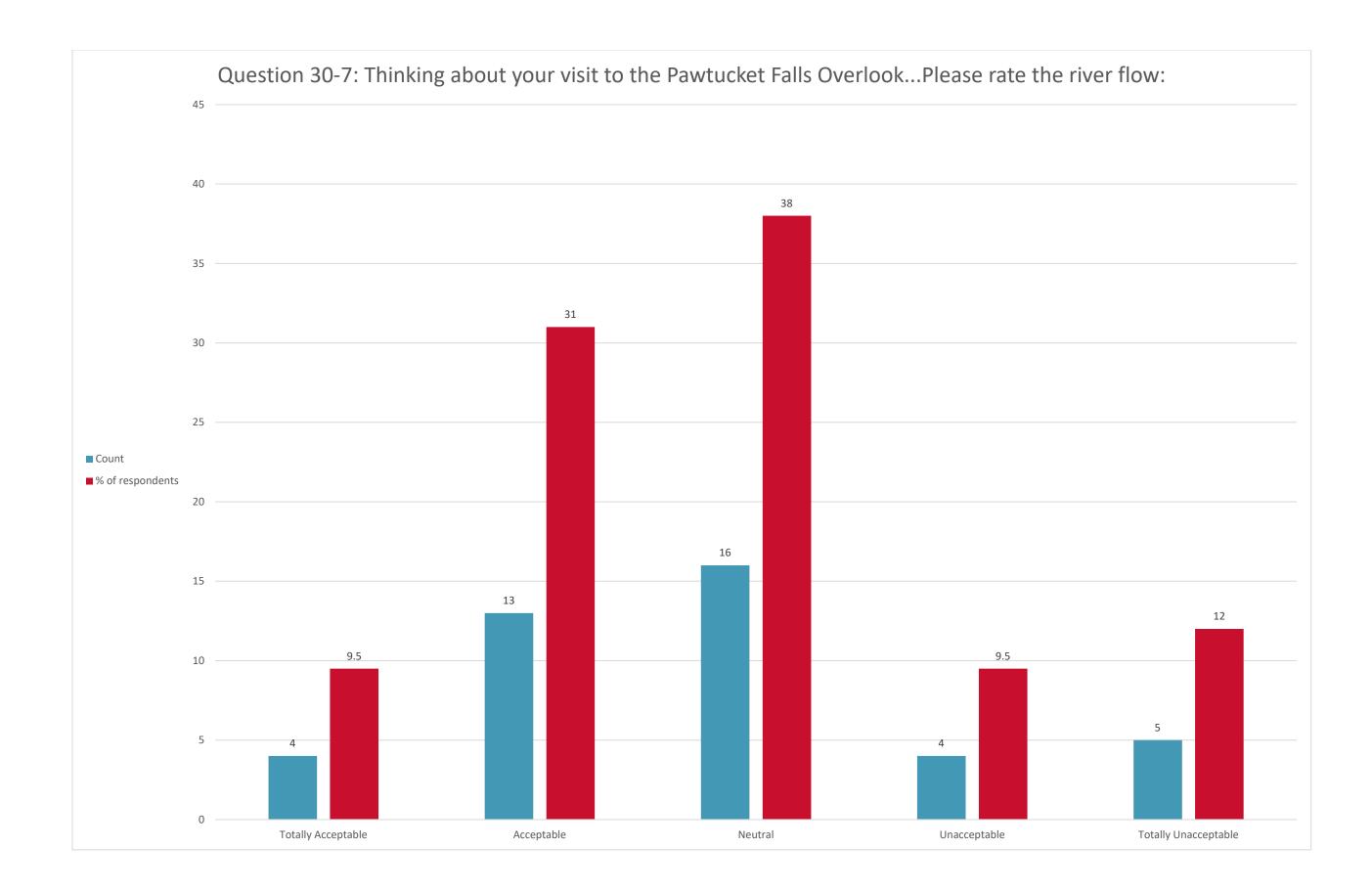


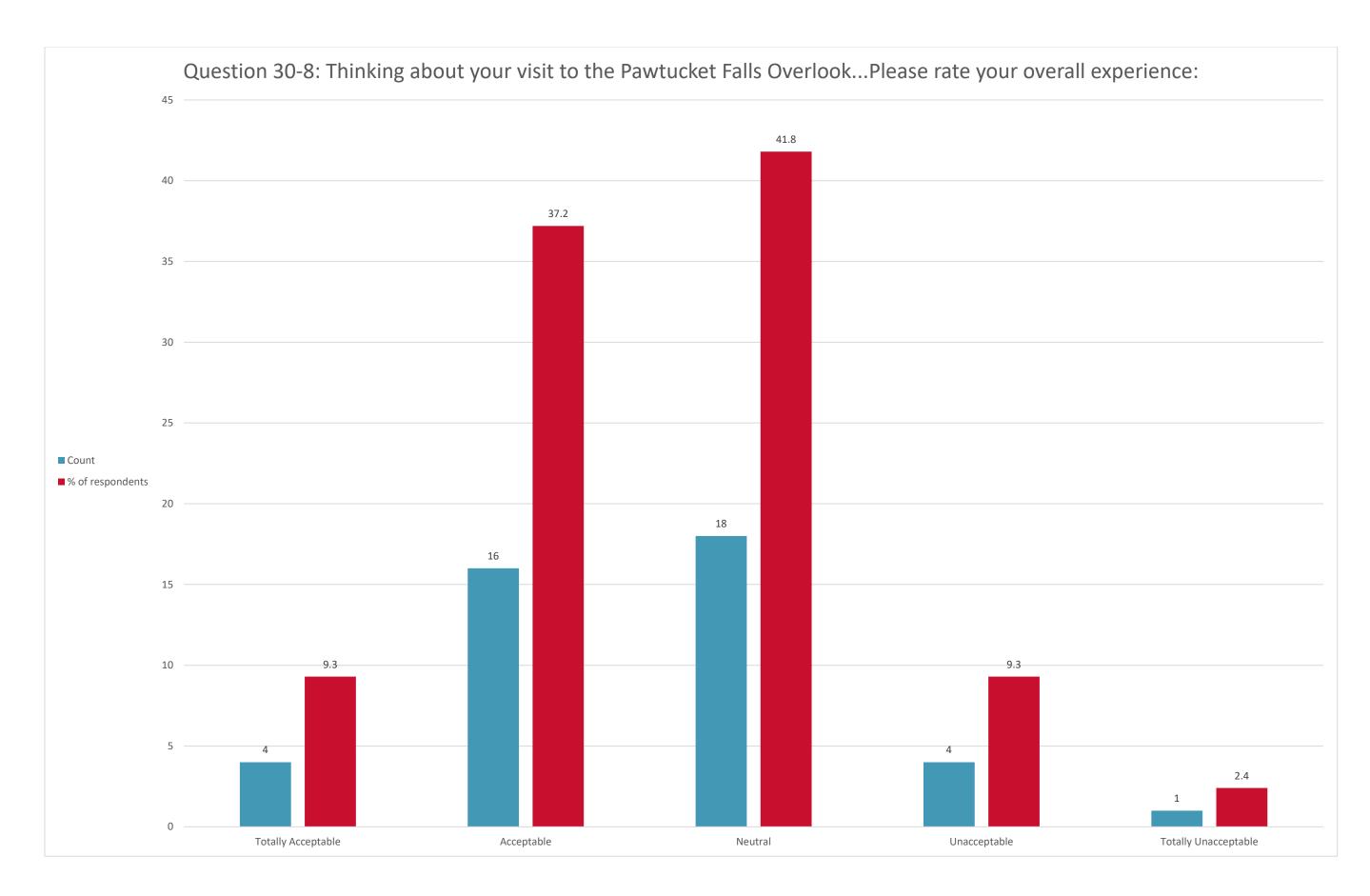


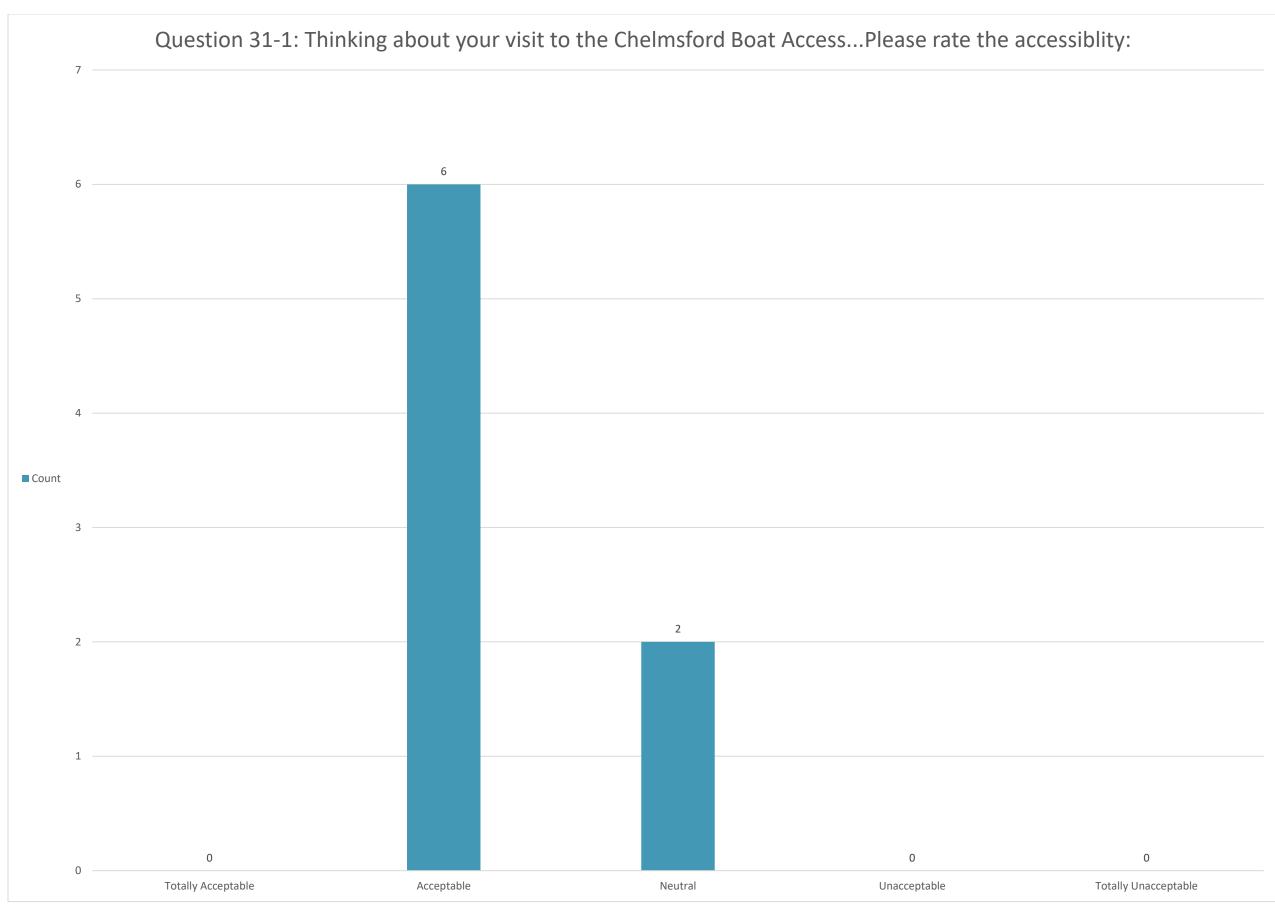


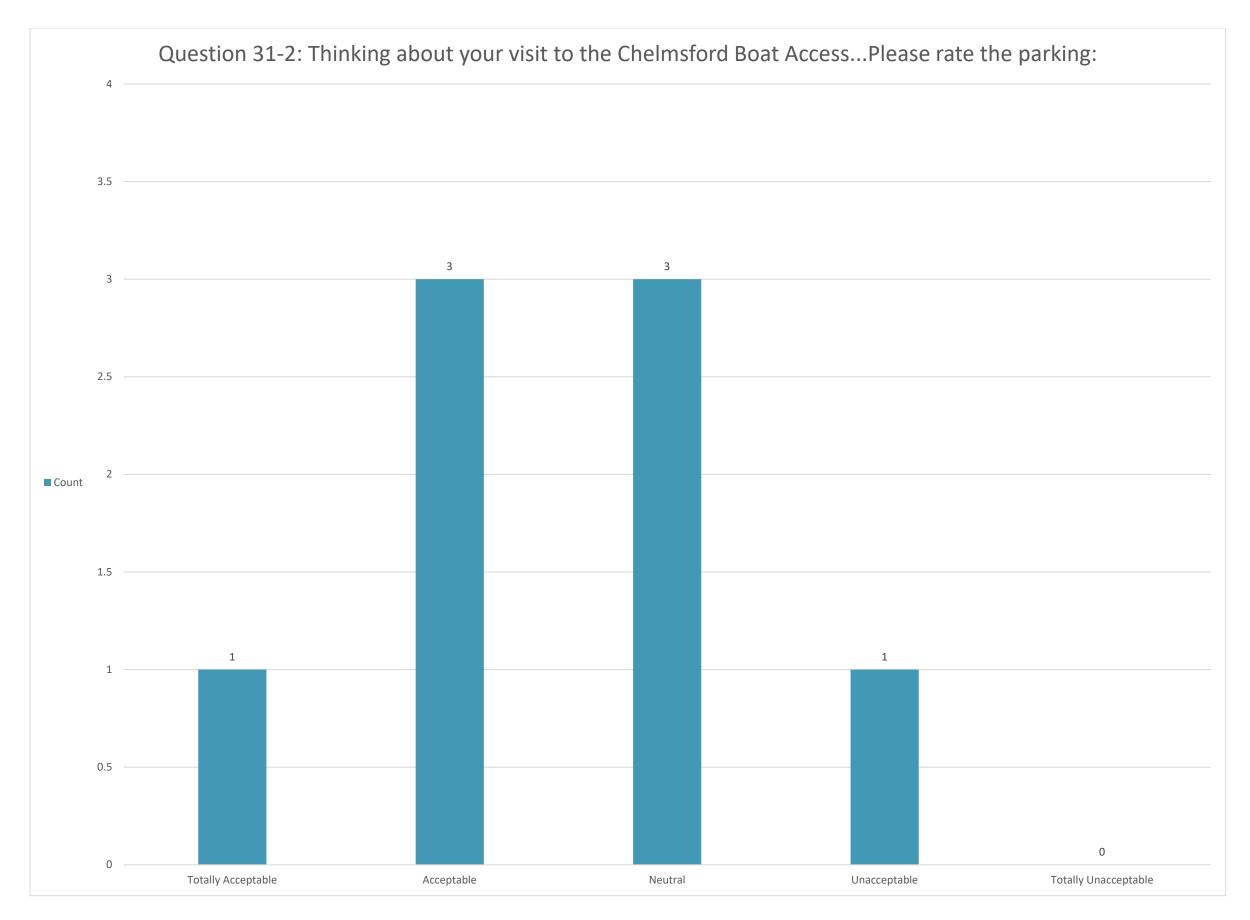


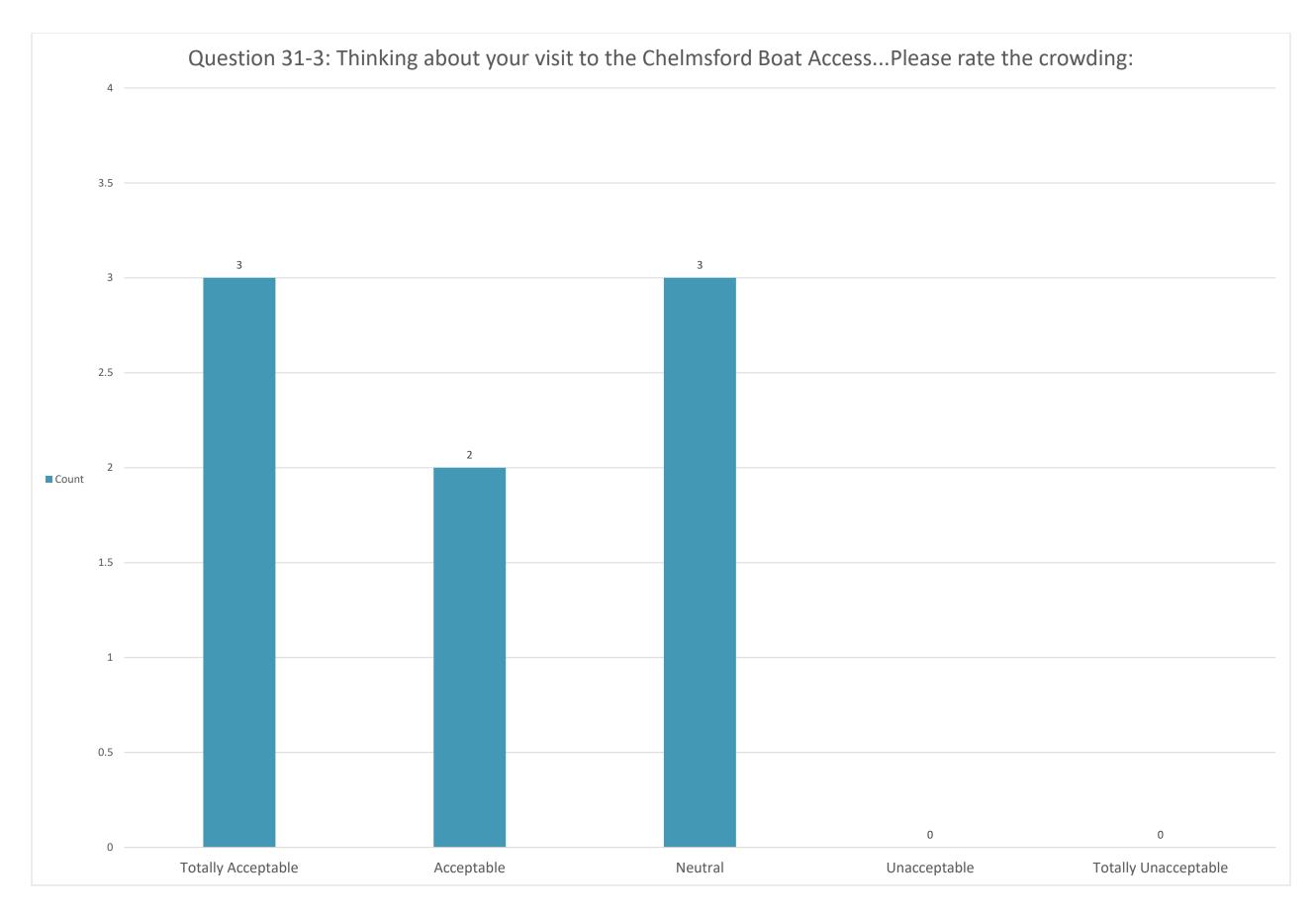


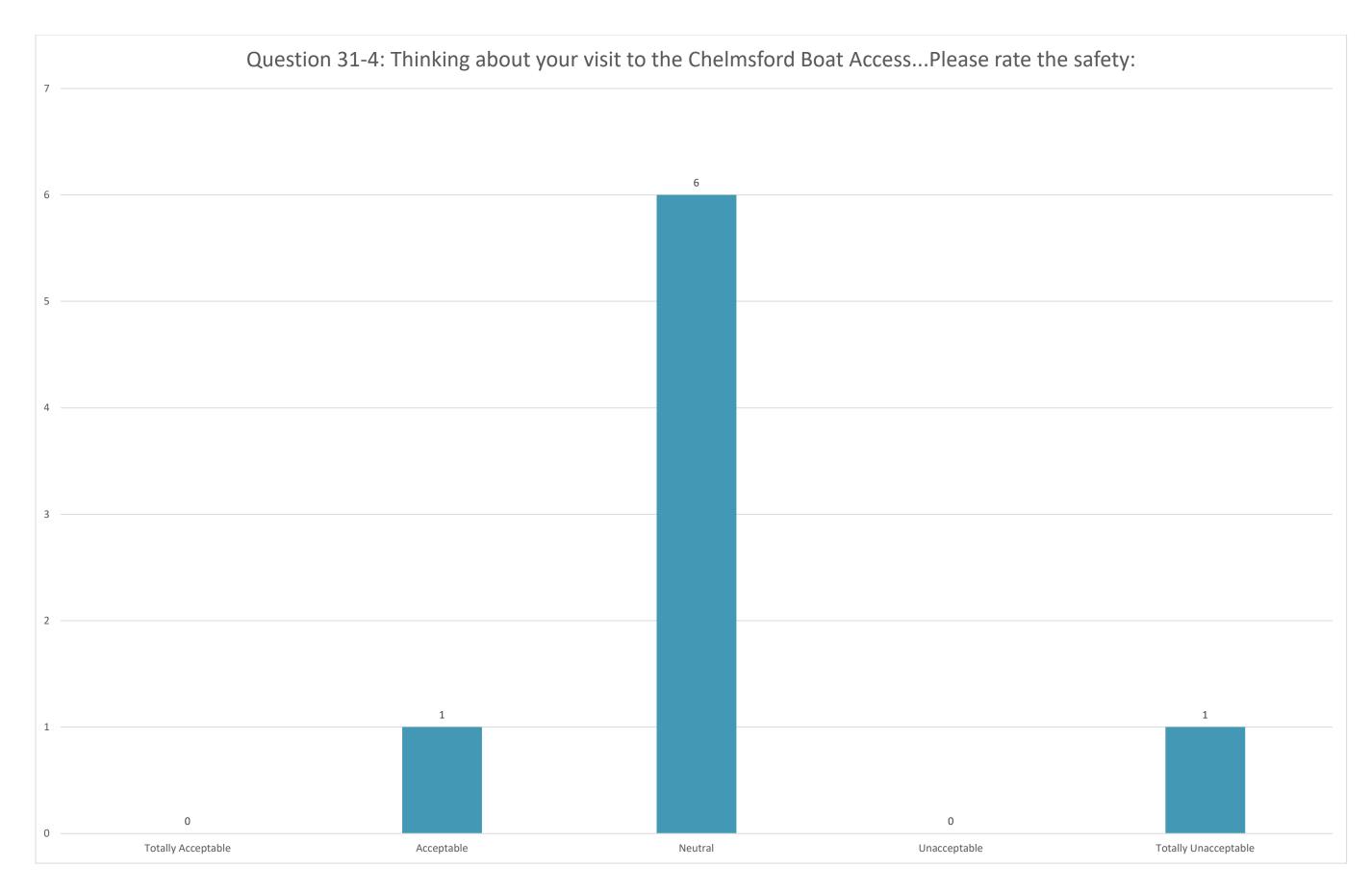


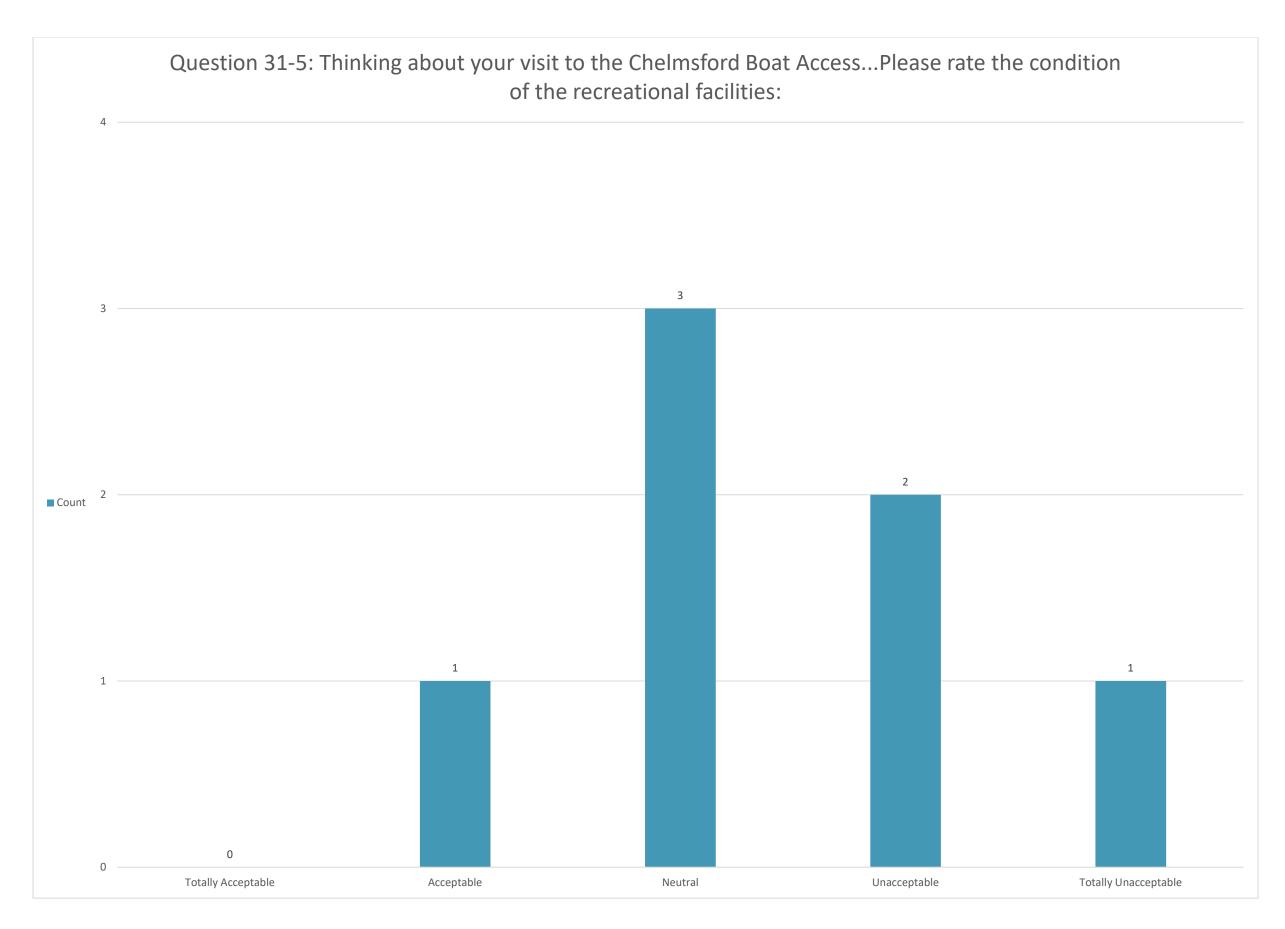


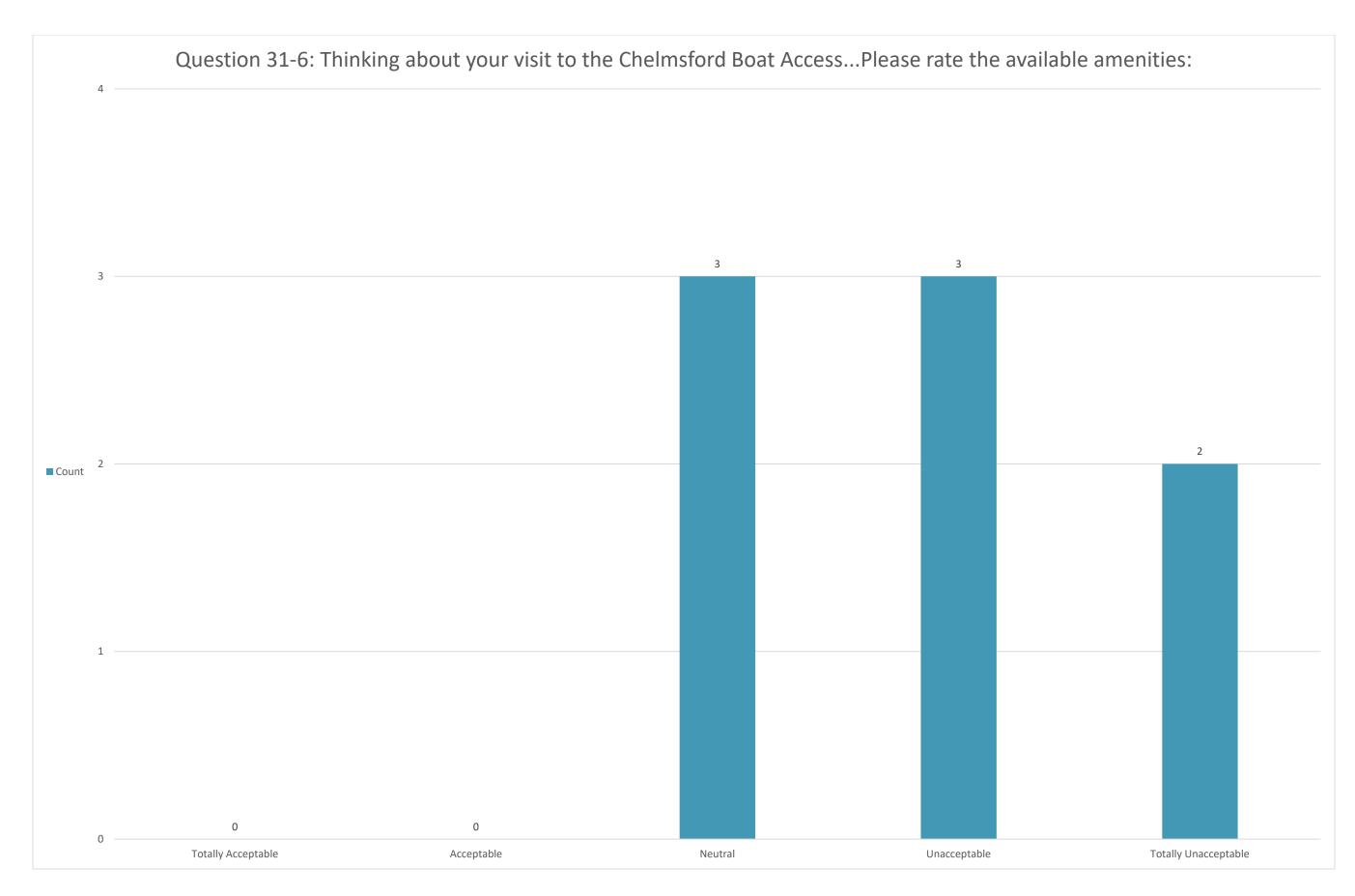


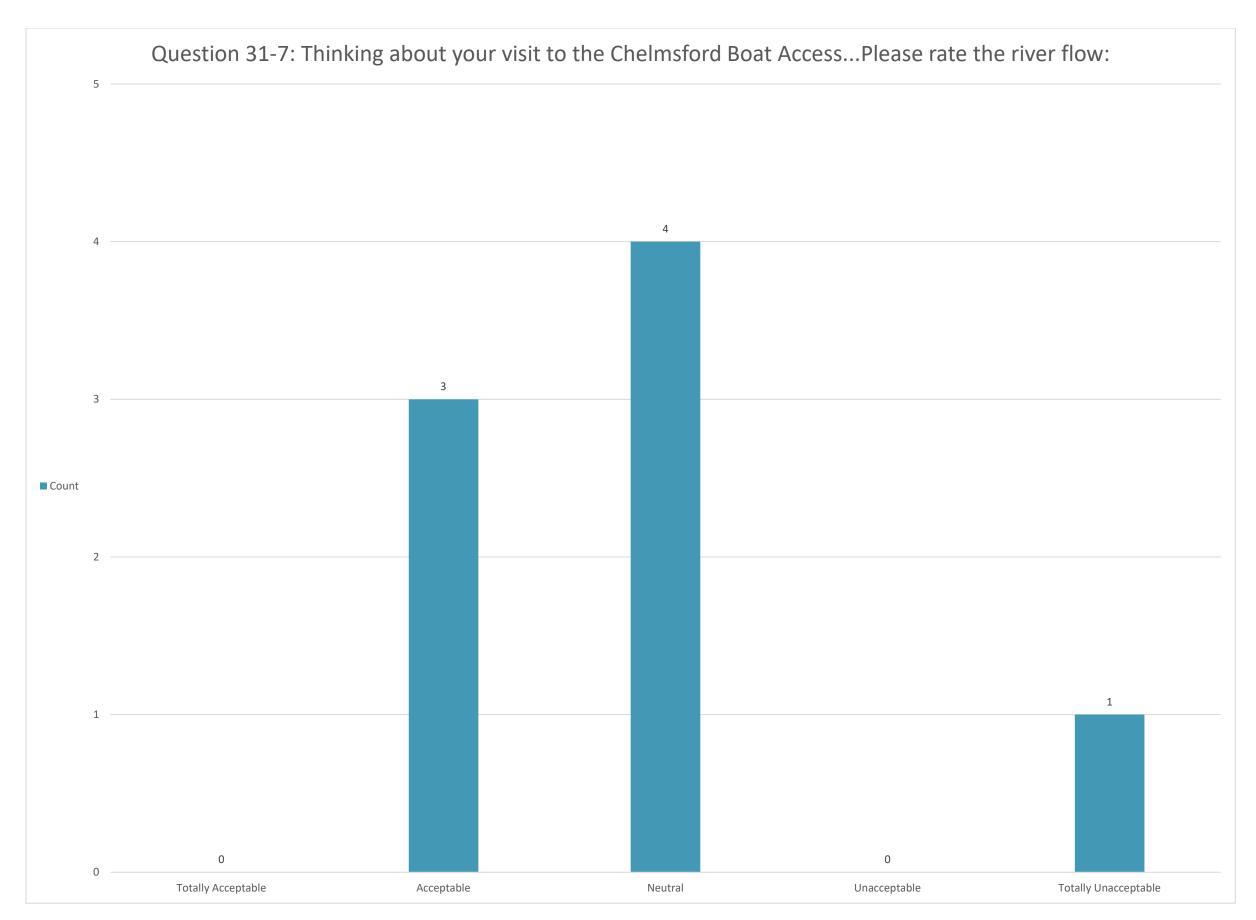


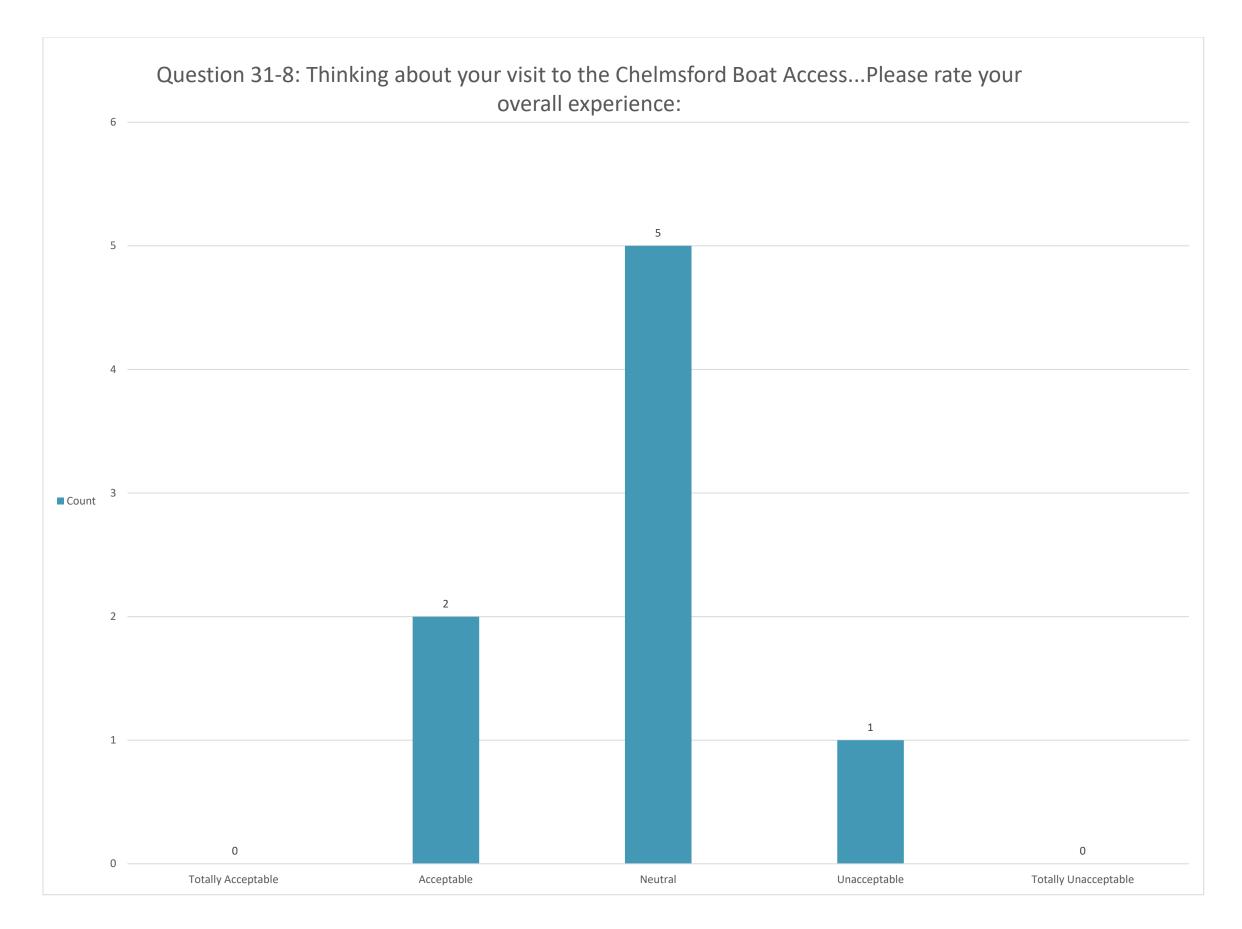


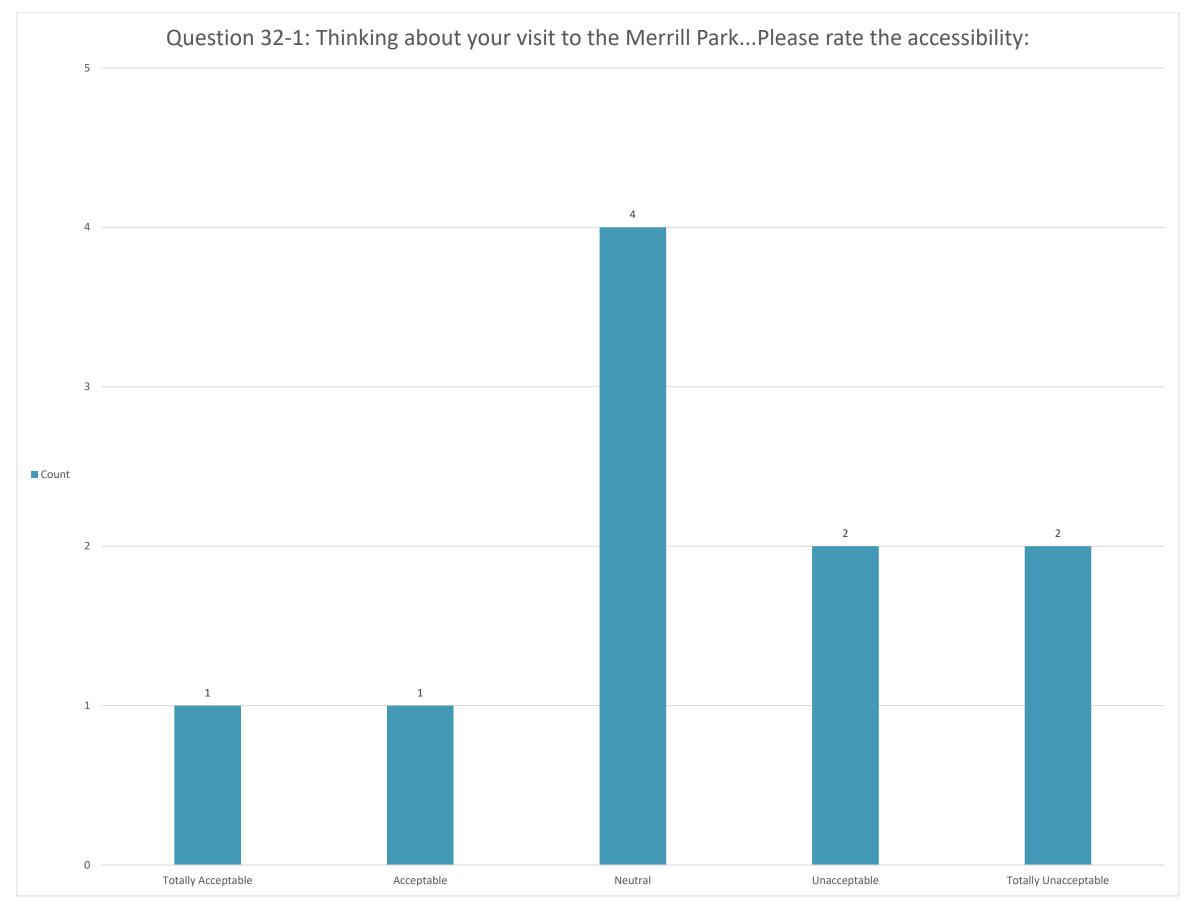


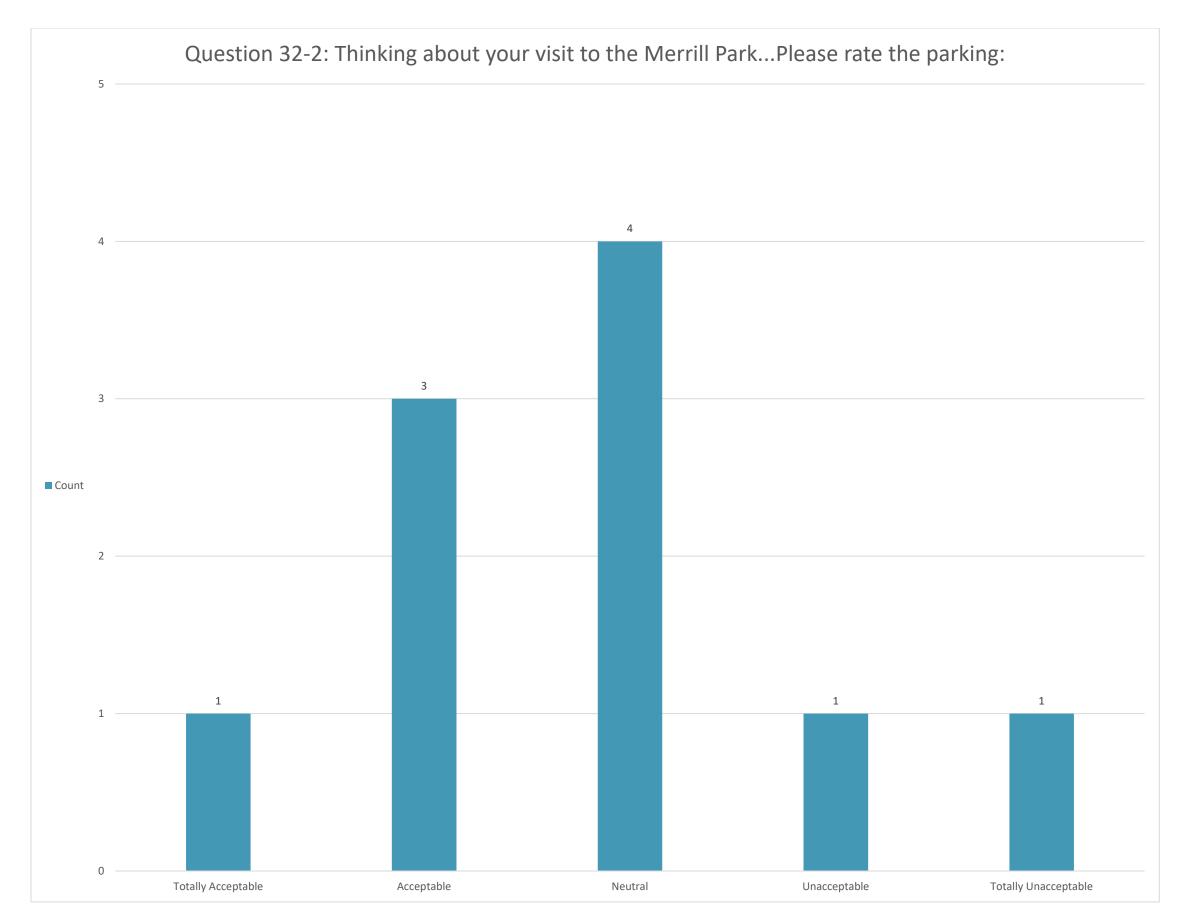


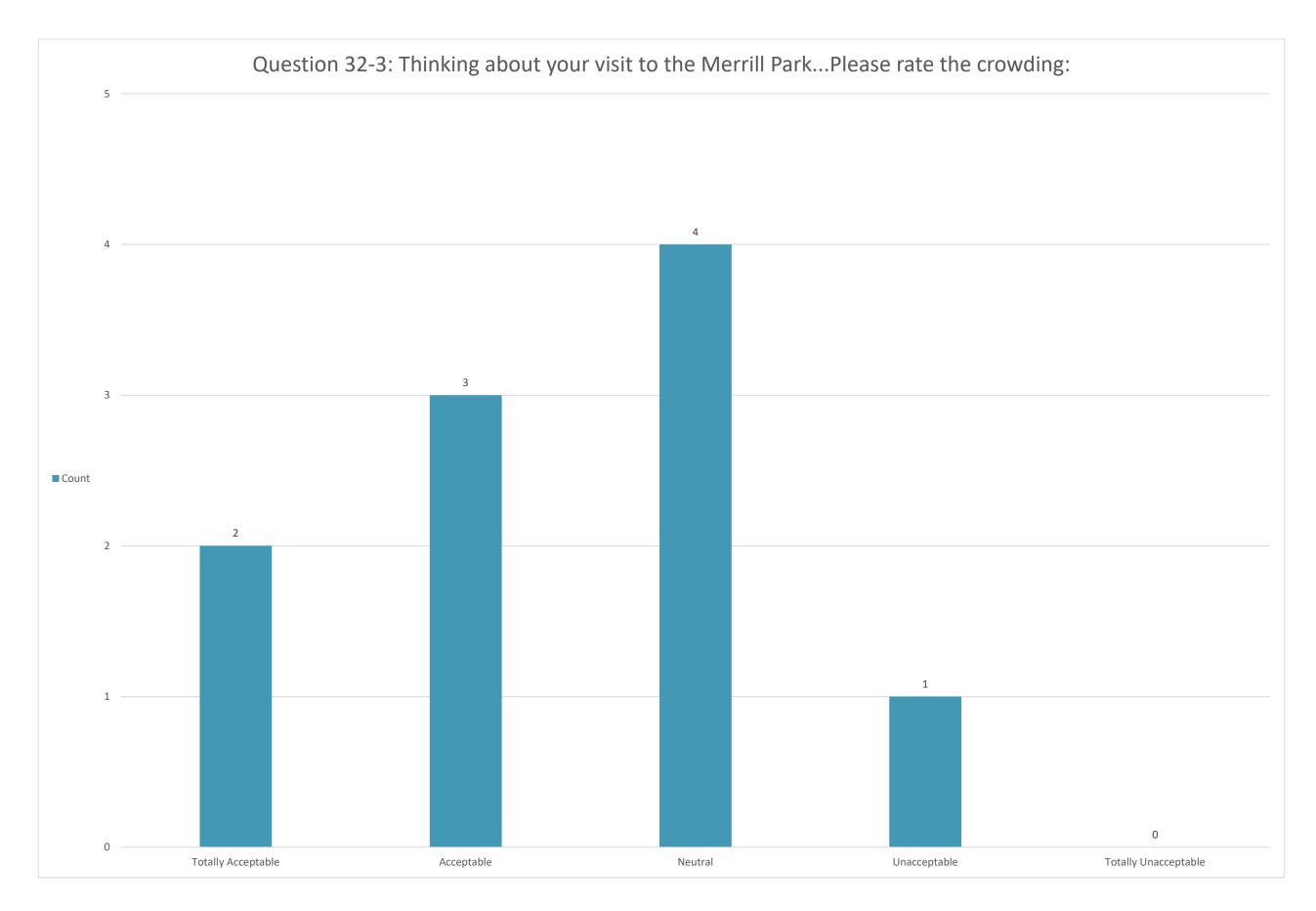


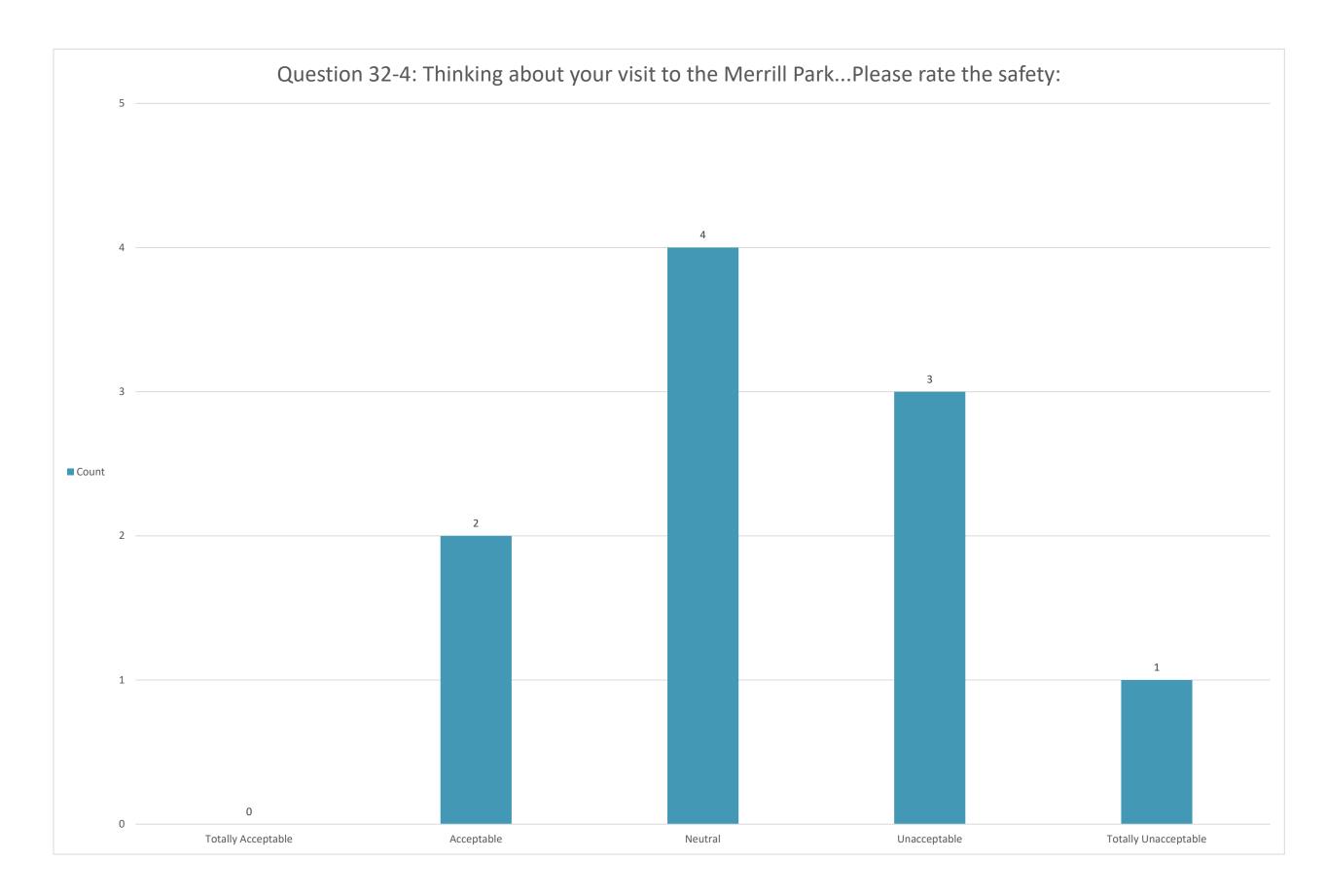


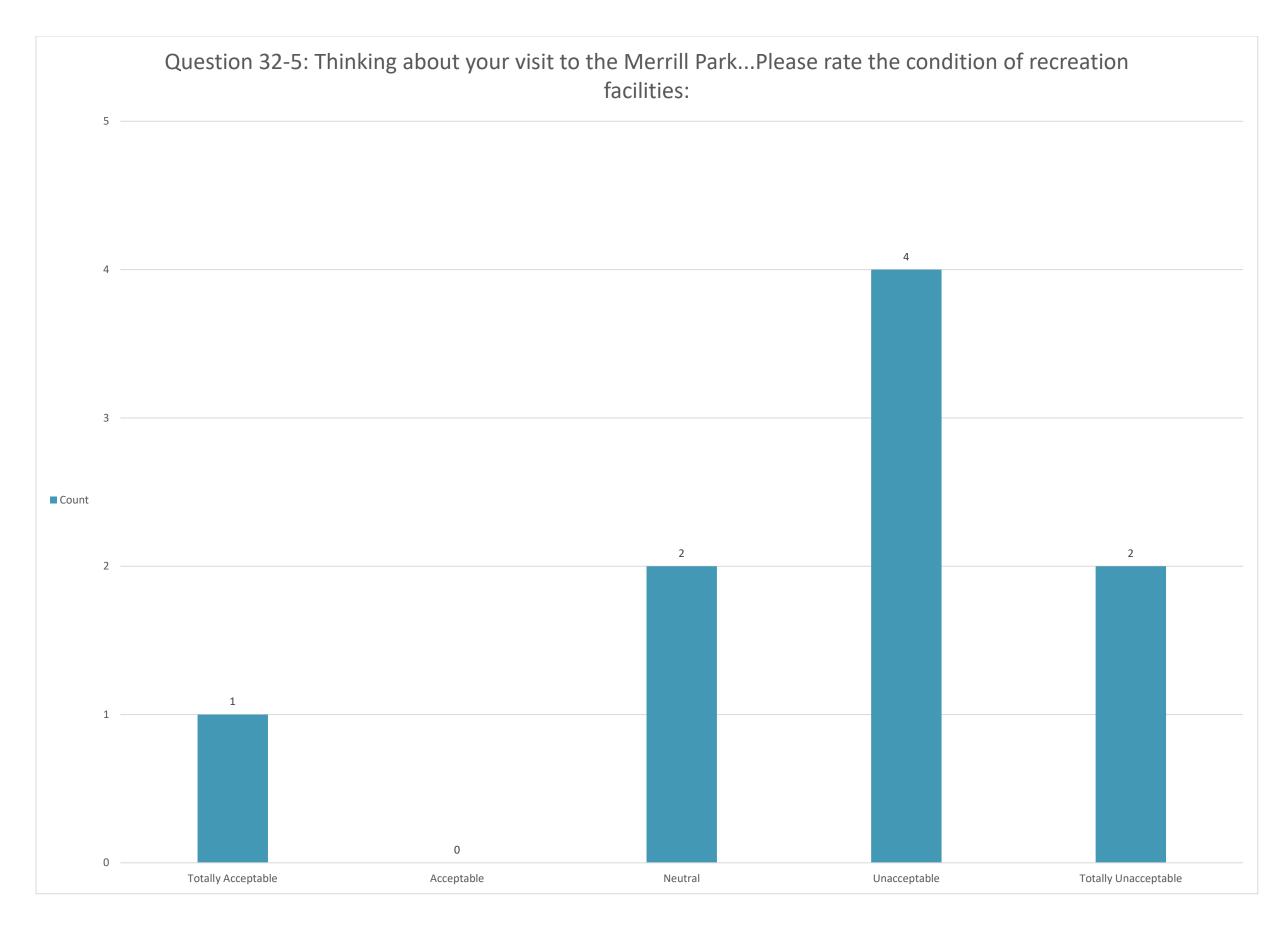


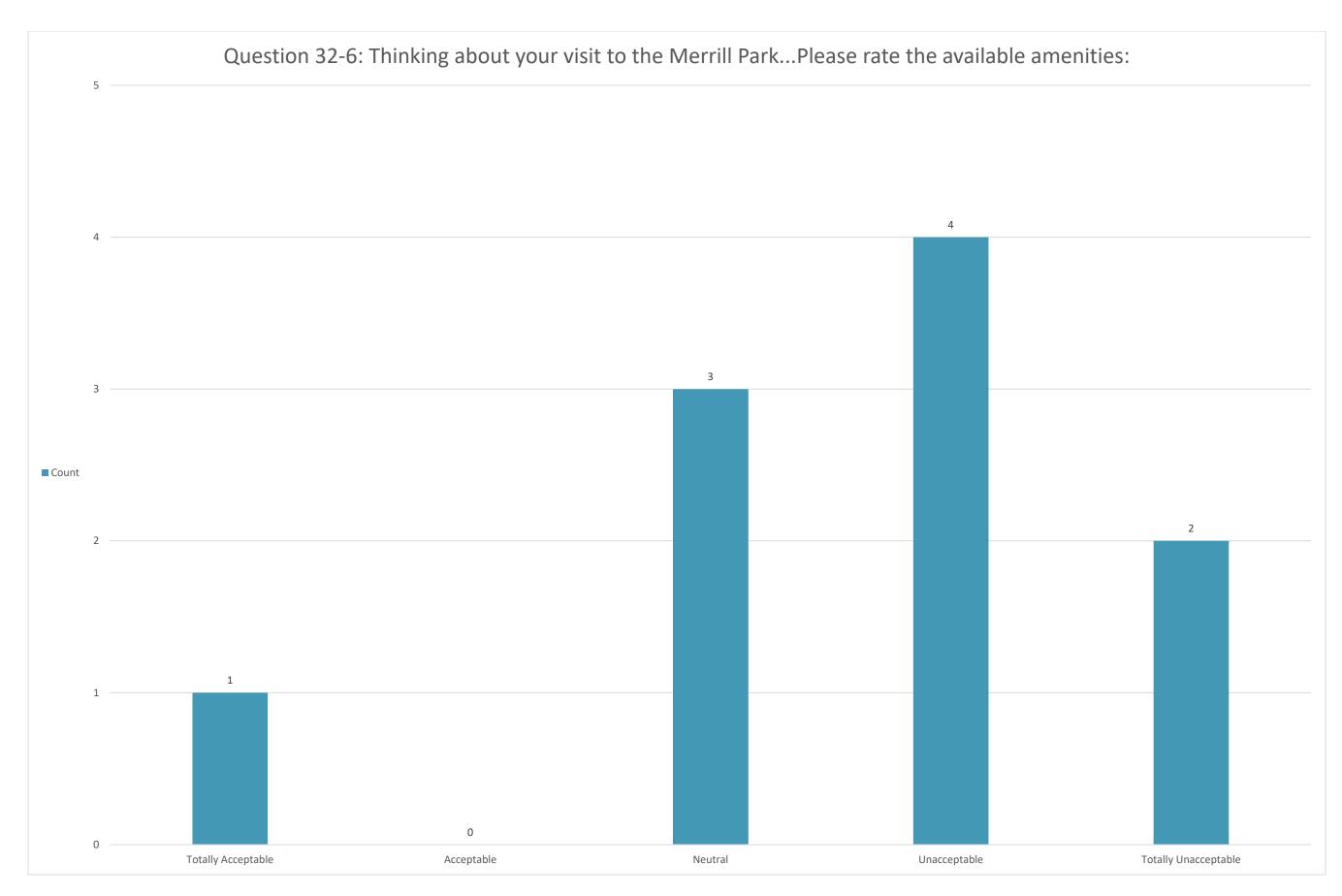


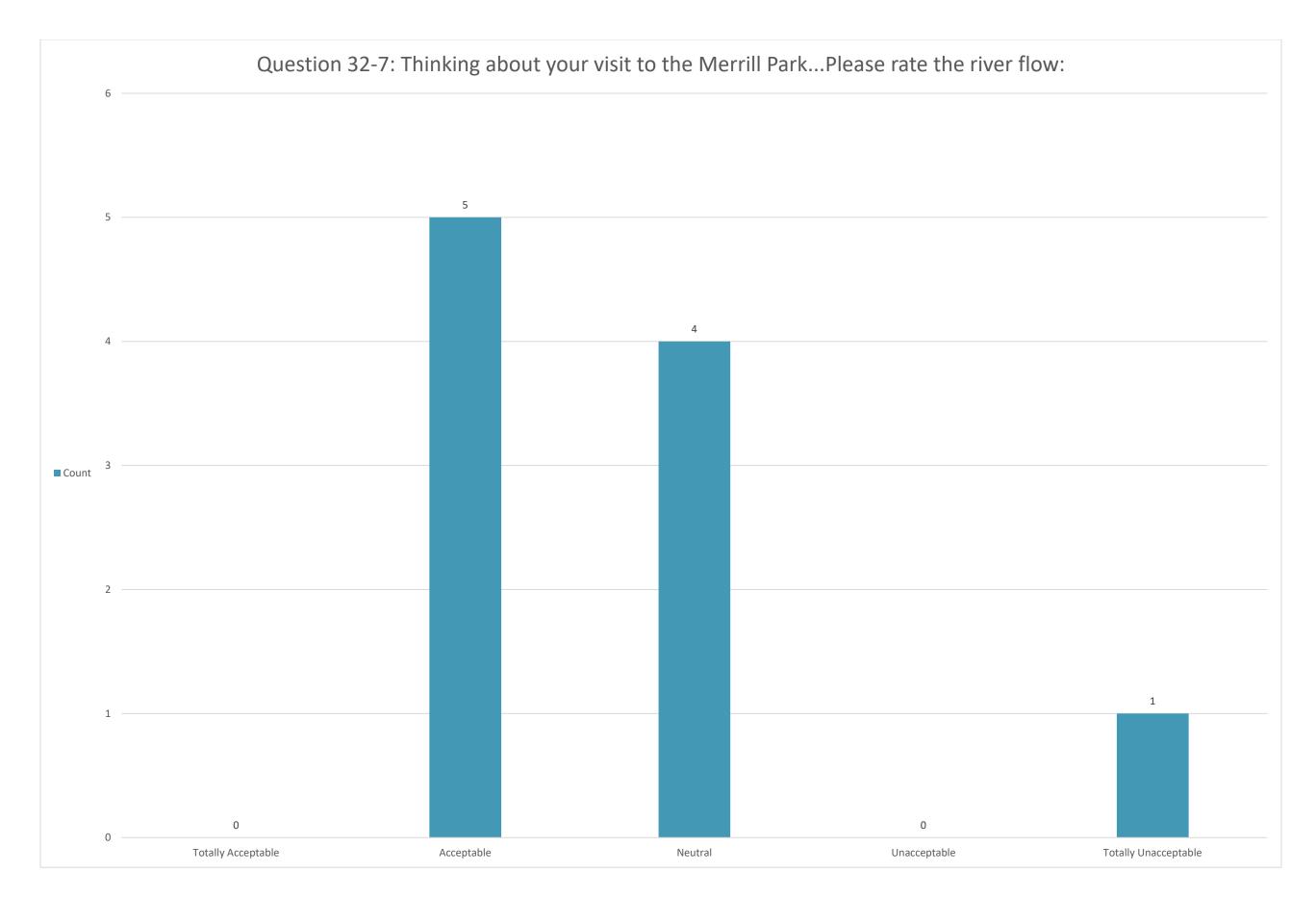


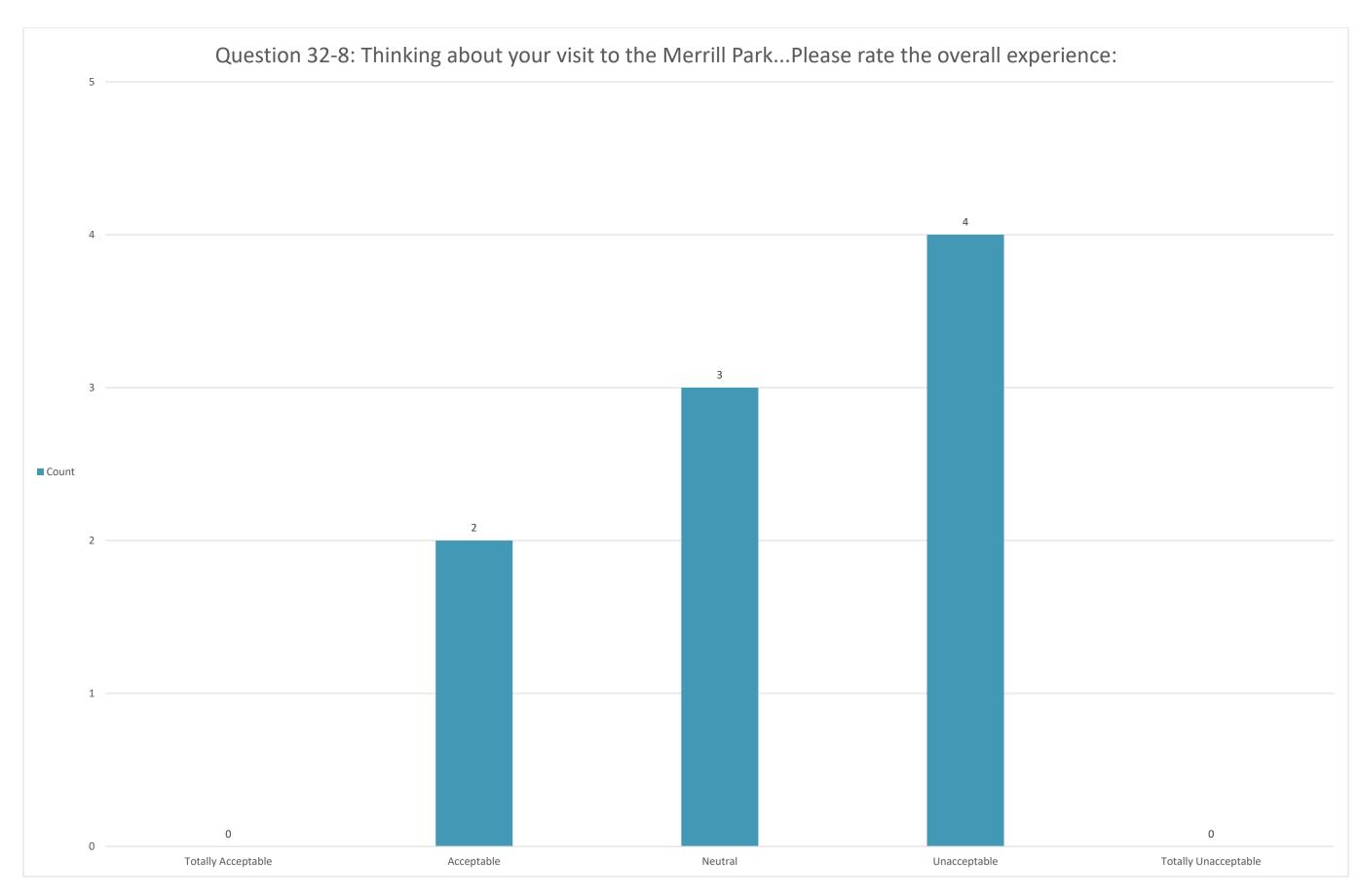


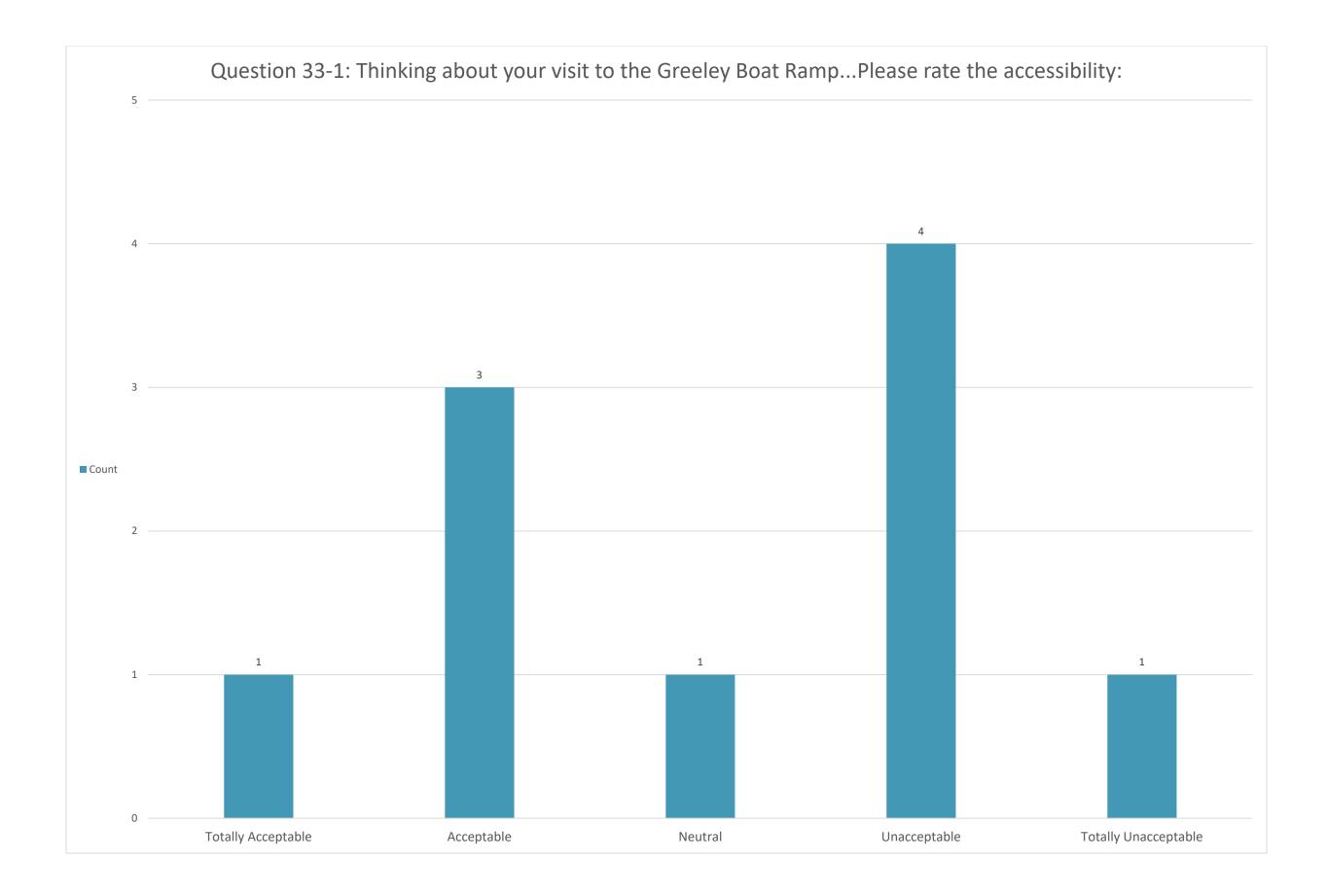


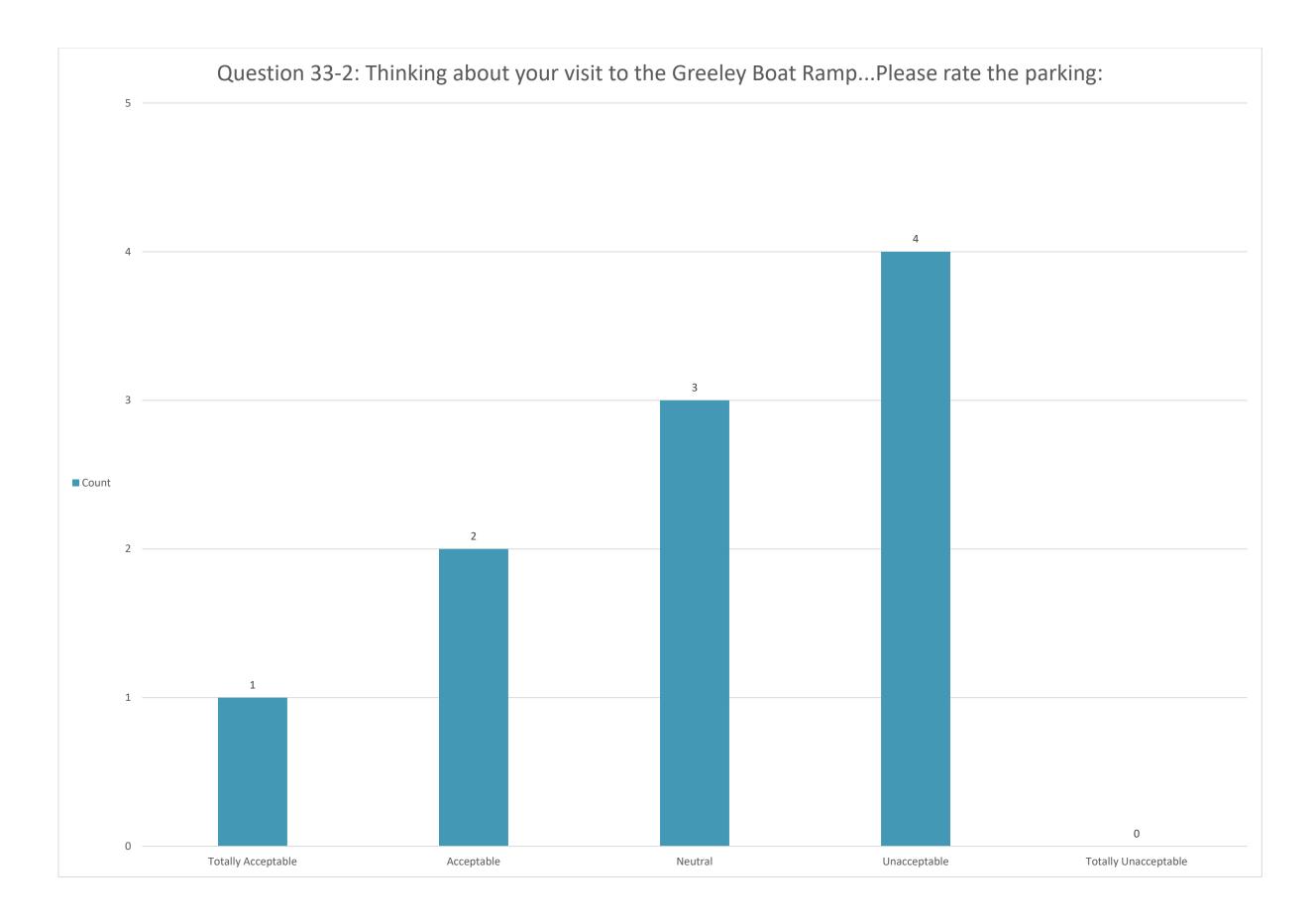


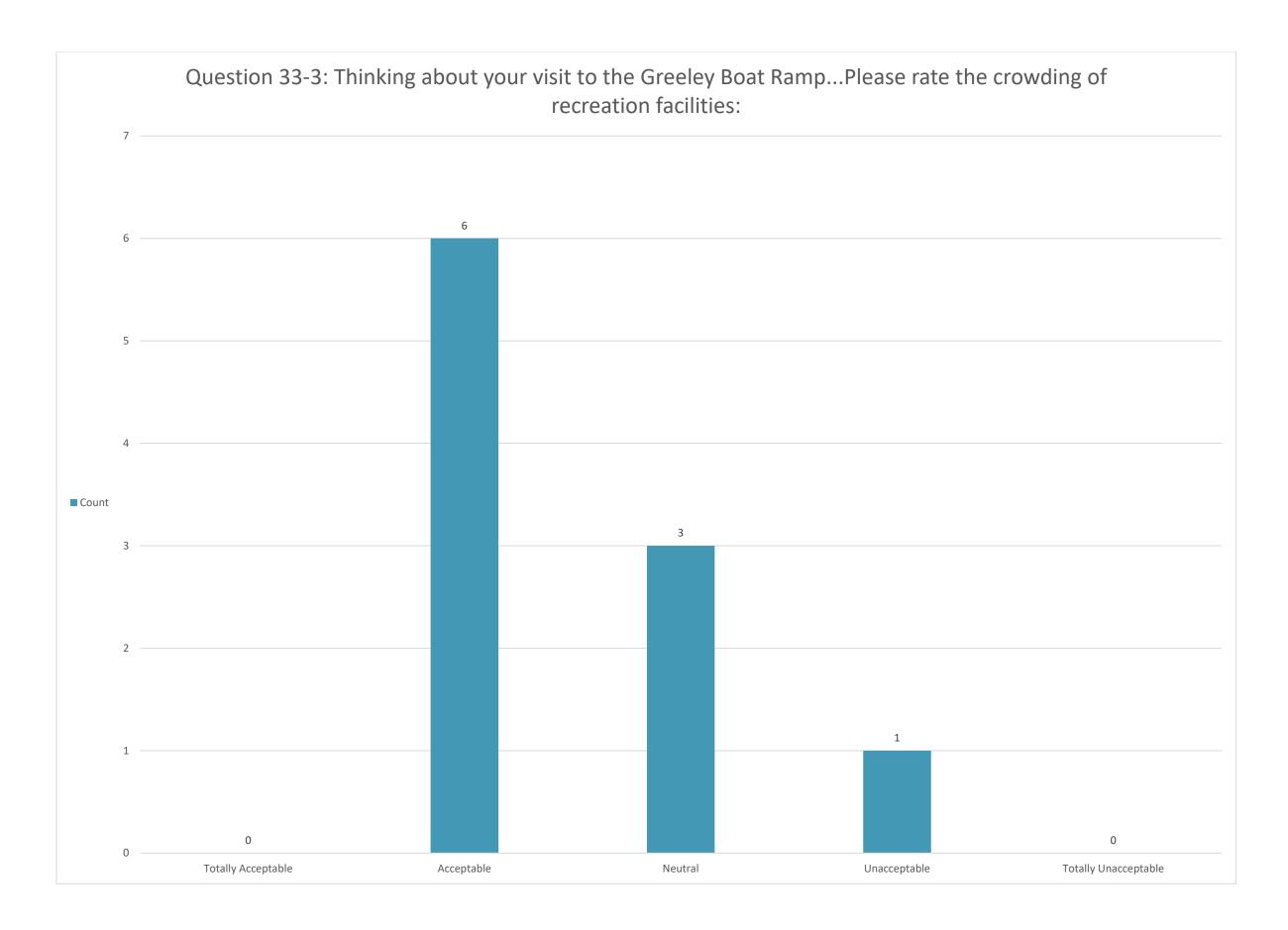


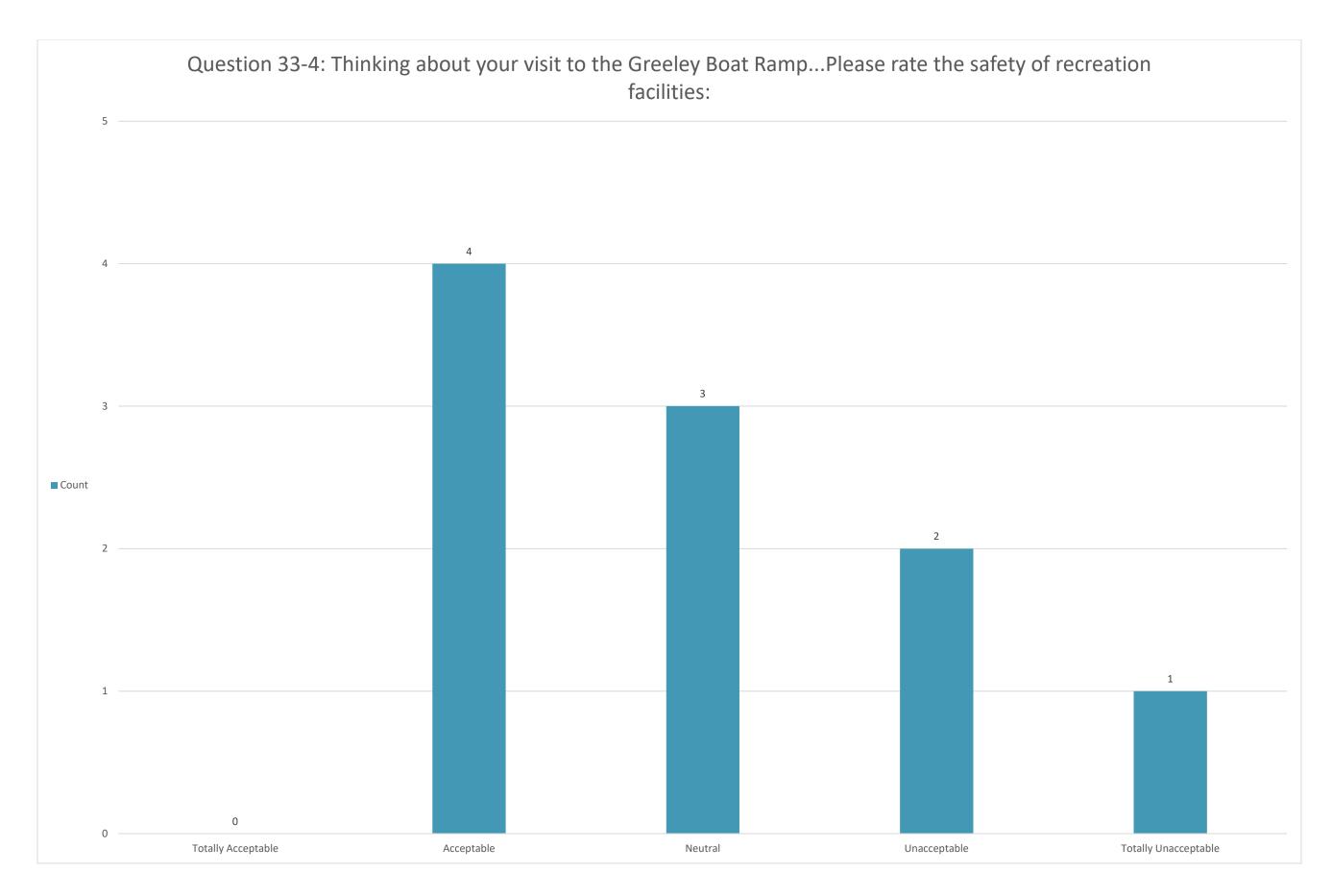


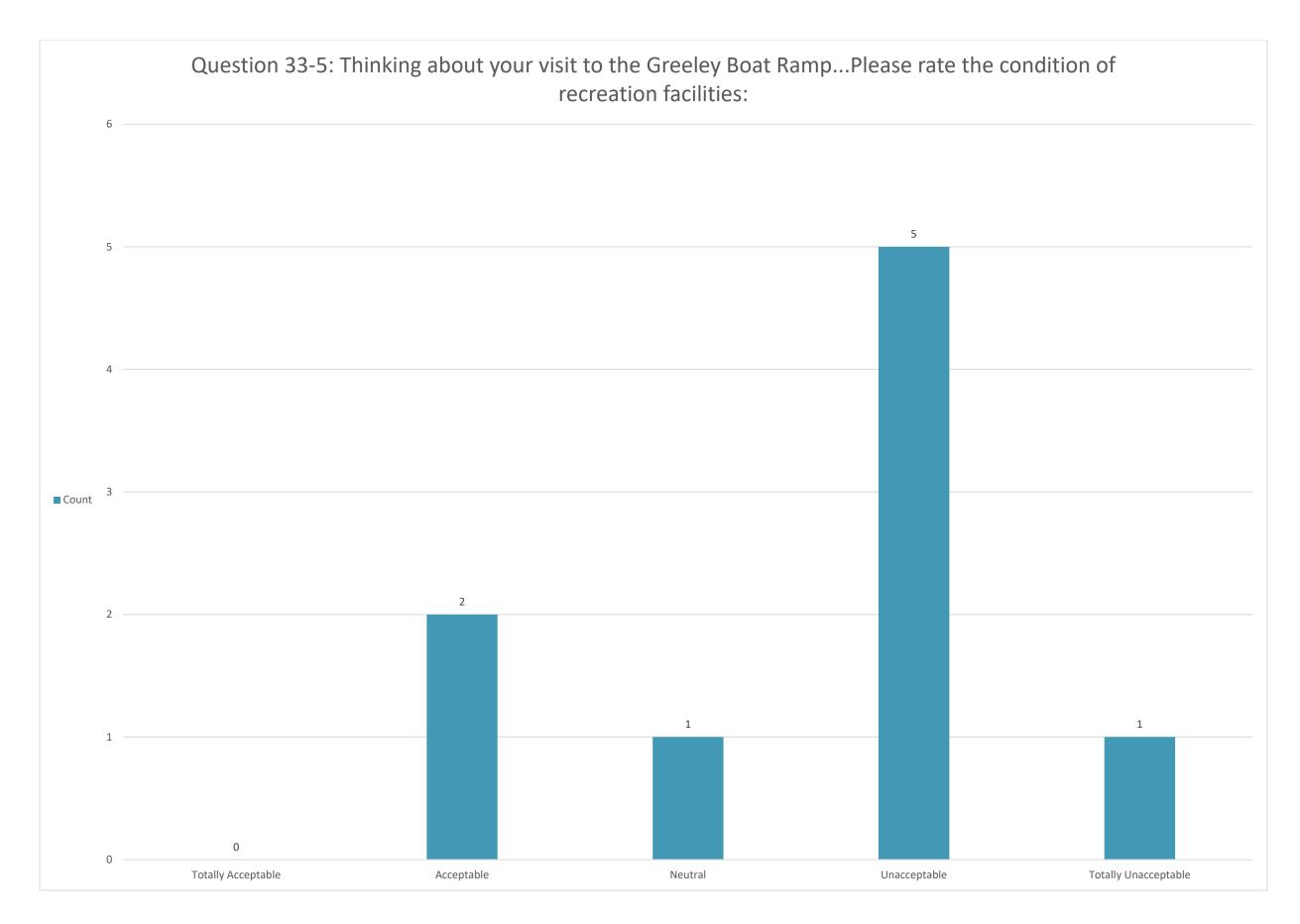


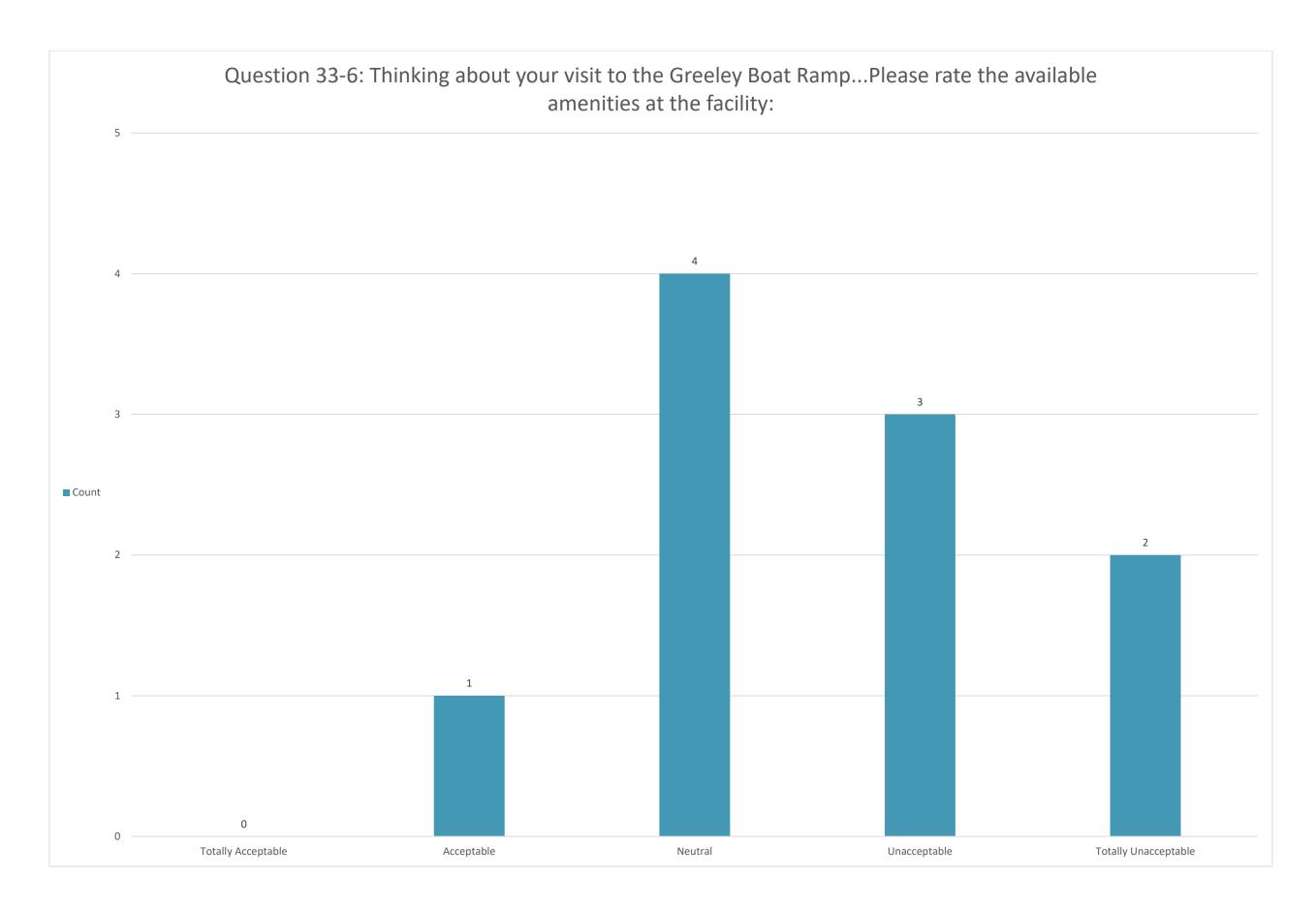


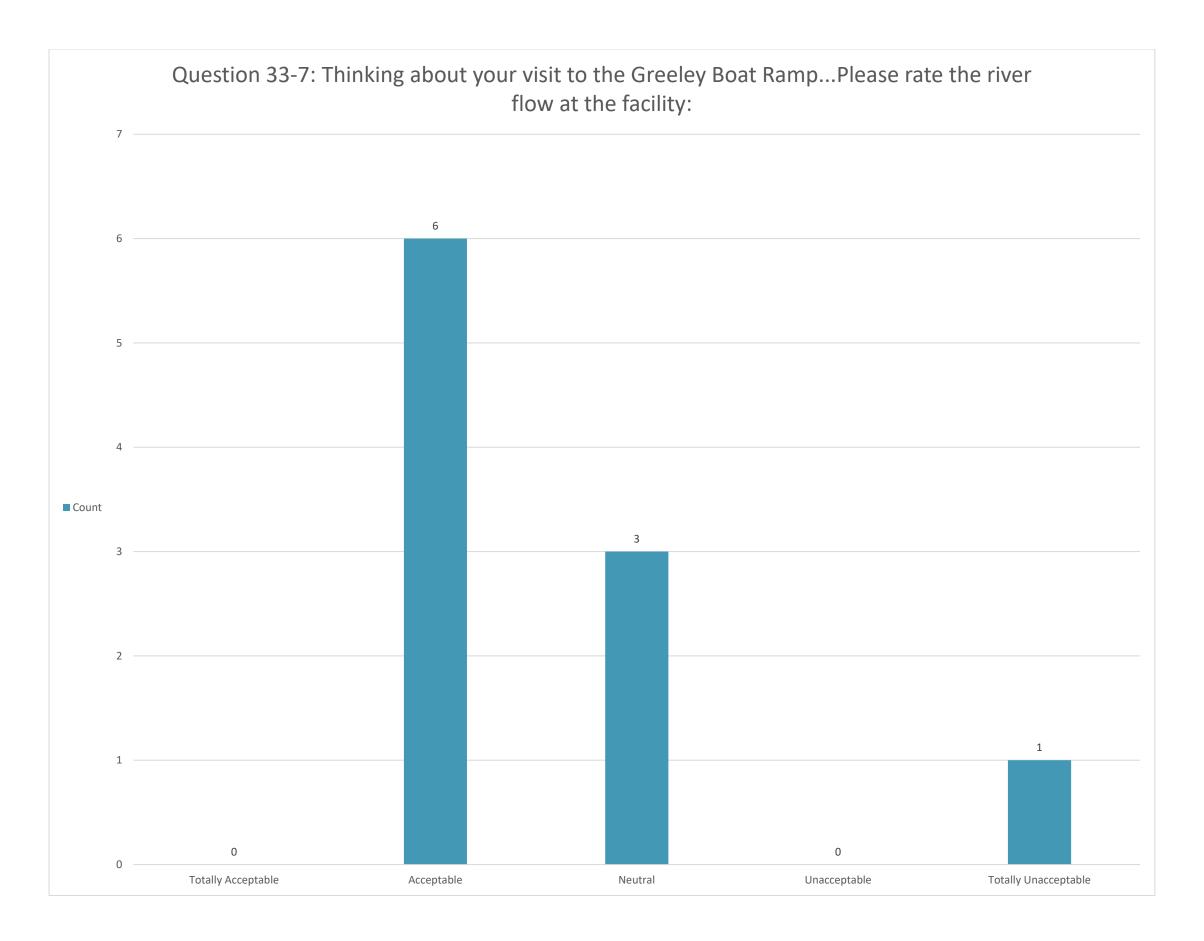


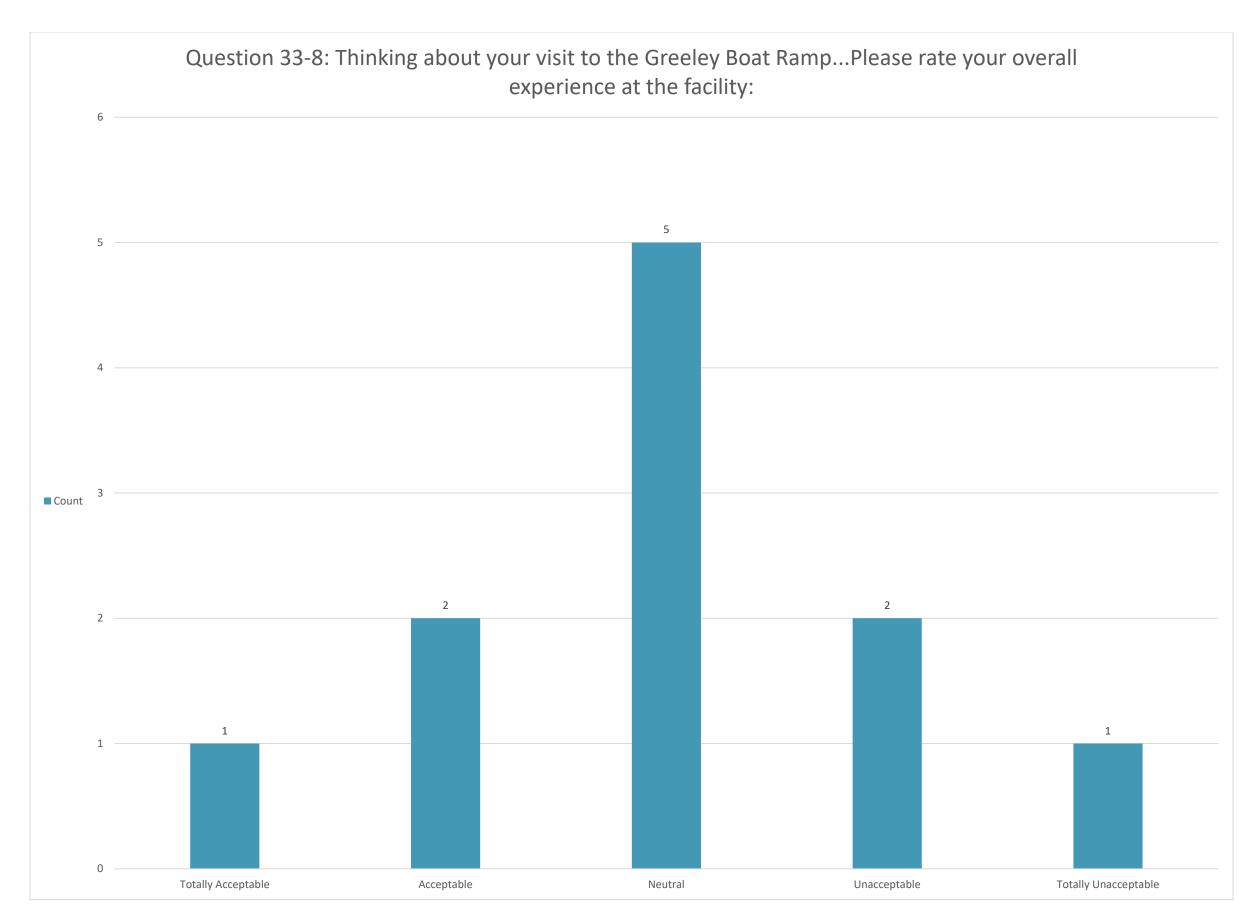


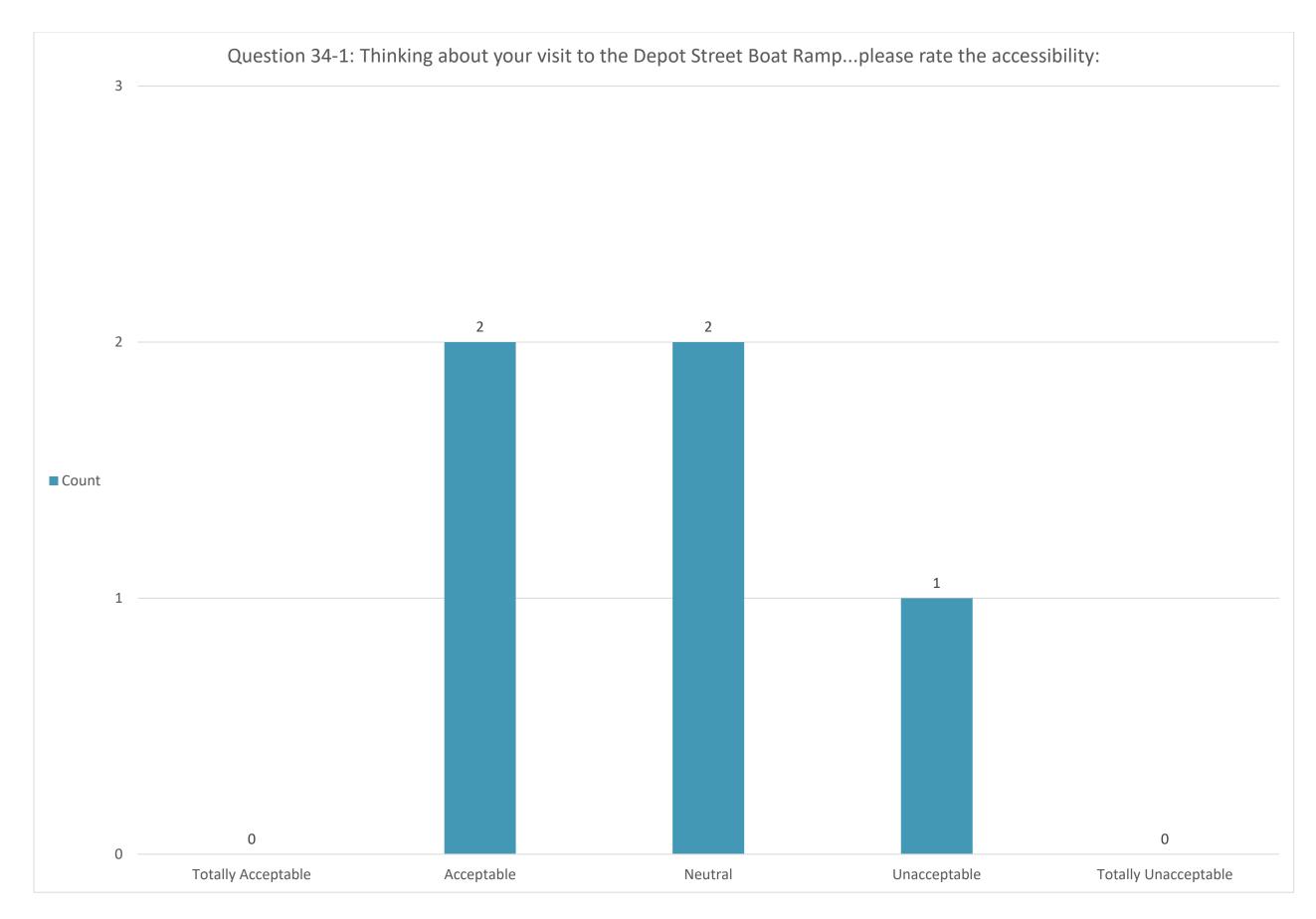


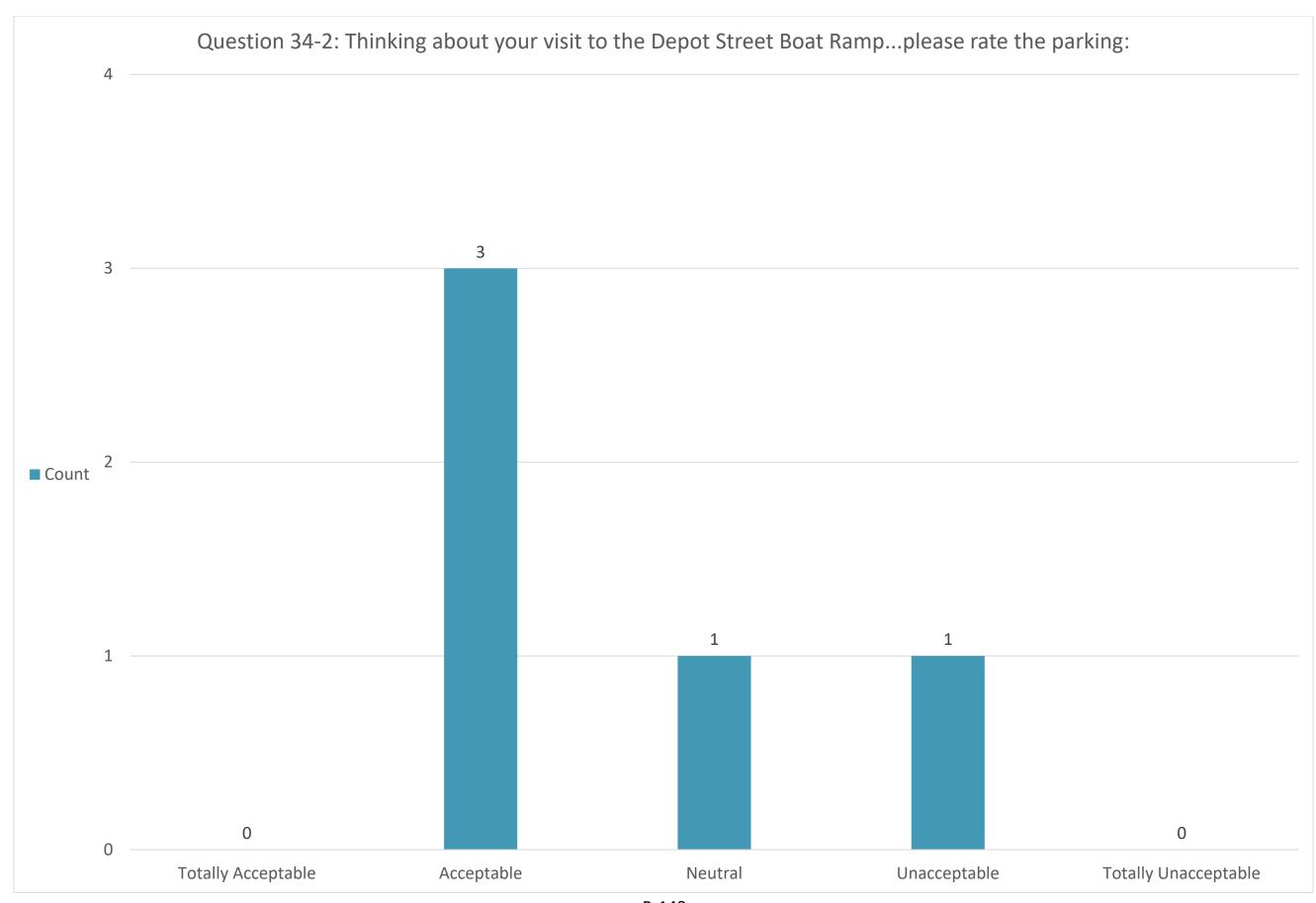


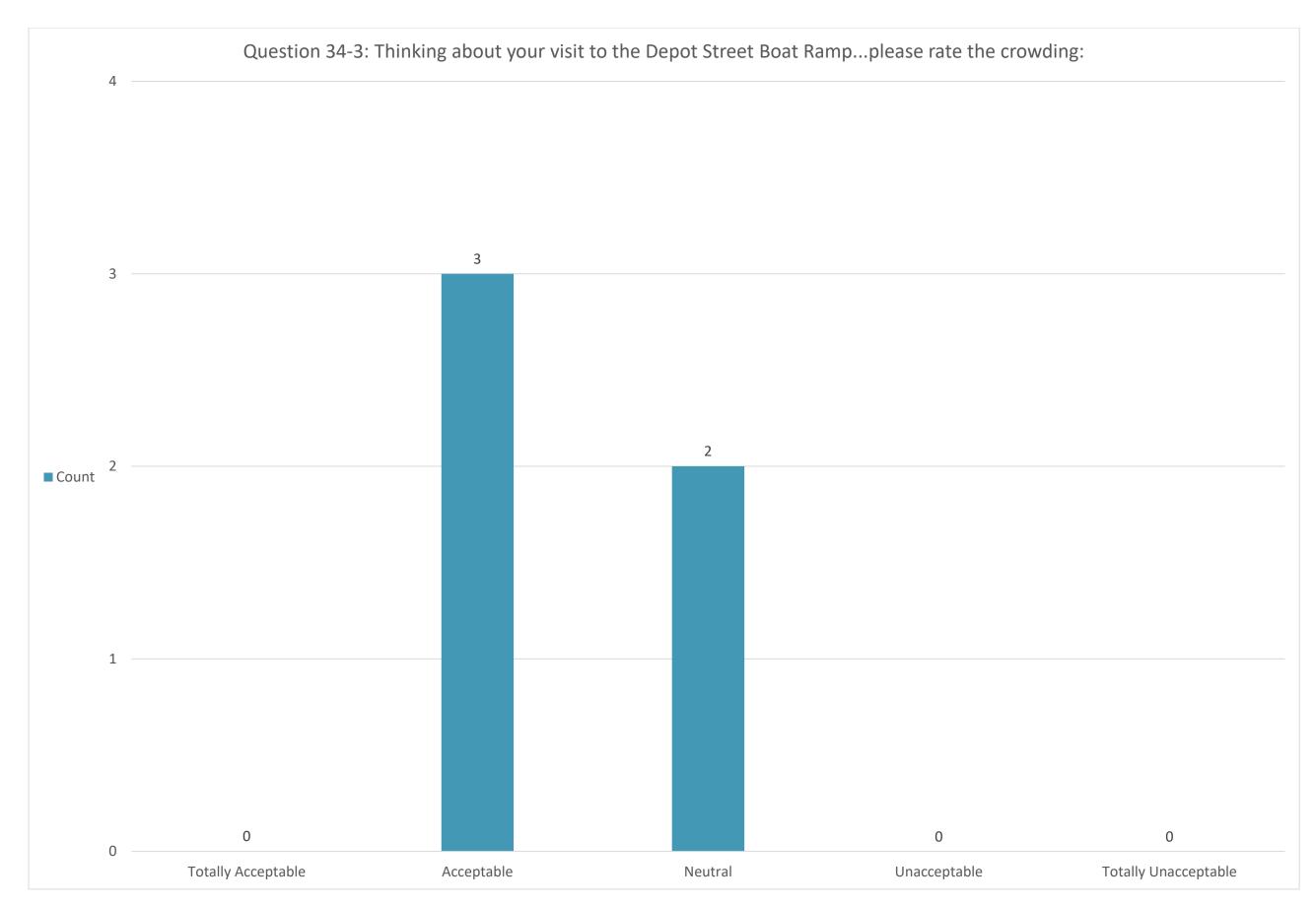


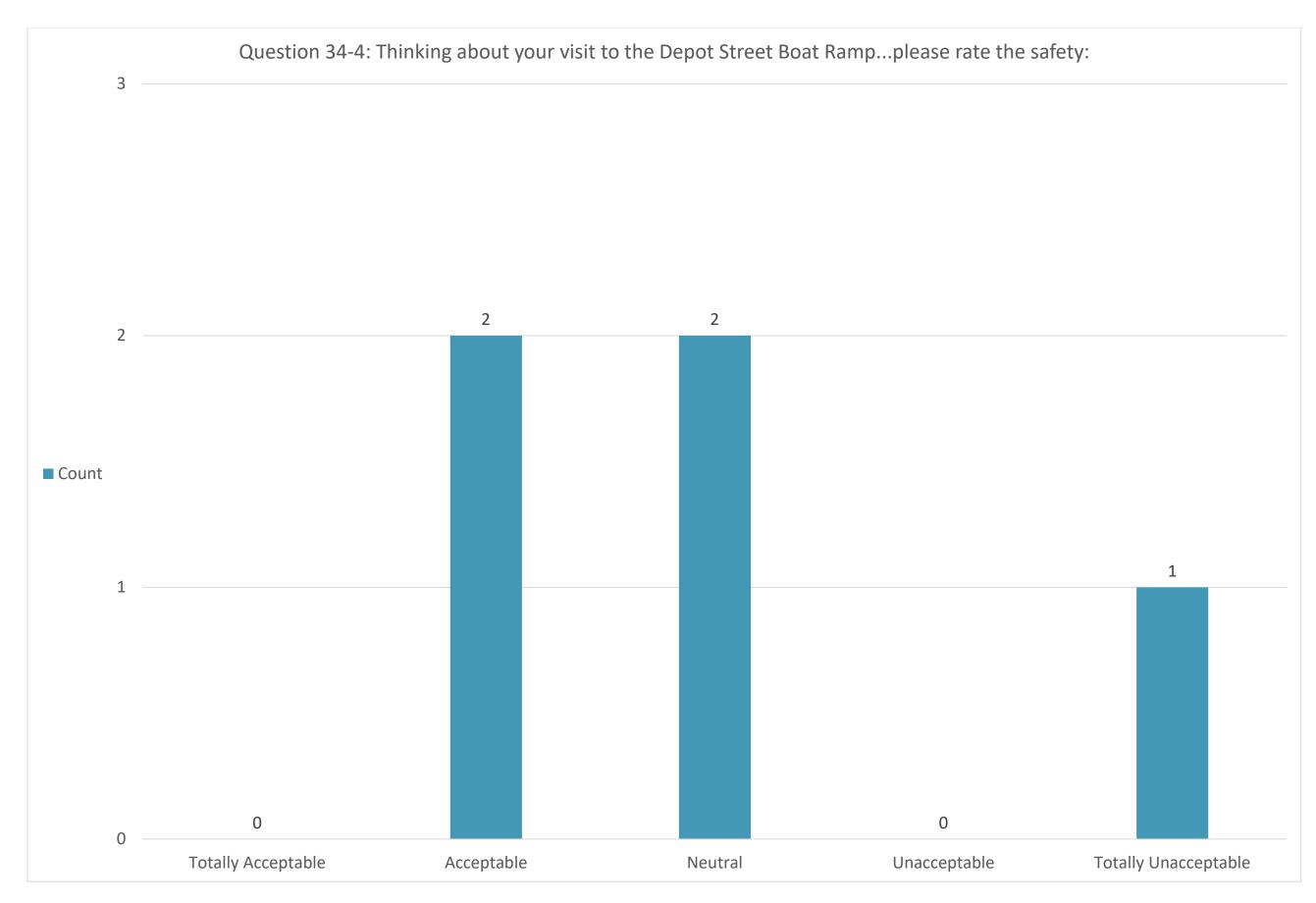


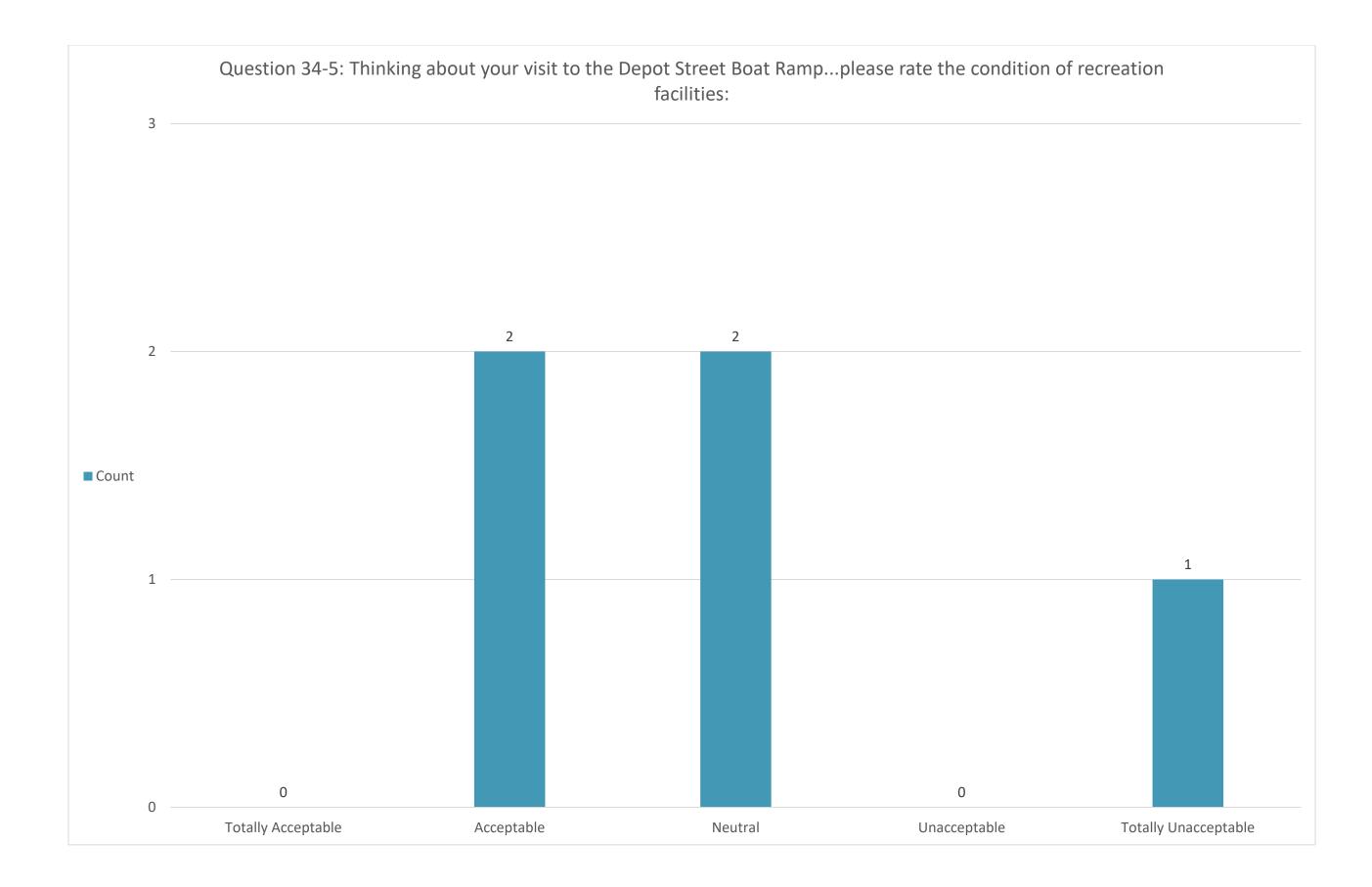


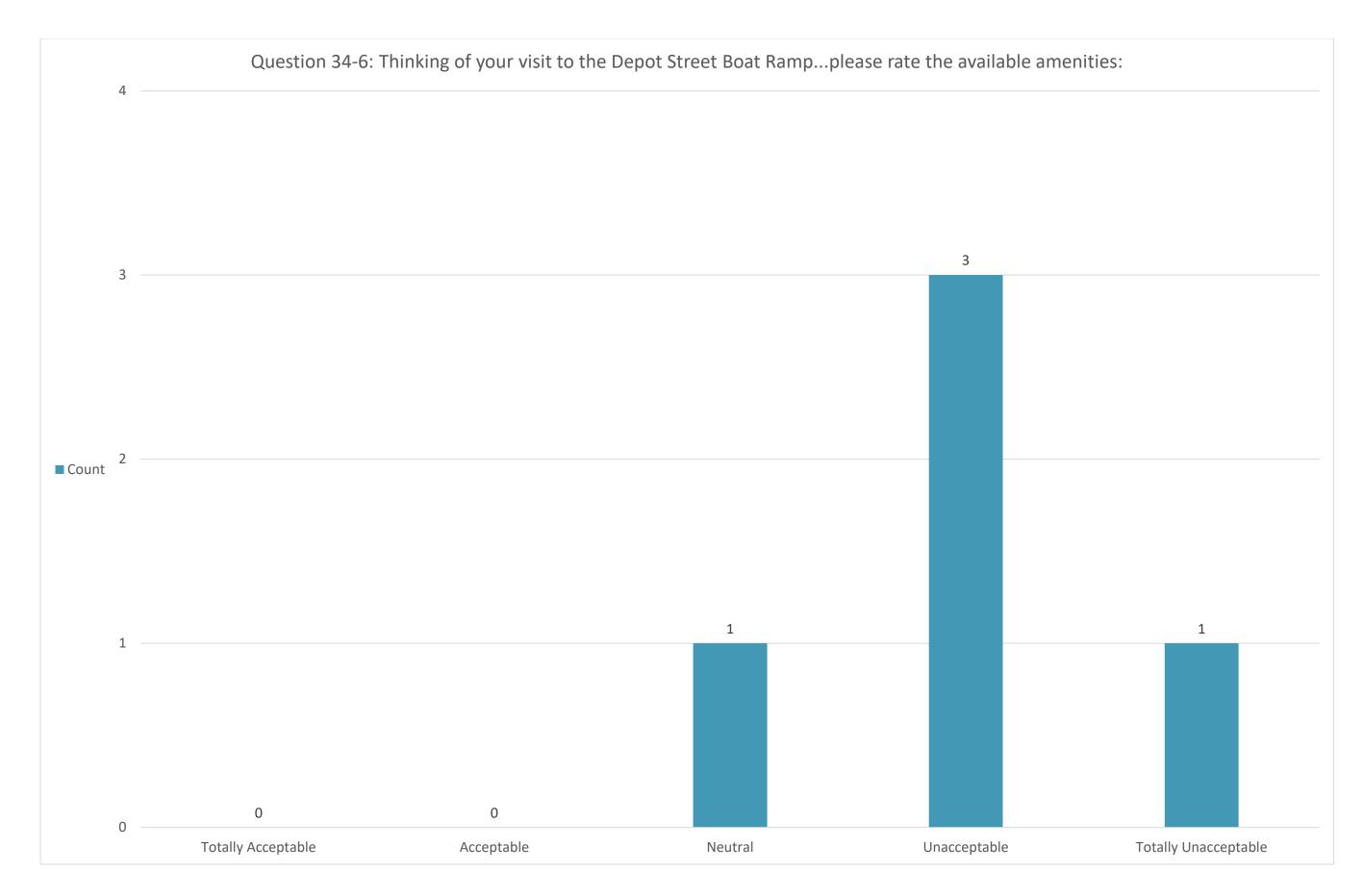


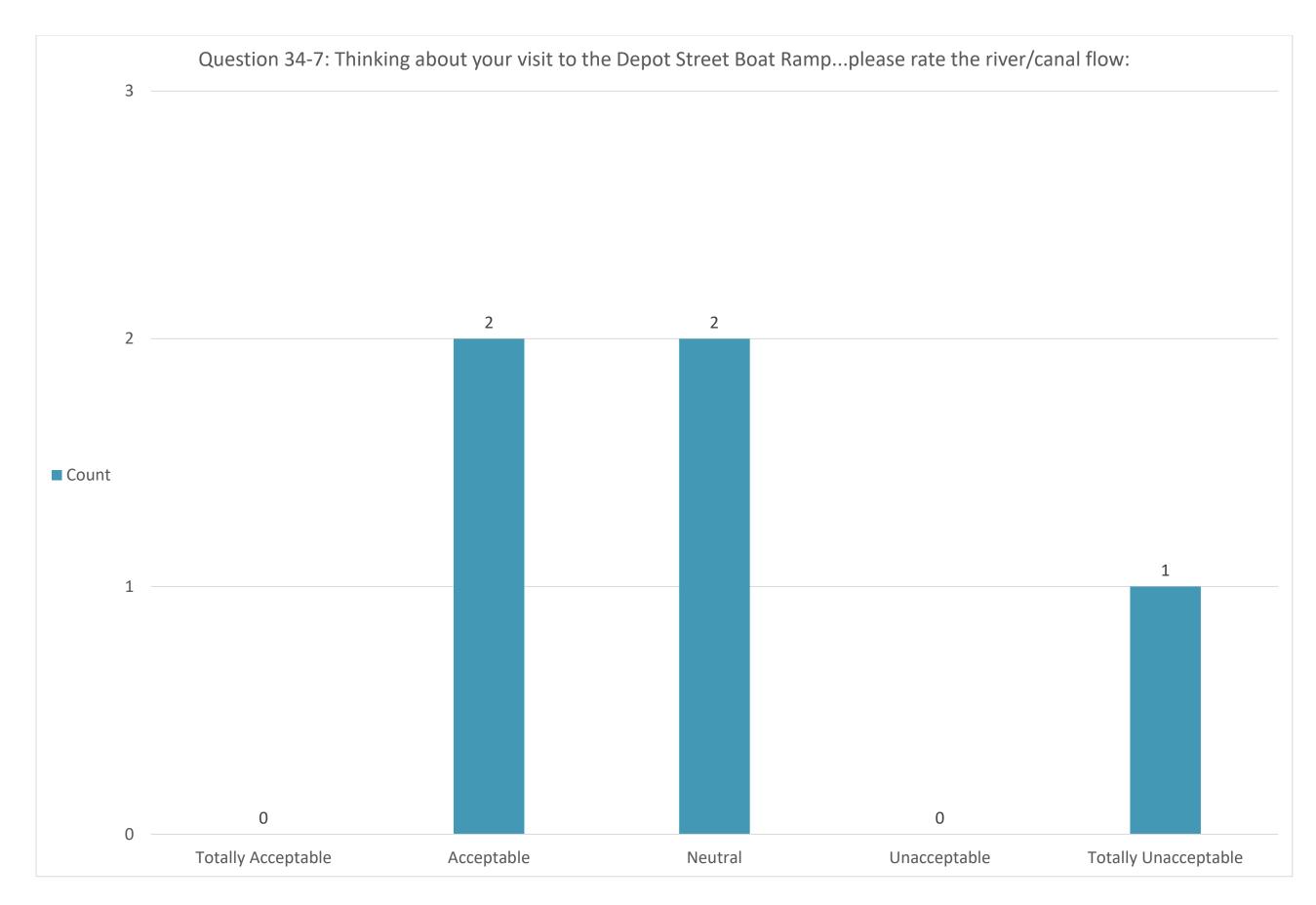


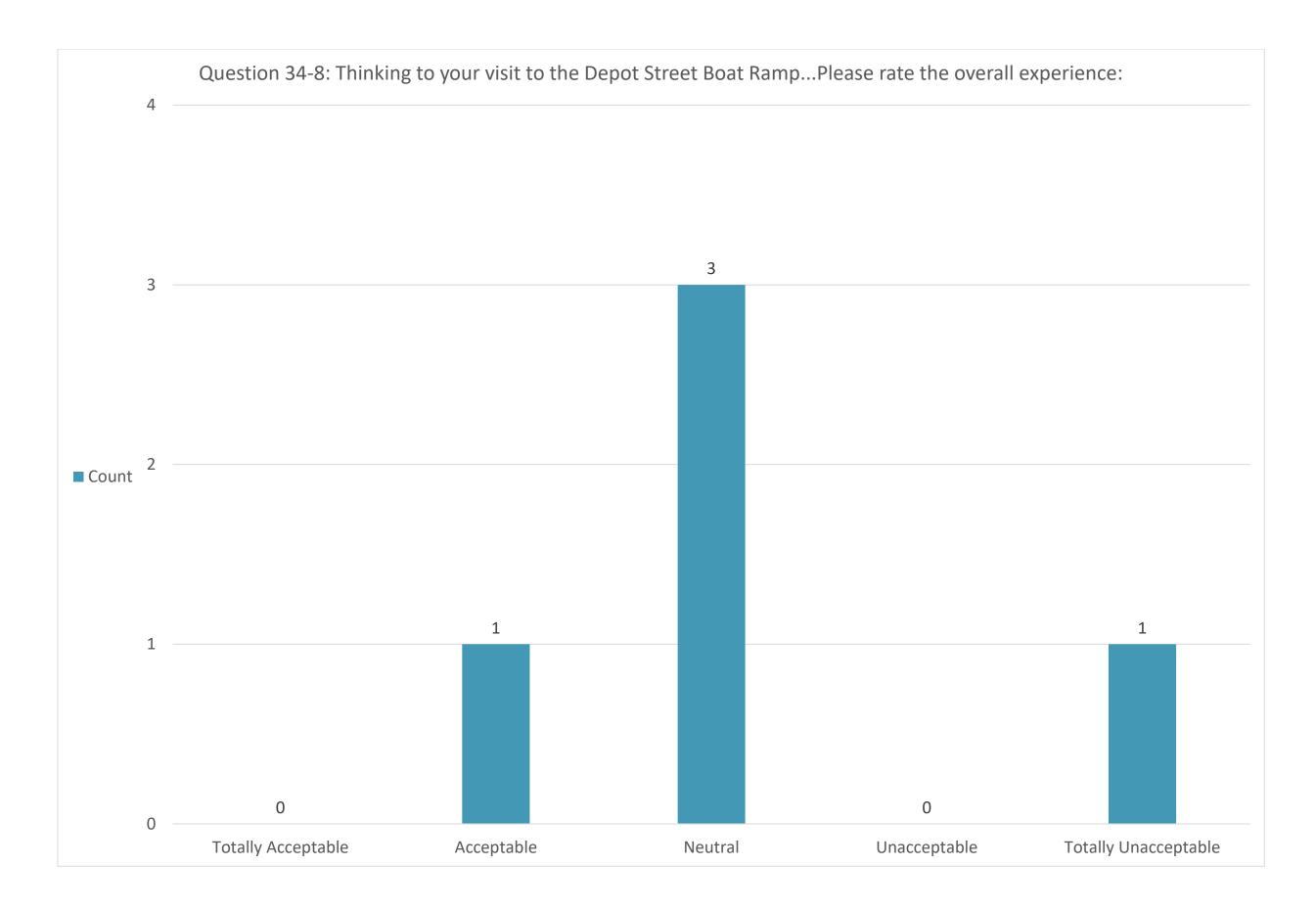


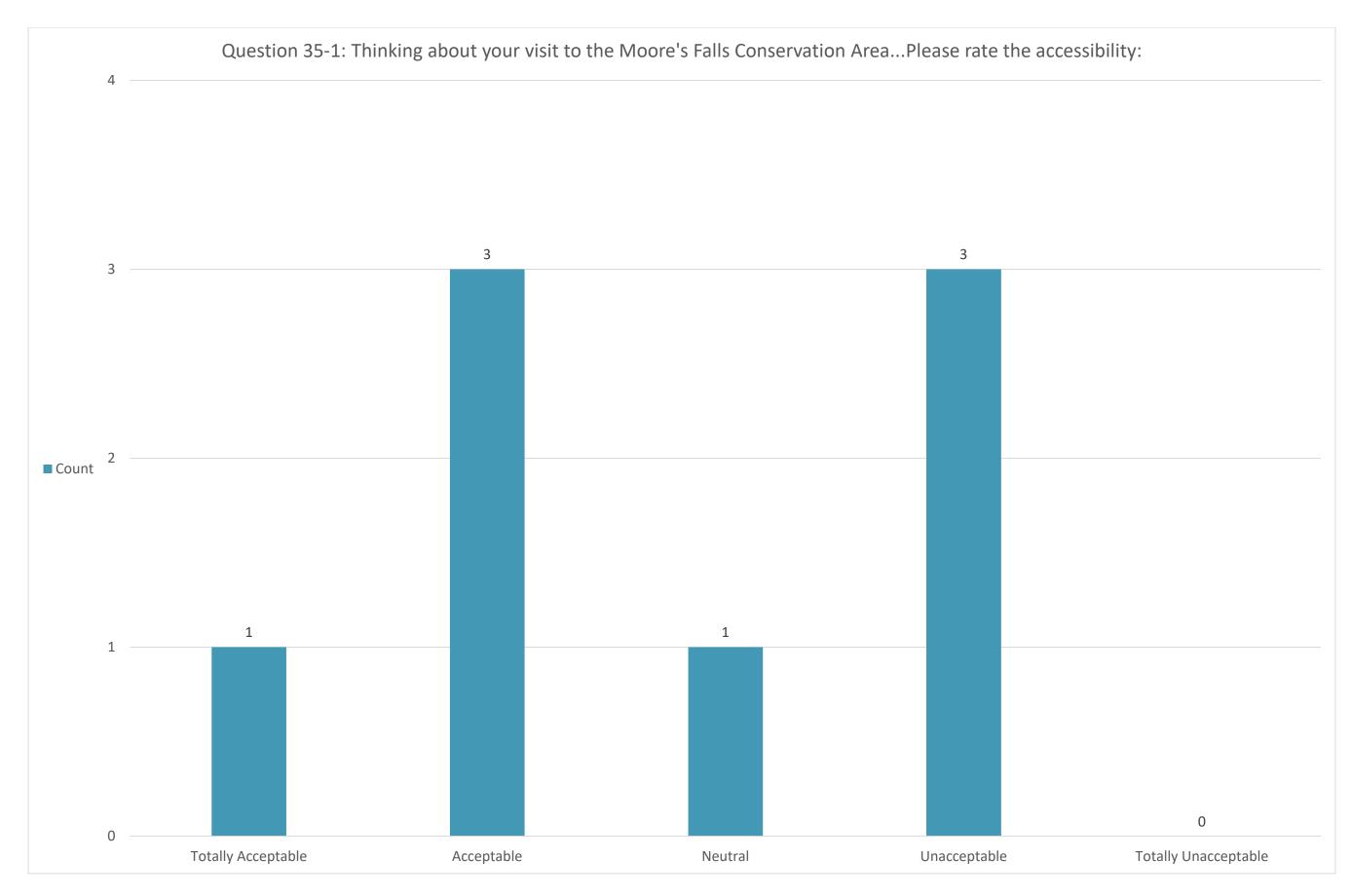


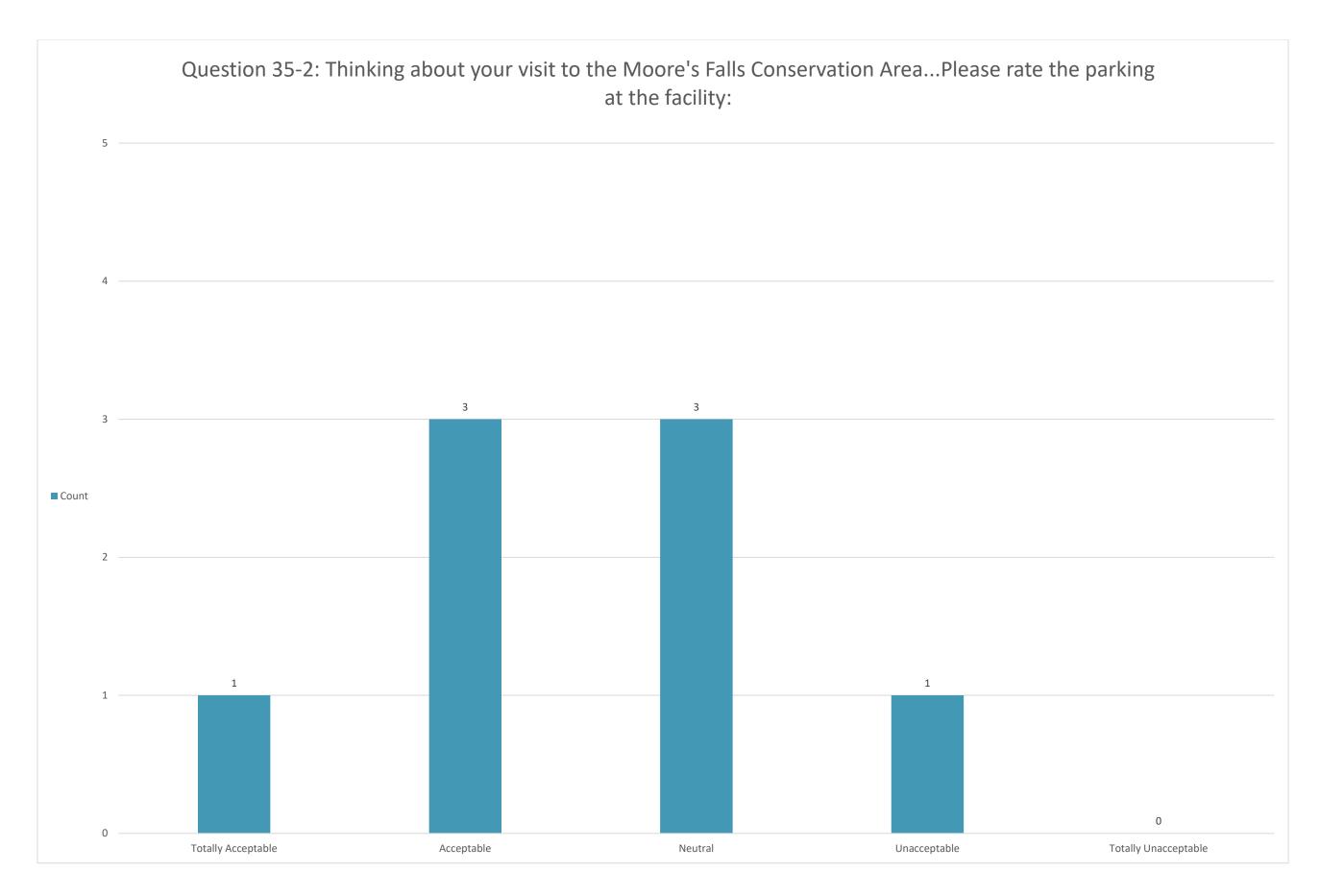


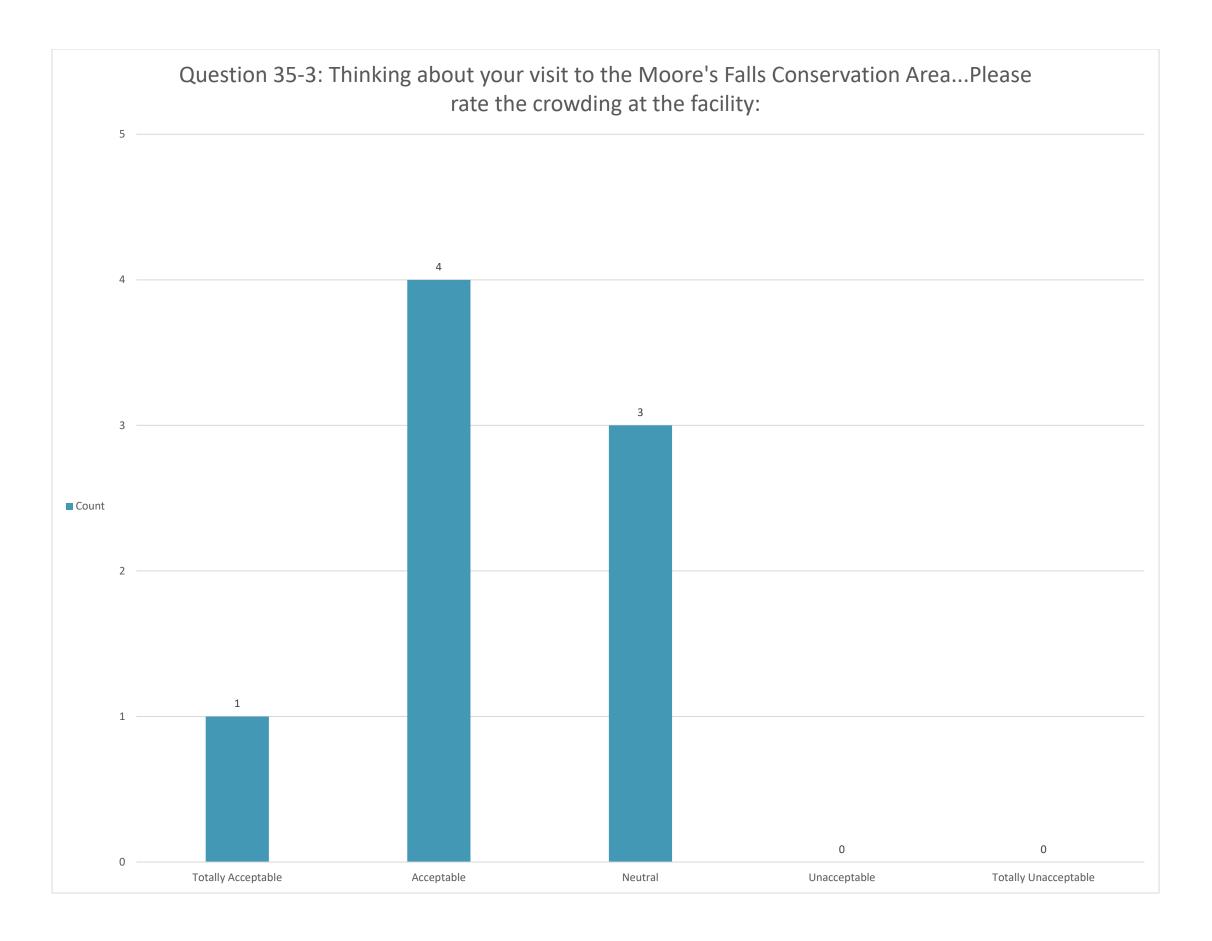


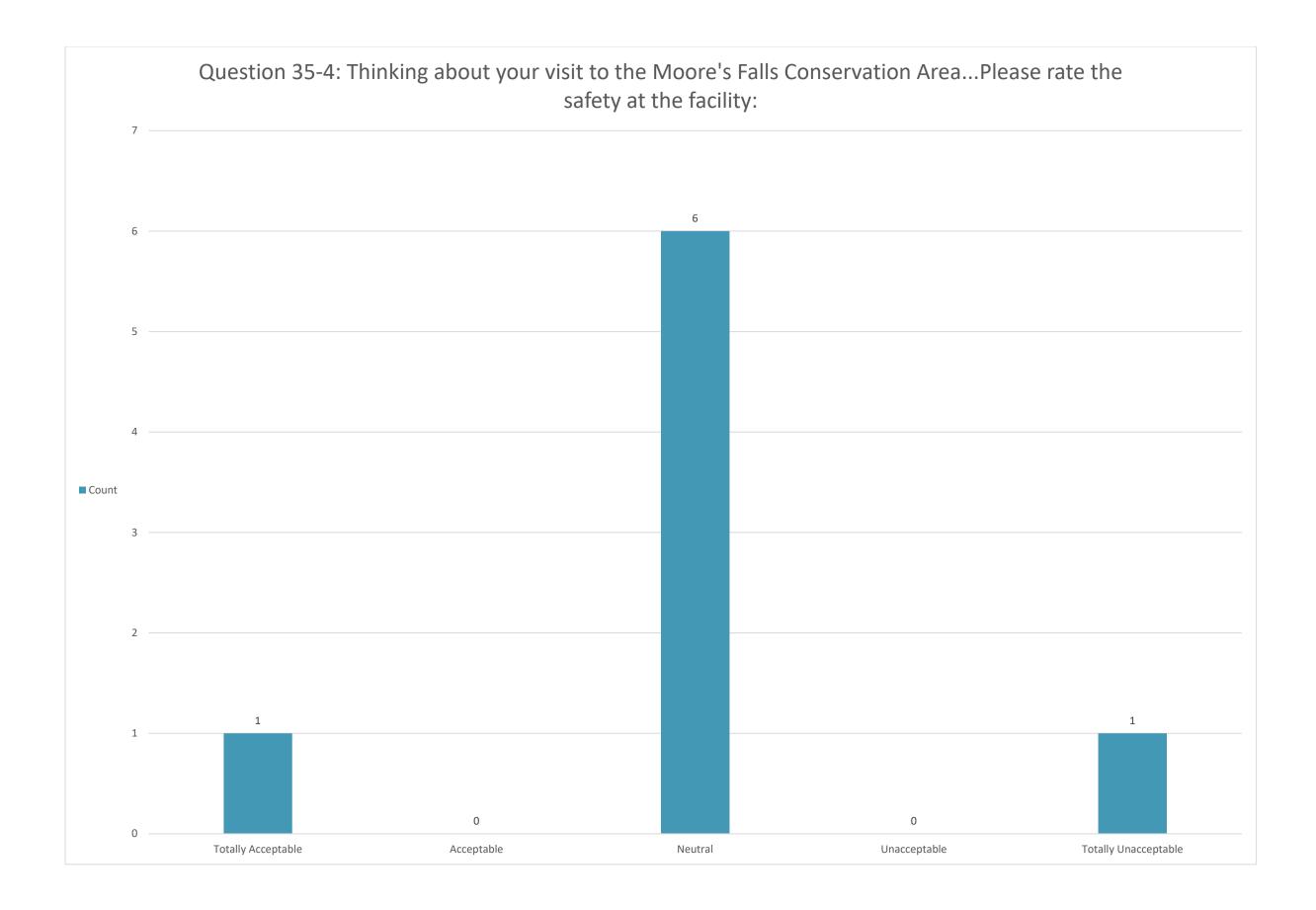


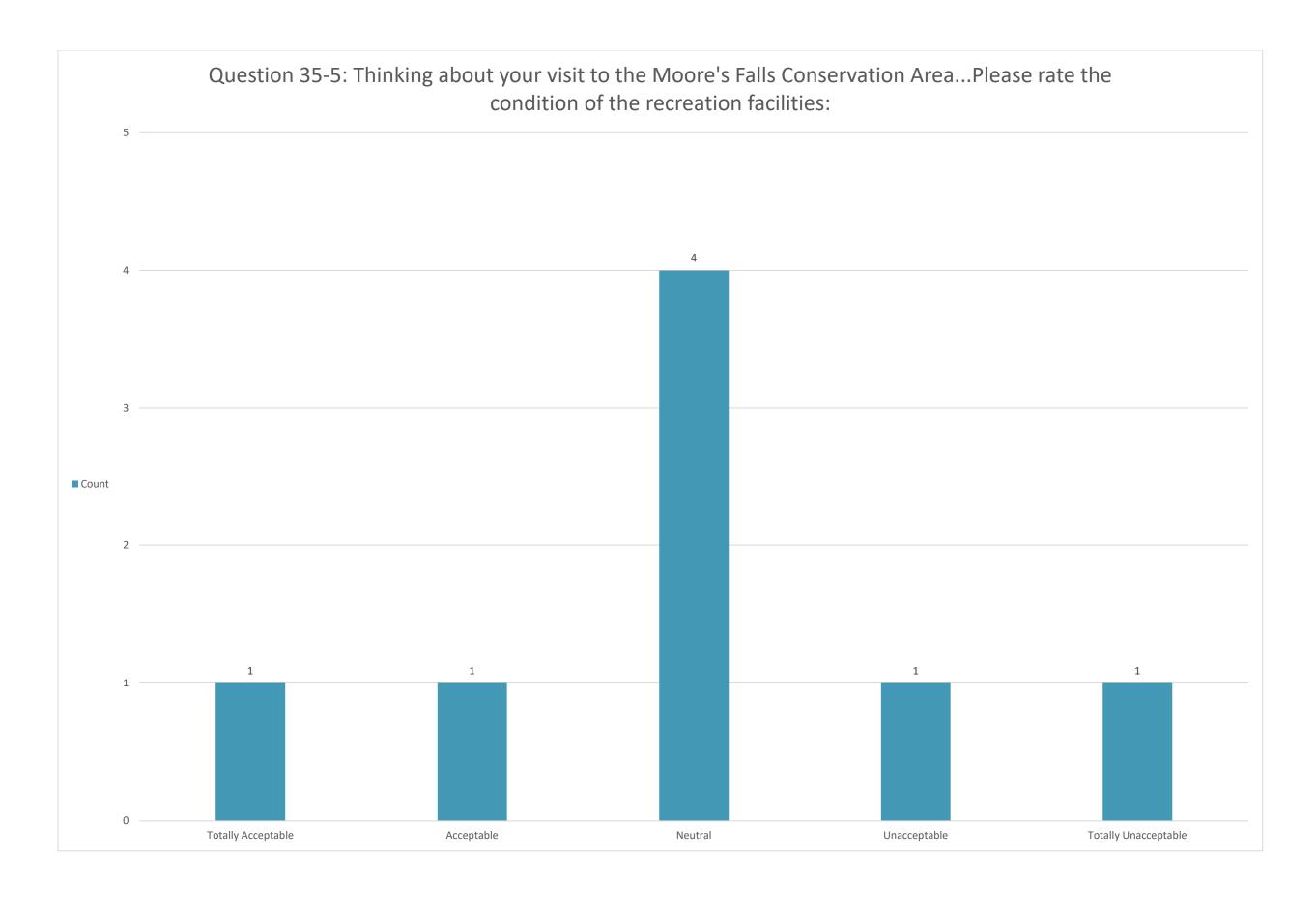


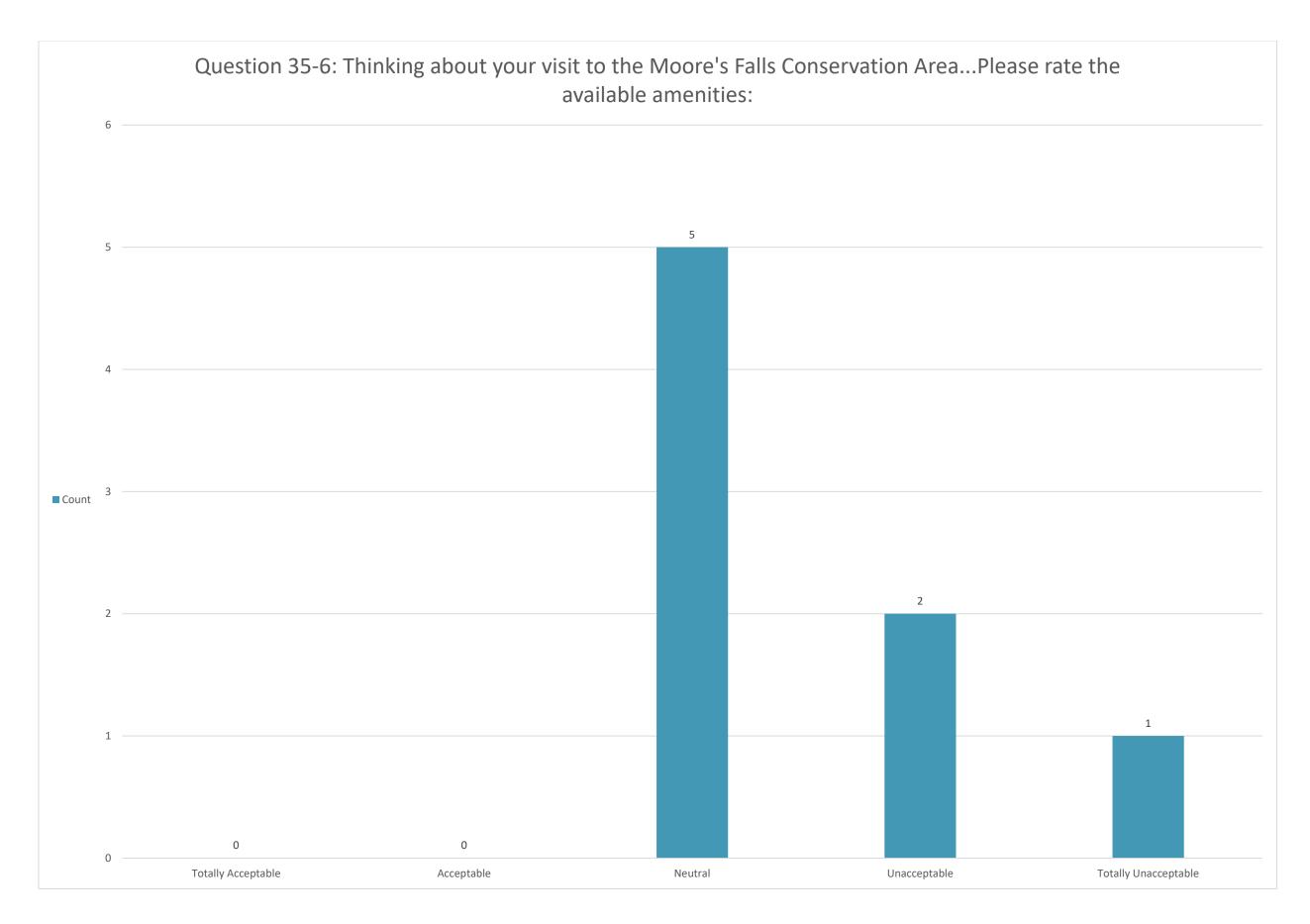


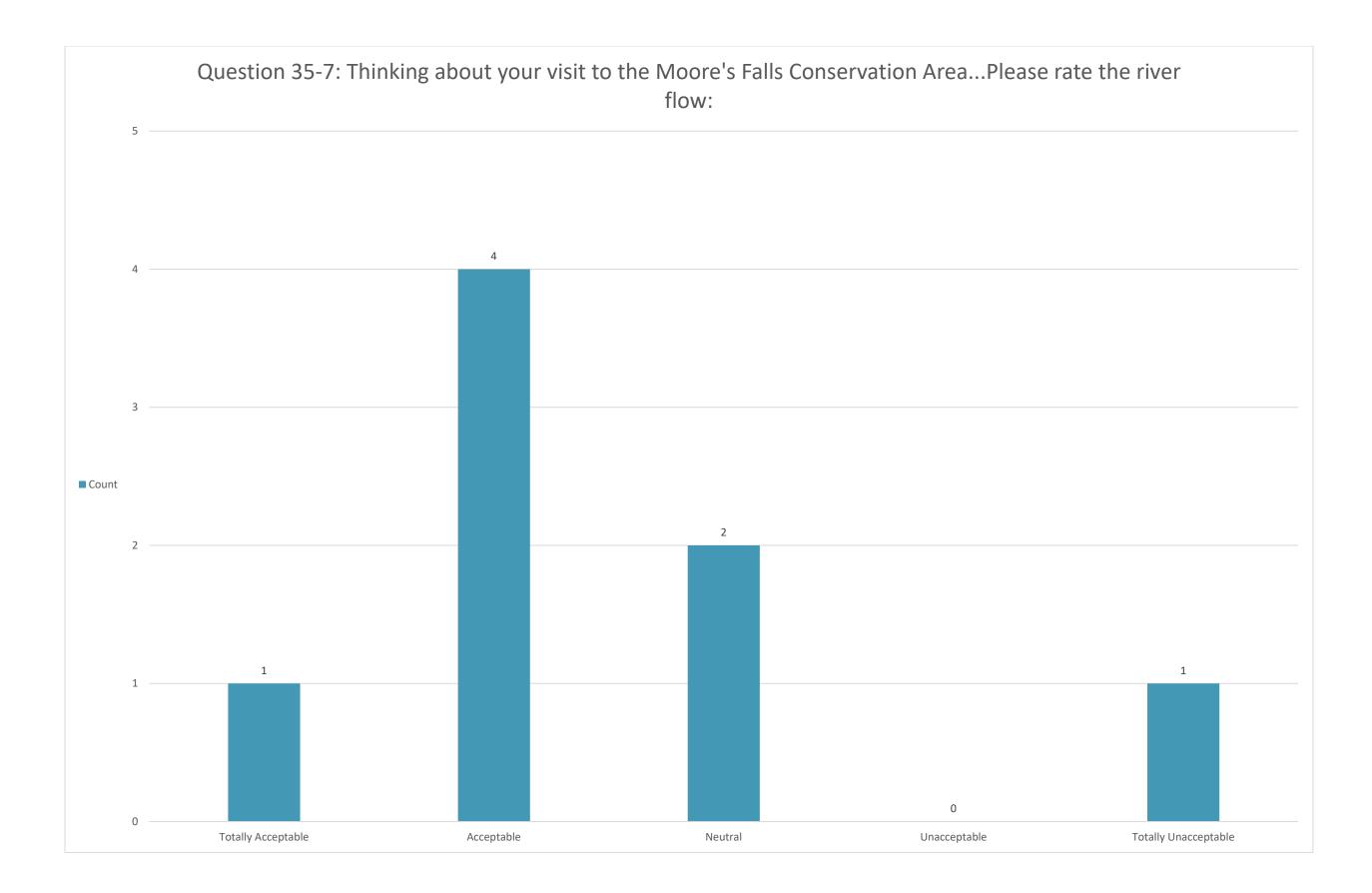


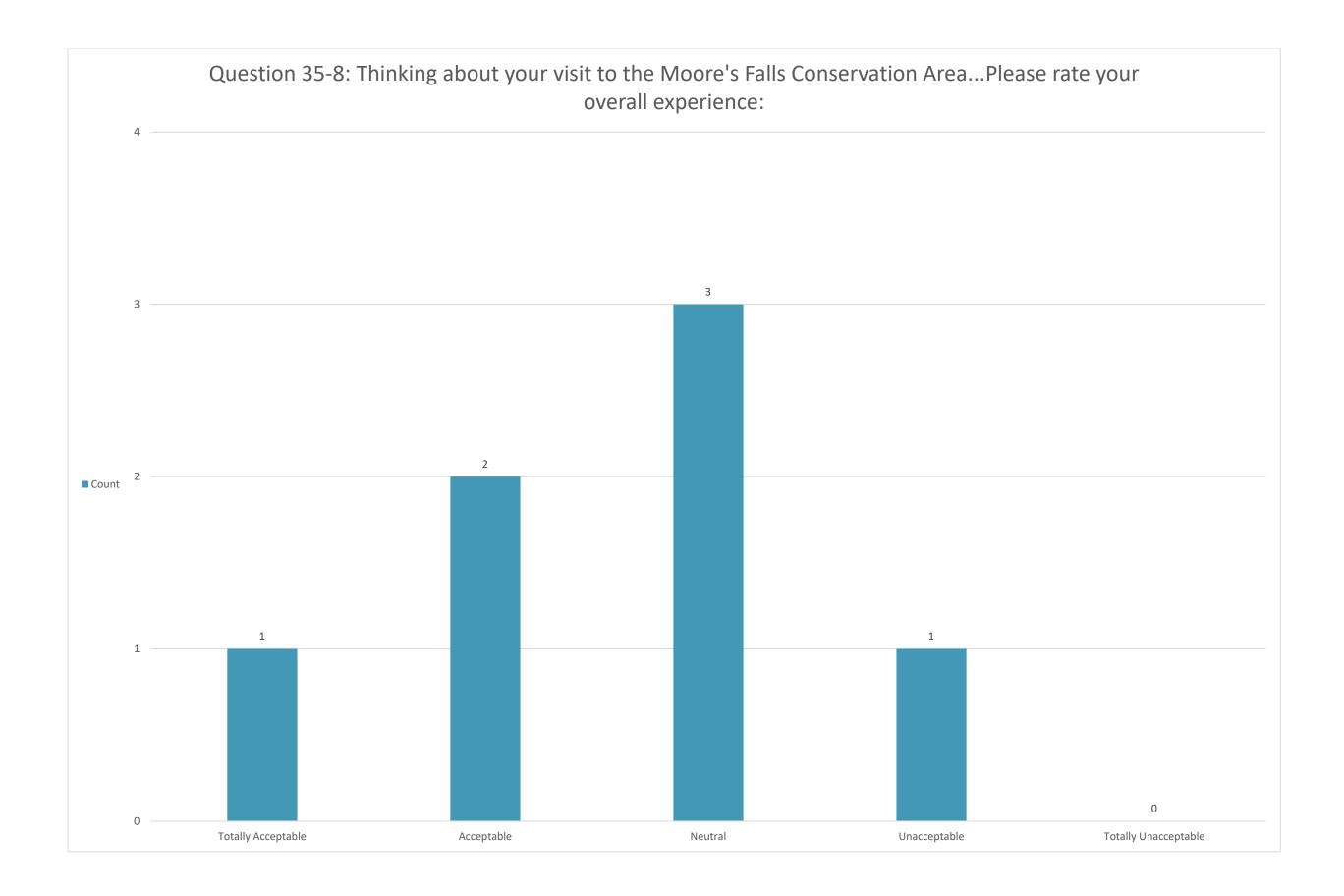












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5/8/2019 7:25	fishing access	Pawtucket falls area	whitewater recreational releases with improved access and adequate flow information	Pawtucket falls	Improved access and trails	Pawtucket falls area	Lowell's world class whitewater and long season, is a resource that is greatly overlooked and underutilized due to the current condition. Whitewater boating is a popular sport in New England with tens of thousands of participants. Many live in the greater Boston area, myself just a few miles. Many Boaters enjoy the rapids on neighboring Concord River. Lowell has potential here to create another unique thriving attraction. Not only to the private boaters but to commercial companies as well. Commercial rafting proceeds on the Concord, currently help fund much of the greenway project. A longer greater season for them means more financial assistance from their proceeds. Lowell should be and has all the potential to be, a Richmond VA of the North.
5/8/2019 8:08	improvements for whitewater paddlers						
5/8/2019 8:53	River access to whitewater sections	Anywhere there is whitewater, in particular just below the dam.					
5/8/2019 9:03	Improved public access to the canals	all canals	better public access for unguided canoeing / kayaking	all canals	public access ramps, parking areas	near canals	It would be fantastic for economic development, waterfront pubs, non-motorized boat rental, to allow public access to Lowell canals - at least from dawn till dusk.
5/8/2019 9:10	Whitewater Access	Pawtucket Falls	Recreational releases	Pawtucket Falls	Proper Flow Gauge for Pawtucket Falls	Pawtucket Falls	I have traveled the country paddling challenging whitewater. Lowell has some of the highest quality whitewater given the correct conditions. However its inaccessibility, lack of flow, and debris problem. Has allowed it

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							to be severely compromised, seldom visited and avoided commercially. Limited shoreline access has also created conditions of underutilized wooded areas, that largely harbor many homeless camps, dumping sites. Further adding to river and shoreline debris. Addressing these recreational potentials will greatly benefit the health of the river and the city as well as help developing Lowells growing recreational attractions.
5/8/2019 9:17							
5/8/2019 9:48							
5/8/2019 9:59	Keep rivers clear of debris and trash including trees	Concord					Good improvements to river putin and takeout locations.
5/8/2019 10:06	Boat ramps	Canals	Kayak and canoe access	Canals			
5/8/2019 10:12	Canoeing	Canals	Kayaking	Canals	Boat kayak access	Canals	
5/8/2019 10:12	Clean up trash	Everywhere					I stopped going because of the garbage, needles, etc
5/8/2019 10:22							
5/8/2019 10:57							

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5/8/2019	River side	Wamesit Falls	River side	Eastern			
11:07	boating put in	Overlook area	boating take out	Canal Park			
5/8/2019 11:27							
5/8/2019 12:55	artificial whitewater park	Pawtucket Canal and/or Northern Canal	whitewater rafting and whitewater kayaking				If one hasn't occurred, a city sponsored business study on the economic cost/benefits of constructing an artificial whitewater park would identify the feasibility of such a project. The proximity to such a large population would drastically promote tourism and should be considered within the city's development and economic plan.
5/8/2019 16:01							Entire project needs to be promoted and spruced up. If more activities were offered on a regular basis, more people would enjoy them. Compare attendance and usage with LOWELL WALKS!
5/8/2019 16:20	Shoreline access	Concord River					It's a valuable whitewater resource for kayaking, canoeing and rafting in Eastern Mass
5/8/2019 19:19							
5/8/2019 20:25	better parking	near greenway					
5/9/2019 4:22							
5/9/2019 6:37	Better kayak access		More releases of water		Less trash, especially needles		Yes please improve access flows and cleanliness for whitewater boaters like myself. Many boaters in the Boston area have to drive all the way to mid New Hampshire tonget decent paddling.

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5/9/2019 23:53	Clean up the hypodermic needles	All locations					clean up the hypodermic needles at all locations
5/10/2019 3:58							Used Hypodermic needles are the immediate safety concern that needs to be addressed
5/11/2019 9:55							
5/13/2019 11:14	River clean-up efforts	Concord River	Old dam clean- up/removal	Concord River			Broad boating access around the city of Lowell would result in my using the area for whitewater recreation significantly more frequently. Currently, there's no reasonable access for rafts to the Merrimack River sections with whitewater that I'm generally aware of.
5/16/2019 8:43	Improving flows to the dewatered section of river	Pawtucket falls.	Access trails along river	Along dewatered section of pawtucket falls	Canoe and kayak access point.	Below Pawtucket falls.	Lowell has been over looked and underutilized when it comes to its recreational resource potentials. This facility has lacked any real recreational efforts in its past license. Its current condition, has limited the window of world class whitewater conditions, to a very few days a year. This has limited the amount of participation from the community of enthusiasts of this region. Improving flows, access, pollution from canals and homeless camps along the facility, would greatly improve these conditions. This license is 47 years in that time Lowell could grow into a Richmond VA like city in that timeframe. If the right choices are made for the residents of Lowell and surrounding communities.
5/16/2019 16:15	Improved flow	Pawtucket falls	Gauge to measure flow	Pawtucket falls	Improved access	Pawtucket falls	Large homeless population needs to be addressed. Not saying they need to be evicted but it is need that should be addressed
5/16/2019 20:28	boat trips						

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6/27/2019 12:30	Kayaking	Somewhere safe on canal system	canoeing	Somewhere safe on canal system			More people would like to use the canal system as a form of recreation. Where can this happen? You are the experts to tell us.
6/27/2019 15:24	More trash cans that are emptied frequently	River walk/canal walk	Beautification of the river walk/ canal walk	All			There's sooo much trash in the canals and around the canal walks /river walk. It's really gross.
6/28/2019 19:57	Damage repair/restoration post operations	North canal gate house/gatekeepers house					My comments are not about recreation. They constantly fail to repair damage that is cause from their crane operations at the northern gate house. I have continously tried to establish a working relationship with them, but to no avail. I live in a house via Massachusetts DCR, historic curatorship program, and i promise they continue to fail on the rules of their permit. I deal with these operations on a yearly basis, for almost 5 years. Not once have they followed their permit and repaired damages.
7/4/2019 7:58	Accessibility	Merrill park	Trail maintenance	Merrill Park	Trash removal	Merrill Park	I go to Merrill Park daily. The park does not seem to be maintained at all. There are no amenities. I collect a bag of trash every day on my visit. This park could be a jewel with a little help.
7/4/2019 8:18	Boat launch	Tyngsboro					Boat ramps are crowded on weekends with jet skiers
7/4/2019 8:31	clearing brush and fixing the walking path down to the river bank	toilets					

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7/4/2019 8:50	Trail maintenace	Merrill park	Signage and mapping	Merrill park	Additional ameneties	Merrill park	Riverfront Park needs to be included in the survey area as this is a highly used access point for fishing and paddling and swimming and great for picnics
7/4/2019 9:09	Leave park as is. Don't encourage use.	Merrill Park					
7/4/2019 9:19	More access to the Northern Canal	Northern Canal					
7/4/2019 9:21							
7/4/2019 9:23	increase access conditions and accessibility to Northern Canal Walkway	Northern Canal Walkway					
7/4/2019 9:28							
7/4/2019 10:37							
7/4/2019 10:38	Protected bicycle lane (or multi-use path parallel to road)	Pawtucket Boulevard - especially, the sidewalk by the Pawtucket Falls Bridge has	Pedestrian signal controls	Crossing by Rourke Bros. Boat Ramp - in the MIDDLE	Protected Bicycle Lane	All bridges across Merrimack River. Yes,	The biggest impediment to cycling in or near the described recreational areas, is safe access by bicycle. The river, itself, is one of the biggest obstacles for cyclists. Within the City of Lowell, only one bridge - at University Ave - is even remotely "bike-friendly", and the intersections at either foot of ALL the bridges are abysmal to cycle through.

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		STAIRS, and is neither bike- friendly, nor even ADA compliant!		section, for access by road cyclists on Pawtucket Boulevard seeking to turn left (to Rourke Bros/ Boat Ramp) or right (to Heritage Ice Cream)		ALL of them!	
7/4/2019 11:20	More accessible walkways / pathways, eliminate stairs	Northern canal walkway					
7/4/2019 11:26							I live in the Boott Mills. The canals have been dry and are dirty and unsightly with litter and trash. Do better
7/4/2019 11:34							
7/4/2019 11:42	bike racks	various					Not every place needs a restroom and a parking lot, it's an urban park and walking should be expected. I'd like to see the Lowell riverwalk connected and extended.

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7/4/2019 12:24	Consider opening some of the canals to recreational boating						So far the river has been consistent in depth since the Crest gate system was installed on the dam.
7/4/2019 12:49							
7/4/2019 12:57							Enel needs to do more to clean up the canals.
7/4/2019 13:10	More Lighting	Riverwalk	More trash removal	All canals	Homeless	All Lowell parks	Let's tidy up. Let's raise taxes! Let's get the community involved!
7/4/2019 13:24	More paths along M river	Hudson	More paths along Nashua River	Nashua, Greeley Park	Safe Road cycling	All, connecting locations	General access to outdoor bike paths & areas to sit in the shade & sun. Connecting bike paths between locations would be good. Availability of coffee and sandwich shops for refreshment would be nice.
7/4/2019 13:53	Improvements	All	Cycling, hiking, fishing, running, walking, swimming	All			
7/4/2019 14:20	More public restrooms	Generally	Signage	Generally			
7/4/2019 15:33	Walkways leveled for better accessibility in certain areas	Canal walks	Canal trash clean up	Merrimack and Eastern canals			Can we have more easily available information about canal draw downs? connect the project area to the rail trails.

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7/4/2019 15:59	Canoe/kayak on the canal	Pawtucket Hamilton canals	Ice skating on canals	Pawtucket	Canal side dining	Pawtucket canal	Need to make the Lowell canals a destination for people to visit. Lighting and activities would be a great start.
7/4/2019 18:01							
7/4/2019 18:36	better and longer parking	Sheehy Memorial	Adult fixed exercise equipment	Merrimack Trail	Dog park	some place other than wher it is	Trash out of the canal. Less flooding in Lowell, due to high river levels. Better water quality in Merrimack.
7/4/2019 22:23							More parks, bocce, bike infrastructure, signage
7/5/2019 7:43	Casual canal boating	Merrimack, Western Canals	Cycling, walking	Merrimack River, Northern Bank	Water Taxi/Drinking/Shopping	Pawtucket Canal	The Canals are difficult for Lowell, as they limit road crossings. But they are also such an amenity unique in Massachusetts. Let's reclaim our title of Venice of America. We could also put up interpretive signage about how the canals still create renewable energy for the area and about how they contribute to the ecology, e.g., fish.
7/5/2019 12:15							
7/5/2019 13:30	Water fountain	All	Public bathroom		Bike and walking trails		The canals always has trash in them
7/5/2019 19:34							
7/7/2019 5:47							
7/7/2019 15:53	Off leash dog park	Anywhere shady by the river					

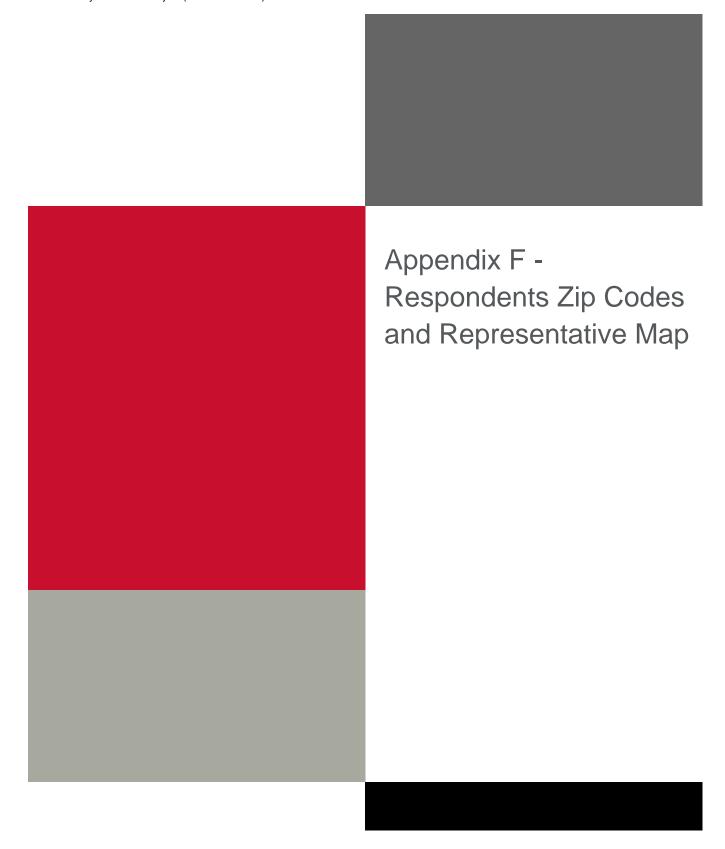
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7/7/2019 19:13							
7/7/2019 20:43	Boat ramp	Greeley park ramp	Widen access road, more parking fix ramp	Nashua			
7/16/2019 10:45	Better parking (current parking lots aren't enough, VFW highway semi- legal)	Heritage Park	Safety and beautification improvements between Sampas and the School St Bridge, by falls overlook				
7/16/2019 14:05							
7/16/2019 14:30	Seating	Along canal walkways	Parking	Near access points			
7/16/2019 15:09	more lighting						
7/16/2019 16:10	More trees, shade, greenery less pavement	all locations		all locations			

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7/16/2019 18:13	More public restroom access	throughout the area	More native plants to attract birds and mammals	throughout the area			I believe developing this aspect of our city can only make the area more attractive to visitors and better for residents who need access to nature
7/16/2019 18:19	Always concerned with access for non- motorized watercraft.	Through-paddlers					
7/16/2019 18:30							
7/17/2019 8:05	Pedestrian walkway improvement	All	Connecting trails	All	Clear, concise signage for areas and trails	All	Deteriorating sidewalks, excessive weedy brush along all trails. Unacceptable trash accumulation in all waterways detracts from top-notch opportunities for active and passive recreation. Desire paths connecting sites along Merrimack River are not suitable for anyone but the very surefooted. Trash removal should be regular event not occasional event. More cooperation between private industry and local National Park/City and Conservation partners. The fish ladder is both an eyesore and poor function. Brush and weeds obscure walking vistas. Poison ivy. Chain link fences are not inviting or welcoming. Many walks are not in compliance with ADA regs
7/17/2019 18:53							
7/18/2019 12:07	Bathrooms available year- round	Lowell Heriatge State Park	More parking, less trash in waterWhole	Pawtucket Falls overlook			Whole area is an urban jewel which needs to be preserved and appreciated.

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			urban jewel				
7/18/2019 14:32							
7/19/2019 10:00	better connected walking facilities	from the overlook to the heritage park					collection of trash in the canals and behind the dam.
7/27/2019 21:23	extra dock for boats						at the Rourke Brothers Boat Ramp the dock is only on the left side so most times you have to wait to load or unload. An extra dock on the right side would be very helpful.
7/29/2019 8:15	trash barrels	Rourke Brothers boat ramp					
8/4/2019 9:43	More boat docks	Rourke boat ramp	River hazard removal and or marking	Merrimack river to NH state line			
8/4/2019 14:35	Clean the canals, can't do anything with them being clean	Canals					You can't improve anything if the canals are full of trash.
8/29/2019 20:47	Whitewater boating	Pawtucket Falls	Fishing	Pawtucket Falls	River Surfing	Pawtucket Falls	Improved flow, access and gauging in the dewatered section of Pawtucket Falls, could greatly enhance recreational opportunity, through both whitewater boating and fishing. Creating better shoreline access, will also rid of the unsightly homeless camps, that are in these fenced off areas. Creating much of the water born trash in the dewatered section.

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8/29/2019	More fishing	Canals near	Free parking	Suffolk st	Cleaner water	Everywhere	There is a thriving aquatic ecosystem in those canals please help keep it
21:06	access	tsongas center					clean for future generations to enjoy.
8/29/2019 21:26	river/bank cleanup and improved access from university ave bridge to beaver brook		trash cleanup at pawtucket falls, parking area, open throughout the year				overall reduction in the amount of trash buildup at dams/canals. Improved access for fishing/sightseeing along the river, especially in the area of umass lowell (university avenue bridge to beaver brook and at pawtucket falls.
8/30/2019 6:03	More shore fishing access from the boat rental ramp past the Rourke Bridge	Rourke Brothers Boat Ramp	Clean up the vegetation as you get closer to the bridge	Rourke Brothers Boat Ramp			
9/3/2019	None						
17:04							
9/9/2019 7:24							
9/24/2019	Boat dock	Greely					The the boat ramp at Greeley is in serious Decline and is a tremendous
16:02							safety hazard
10/9/2019 13:29							
11/14/2019 18:31	restrooms		interpretive panels		map panels to guide you to other features nearby		opening up the area for walking along the river with lights and benches and trash cans will really make the area, around the college and along the

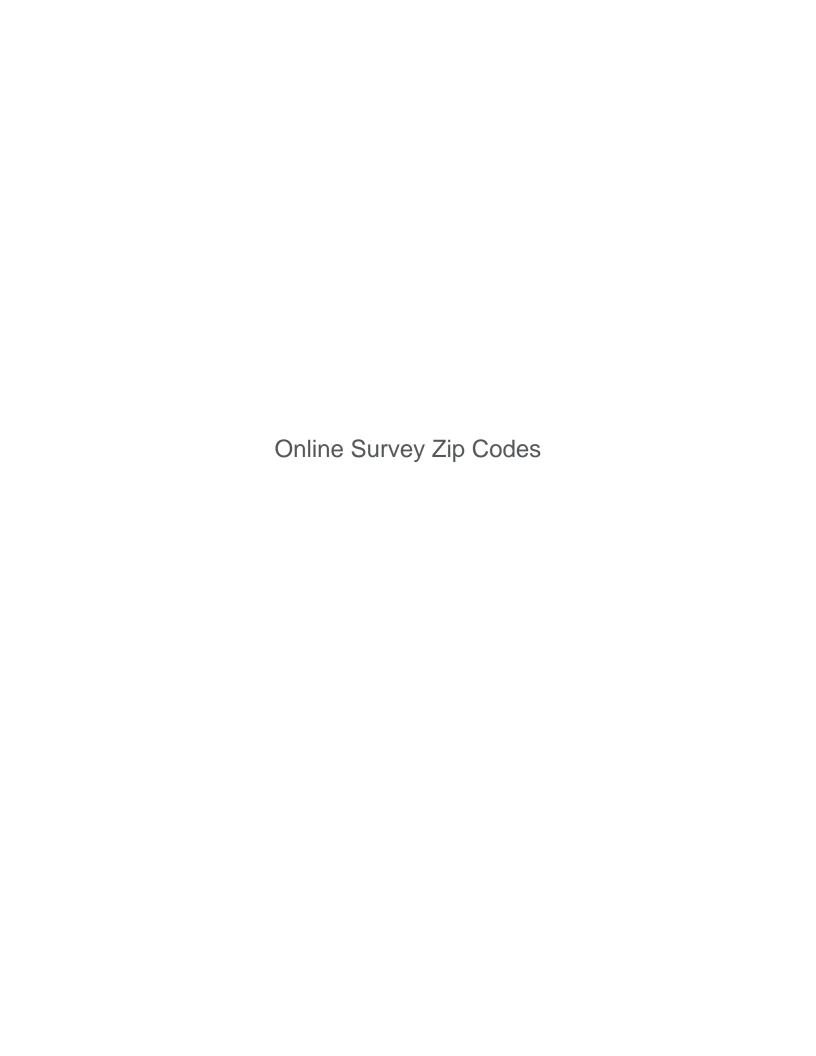
Question 36-1: Please tell us what type(s) of recreation enhancements you believe are needed and at what specific location(s) at the Lowell Project:		Question 36-2: Please tell us what type(s) of recreation enhancements you believe are needed and at what specific location(s) at the Lowell Project:		Question 36-3: Please tell us what type(s) of recreation enhancements you believe are needed and at what specific location(s) at the Lowell Project:		Q37. Please share any other comments that you have regarding recreation near the Lowell Project:	
Recorded Date	Q36-1. Type of Recreation Enhancement:	Q. 36-1. Location(s)	Q36-2. Type of Recreation Enhancement:	Q. 36-2. Location(s)	Q36-3. Type of Recreation Enhancement:	Q. 36-3. Location(s)	
							canal, closer to what other cities have successfully done in developing their
							waterfront areas. great to see this project underway- Lowell is a real gem!
11/15/2019 14:50	Mapiing of navigation hazards	impoundment from Chelmsford to Cromwells Falls					Access in NH is way below contemporary standards
11/26/2019 19:08							
1/20/2020 8:29	Public notification of CSO events	Nashua, Manchester	whitewater recreational releases with improved access and adequate flow information	Pawtucket falls			Public has a right to receive automatic notification of upstream CSO events that would interfere with the use of the Impoundment



Personal Interview Respondent Zip Codes

Zip code/location	Miles from Project
01440/Gardner, Massachusetts	42.1
01701/Framingham, Massachusetts	34.3
01810/Andover, Massachusetts	11.6
01821/Billerica, Massachusetts	8.7
01821/Billerica, Massachusetts	8.7
01824/Chelmsford, Massachusetts	6.0
01826/Dracut, Massachusetts	2.4
01826/Dracut, Massachusetts	2.4
01826/Dracut, Massachusetts	2.4
01845/North Andover, Massachusetts	11.9
01850/Lowell, Massachusetts	1.5
01850/Lowell, Massachusetts	1.5
01851/Lowell, Massachusetts	1.5
01852/Lowell, Massachusetts	1.5
01853/Lowell, Massachusetts	0.5
01853/Lowell, Massachusetts	0.5
01854/Lowell, Massachusetts	0.5

Zip code/location	Miles from Project
01854/Lowell, Massachusetts	0.5
01863/North Chelmsford, Massachusetts	7.5
01876/Tewksbury, Massachusetts	5.8
01876/Tewksbury, Massachusetts	5.8
01879/Tyngsboro, Massachusetts	11.2
01879/Tyngsboro, Massachusetts	11.2
01886/Graniteville, Massachusetts	12.8
01970/Salem, Massachusetts	33.1
02067/Sharon, Massachusetts	44.4
02461/Newton, Massachusetts	28.5
03051/Hudson, New Hampshire	11.5
03110/Bedford, New Hampshire	31.3
21009/Abingdon, Maryland	383.0
98040/Mercer Island, Washington	3045.0



Zip Code	Miles from project
01340/Colrain, Massachusetts	88.9
01450/Groton, Massachusetts	19.1
01453/Leominster, Massachusetts	27.9
01463/Pepperell Massachusetts	20.2
01503/Berlin, Massachusetts	26.8
01516/Douglas, Massachusetts	58.9
01604/Worcester, Massachusetts	41.6
01719/Boxborough, Massachusetts	19.5
01748/Hopkinton, Massachusetts	40.0
01757/Milford, Massachusetts	44.5
01760/Natick, Massachusetts	31.8
01821/Billerica, Massachusetts	8.7
01821/Billerica, Massachusetts	8.7
01824/Chelmsford, Massachusetts	6.0
01824/Chelmsford, Massachusetts	6.0
01824/Chelmsford, Massachusetts	6.0
01826/Dracut, Massachusetts	2.4
01826/Dracut, Massachusetts	2.4
01844/Methuen, Massachusetts	9.8
01844/Methuen, Massachusetts	9.8
01850/Lowell, Massachusetts	1.5
01851/Lowell, Massachusetts	1.5

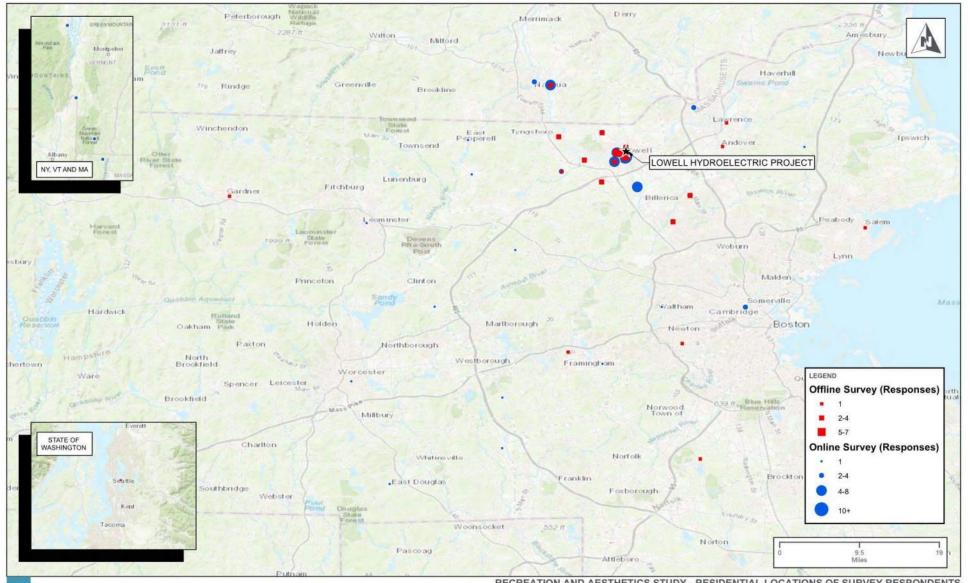
Zip Code	Miles from project
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01851/Lowell, Massachusetts	1.5
01852/Lowell, Massachusetts	1.5
01854/Lowell, Massachusetts	0.5

Zip Code	Miles from project
01854/Lowell, Massachusetts	0.5
01862/North Billerica, Massachusetts	5.1
01863/North Chelmsford, Massachusetts	7.5
01876/Tewksbury, Massachusetts	5.8
01876/Tewksbury, Massachusetts	5.8
01876/Tewksbury, Massachusetts	5.8
01879/Tyngsboro, Massachusetts	11.2
01886/Westford, Massachusetts	11.2
01886/Westford, Massachusetts	11.2
01921/Boxford, Massachusetts	19.6
02143/Somerville, Massachusetts	26.4
02143/Somerville, Massachusetts	26.4
02451/Waltham, Massachusetts	22.7
3051/Hudson, New Hampshire	11.5
03051/Hudson, New Hampshire	11.5
03051/Hudson, New Hampshire	11.5
03051/Hudson, New Hampshire	11.5
03051/Hudson, New Hampshire	11.5
03051/Hudson, New Hampshire	11.5
03051/Hudson, New Hampshire	11.5

Zip Code	Miles from project
03051/Hudson, New Hampshire	11.5
03064/Nashua, New Hampshire	13.0
03064/Nashua, New Hampshire	13.0
03064/Nashua, New Hampshire	13.0
05356/West Dover, Vermont	115.0
05743/Fair Haven, Vermont	175.0
10003/New York City, New York	218.0
12901/Plattsburgh, New York	231.0

^{*}Not all respondents to the online survey provided a home zip code.

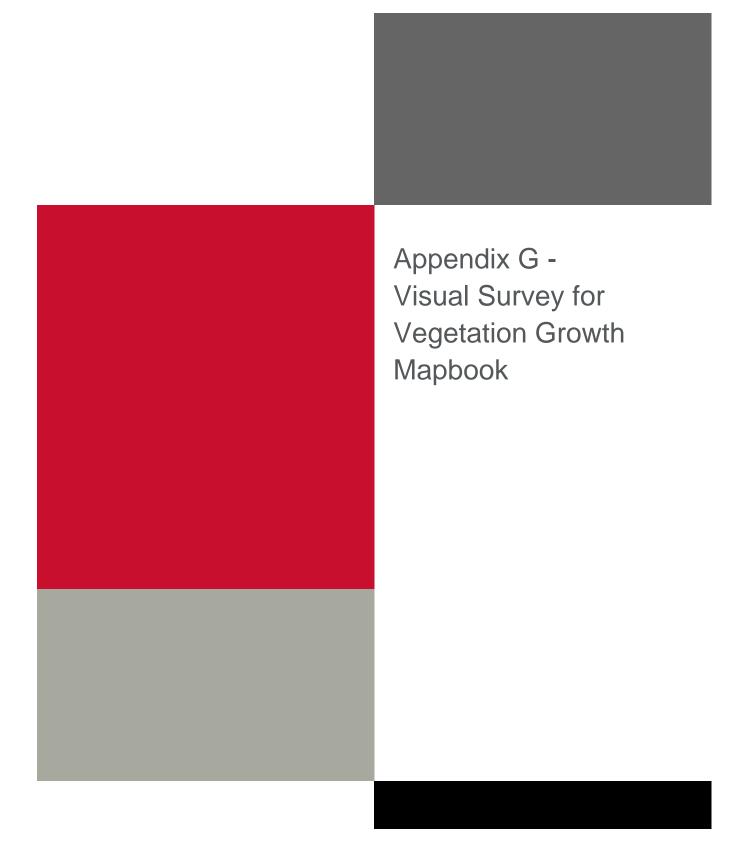




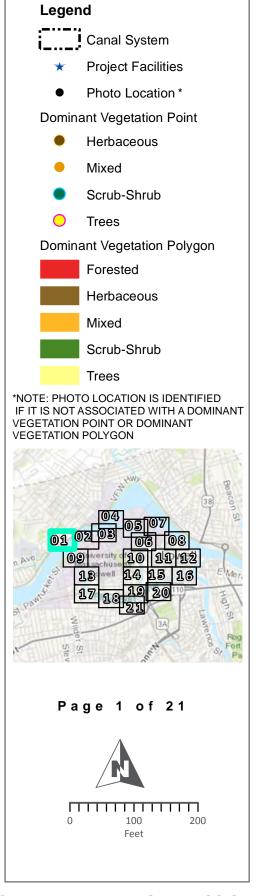
RECREATION AND AESTHETICS STUDY - RESIDENTIAL LOCATIONS OF SURVEY RESPONDENTS

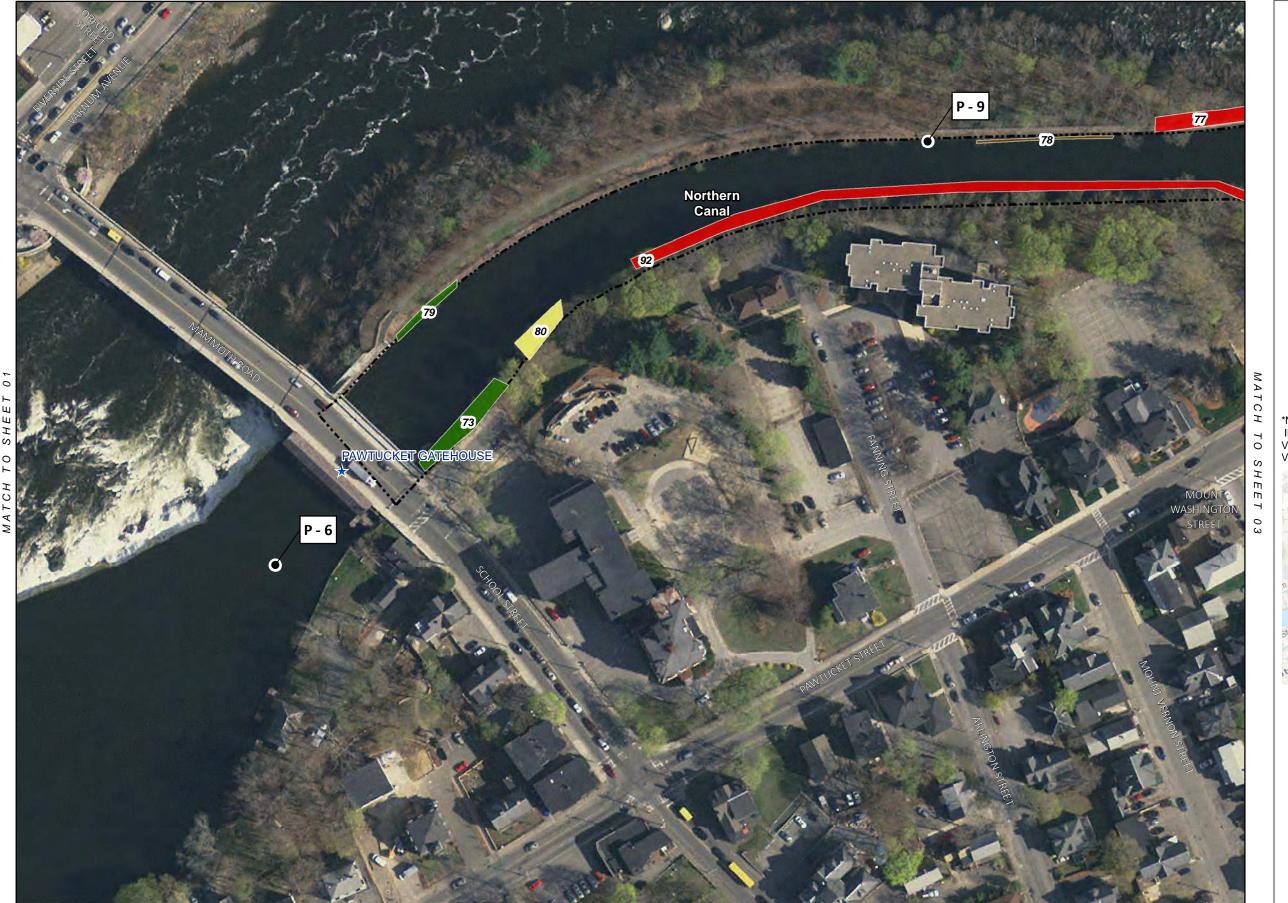
LOWELL HYDROELECTRIC PROJECT

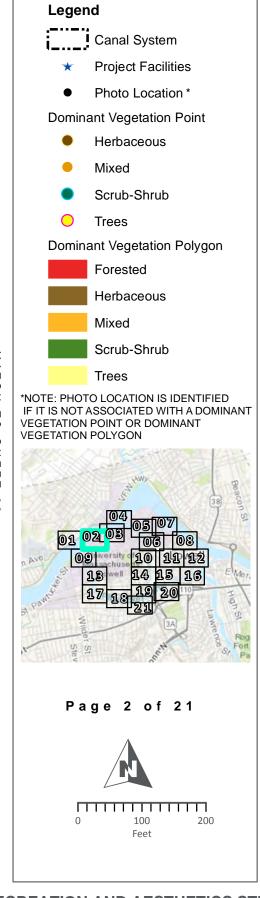
BOOTT HYDRO, LLC.



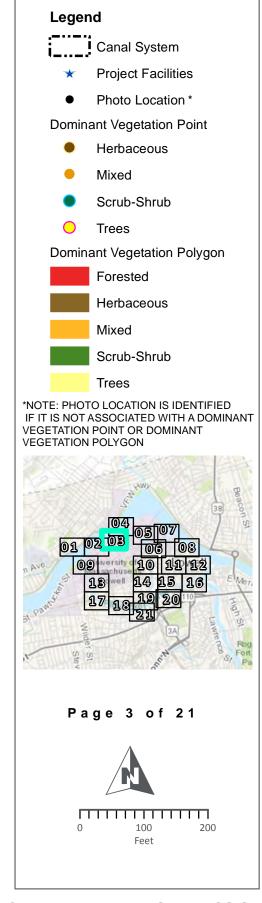


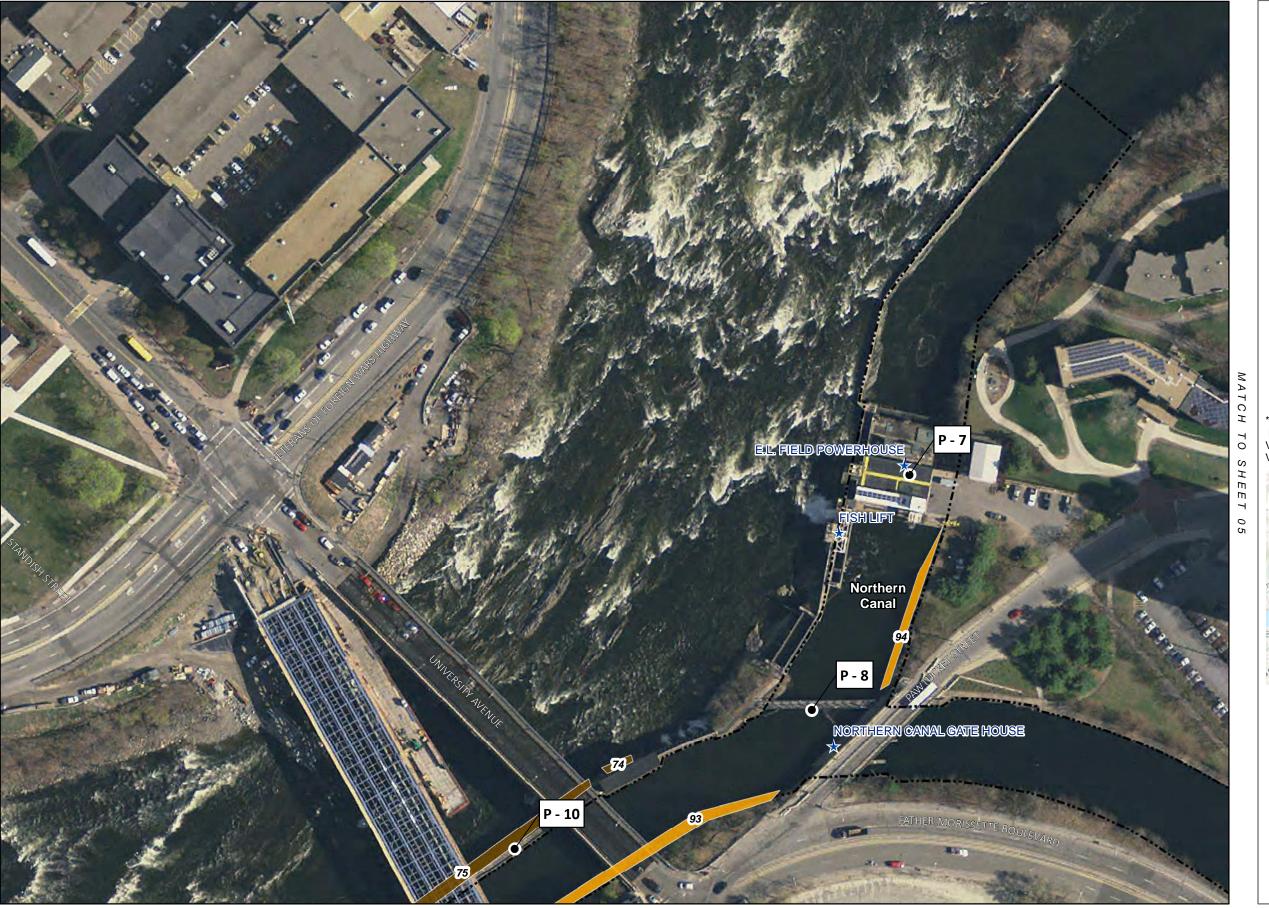


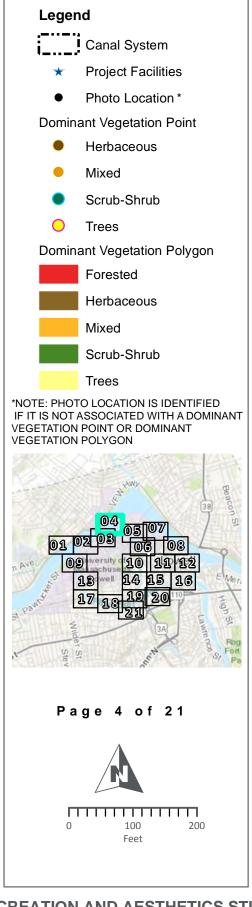












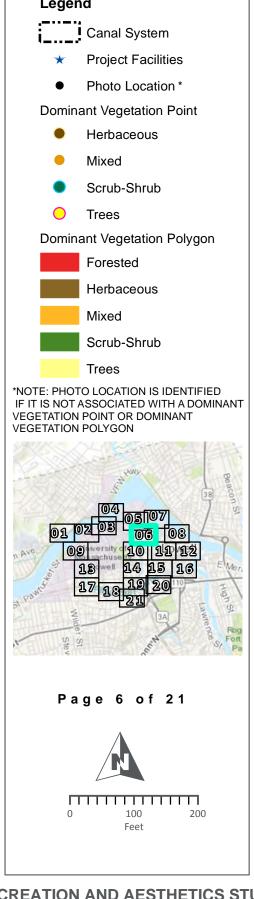
FOR BOOTT HYDRO, LLC.

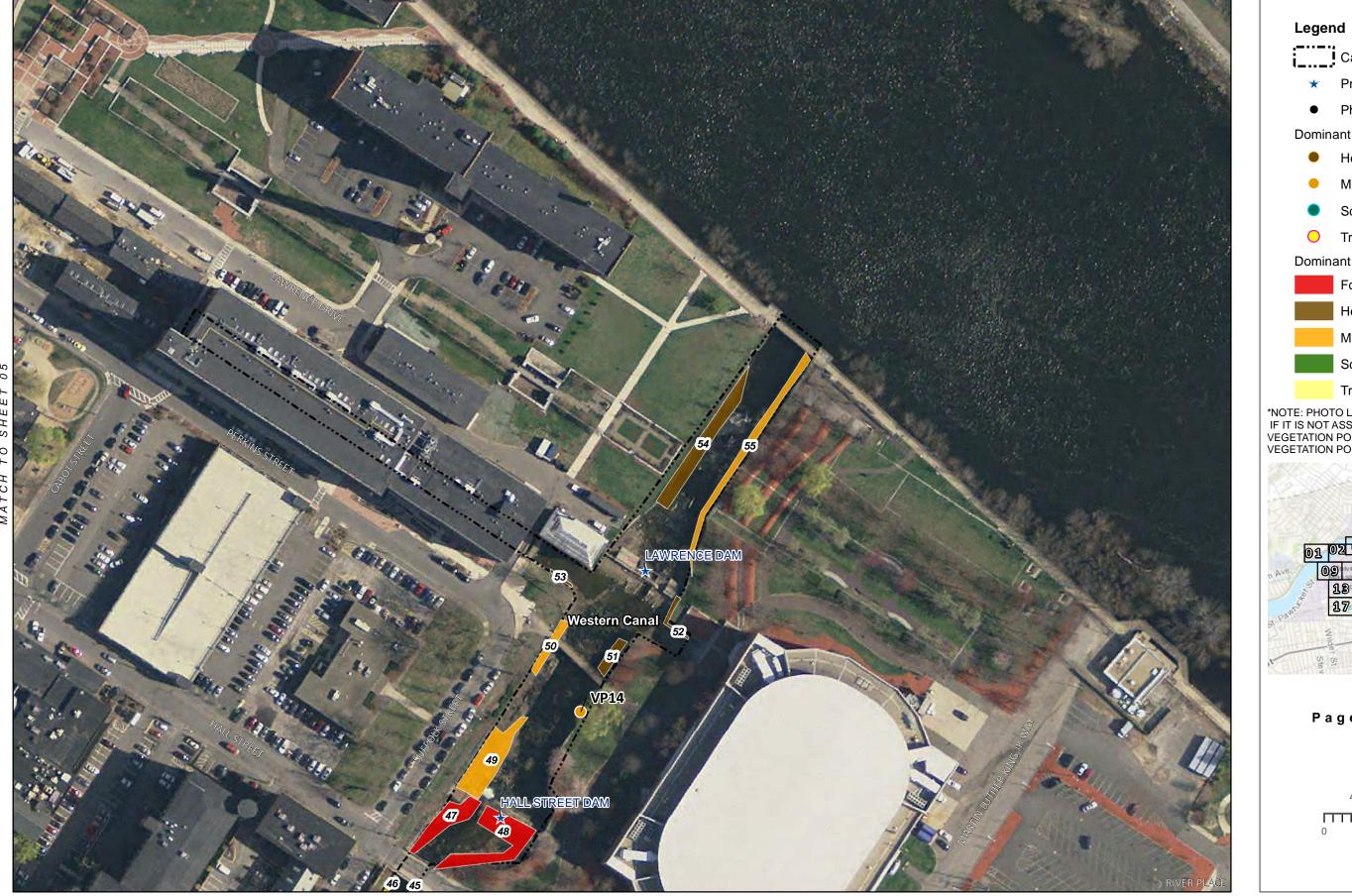


Legend Canal System **Project Facilities** Photo Location * **Dominant Vegetation Point** Herbaceous Mixed Scrub-Shrub Trees Dominant Vegetation Polygon Forested Herbaceous Mixed Scrub-Shrub Trees *NOTE: PHOTO LOCATION IS IDENTIFIED
IF IT IS NOT ASSOCIATED WITH A DOMINANT
VEGETATION POINT OR DOMINANT
VEGETATION POLYGON Page 5 of 21 100

BOOTT HYDRO, LLC.





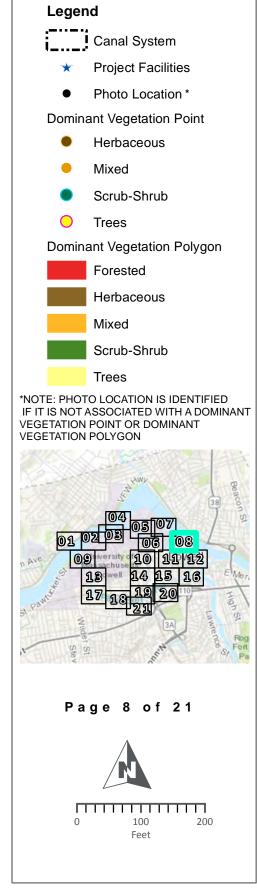


Canal System **Project Facilities** Photo Location * **Dominant Vegetation Point** Herbaceous Mixed Scrub-Shrub Trees Dominant Vegetation Polygon Forested Herbaceous Mixed Scrub-Shrub Trees *NOTE: PHOTO LOCATION IS IDENTIFIED IF IT IS NOT ASSOCIATED WITH A DOMINANT VEGETATION POINT OR DOMINANT VEGETATION POLYGON Page 7 of 21 100 Feet

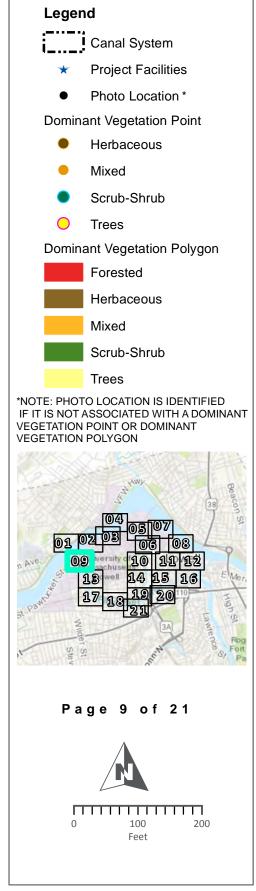
MATCH TO SHEET 05

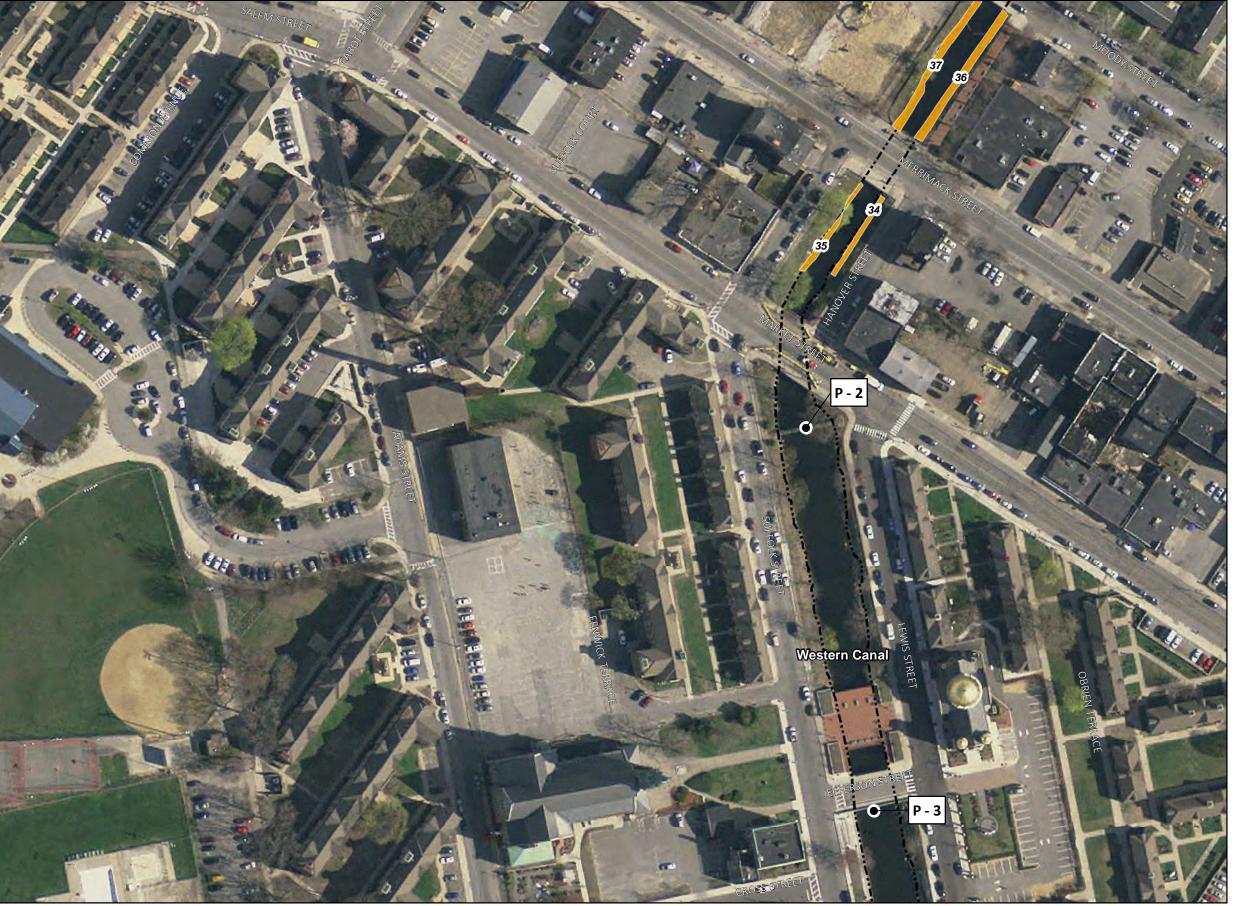
BOOTT HYDRO, LLC.

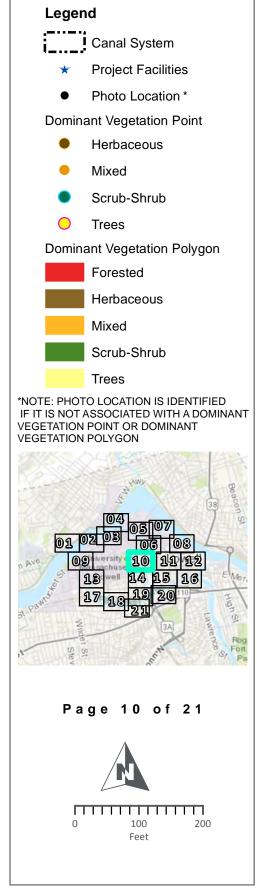


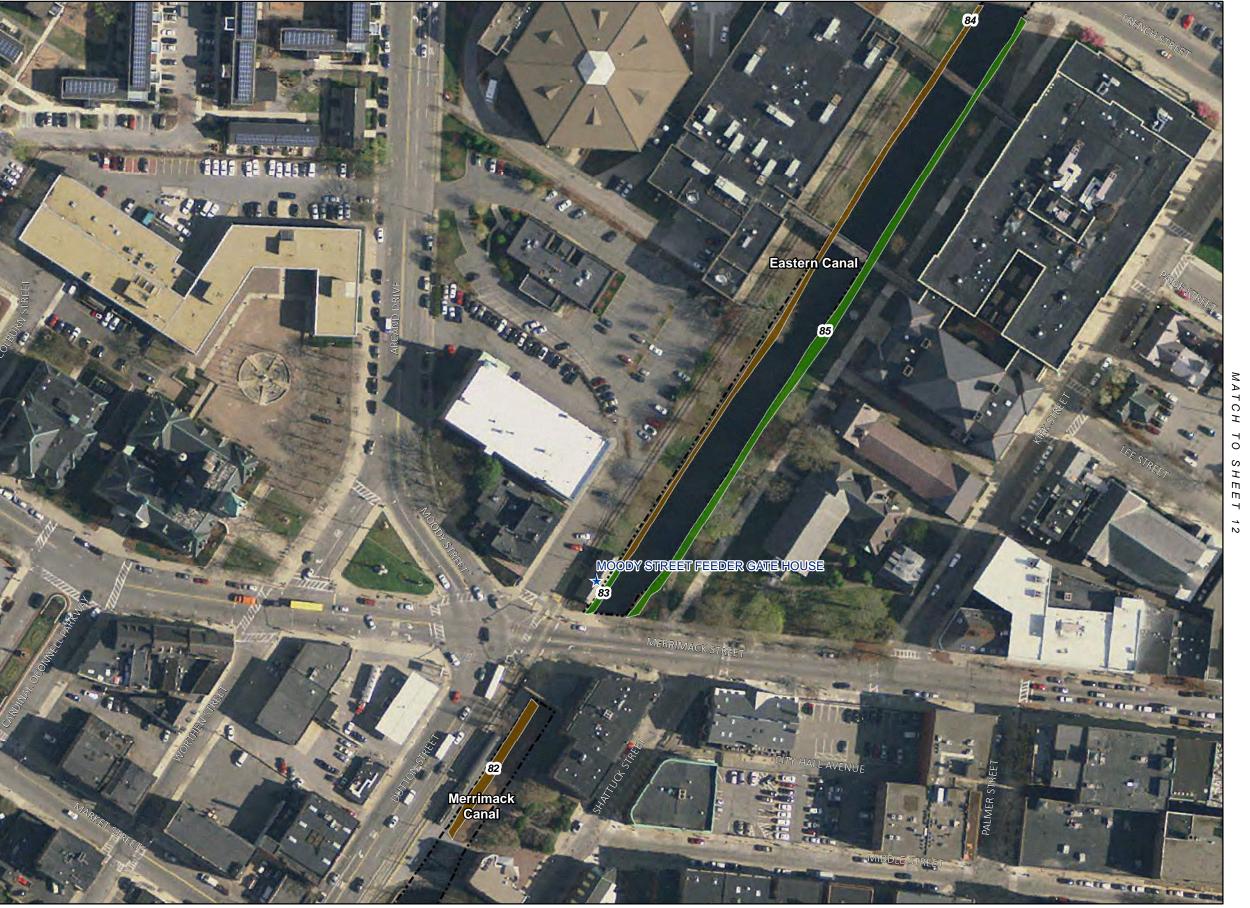


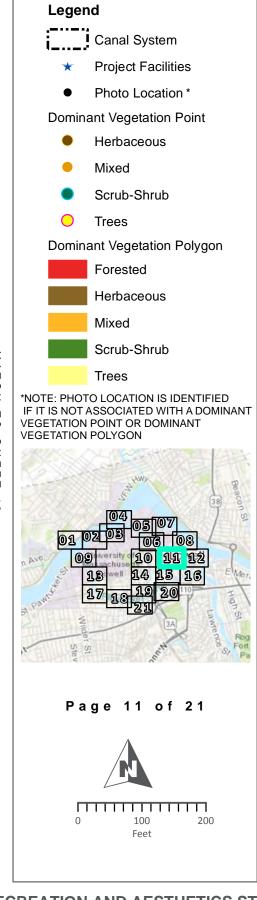


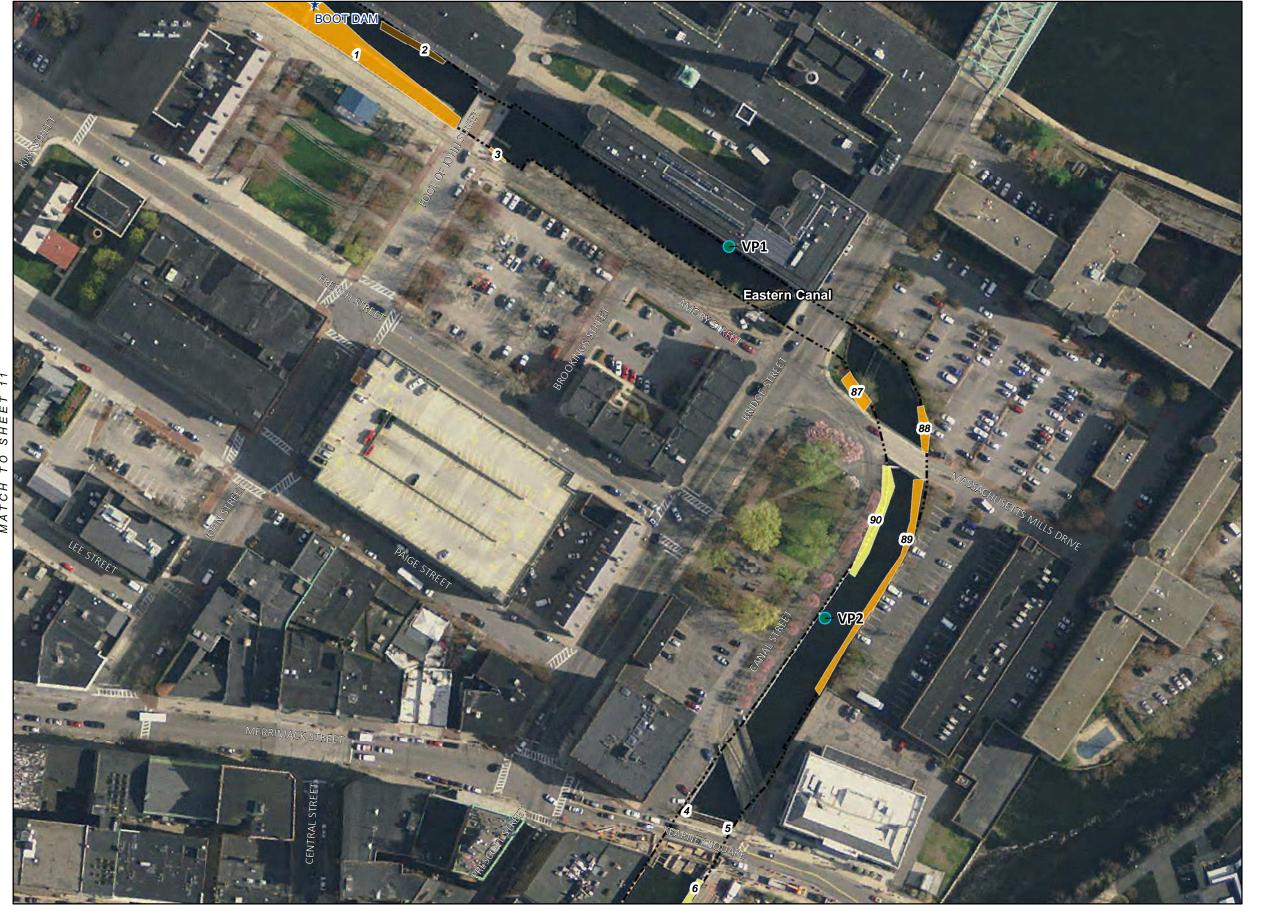


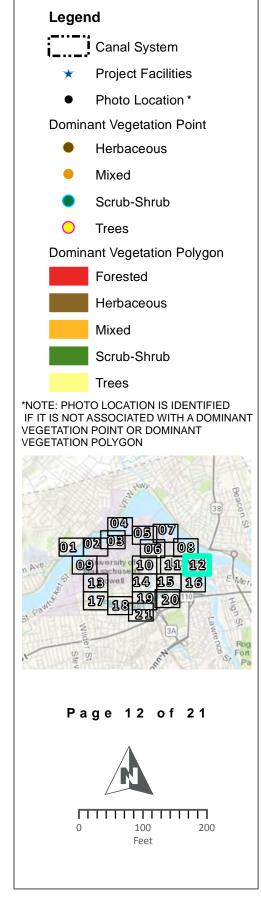


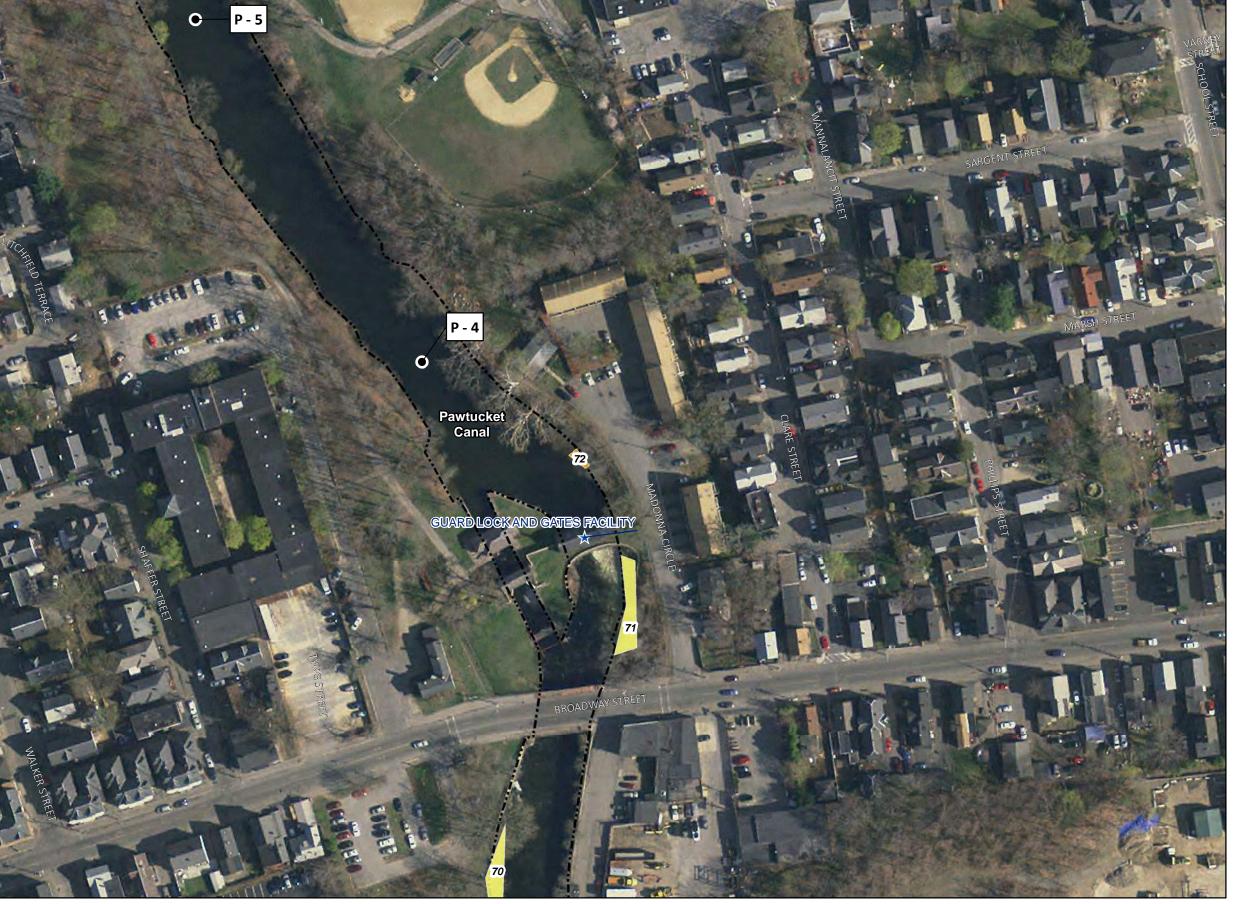


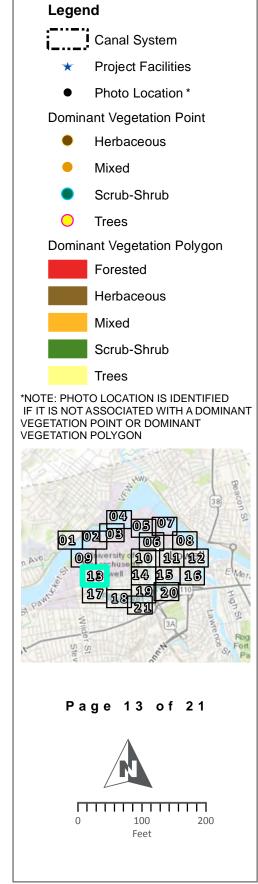


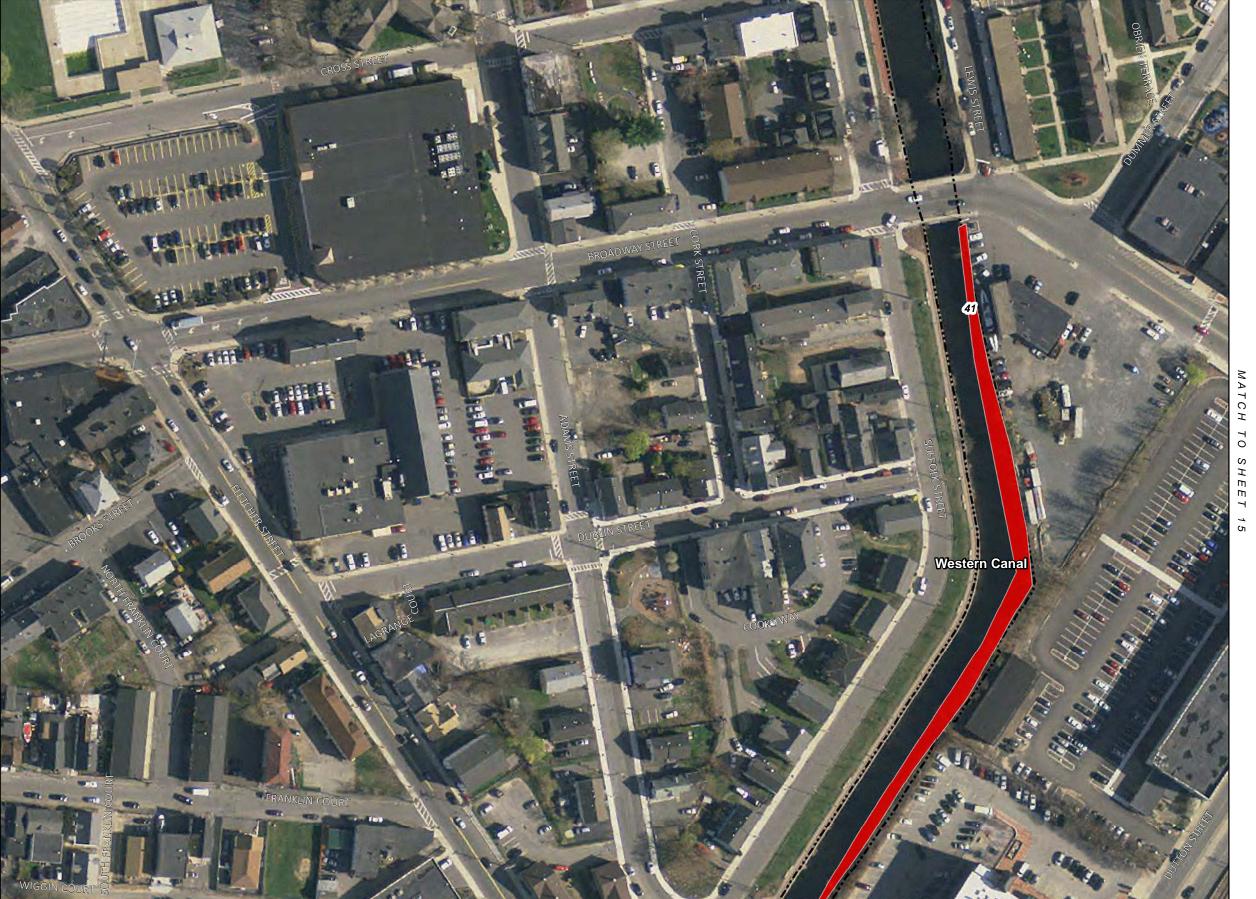


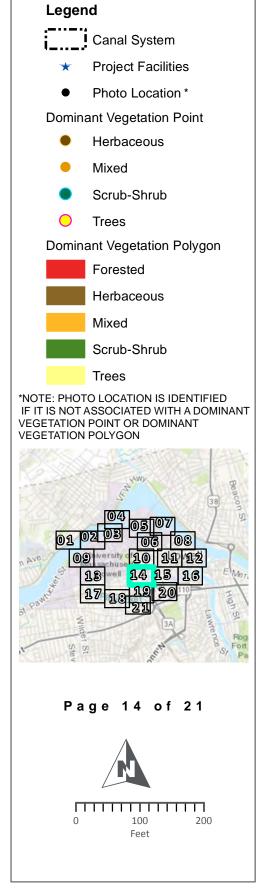


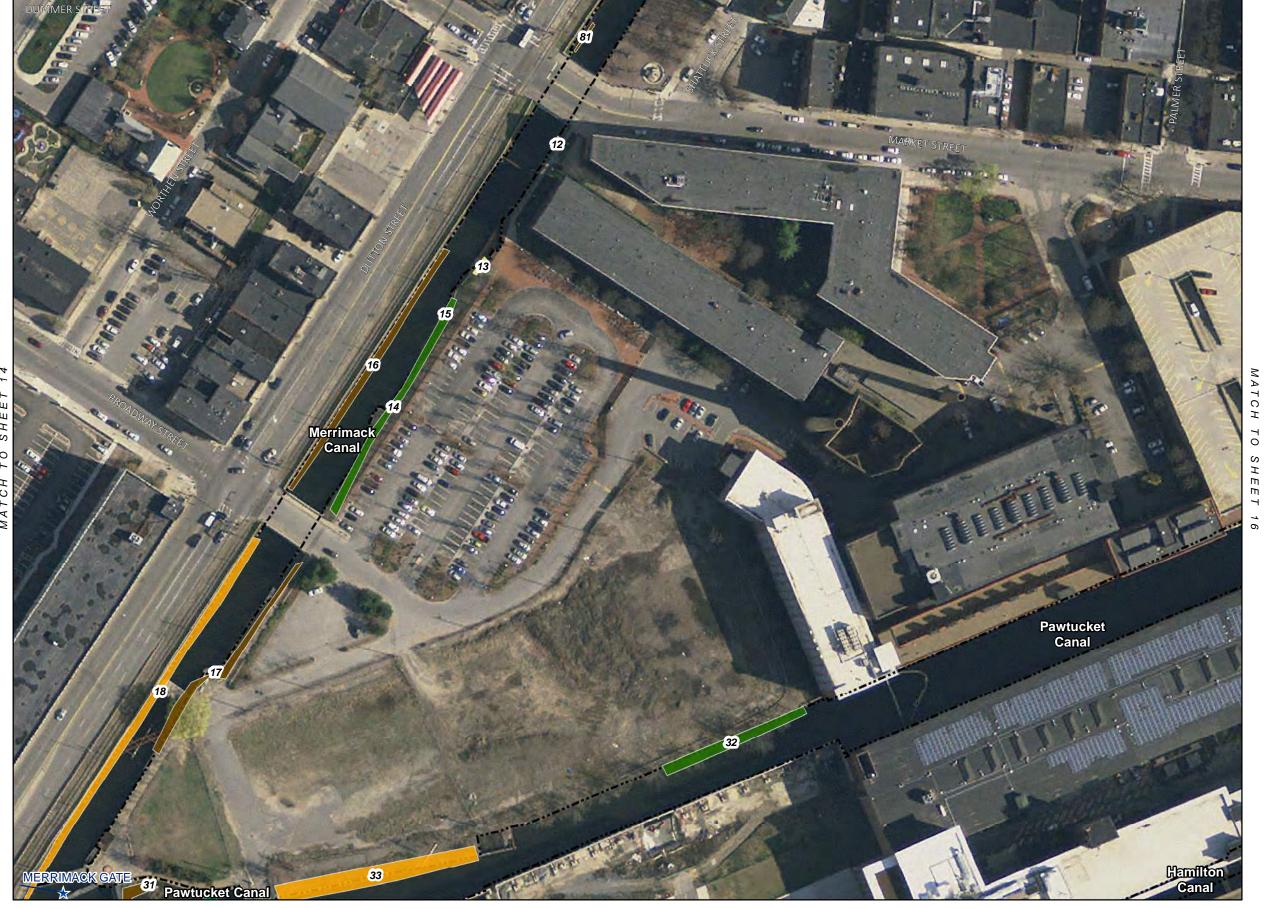


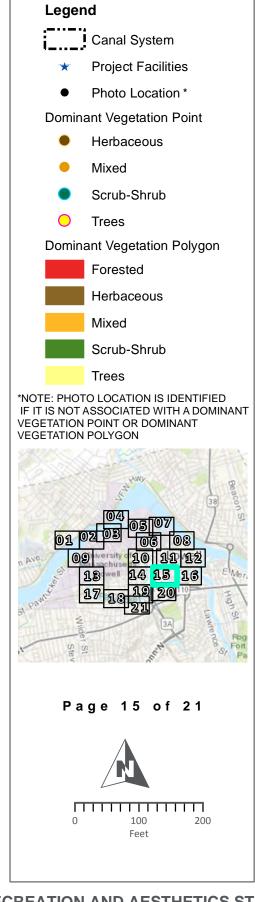


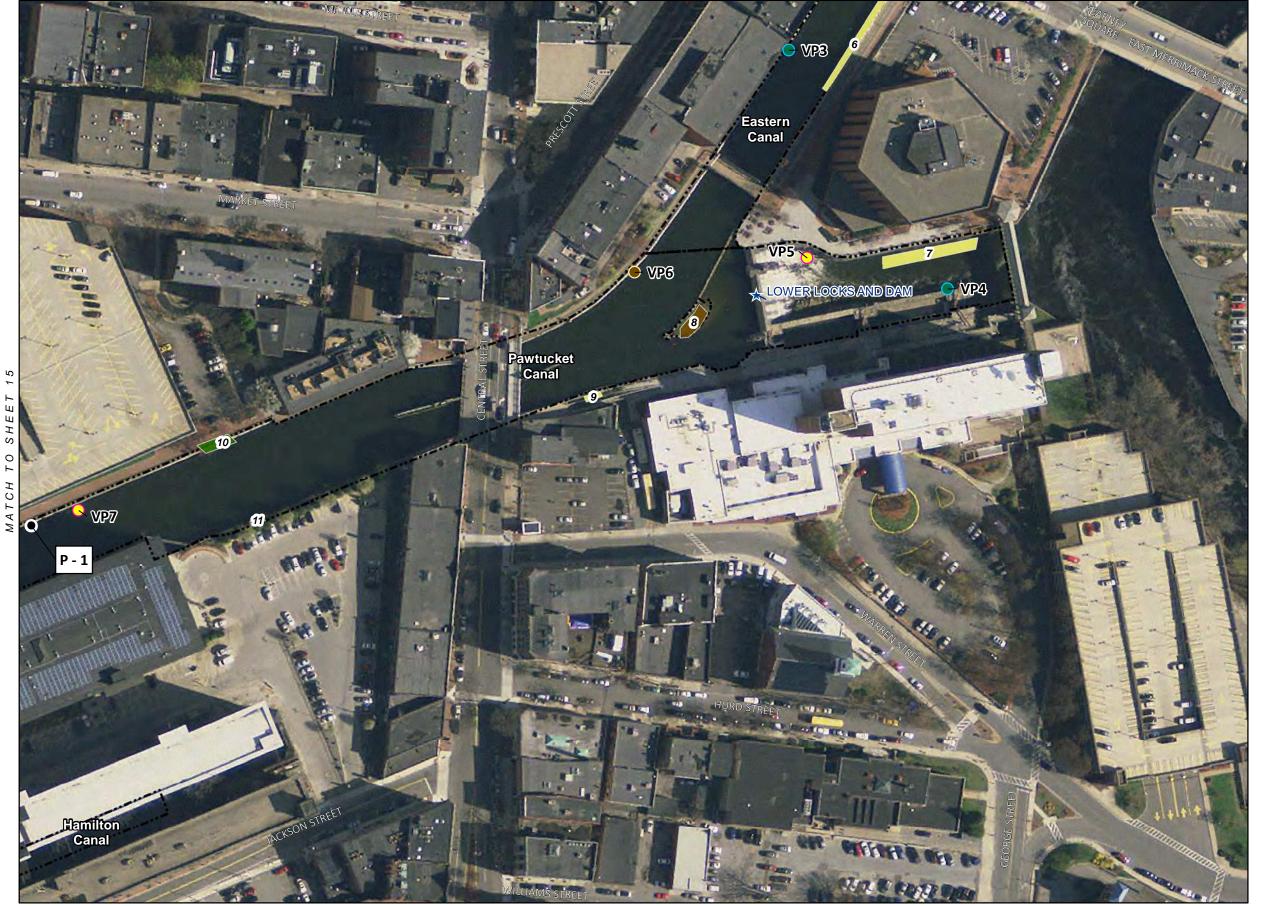


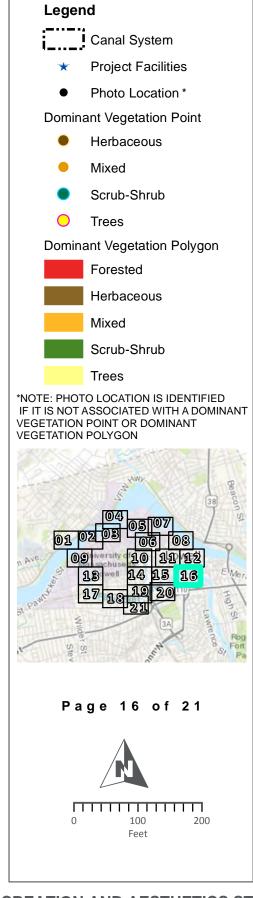




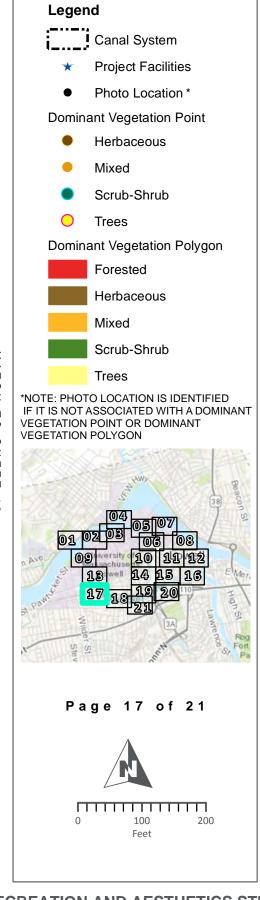




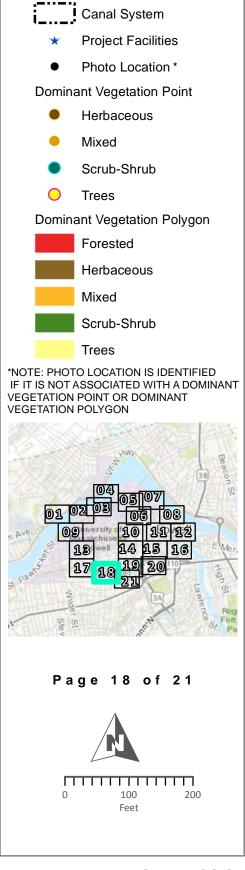






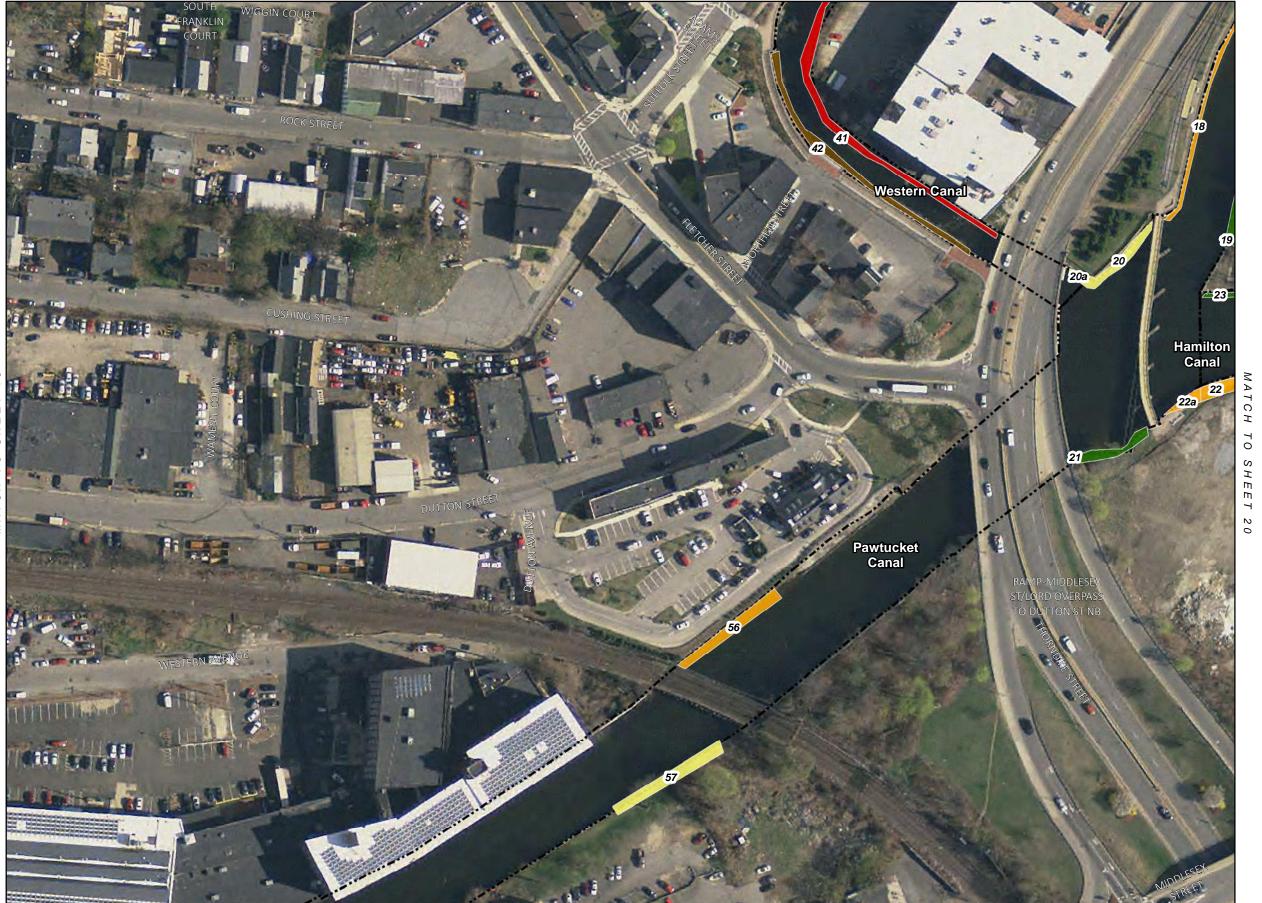




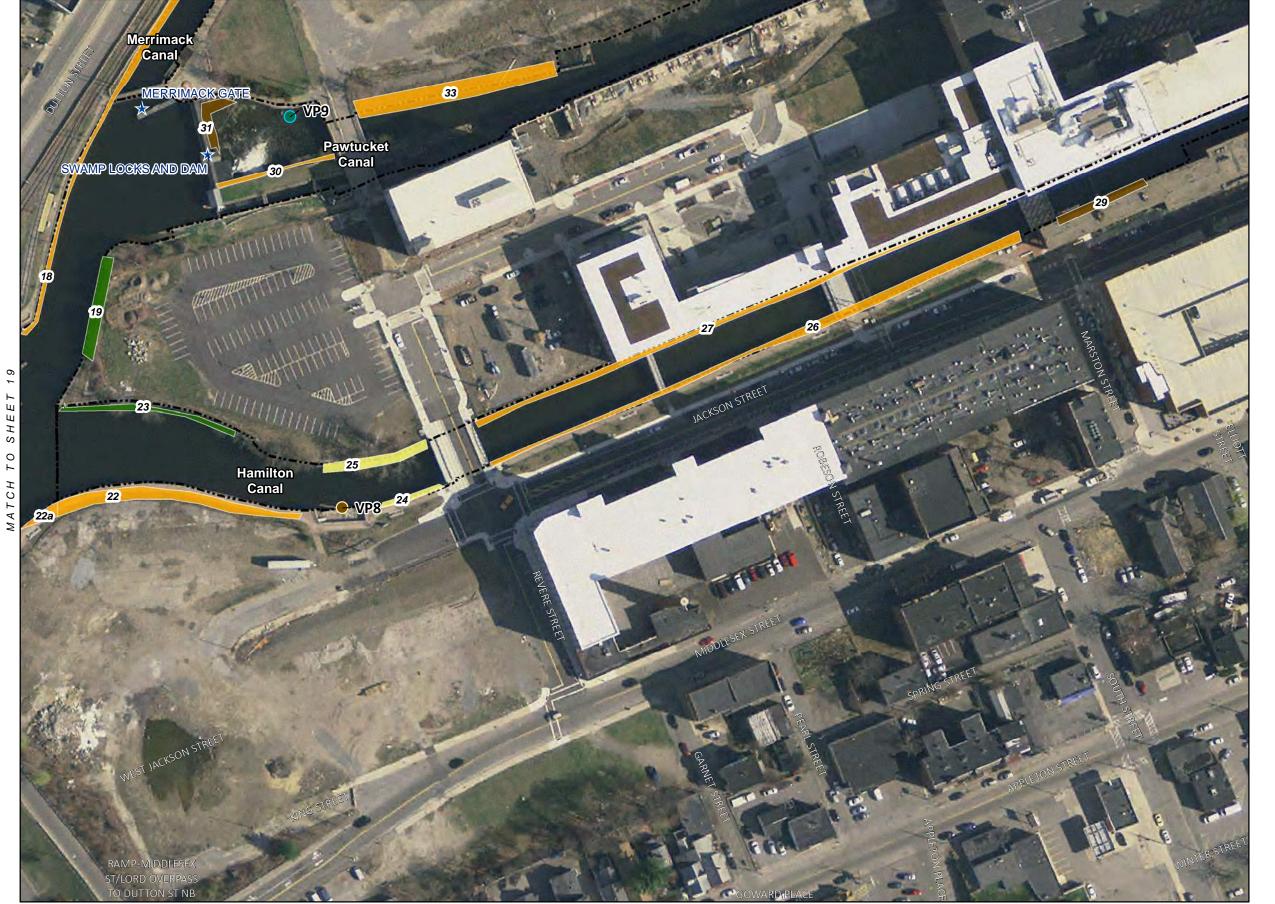


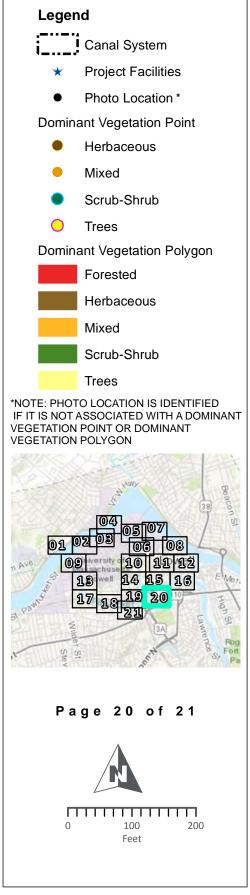
Legend

BOOTT HYDRO, LLC.

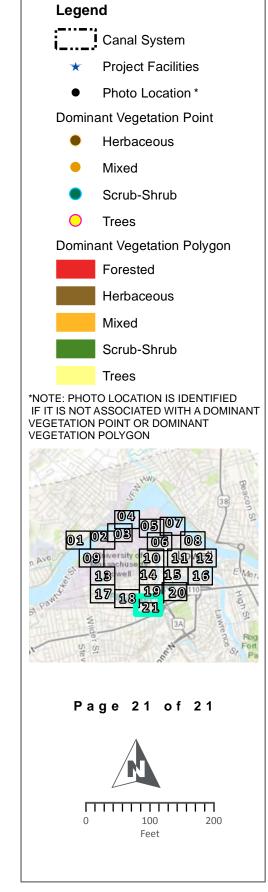


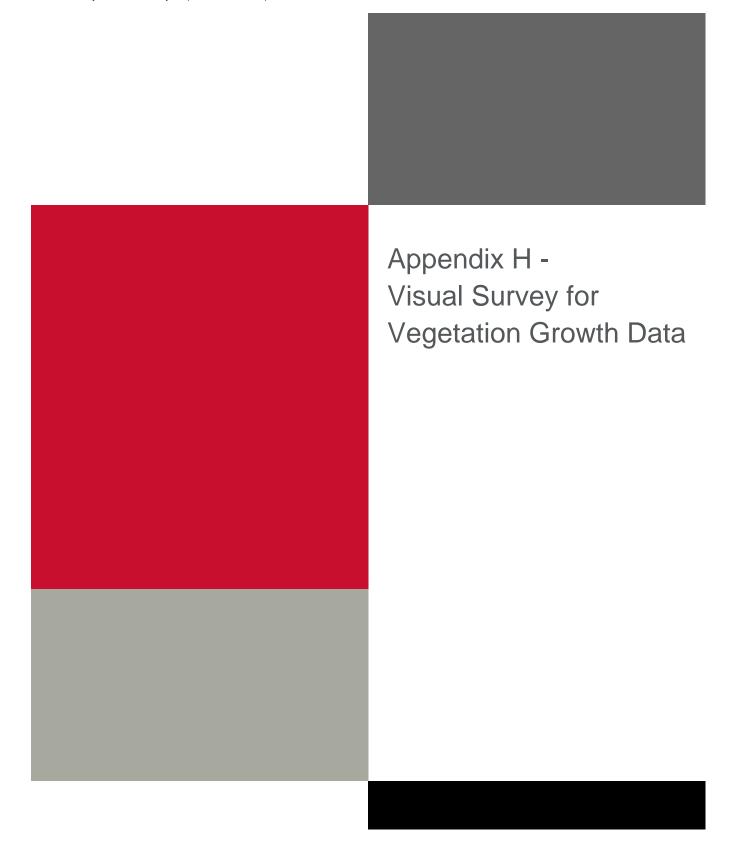
Legend Canal System **Project Facilities** Photo Location * **Dominant Vegetation Point** Herbaceous Mixed Scrub-Shrub Trees Dominant Vegetation Polygon Forested Herbaceous Mixed Scrub-Shrub Trees *NOTE: PHOTO LOCATION IS IDENTIFIED
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VEGETATION POINT OR DOMINANT
VEGETATION POLYGON Page 19 of 21 100 Feet





MATCH TO SHEET 19





Vegetation Polygon/ Point Identifier	Dominant Vegetation Type ¹	Dominant Shoreline Type ²	Canal ³	Mapbook Sheet(s)	Polygon Acreage	Canal Acreage	% of Polygon	Field Notes Summary/Comments
14	Mixed	Block Wall	Eastern	12	0.337	4.026	8.371	Several large woody trees are located at the northwestern end of the canal, while herbaceous plants dominate the western side of the canal
2	Herbaceous	Block Wall	Eastern	12	0.015	4.026	0.373	Small black locust scattered among purple loosestrife and other herbaceous weeds at base of building
34	Mixed	Block Wall	Eastern	12	0.002	4.026	0.050	One elm tree, Boston ivy, ragweed; bottom of canal contains scattered aquatic vegetation
44	Trees	Block Wall/Concrete/St one Wall Mix	Eastern	12	0.002	4.026	0.050	One multi-trunked tree of heaven, 4 to 6 inches DBH
5	Trees	Block Wall/Concrete/St one Wall Mix	Eastern	12	0.001	4.026	0.025	One multi-trunked birch, 1 inch DBH
6	Trees	Block Wall	Eastern	12, 16	0.024	4.026	0.596	Multiple tree of heaven and elm trees rooted and growing between stones of canal wall
7	Trees	Stone Wall	Pawtucket	16	0.034	19.630	0.173	Several large woody trees including river birch, tree of heaven, and silver maple, all 2 to 5 inches DBH
8	Herbaceous	Block Wall	Pawtucket	16	0.013	19.630	0.066	Canal contains what appears to be sediment deposited against the canal wall, sediment is topped with a layer of herbaceous plants
9	Trees	Concrete	Pawtucket	16	0.003	19.630	0.015	One tree of heaven and one unidentified hardwood growing on top of canal wall
10	Scrub-Shrub	Block Wall/Concrete/St one Wall Mix	Pawtucket	16	0.010	19.630	0.051	Four tree of heaven, all 1 inch DBH growing on/out of canal wall
11	Scrub-Shrub	Block Wall	Pawtucket	16	0.003	19.630	0.015	Multiple tree of heaven growing out of canal wall
12	Trees	Block Wall/Concrete/St one Wall Mix	Merrimack	15	0.002	1.402	0.143	Three multi-trunked elm trees, all with 1 inch DBH growing out of canal wall
13	Trees	Concrete	Merrimack	15	0.003	1.402	0.214	One elm tree and one mulberry growing out of concrete portion of canal wall
14	Herbaceous	Block Wall/Concrete/St one Wall Mix	Merrimack	15	0.054	1.402	3.852	Approximately 20% of the canal wall has woody trees (i.e. elms, locust, and mulberry) or herbaceous plants growing on it

Vegetation Polygon/ Point Identifier	Dominant Vegetation Type ¹	Dominant Shoreline Type ²	Canal ³	Mapbook Sheet(s)	Polygon Acreage	Canal Acreage	% of Polygon	Field Notes Summary/Comments
15	Scrub-Shrub	Block Wall/Concrete/St one Wall Mix	Merrimack	15	0.054	1.402	3.852	Approximately 20% of the canal wall has woody trees or herbaceous plants growing on it; woody trees include elms, locust, and mulberry
16	Herbaceous	Block Wall	Merrimack	15	0.053	1.402	3.780	Approximately 20% of the canal wall has woody trees (i.e. elms, locust, and mulberry) or herbaceous plants growing on it
17	Herbaceous	Block Wall/Concrete/St one Wall Mix	Merrimack	15	0.049	1.402	3.495	Approximately 20% of the canal wall has woody trees (i.e. mulberry and tree of heaven) or herbaceous plants growing on it
18	Mixed	Block Wall	Pawtucket	15, 19, 20	0.121	19.630	0.616	Tree of heaven, ragweed, maple, common mullein, Japanese knotweed, estimated at 20 % cover; Japanese knotweed density increased at NPS boat dock
18a*	Mixed	Block Wall	Merrimack	15, 19, 20	0.121	1.402	8.631	Approximately 20% of the canal wall has woody trees, shrubs, and/or herbaceous plants growing on it; vegetation includes tree of heaven, maple, common mullein, Japanese knot weed and ragweed. Japanese knot weed coverage increases with closer proximity to the NPS boat dock
19	Scrub-Shrub	Block Wall	Pawtucket	19, 20	0.037	19.630	0.188	Vegetation on canal wall includes elms, birches, and scattered ferns
20	Trees	Block Wall	Pawtucket	19	0.023	19.630	0.117	Catalpa tree is growing out of the top of the canal wall and several tree of heaven and birch, some with 5 to 10 inches DBH
20a*	Trees	Block Wall	Pawtucket	19	0.005	19.630	0.025	Catalpa growing out of wall, several trees of heaven, and birch, some with DBH of 5 to 10 inches
21	Scrub-Shrub	Block Wall/Concrete/St one Wall Mix	Pawtucket	19	0.020	19.630	0.102	Vegetation on canal wall includes glossy buckthorn, boxelder, and tree of heaven, some with 3 to 5 inches DBH
22	Mixed	Block Wall/Concrete/St one Wall Mix	Hamilton	19, 20	0.076	2.005	3.791	Vegetation on canal wall includes woody trees such as tree of heaven and elms, scattered herbaceous plants such as ragweed and mullein, and Virginia creeper vine
22a*	Mixed	Block Wall/Concrete/St one Wall Mix	Pawtucket	19, 20	0.010	19.630	0.051	Tree of heaven, elms, ragweed, mullein, and Virginia creeper

Vegetation Polygon/ Point Identifier	Dominant Vegetation Type ¹	Dominant Shoreline Type ²	Canal ³	Mapbook Sheet(s)	Polygon Acreage	Canal Acreage	% of Polygon	Field Notes Summary/Comments
23 ⁴	Scrub-Shrub	Block Wall	Hamilton	19, 20	0.027	2.005	1.347	Vegetation on canal wall is primarily tree of heaven and ragweed, with lesser density of mullein
24	Trees	Block Wall/Concrete/St one Wall Mix	Hamilton	20	0.010	2.005	0.499	Vegetation on canal wall is primarily box elder and ragweed, with sporadic coverage of elm trees
25 ⁴	Trees	Block Wall	Hamilton	20	0.032	2.005	1.596	Vegetation growing out of canal wall includes one sycamore, several tree of heaven, glossy buckhorn, and ragweed
26 ⁴	Mixed	Block Wall/Concrete/St one Wall Mix	Hamilton	20	0.105	2.005	5.237	The canal wall, west of walking bridge, consists of portions of concrete and is primarily covered in ragweed. The canal wall, east of walking bridge, contains trees, such as tree of heaven and elm
274	Mixed	Block Wall/Concrete/St one Wall Mix	Hamilton	20	0.076	2.005	3.791	Vegetation on canal wall consists primarily of trees with approximately 10 percent cover. Trees are smaller and less dense on canal wall east of the walking bridge. The canal wall west of the walking bridge consists of portions of concrete
29 ⁵	Herbaceous	Block Wall/Concrete/St one Wall Mix	Hamilton	20	0.024	2.005	1.197	Vegetation growing out of canal wall at the eastern end is hard to distinguish because of lack of access; however, vegetation coverage was approximately 15-20 percent and likely consists of ragweed, ivy, and elms
30	Mixed	Block Wall/Concrete/St one Wall Mix	Pawtucket	20	0.013	19.630	0.066	Vegetation is located at the toe of the canal wall and includes elm, tree of heaven, ragweed, and jewelweed
31	Herbaceous	Block Wall/Concrete/St one Wall Mix	Pawtucket	15, 20	0.019	19.630	0.097	Vegetation growing out of canal wall is primarily herbaceous species, including purple loosestrife, Japanese knotweed, jewelweed, and buckthorn shrubs
32	Scrub-Shrub	Block Wall	Pawtucket	15	0.046	19.630	0.234	Shrubs are growing along the top of the canal wall, but cannot distinguish species because of lack of access; cannot tell if shrubs are growing out of the canal wall
33	Mixed	Block Wall	Pawtucket	15, 20	0.111	19.630	0.565	Vegetation growing on top of canal wall include several tree species and herbaceous species

Vegetation Polygon/ Point Identifier	Dominant Vegetation Type ¹	Dominant Shoreline Type ²	Canal ³	Mapbook Sheet(s)	Polygon Acreage	Canal Acreage	% of Polygon	Field Notes Summary/Comments
344	Mixed	Block Wall/Concrete/St one Wall Mix	Western	10	0.014	5.510	0.254	Vegetation growing on the canal wall is sparse and consists primarily of vines. Vegetation growing on top of and approximately 3 feet back from canal wall is primarily herbaceous
35 ⁴	Mixed	Block Wall/Concrete/St one Wall Mix	Western	10	0.014	5.510	0.254	Vegetation growing out of the canal wall is sparse and there are a few trees growing on top of and approximately 3 feet back from the canal wall
364	Mixed	Block Wall/Concrete/St one Wall Mix	Western	6, 10	0.036	5.510	0.653	Vegetation growing out of canal wall consists of mostly vines with a few tree of heaven are growing on top of and approximately 5 feet back from canal wall
37	Mixed	Block Wall/Concrete/St one Wall Mix	Western	6, 10	0.034	5.510	0.617	Vegetation growing out of canal wall consists of mostly vines and a few tree of heaven are growing on top of and approximately 3 feet back from canal wall
384	Scrub-Shrub	Block Wall	Western	6	0.025	5.510	0.454	Vegetation growing out of the canal wall, near the top, consists of shrubs,
39 ⁴	Herbaceous	Block Wall	Western	6	0.004	5.510	0.073	A few, small tree of heaven trees are growing out of the canal wall, near the top of wall
40	Herbaceous	Block Wall	Western	6	0.002	5.510	0.036	Small clump of shrubs growing out of the canal wall
414	Forested	Block Wall/Concrete/St one Wall Mix	Western	14, 19	0.377	5.510	6.842	Portions of the canal wall at bridge crossings on each side of the canal are concrete and brick; the highest density of vegetation in the polygon consists of locust, tree of heaven, box elder, maples and scattered shrubs, some with 6 to 14 inches DBH
42	Herbaceous	Block Wall/Concrete/St one Wall Mix	Western	19	0.051	5.510	0.926	Vegetation on canal wall consists of scattered herbaceous species that include Japanese knotweed, and scattered shrubs
43	Scrub-Shrub	Block Wall	Northern	6	0.001	11.670	0.009	Small clump of maple and elms growing on the canal wall
44	Scrub-Shrub	Block Wall	Northern	6	0.009	11.670	0.077	A clump of five small trees, including ash and elm with 1 to 2 inches DBH, growing on the canal wall

Vegetation Polygon/ Point Identifier	Dominant Vegetation Type ¹	Dominant Shoreline Type ²	Canal ³	Mapbook Sheet(s)	Polygon Acreage	Canal Acreage	% of Polygon	Field Notes Summary/Comments
45 ⁴	Mixed	Block Wall	Western	6, 7	0.019	5.510	0.345	Vegetation growing on the eastern side of the canal wall includes several trees (i.e. mulberry, buckthorn, tree of heaven) and dense vines, including Boston and poison ivy
46 ⁴	Mixed	Block Wall	Western	6, 7	0.020	5.510	0.363	Vegetation growing on western side of the canal wall includes less trees than the eastern side of the canal wall (see Polygon 46) and similar vine species, such as Boston ivy and poison ivy
47 ⁴	Forested	Block Wall/Concrete/St one Wall Mix	Western	6, 7	0.037	5.510	0.672	Vegetation growing on the canal wall includes large locust trees and ragweed
48	Forested	Block Wall/Concrete/St one Wall Mix	Western	6, 7	0.065	5.510	1.180	Vegetation growing on the canal wall includes dense clumps of large buckhorn, elm, and birch
49	Mixed	Block Wall/Concrete/St one Wall Mix	Western	6, 7	0.060	5.510	1.089	Tree of heaven, elms, vines and dense herbaceous species growing on canal wall
50	Mixed	Block Wall	Western	7	0.015	5.510	0.272	Tree of heaven, elms, and ragweed growing on canal wall
51 ⁴	Herbaceous	Block Wall	Western	7	0.012	5.510	0.218	Vegetation growing on canal wall include trees, such as mulberry and elms, and herbaceous ragweed
52	Herbaceous	Block Wall	Western	7	0.006	5.510	0.109	Vegetation growing on canal wall include trees, such as sycamore, and herbaceous species, such as purple loosestrife and Japanese knotweed
53	Herbaceous	Block Wall	Western	7	0.002	5.510	0.036	Small shrubs are growing out of canal wall
544	Herbaceous	Block Wall	Western	7	0.060	5.510	1.089	Vegetation growing on canal wall consists primarily of vines; a few tree of heaven trees are growing at the toe of the canal wall, likely on deposited sediment
55 ⁴	Mixed	Block Wall	Western	7	0.045	5.510	0.817	Vegetation growing on canal wall consists primarily of herbaceous vegetation, such as ragweed, and vines; a few tree of heaven also growing on canal wall, but mostly at the toe of the canal wall

Vegetation Polygon/ Point Identifier	Dominant Vegetation Type ¹	Dominant Shoreline Type ²	Canal ³	Mapbook Sheet(s)	Polygon Acreage	Canal Acreage	% of Polygon	Field Notes Summary/Comments
56 ⁴	Mixed	Concrete	Pawtucket	19, 21	0.037	19.630	0.188	Most of the canal wall is made of concrete with riprap placed at the toe of the wall; vegetation growing on wall consists of tree of heaven, box elder, and vines, such as Boston ivy
57	Trees	Block Wall	Pawtucket	19, 21	0.043	19.630	0.219	Vegetation growing out of the canal wall includes ash trees with 6 to 8 inches DBH
58 ⁴	Trees	Block Wall	Pawtucket	21	0.086	19.630	0.438	Vegetation growing out of the canal wall includes locust trees, tree of heaven, wild grape, and oriental bittersweet
59	Trees	Block Wall/Concrete/St one Wall Mix	Pawtucket	21	0.010	19.630	0.051	Clump of trees currently growing out of the canal wall was being removed at time of survey
60	Trees	Block Wall	Pawtucket	21	0.019	19.630	0.097	Vegetation growing out of canal wall includes five small shrubs and ash and elm trees
61	Trees	Block Wall	Pawtucket	18	0.144	19.630	0.734	Vegetation growing out of canal wall consists primarily of oriental bittersweet; trees, such as birch and box elder, are growing primarily on top of the canal wall at the edge
62	Trees	Block Wall	Pawtucket	18	0.008	19.630	0.041	4 small birches are growing out of the canal wall
63	Trees	Block Wall	Pawtucket	18	0.091	19.630	0.464	Several tree species are growing out of the canal wall
64	Trees	Block Wall	Pawtucket	18	0.078	19.630	0.397	Black locust and box elder with 2 to 4 inches DBH are growing out of canal wall
65	Trees	Block Wall	Pawtucket	17	0.033	19.630	0.168	Tree species growing out of canal wall include tree of heaven, locust, and birch
66 ⁴	Mixed	Block Wall	Pawtucket	17	0.078	19.630	0.397	Vegetation growing out of canal wall at top of the wall include trees such as tree of heaven and birch, and vines, such as Boston ivy
67 ⁴	Trees	Block Wall	Pawtucket	17	0.044	19.630	0.224	Large locust and birch trees growing on top of canal wall
68	Mixed	Block Wall	Pawtucket	17	0.103	19.630	0.525	Sporadic trees, including elms and birch, and ragweed are growing on top edge of canal wall; vines, such as Boston ivy growing down canal wall

Vegetation Polygon/ Point Identifier	Dominant Vegetation Type ¹	Dominant Shoreline Type ²	Canal ³	Mapbook Sheet(s)	Polygon Acreage	Canal Acreage	% of Polygon	Field Notes Summary/Comments
69 ⁴	Trees	Block Wall/Concrete/St one Wall Mix	Pawtucket	17	0.012	19.630	0.061	Trees growing out of canal wall include tree of heaven and elms, approximately 10 feet tall
704	Trees	Concrete	Pawtucket	13, 17	0.033	19.630	0.168	Canal wall is primarily concrete with trees, such as locust and elm, growing at the toe of the wall
71	Trees	Block Wall	Pawtucket	13	0.039	19.630	0.199	Tree of heaven and elm trees are primarily growing on top of the canal wall
72	Mixed	Block Wall	Pawtucket	13	0.005	19.630	0.025	Vegetation growing out of canal wall includes tree of heaven and vines
73	Scrub-Shrub	Block Wall	Northern	2	0.056	11.670	0.480	Tree of heaven, catalpa, and ash trees are growing on top of the canal wall
744	Herbaceous	Block Wall/Concrete/St one Wall Mix	Northern	3,4	0.007	11.670	0.060	Ragweed is growing out of the canal wall located beneath the building
7 5⁴	Herbaceous	Block Wall/Concrete/St one Wall Mix	Northern	3,4	0.236	11.670	2.022	Vegetation is growing from small sill under the first block down on the canal wall and is dominated by herbaceous plants, such as ragweed, purple loosestrife, aster, scattered ferns, golden rod spp., scattered mulberry, elms, and buckthorn.
76	Mixed	Block Wall	Northern	3	0.157	11.670	1.345	Scattered trees and shrubs are growing out of the canal wall and along the toe of the wall
774	Forested	Block Wall/Concrete/St one Wall Mix	Northern	2, 3	0.048	11.670	0.411	At the western edge of polygon, the canal broadens and is forested with riparian species; topography extends to bypass reach; species include elms, mulberry, and honeysuckle; some stumps have been cut along the wall on the same side as the bypass reach
78 ⁴	Herbaceous	Block Wall	Northern	2, 3	0.011	11.670	0.094	Vegetation growing out of the canal walls include tree of heaven and mulberry and herbaceous species such as purple loosestrife and mullein
79 ⁴	Scrub-Shrub	Block Wall	Northern	2	0.017	11.670	0.146	Tree of heaven trees and vines are growing on top of the canal wall and within approximately 3 feet of the canal wall
80	Trees	Block Wall	Northern	2	0.033	11.670	0.283	Vegetation consists of few, large trees growing at the toe of the canal wall

Vegetation Polygon/ Point Identifier	Dominant Vegetation Type ¹	Dominant Shoreline Type ²	Canal ³	Mapbook Sheet(s)	Polygon Acreage	Canal Acreage	% of Polygon	Field Notes Summary/Comments
81	Herbaceous	Stone Wall	Merrimack	15	0.003	1.402	0.214	Scattered ferns and 1 small, 4 ft. maple with .5 inch DBH growing out of canal wall
824	Herbaceous	Block Wall/Concrete/St one Wall Mix	Merrimack	11	0.045	1.402	3.210	90% vegetative cover in this area; vegetation is mostly herbaceous, including ragweed, clover, <i>Aster</i> spp., and weeds; two small tree of heaven also present on canal wall
83	Scrub-Shrub	Block Wall	Eastern	11	0.010	4.026	0.248	Vegetation on the canal wall includes a dense clump of climbing vines, one small maple, and one small honeysuckle
844	Herbaceous	Block Wall	Eastern	8, 11	0.109	4.026	2.707	Approximately 20% vegetative cover on the western side of the canal wall located primarily one block down from the top of the wall; vegetation includes a few maples, honeysuckle, and scattered herbaceous species.
85 ⁴	Scrub-Shrub	Block Wall	Eastern	8, 11	0.160	4.026	3.974	Approximately 40% vegetative cover on the east side of the canal wall; vegetation includes several 5 ft. elms, several birches, and a few red maples
864	Mixed	Block Wall	Eastern	8	0.088	4.026	2.186	Mixed vegetation includes tree of heaven and some emergent wetland vegetation and cattail spp.; other herbaceous species are growing at the bottom of the canal
87	Mixed	Block Wall/Concrete/St one Wall Mix	Eastern	12	0.014	4.026	0.348	Vegetation growing out of the canal wall includes and 8-trunked box elder at 5-10 inches DBH, glossy buckthorn, and two mulberry shrubs
88	Mixed	Block Wall/Concrete/St one Wall Mix	Eastern	12	0.012	4.026	0.298	Vegetation growing out of the canal wall includes five tree of heaven at 1-2 inches DBH, one quaking aspen, and several multistemmed birches
89 ⁴	Mixed	Block Wall/Concrete/St one Wall Mix	Eastern	12	0.046	4.026	1.143	Vegetation growing out of the canal wall includes an approximately 10-trunked tree of heaven tree at 6 inches DBH and poison ivy
904	Trees	Block Wall/Concrete/St one Wall Mix	Eastern	12	0.034	4.026	0.845	Vegetation growing out of canal wall is a 3-trunked tree of heaven tree at 4 inches DBH; also observed a recently cut birch tree tied with rope

Vegetation Polygon/ Point Identifier	Dominant Vegetation Type ¹	Dominant Shoreline Type ²	Canal ³	Mapbook Sheet(s)	Polygon Acreage	Canal Acreage	% of Polygon	Field Notes Summary/Comments
914	Mixed	Block Wall/Concrete/St one Wall Mix	Eastern	8	0.078	4.026	1.937	Vegetation growing on the canal wall is primarily herbaceous, however, one maple at approximately 5-10 inches DBH is within polygon
924	Forested	Block Wall	Northern	2, 3	0.191	11.670	1.637	View toward south side of canal showing vegetation growing on top of single stone/block
93 ⁴	Mixed	Earthen/ Terrestrial Cultural	Northern	3,4	0.093	11.670	0.797	View looking toward E.L Field Powerhouse, vegetation growing on bedrock along the south side of the canal
94	Mixed	Earthen/ Terrestrial Cultural	Northern	4	0.034	11.670	0.291	View looking west toward the E.L. Field Powerhouse from the NPS walking trail; vegetation is growing on bedrock along the south side of the canal
VP-1 ⁴	Scrub-Shrub	Block Wall	Eastern	12	N/A	4.026	N/A	Vegetation includes a single shrub growing out of the canal wall below the brick building and sparse herbaceous species
VP-2	Scrub-Shrub	Block Wall/Concrete/St one Wall Mix	Eastern	12	N/A	4.026	N/A	Two tree of heaven at 1 inch DBH are growing out of the canal wall
VP-3	Scrub-Shrub	Block Wall/Concrete/St one Wall Mix	Eastern	16	N/A	4.026	N/A	A single maple tree and a single elm tree are growing out of the canal wall
VP-4 ⁴	Scrub-Shrub	Stone Wall	Pawtucket	16	N/A	19.630	N/A	A multi-trunked clump of trees, approximately 6 to 8 feet tall, are growing out of canal wall
VP-5	Trees	Stone Wall	Pawtucket	16	N/A	19.630	N/A	A single small hardwood tree, approximately 6 feet tall, is growing out of the canal wall at toe of wall
VP-6	Herbaceous	Block Wall/Concrete/St one Wall Mix	Pawtucket	16	N/A	19.630	N/A	A single, small elm, approximately 4 feet tall, is growing out of canal wall/piping along wall
VP-7	Trees	Block Wall/Concrete/St one Wall Mix	Pawtucket	16	N/A	19.630	N/A	One birch at 3 inches DBH is growing out of the canal wall
VP-8	Herbaceous	Block Wall/Concrete/St one Wall Mix	Hamilton	20	N/A	2.005	N/A	One tree of heaven, approximately 4 feet tall, is growing at the edge of the lock platform

Vegetation Polygon/ Point Identifier	Dominant Vegetation Type ¹	Dominant Shoreline Type ²	Canal ³	Mapbook Sheet(s)	Polygon Acreage	Canal Acreage	% of Polygon	Field Notes Summary/Comments
VP-9	Scrub-Shrub	Concrete	Pawtucket	20	N/A	19.630	N/A	One tree of heaven growing out of a concrete portion of the canal wall, at top of the wall along sidewalk
VP-10 ⁴	Trees	Block Wall	Northern	6	N/A	11.670	N/A	Small maple growing out of the canal wall, near top of wall
VP-11 ⁴	Scrub-Shrub	Block Wall	Western	6	N/A	5.510	N/A	A small clump of silver maples are growing out of canal wall
VP-12	Scrub-Shrub	Concrete	Western	6	N/A	5.510	N/A	A small clump of mulberry growing out of canal wall
VP-13 ⁴	Herbaceous	Block Wall	Western	6	N/A	5.510	N/A	One tree of heaven growing out of canal wall
VP-14 ⁴	Mixed	Block Wall	Western	7	N/A	5.510	N/A	A small clump of shrubs growing out of canal wall
VP-15	Trees	Block Wall	Pawtucket	18	N/A	19.630	N/A	A single ash tree growing out of the canal wall
VP-16 ⁴	Trees	Block Wall	Pawtucket	18	N/A	19.630	N/A	Large tree growing out of canal wall
VP-17	Trees	Block Wall	Pawtucket	18	N/A	19.630	N/A	Small tree growing out of canal wall near outfall
VP-18	Scrub-Shrub	Block Wall	Northern	6	N/A	11.670	N/A	Two small shrubs growing on top of the canal wall
VP-19	Scrub-Shrub	Block Wall	Northern	5,6	N/A	11.670	N/A	One tree, likely dead, growing out of canal wall
VP-20	Scrub-Shrub	Block Wall	Northern	5	N/A	11.670	N/A	A single shrub (next to smaller shrubs) growing out of the canal wall
VP-21	Scrub-Shrub	Block Wall	Northern	6	N/A	11.670	N/A	Tree of heaven and oriental bittersweet growing out canal wall
VP-22	Trees	Block Wall	Northern	6	N/A	11.670	N/A	One small maple growing out of the canal wall
VP-23	Trees	Block Wall	Northern	6	N/A	11.670	N/A	Small clump of birch trees growing out of canal wall
VP-24	Trees	Block Wall	Northern	6	N/A	11.670	N/A	One small birch tree growing out of canal wall

Notes:

N/A = Not Applicable. Vegetation Points (VPs) were used to identify areas along canal walls where a single vegetation type point was recorded. VPs were not included in vegetation category percentage calculations because they represent a single point on the canal wall and were not assigned area estimates.

^{*} In instances where a polygon was recorded in more than one canal, for reporting purposes, it was separated into two distinct polygons that were each given a unique polygon identifier (e.g., 18 and 18a).

¹ Dominant Vegetation Types:

Herbaceous - Characterized by primarily herbaceous (non-woody) plants, including herbaceous vines, regardless of size, and woody plants less than 3 feet tall.

Scrub-Shrub - Consists of woody plants less than 3 inches diameter at breast height (DBH) and greater than or equal to 3 feet tall.

Trees - Consists of woody plants 3 inches or more in DBH, regardless of height. This vegetation type description was generally used to describe areas along canal walls where only a few trees were growing in a clump.

Forested - Characterized as a relatively large area that consists of primarily trees and underbrush.

Mixed - Characterized by a mosaic of herbaceous, scrub-shrub, and/or trees.

² Dominant Shoreline Types:

Block Wall - Canal walls primarily dominated by placed, generally uniformly-sized blocks with concrete caps or block alone.

Concrete - Canal walls primarily dominated by concrete, with various types of cements and aggregate.

Earthen/Terrestrial Cultural - Canal walls generally dominated by earthen embankments (forested and unforested) and areas of exposed bedrock. Some of these areas (e.g., riprapped areas) have been created and/or maintained by human activities.

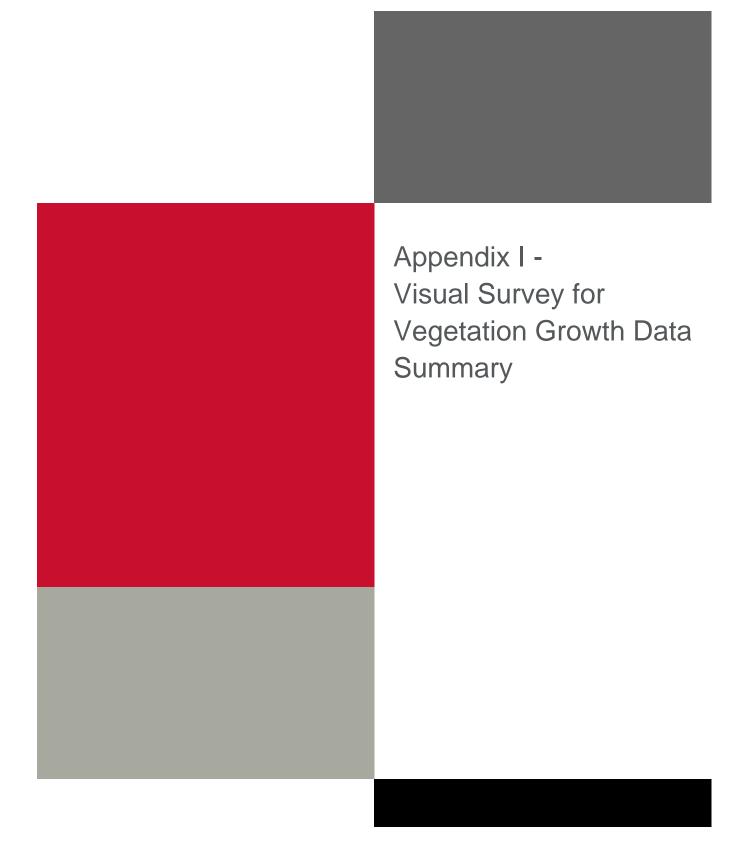
Stone Wall - Canal walls primarily dominated by placed, generally non-uniformly-sized blocks with concrete caps or blocks alone.

Block Wall/Concrete/Stone Wall Mix - Areas of canal walls predominantly composed of a conglomeration of block wall, concrete, or stone wall at varying quantities.

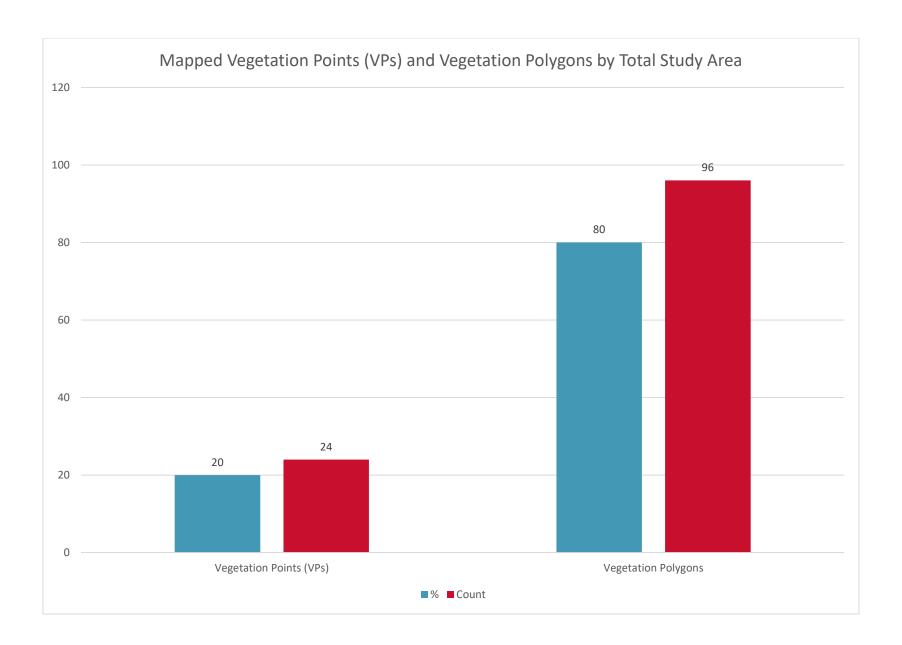
³ The vegetation survey was conducted between September 25 and 27, 2019. For the purposes of examining vegetation type distribution, the study area was divided into the six canals associated with the Lowell Project canal system including: 1) Pawtucket Canal; 2) Northern Canal; 3) Western Canal; 4) Merrimack Canal; 5) Eastern Canal; and 6) Hamilton Canal.

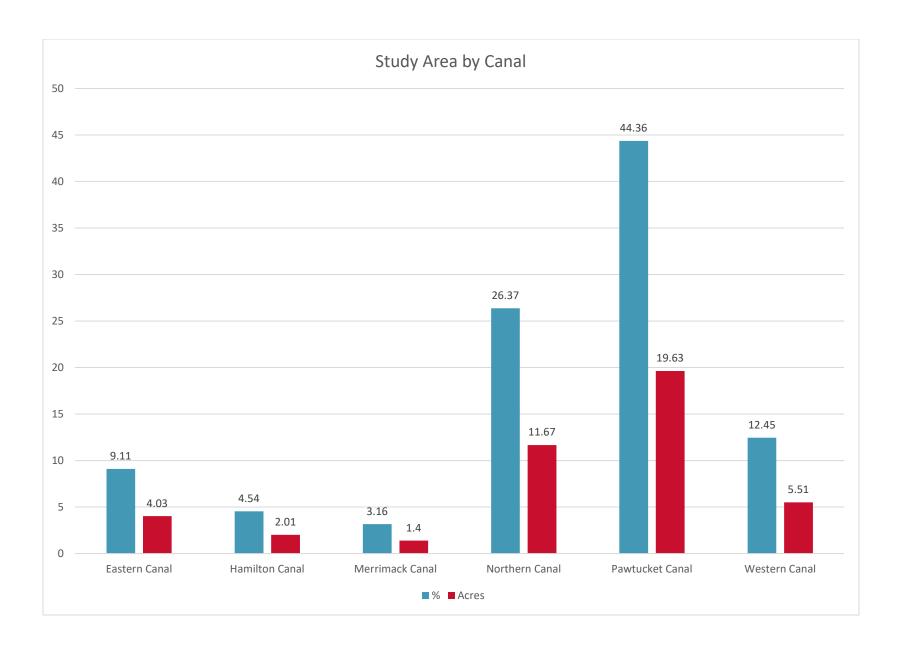
⁴This Vegetation Polygon/Point Identifier has a photograph(s) included in Appendix J.

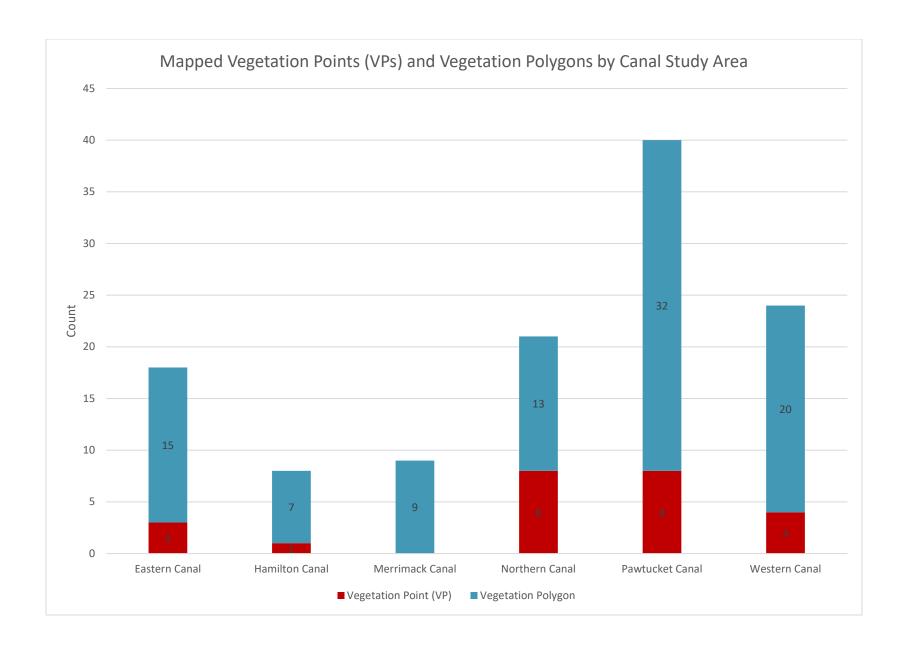
⁵ Vegetation Polygon/Point Identifier 28 was not included in final results.

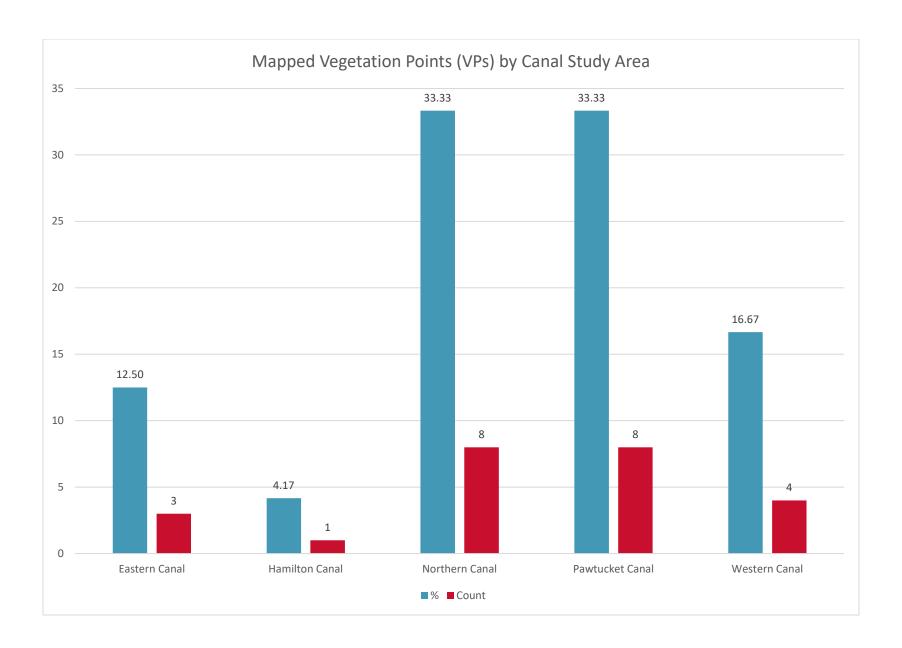


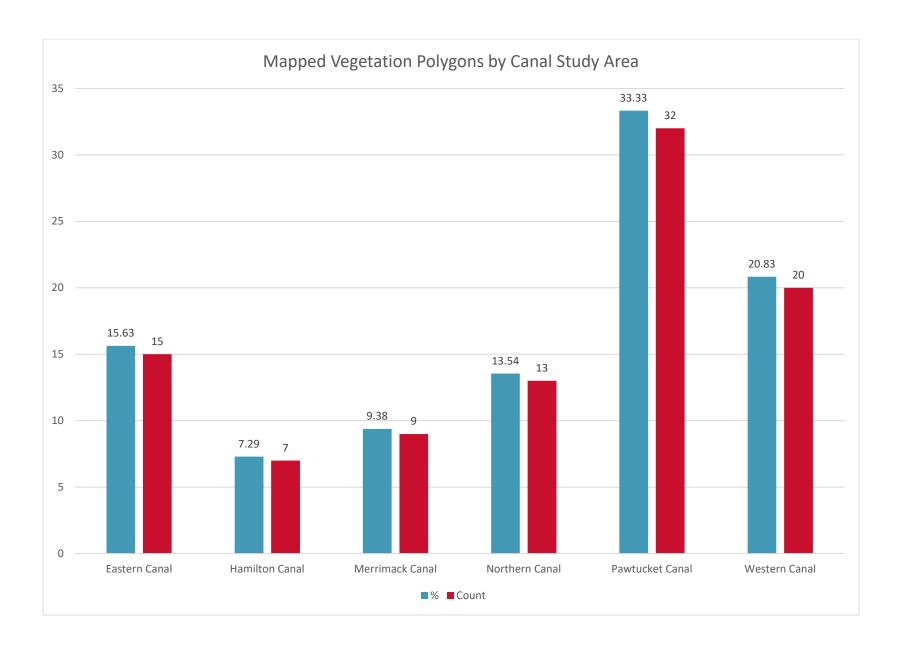
Summary of Visual Survey for Vegetation Growth Data

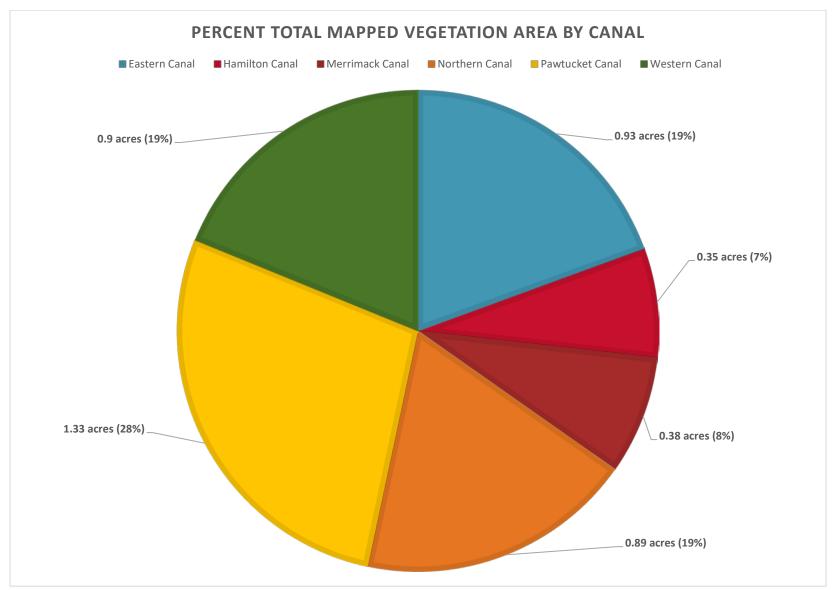


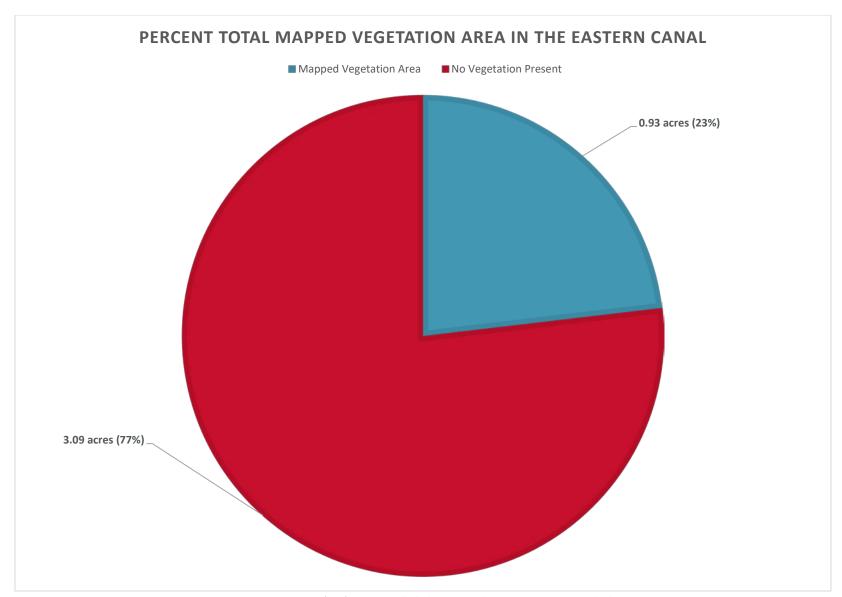


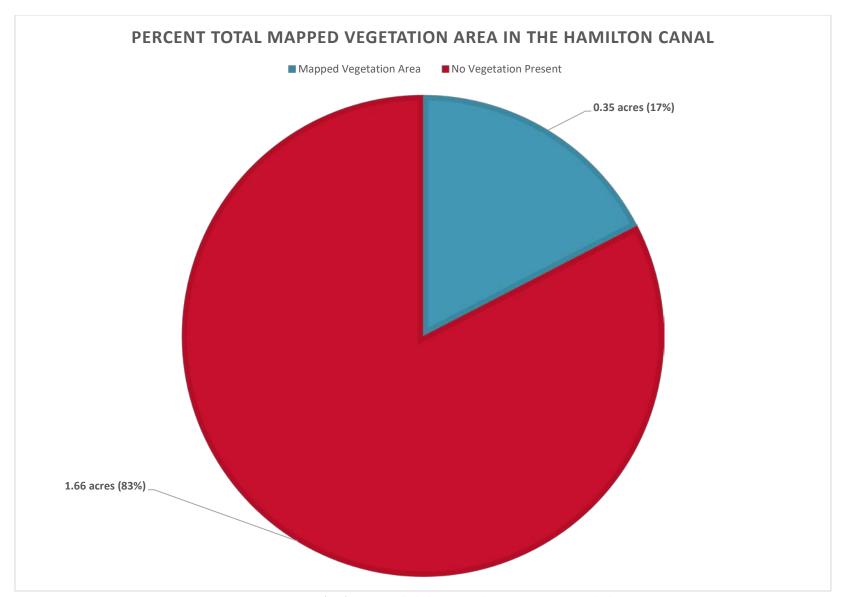


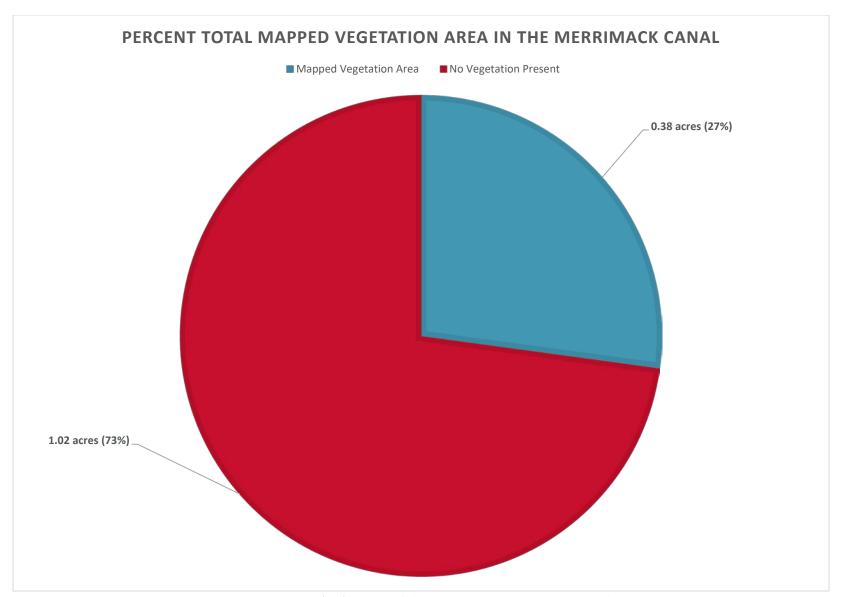


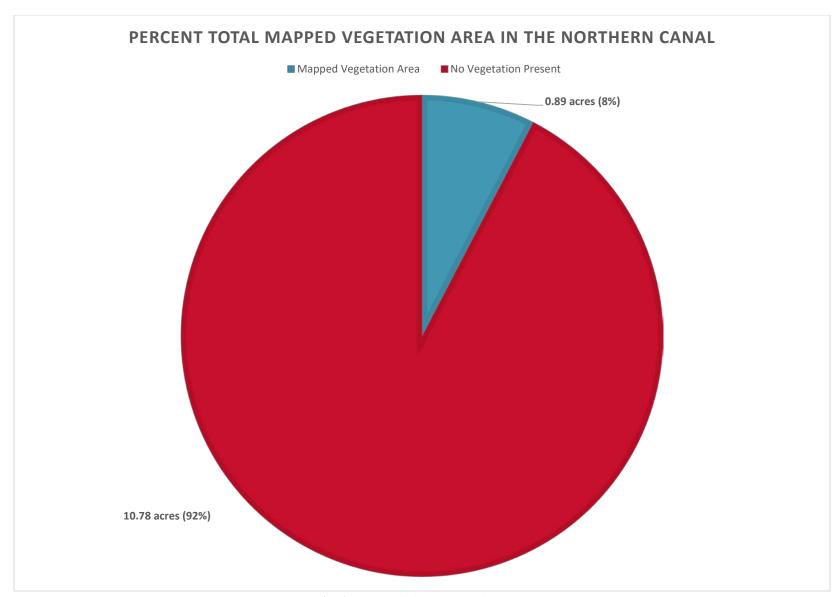


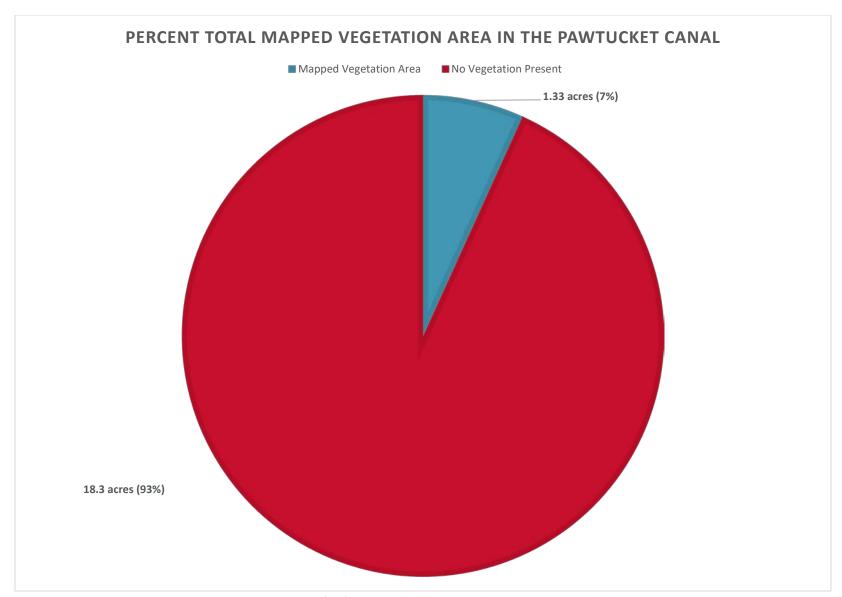


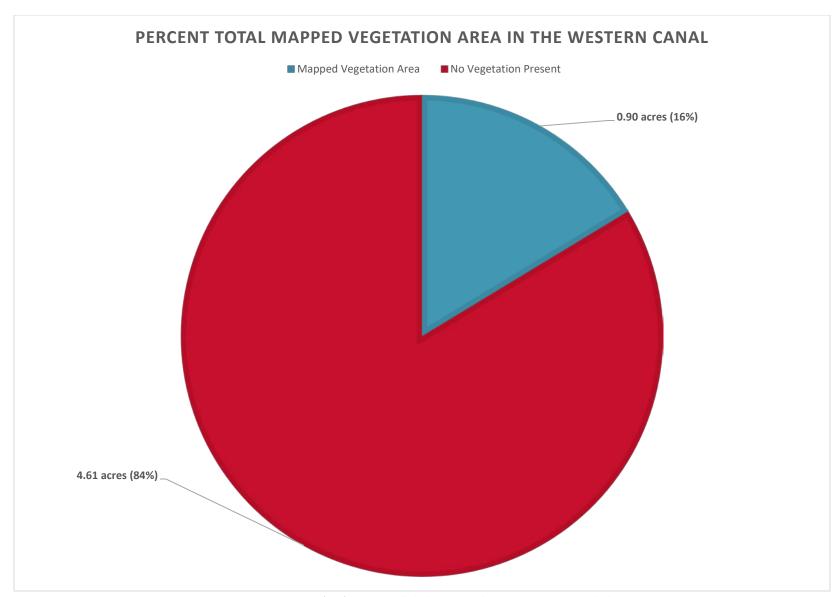


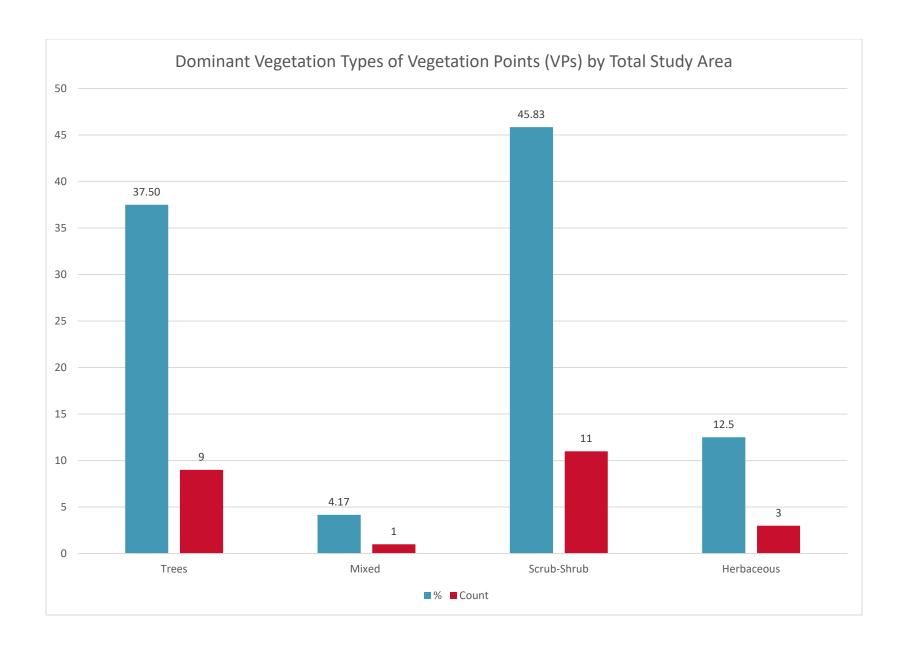


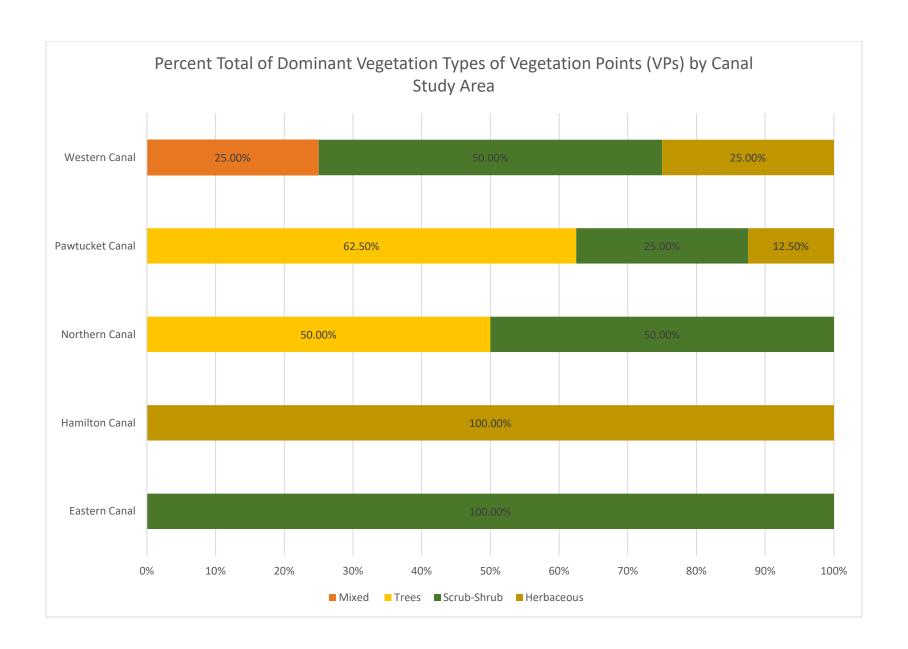


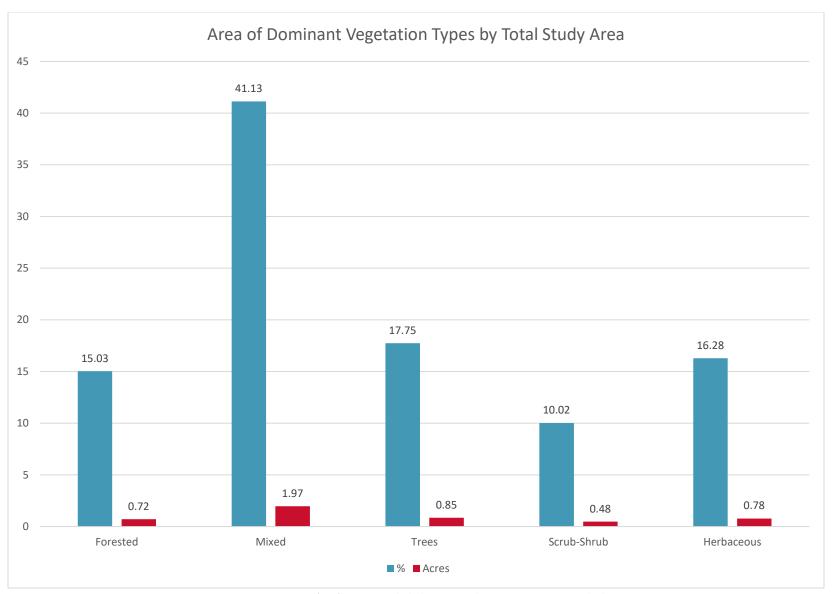


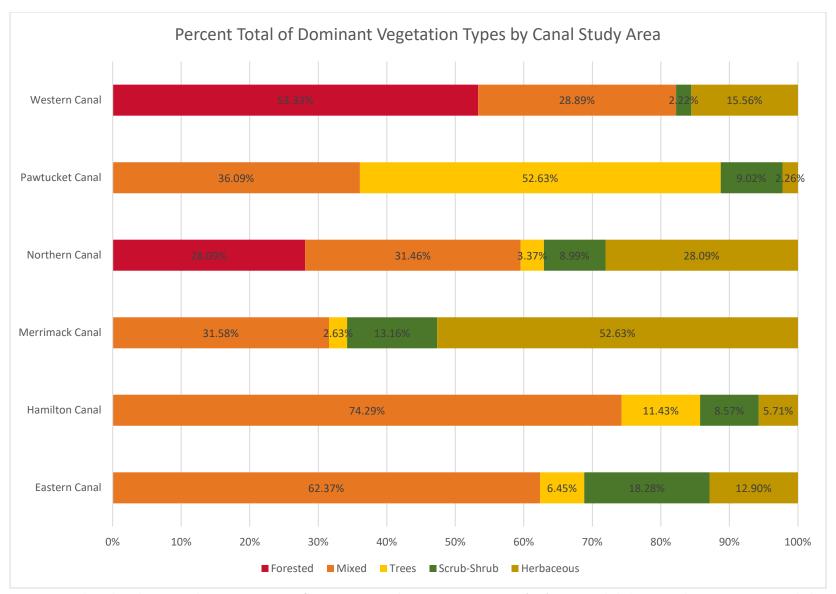




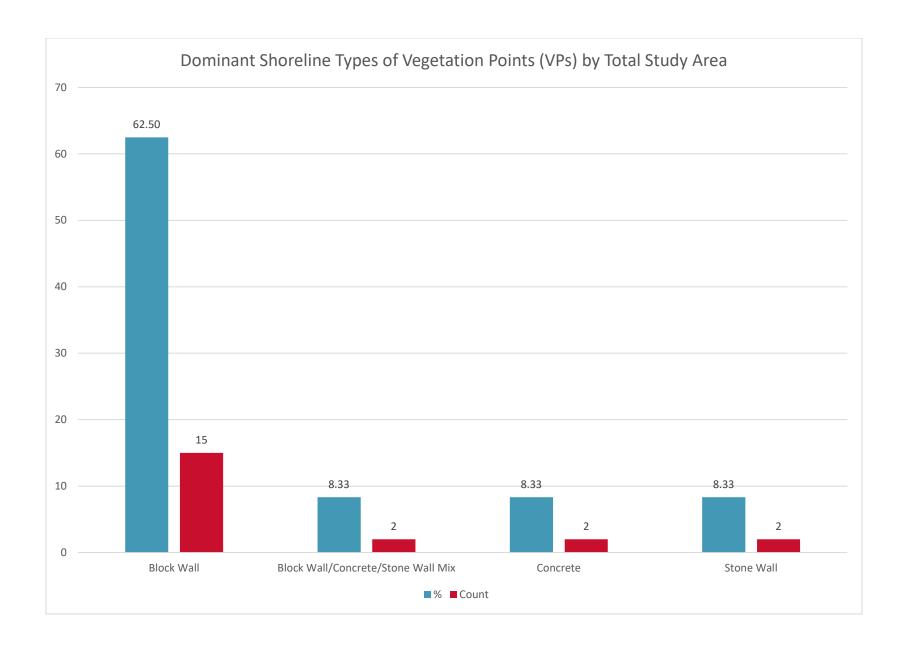


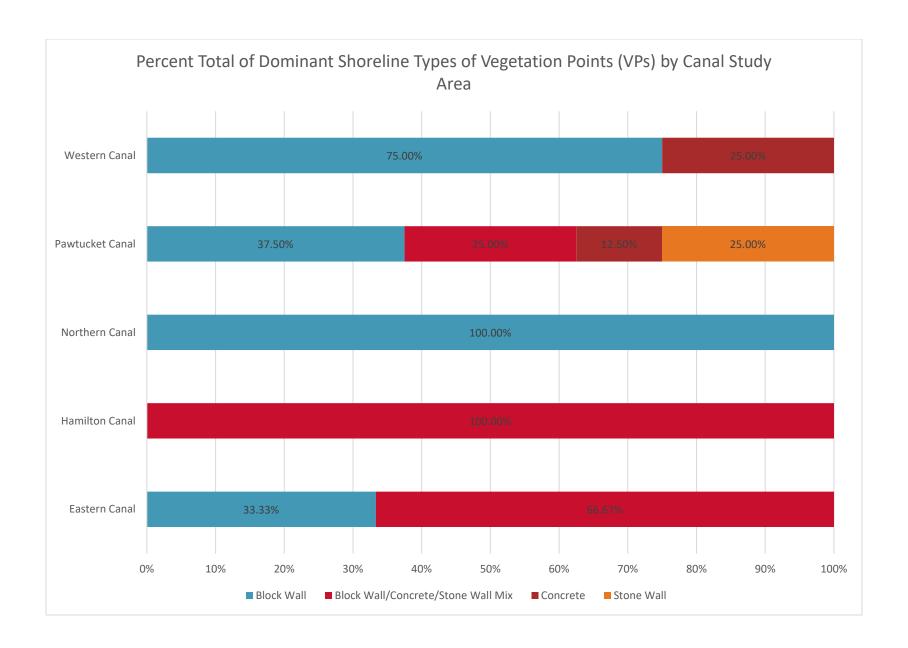


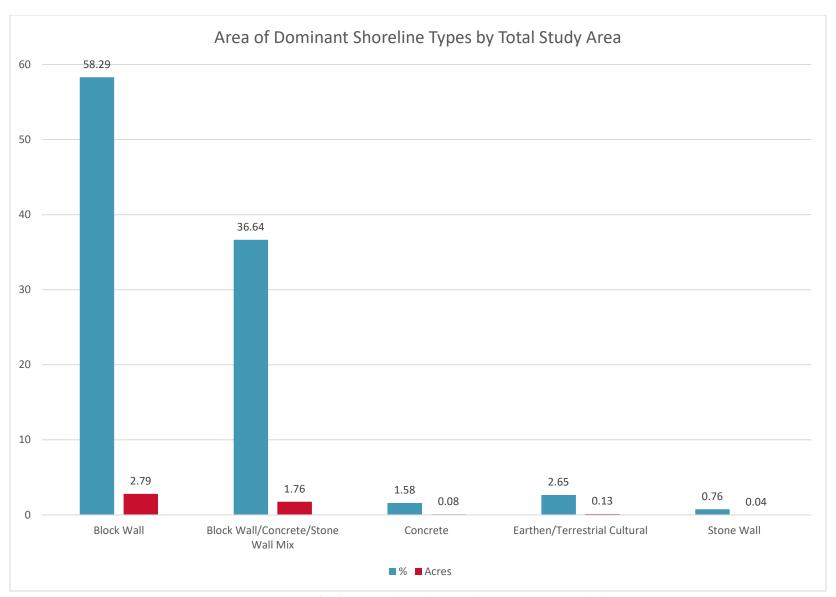


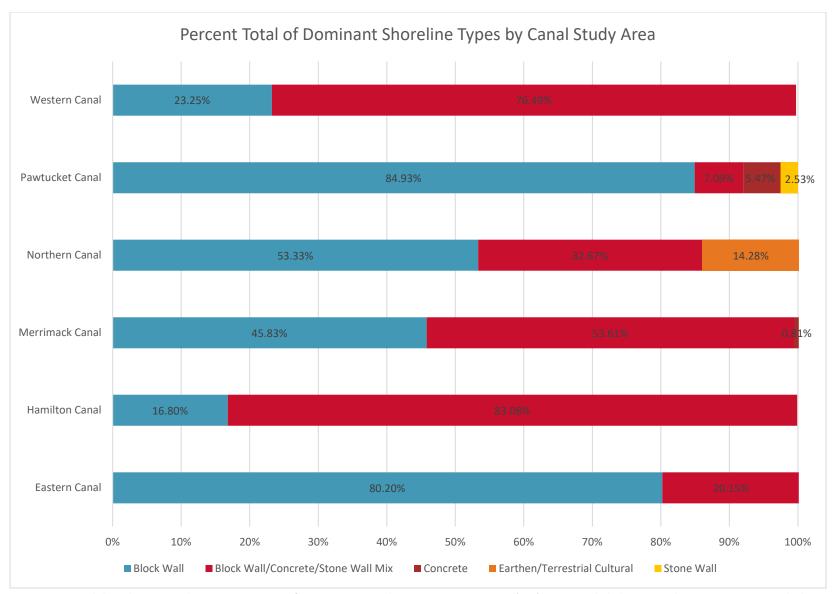


Note: Percent totals are based on mapped vegetation acreages from Vegetation Polygons; Vegetation Points (VPs) are not included in mapped vegetation acreage calculations

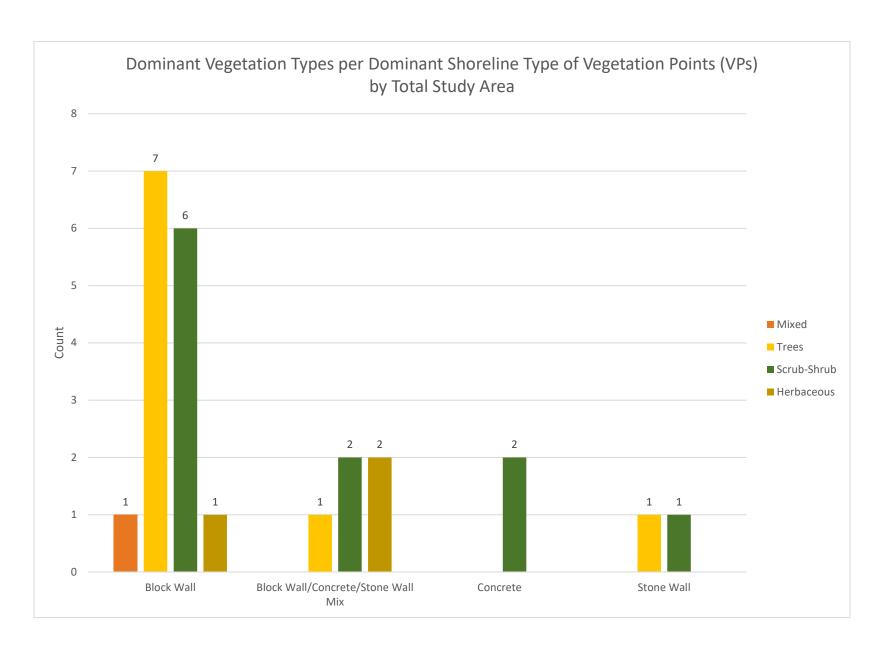


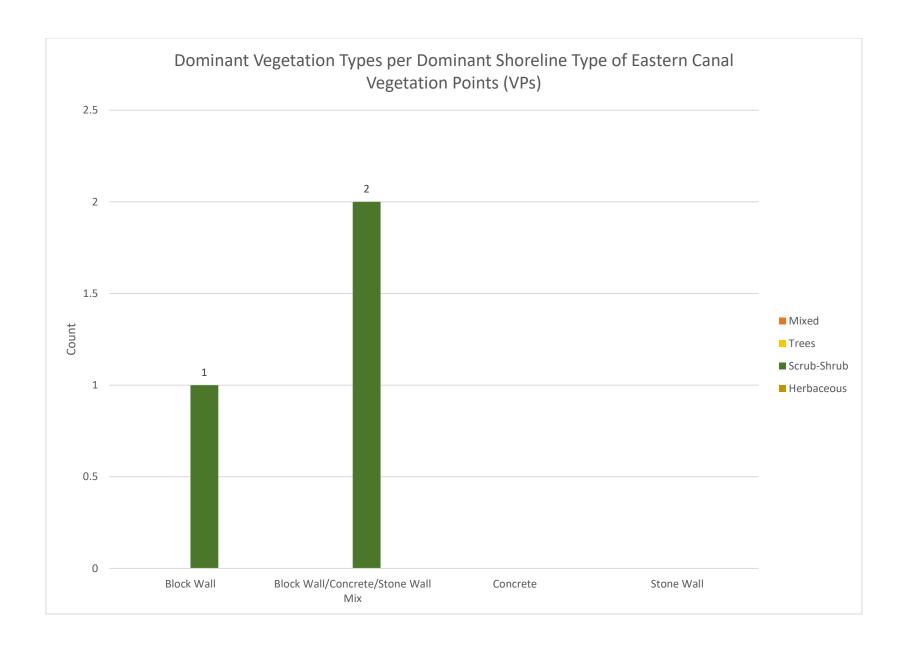


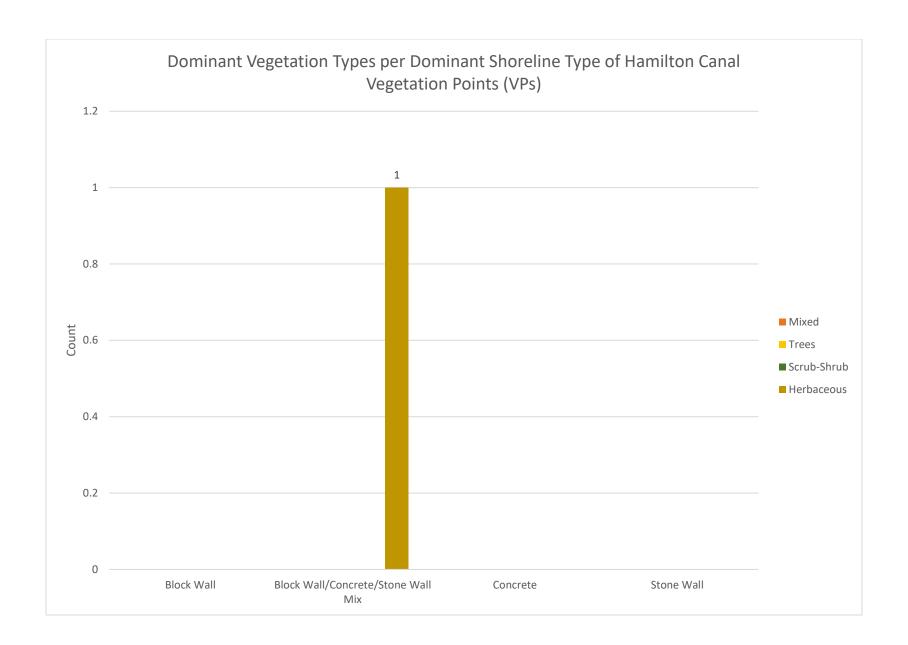


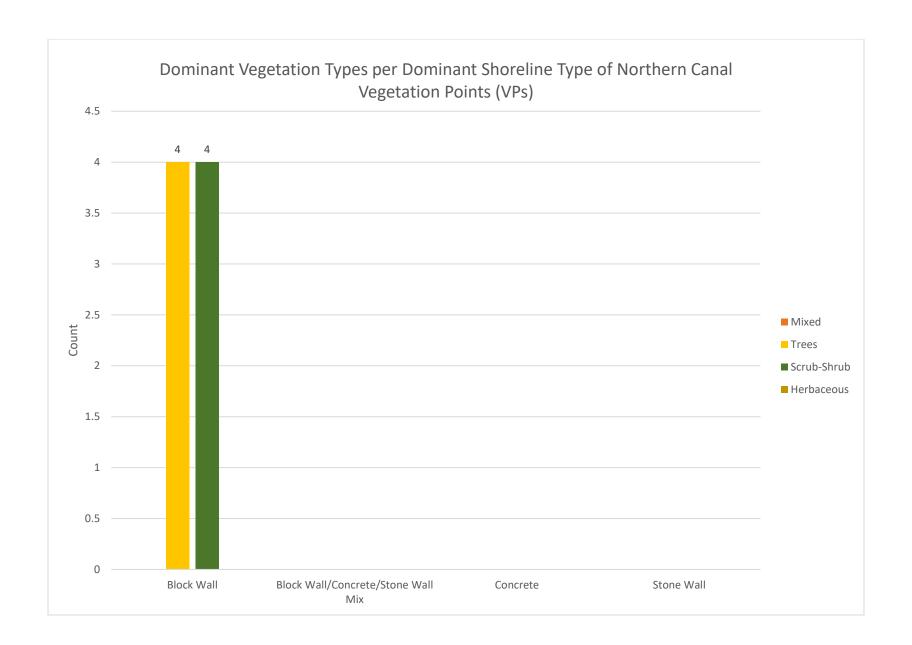


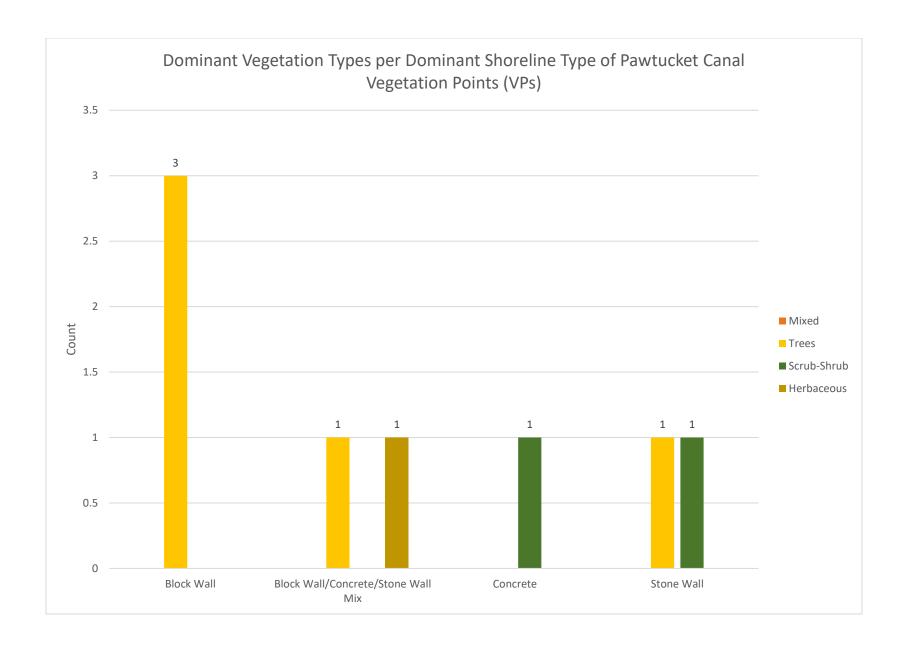
Note: Percent totals based on mapped vegetation acreages from Vegetation Polygons; Vegetation Points (VPs) are not included in mapped vegetation acreage calculations

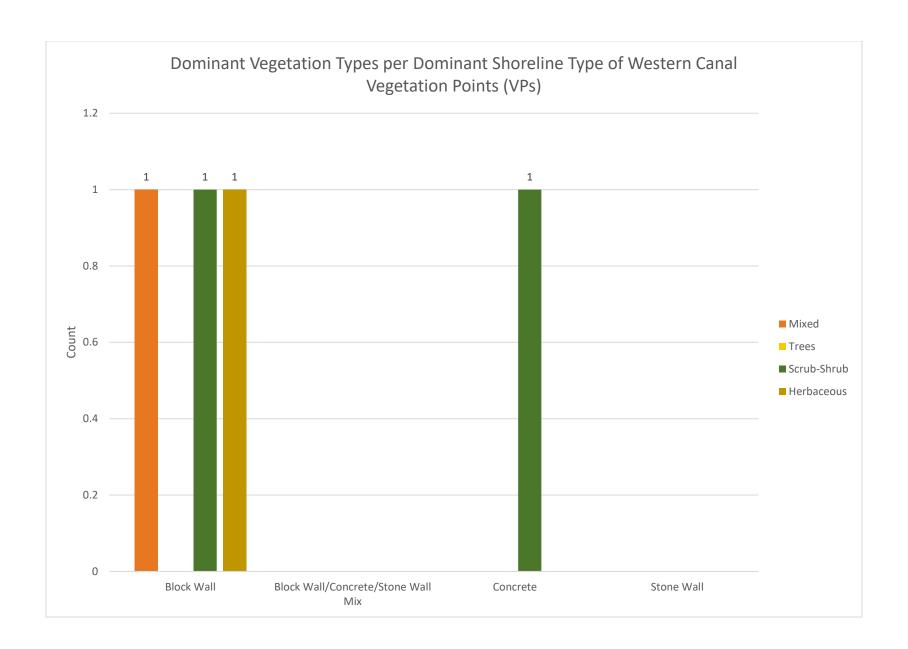


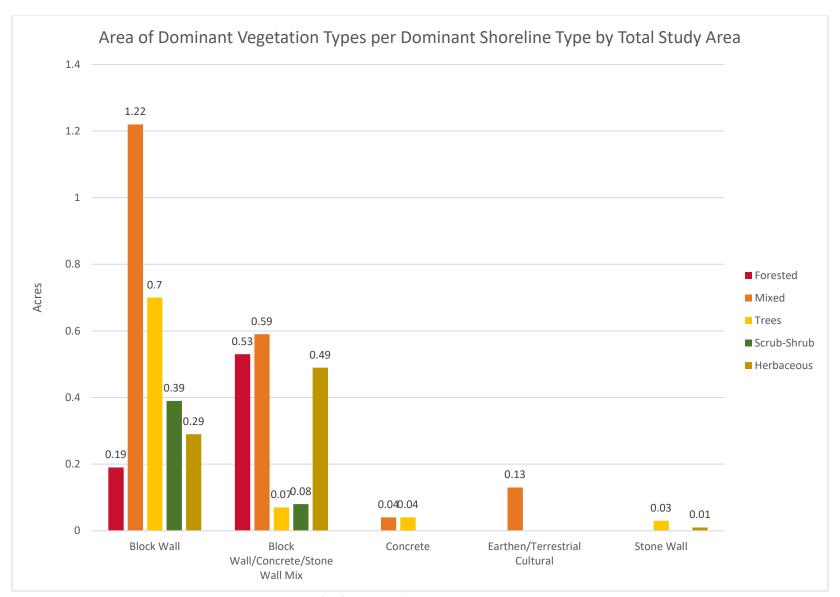


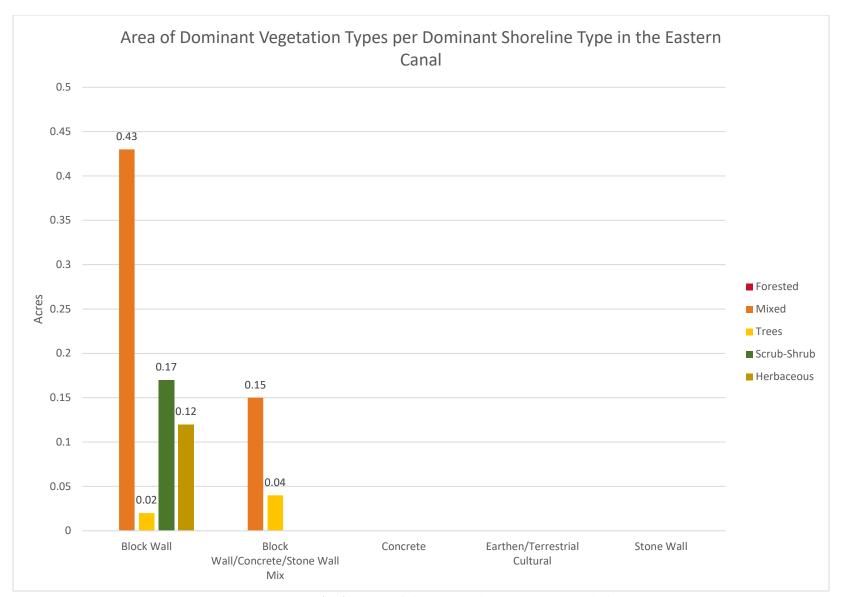


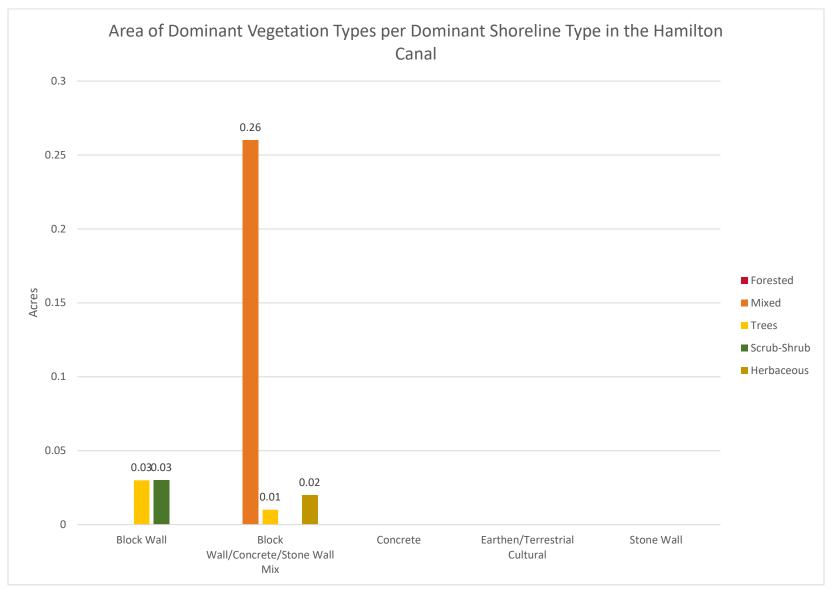


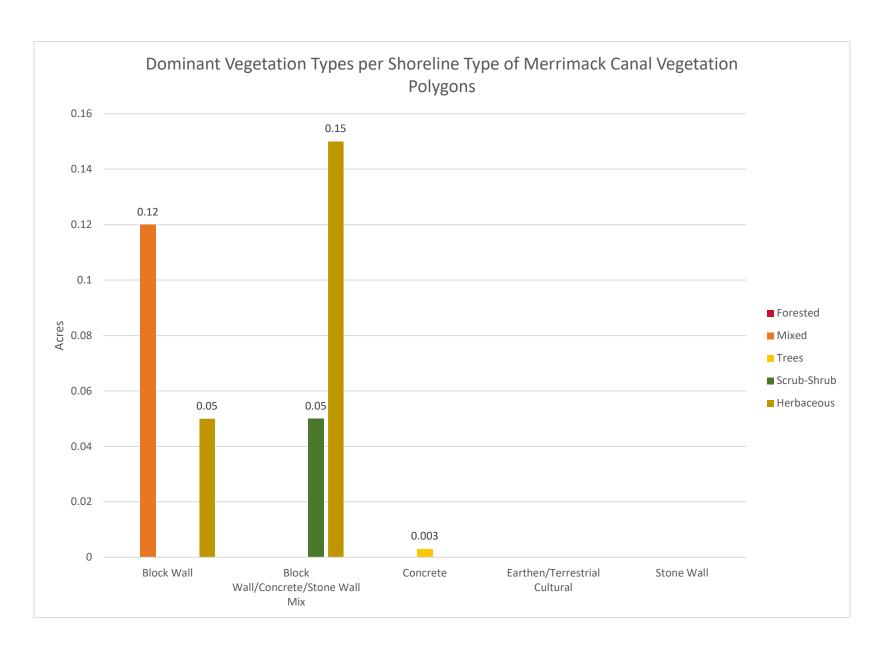




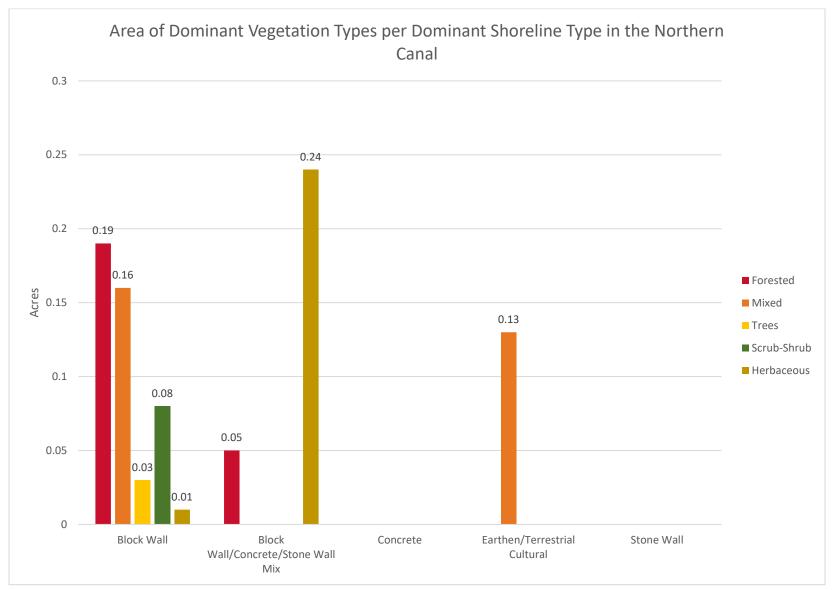


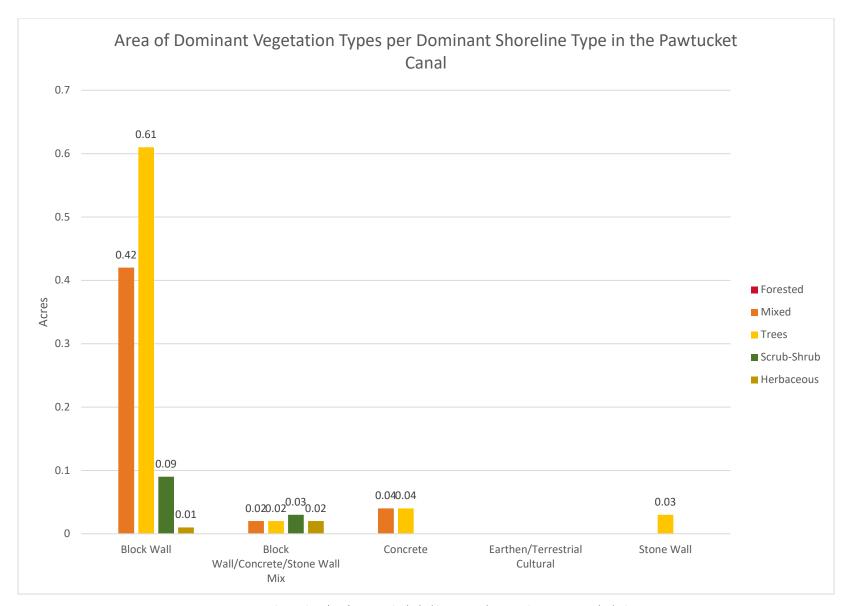


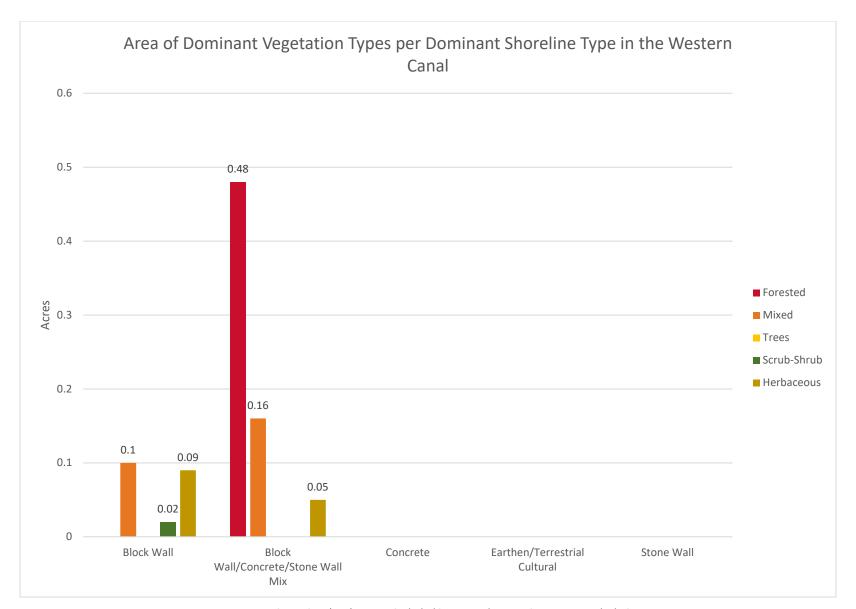




Note: Vegetation Points (VPs) are not included in mapped vegetation acreage calculations







Appendix J -Visual Survey for **Vegetation Growth** Representative Photographic Log

Lowell Hydroelectric Project (FERC No. 2790)

Canal Wall Vegetation Mapping Photo Log





Polygon No.: 79
Photo No.: 79
Date: 9/27/2019
Direction Photo Taken: Northeasterly
Description: Tree of heaven trees and vines are growing on top of the canal wall and within approximately 3 feet of the canal wall.



Polygon No.: 78
Photo No.: 78
Date: 9/27/2019
Direction of Photo Taken: Westerly
Description: Vegetation growing out
of the canal walls include tree of
heaven and mulberry and
herbaceous species such as purple
loosestrife and mullein.

Lowell Hydroelectric Project (FERC No. 2790)

Canal Wall Vegetation Mapping Photo Log





Polygon No.: 92 Photo No.: P-9 Date: 9/27/2019

Direction Photo Taken: Southerly

Description: Vegetation growing on top of single stone/block wall on south side of the canal is forested habitat.



Polygon No.: 77 Photo No.: 77a Date: 9/27/2019

Direction Photo Taken: Westerly Description: At the western edge of the polygon, the canal broadens and is forested with riparian species. The topography extends to the bypass reach. Species include elms, mulberry, and honeysuckle. Some stumps have been cut along the canal wall on the same side as the bypass reach.

Lowell Hydroelectric Project (FERC No. 2790)

Canal Wall Vegetation Mapping Photo Log



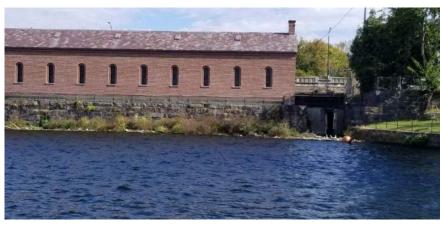


Photo Location No.: P-6
Date: 9/26/2019
Direction Photo Taken: Easterly
Description: View of Pawtucket Gatehouse. Vegetation is growing on debris deposited against the gatehouse.



Polygon No.: 75
Photo No.: 75a
Date: 9/27/2019
Direction: Northeasterly
Description: Vegetation is
growing from small sill under
the first block down on the
canal wall and is dominated by
berbaceous plants such as

herbaceous plants such as ragweed, purple loosestrife, aster, scattered ferns, golden rod spp., scattered mulberry, elms, and buckthorn.

Lowell Hydroelectric Project (FERC No. 2790)

Canal Wall Vegetation Mapping Photo Log





Polygon No.: 74 Photo No.: 74 Date: 9/27/2019 Direction: Northeasterly Description: Ragweed is growing out of the canal wall located beneath the building.



Polygon No.: 93 Photo Location No.: P-10 Date: 9/27/2019

Direction Photo Taken: Southerly
Description: Vegetation is growing on bedrock along south side of the canal.

Lowell Hydroelectric Project (FERC No. 2790)

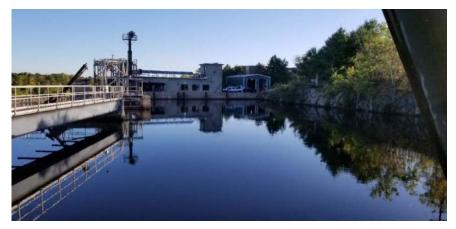
Canal Wall Vegetation Mapping Photo Log





Photo Location No.: P-7 Date: 9/26/2019

Direction Photo Taken: Northeasterly
Description: View from E.L. Field Powerhouse deck.



Polygon No.: 94 Photo Location No.: P-8 Date: 9/26/2019 Date: 97:002019 Direction Photo Taken: Northerly Description: View looking west toward E.L. Field Powerhouse from the NPS walking trail. Vegetation is growing on bedrock along south side of the canal.

Lowell Hydroelectric Project (FERC No. 2790)

Canal Wall Vegetation Mapping Photo Log





Vegetation Point No.: VP-10
Photo No.: VP-13
Date: 9/26/2019
Direction Photo Taken: Southerly
Description: A small maple is growing out of the canal wall, near the top of the wall.



Vegetation Point No.: VP-11 Photo No.: VP-14 Date: 9/26/2019 Direction Photo Taken: Southwesterly Description: A small clump of silver maples are growing out of the canal wall.

Lowell Hydroelectric Project (FERC No. 2790)

Canal Wall Vegetation Mapping Photo Log





Polygon No.: 45 and 46
Photo No.: 45
Date: 978(2019
Direction Photo Taken: Northeasterly
Description: Vegetation growing on the eastern side of the canal wall (left side of the photograph) includes several tree species (i.e. mulberry, buckflorn, tree of heaven, etc.) and dense vines, including Boston ivy and poison by. Vegetation growing on the western side of the canal wall (right side of the photograph) includes less trees than the eastern side of the canal and similar vine species.



Polygon No.: 47 Photo No.: 47 Date: 9/26/2019

Direction Photo Taken: Northeasterly
Description: The vegetation growing on the canal wall includes large locust trees and ragweed.

Lowell Hydroelectric Project (FERC No. 2790)

Canal Wall Vegetation Mapping Photo Log





Polygon No.: 39 Photo No.: 39 Date: 9/25/2019

Direction Photo Taken: Northerly
Description: A few small tree of heaven trees are growing out of the canal wall, near the top of

the wall.



Polygon No.: 38 Photo No.: 38 Date: 9/25/2019 Direction Photo Taken: Northeasterly
Description: Vegetation growing
out of the canal wall, near the top of the wall consists of shrubs.

Lowell Hydroelectric Project (FERC No. 2790)

Canal Wall Vegetation Mapping Photo Log





Vegetation Point No.: VP-14 Photo No.: VP-17 Date: 9/26/2019 Direction Photo Taken: Southwesterly Description: A small clump of shrubs growing out of the canal wall.



Polygon No.: 51 Photo No.: 51 Date: 9/26/2019 Direction Photo Taken: Northeasterly Description: Vegetation growing on the canal wall include trees, such as mulberry and elms, and herbaceous ragweed.

Lowell Hydroelectric Project (FERC No. 2790)

Canal Wall Vegetation Mapping Photo Log





Polygon No.: 54 and 55
Photo No.: 54
Photo No.: 54
Photo No.: 54
Photo Taken: Northerly
Description: Vegetation growing on the northern side of the canal wall (left side of the photograph) consists of primarily vines. Vegetation growing on the southern side of the canal wall (right side of the photograph) consists primarily of herbaceous vegetation, such as ragweed, and vines. A few tree of heaven trees are growing primarily at the toe of the canal wall on both sides of the canal; likely on deposited sediment, especially along the northern canal wall.



Polygon No.: 86 Photo No.: CV_Poly6 Date: 9/25/2019

Direction Photo Taken: Northerly

Description: Vegetation growing on canal wall at the southwestern end of Polygon 86 is primarily

herbaceous.

Lowell Hydroelectric Project (FERC No. 2790)

Canal Wall Vegetation Mapping Photo Log





Polygon No.: 86 Photo No.: CV_Poly6b Date: 9/25/2019

Direction Photo Taken: Easterly

Description: The vegetation growing out of the canal includes tree of heaven and potentially milfoil and *Typha* spp.; other herbaceous species are growing at the bottom of the canal.



Polygon No.: 91 Photo No.: CV_Poly6a Date: 9/25/2019

Direction Photo Taken: Northerly
Description: The vegetation growing on the canal is primarily herbaceous; however, one maple at approximately 5-10 inches diameter at breast height is located approximately 2 feet back from the wall.

Lowell Hydroelectric Project (FERC No. 2790)

Canal Wall Vegetation Mapping Photo Log





Polygon No.: 1
Photo No.: 1
Photo No.: 1
Photo No.: 1
Date: 9/25/2019
Direction Photo Taken: Northwesterly
Description: Several large woody trees are located at the northwestern end of the canal, including river birch growing on top of the canal wall. Herbaceous plants including ragweed and Boston ivy dominate the western side of the canal wall (left side of the photograph).



Polygon No.: 1
Photo No.: 1a
Date: 9/25/2019
Direction Photo Taken: Easterly
Description: Herbaceous plants including ragweed and Boston ivy dominate the western side of the canal wall (right side of the photograph).

Lowell Hydroelectric Project (FERC No. 2790)

Canal Wall Vegetation Mapping Photo Log





Photo Location No.: P-2
Date: 9/25/2019
Direction Photo Taken: Southwesterly
Description: Vegetation is growing on the riprap shoreline along both sides of the canal.



Photo Location No.: P-3
Date: 9/25/2019
Direction Photo Taken: Southwesterly
Description: Vegetation is growing on the riprap shoreline located on the eastern side of the canal (left side of the photograph). The western side of the canal wall (right side of the photograph) is concrete with little to no vegetation present.

Lowell Hydroelectric Project (FERC No. 2790)

Canal Wall Vegetation Mapping Photo Log





Polygon No.: 34, 35, and 36
Photo No.: 34
Date: 9/25/2019
Direction Photo Taken: Northeasterly
Description: The vegetation growing out of the eastern side of the canal wall (right side of the photograph) is sparse and consists primarily of vines. The vegetation growing on top of and approximately 3 feet back from the western side of the canal wall (left side of the photograph) is primarily herbaceous.



Polygon No.: 82
Photo No.: CV_Poly2
Date: 9/25/2019
Direction Photo Taken: Northeasterly
Description: There is approximately 90 percent vegetative cover in this area; vegetation is mostly herbaceous, including ragiveed, clover, *Aster* spp., and other common weeds. Two small tree of heaven trees are also present on the canal

Lowell Hydroelectric Project (FERC No. 2790)

Canal Wall Vegetation Mapping Photo Log





Polygon No.: 84 and 85
Photo No.: CV_Poly4c
Date: 9/25/2019
Direction Photo Taken: Northeasterly
Description: There is approximately 20 percent vegetative cover on the western side of the canal wall (right side of the photograph) located primarily one block down from the top of the wall: vegetation includes a few maples, honeysuckle, and scattered herbaceous species. There is approximately 40 percent vegetative cover on the eastern side of the canal wall (left side of the photograph); vegetation includes several elms, approximately 5 feet tall, several birches, and a few red maples.



Polygon No.: 3
Photo No.: 3
Date: 9/25/2019
Direction Photo Taken: Northwesterly
Description: The vegetation growing on the canal wall includes one elm tree, Boston ivy, and ragweed.
Scattered submerged aquatic vegetation is growing in the canal.

Lowell Hydroelectric Project (FERC No. 2790)

Canal Wall Vegetation Mapping Photo Log





Vegetation Point No.: VP-1
Photo No.: VP-4
Date: 9/25/2019
Direction Photo Taken: Northeasterly
Description: Vegetation includes a single shrub growing out of the canal wall below the brick building and sparse herbaceous species.



Polygon No.: 89
Photo No.: CV_Poly9
Date: 9/25/2019
Direction Photo Taken: Southeasterly
Description: The vegetation growing out of the canal wall includes an approximately 10-trunked tree of heaven tree at approximately 6 inches diameter at breast height and poison ivy.

Lowell Hydroelectric Project (FERC No. 2790)

Canal Wall Vegetation Mapping Photo Log





Polygon No.: 90
Photo No.: CV_Poly10a
Date: 9/25/2019
Direction Photo Taken: Southwesterly
Description: The vegetation growing out of canal wall is a 3-trunked tree of heaven tree at approximately 4 inches diameter at breast height. A recently cut birch tree tied with rope was also observed along the canal wall.



Polygon No.: 4 Photo No.: 4 Date: 9/25/2019

Direction Photo Taken: Southerly Description: There is one, multi-trunked tree of heaven tree at approximately 4 to 6 inches diameter at breast height growing out of the canal wall.

Lowell Hydroelectric Project (FERC No. 2790)

Canal Wall Vegetation Mapping Photo Log





Polygon No.: 70 Photo No.: 70 Date: 9/26/2019

Direction Photo Taken: Northwesterly

Description: The canal wall is primarily concrete with trees, such as locust and elm, growing at the toe of the wall.



Photo Location No.: P-4 Photo No.: P-15 Date: 9/26/2019

Direction Photo Taken: Easterly
Description: Dense vegetation is growing on earthen banks along the canal.

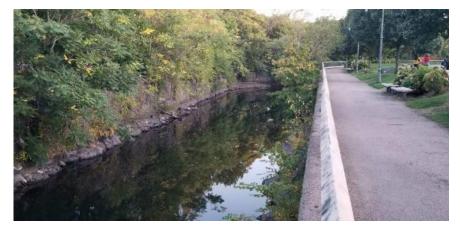
Lowell Hydroelectric Project (FERC No. 2790)

Canal Wall Vegetation Mapping Photo Log





Photo Location No.: P-5
Photo No.: P-16
Date: 9/26/2019
Direction Photo Taken: Northwesterly
Description: Upstream view of dense vegetation growing on earthen banks along both sides of the canal.



Polygon No.: 41
Photo No.: 41b
Date: 9/25/2019
Direction Photo Taken: Southeasterly
Description: Portions of the canal wall at bridge crossings on each side of the canal are concrete and brick. The highest density of vegetation in the polygon consists of locust, tree of heaven, box elder, maples and scattered shrubs, some with approximately 6 to 14 inches diameter at breast height.

Lowell Hydroelectric Project (FERC No. 2790)

Canal Wall Vegetation Mapping Photo Log





Polygon No.: 13 Photo No.: 13 Date: 9/25/2019

Direction Photo Taken: Southerly
Description: There is one elm tree and one mulberry growing out of concrete portion of the canal wall.



Polygon No.: 16 Photo No.: 16 Date: 9/25/2019

Direction Photo Taken: Northerly
Description: Approximately 20 percent of the canal wall has woody trees (i.e. elms, locust, and mulberry) or herbaceous plants growing on it.

Lowell Hydroelectric Project (FERC No. 2790)

Canal Wall Vegetation Mapping Photo Log





Polygon No.: 18
Photo No.: 18
Photo No.: 18
Date: 9/25/2019
Direction Photo Taken: Southwesterly
Description: Approximately 20 percent of the canal wall has woody trees, shrubs, and/or herbaceous plants growing on it.
The vegetation includes tree of heaven, maple, common mullein, Japanese knot weed, and ragweed. Japanese knot weed coverage increases with closer proximity to the National Park Service boat dock.



Polygon No.: 7
Photo No.: 7a
Date: 9/25/2019
Direction Photo Taken: Easterly
Description: Several large woody trees including river birch, tree of heaven, and silver maple, all approximately 2 to 5 inches diameter at breast height are growing out of the canal wall.

Lowell Hydroelectric Project (FERC No. 2790)

Canal Wall Vegetation Mapping Photo Log





Polygon No.: 8
Photo No.: 8
Date: 9/25/2019
Direction Photo Taken: Easterly
Description: The canal contains potential sediment deposited against the canal wall; the sediment is topped with a layer of herbaceous plants.



Vegetation Point No.: VP-4
Photo No.: VP-7
Date: 9/25/2019
Direction Photo Taken: Southeasterly
Description: A multi-trunked clump of trees, approximately 6 to 8 feet tall, are growing out of canal wall.

Lowell Hydroelectric Project (FERC No. 2790)

Canal Wall Vegetation Mapping Photo Log





Polygon No.: 69 Photo No.: 69 Date: 9/26/2019 Direction Photo Taken: Northwesterly
Description: The trees growing out of canal wall include tree of heaven and elms at approximately 10 feet tall.



Polygon No.: 67 Photo No.: 67 Date: 9/26/2019

Direction Photo Taken: Northwesterly
Description: Large locust and birch trees are growing on top of the canal wall.

Lowell Hydroelectric Project (FERC No. 2790)

Canal Wall Vegetation Mapping Photo Log





Polygon No.: 66
Photo No.: 66a
Date: 9/26/2019
Direction Photo Taken: Northerly
Description: The vegetation growing out of the eastern side of the canal wall (right side of the photograph), at the top of the wall, includes trees, such as tree of heaven and birch, and vines, such as Boston ivy.



Vegetation Point No.: VP-16 Photo No.: VP-19 Date: 9/26/2019 Direction Photo Taken: Northerly Description: A small clump of mulberry are growing out of the canal wall.

Lowell Hydroelectric Project (FERC No. 2790)

Canal Wall Vegetation Mapping Photo Log





Polygon No.: 56
Photo No.: 56
Date: 9/26/2019
Direction Photo Taken: Southwesterly
Description: Most of the canal wall is made of concrete with riprap placed at the toe of the wall. The vegetation growing on the canal wall consists of tree of heaven, box elder, and vines, such as Boston ivy.



Polygon No.: 57 Photo No.: 57 Date: 9/26/2019 Direction Photo Taken: Easterly Description: Vegetation growing out of the canal wall includes ash trees at approximately 6 to 8 inches diameter at breast height.

Lowell Hydroelectric Project (FERC No. 2790)

Canal Wall Vegetation Mapping Photo Log





Polygon No.: 23 Photo No.: 23 Date: 9/25/2019

Direction Photo Taken: Northerly Description: The vegetation on the canal wall is primarily tree of heaven and ragweed, with lesser density of mullein.



Polygon No.: 25 Photo No.: 25 Date: 9/25/2019

Direction Photo Taken: Northerly
Description: The vegetation growing out of the canal wall includes one sycamore, several tree
of heaven, glossy buckhorn, and ragweed.

Lowell Hydroelectric Project (FERC No. 2790)

Canal Wall Vegetation Mapping Photo Log





Polygon No.: 26 and 27 Photo No.: 26 Date: 9/25/2019

Direction Photo Taken: Northeasterly

Description: The southern side of the canal wall (right side of the photograph), west of the walking bridge, consists of portions of concrete and is primarily covered in ragweed. Vegetation on the northern side of the canal wall (left side of the photograph) consists primarily of trees with approximately 10 percent cover. The northern side of the canal wall, west of the walking bridge, consists of portions of concrete.



Polygon No.: 26 and 27
Photo No.: 26a
Date: 9/25/2019
Direction Photo Taken: Southwesterly
Description: The southern side of the canal wall (left side of the photograph), east of the walking bridge, contains trees, such as tree of heaven and elm. Trees on the northern side of the canal wall (right side of the photograph), east of the walking bridge, are smaller and less dense than west of the walking bridge.

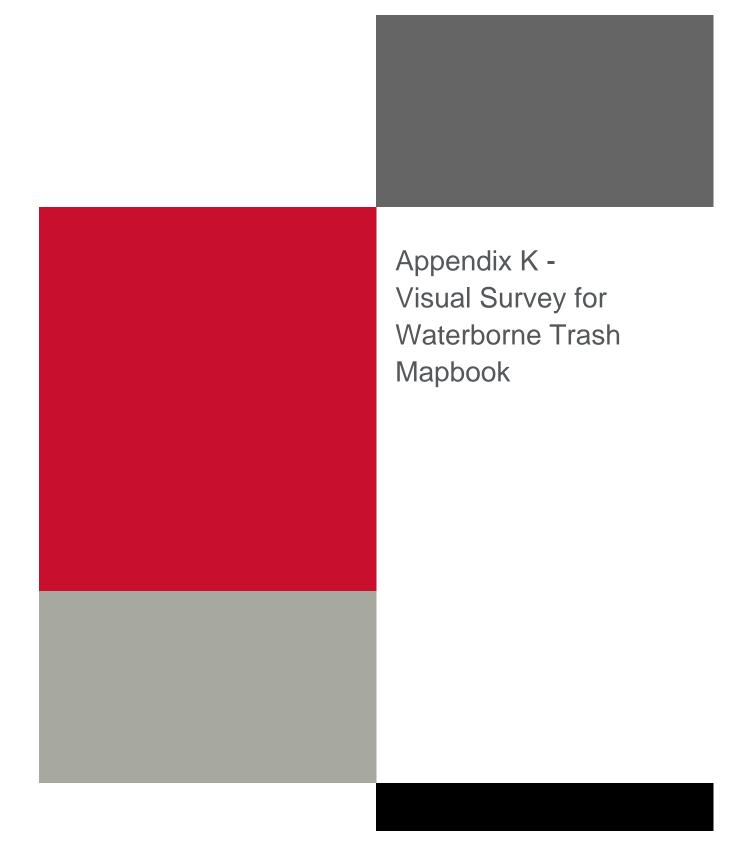
Lowell Hydroelectric Project (FERC No. 2790)

Canal Wall Vegetation Mapping Photo Log





Polygon No.: 58
Photo No.: 58b
Date: 9/26/2019
Direction Photo Taken: Southerly
Description: The vegetation growing out of the canal wall includes locust trees, tree of heaven trees, wild grape, and oriental bittersweet.







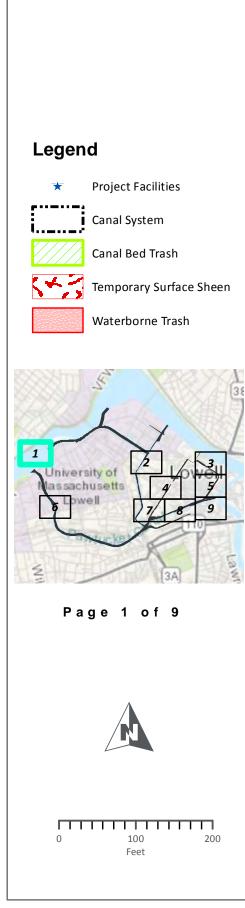
FOR BOOTT HYDRO, LLC.





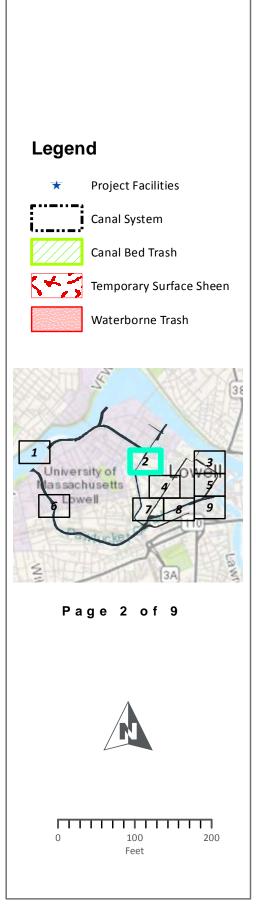
FOR BOOTT HYDRO, LLC.



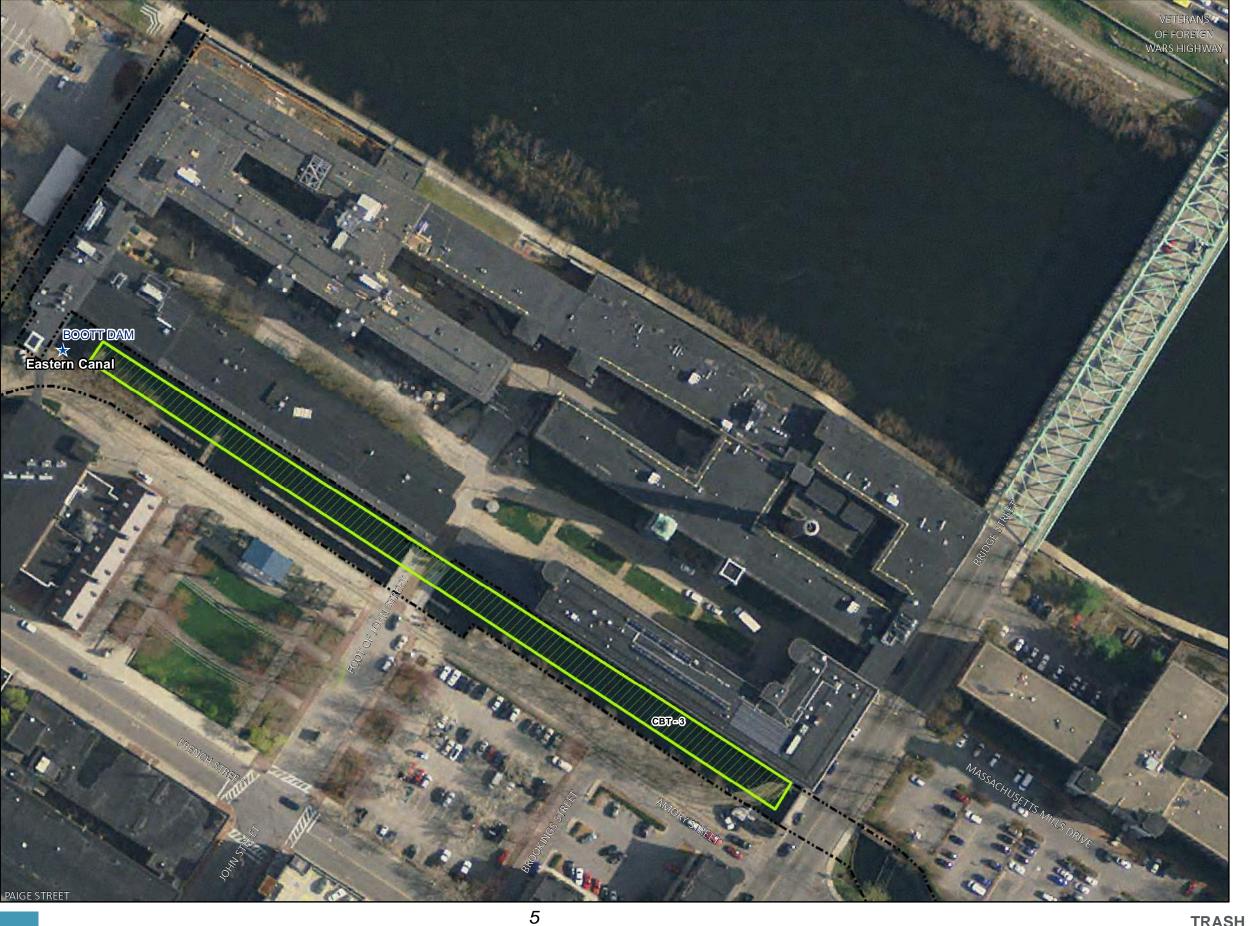


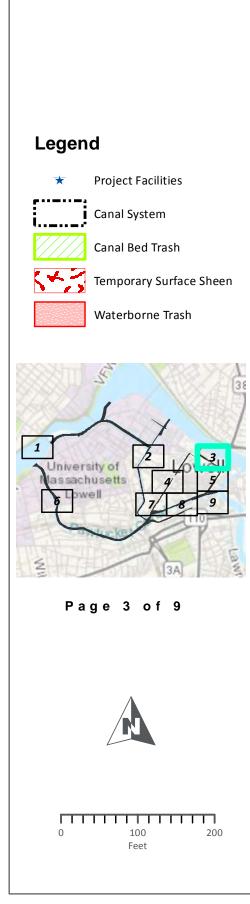
BOOTT HYDRO, LLC.





FOR BOOTT HYDRO, LLC.





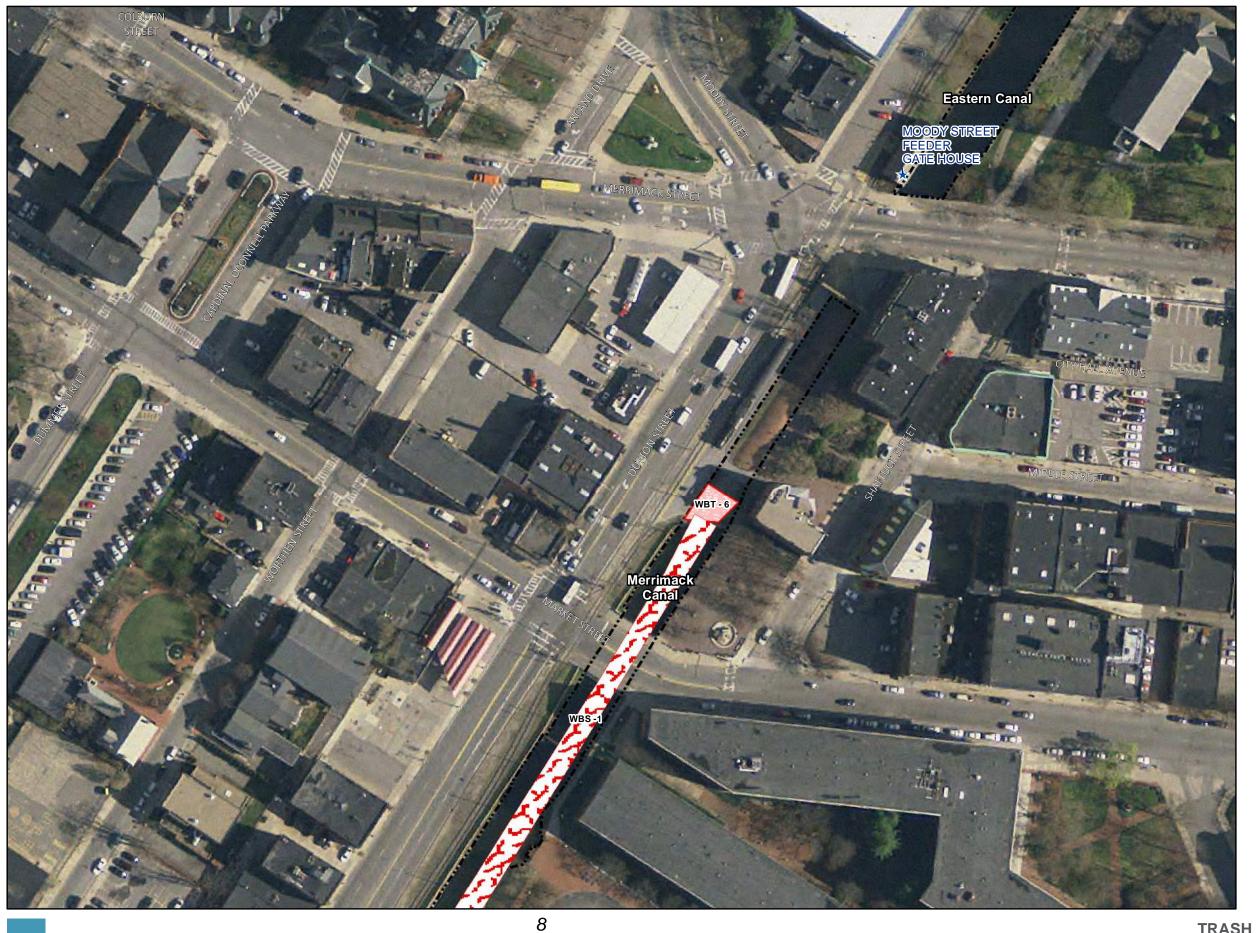


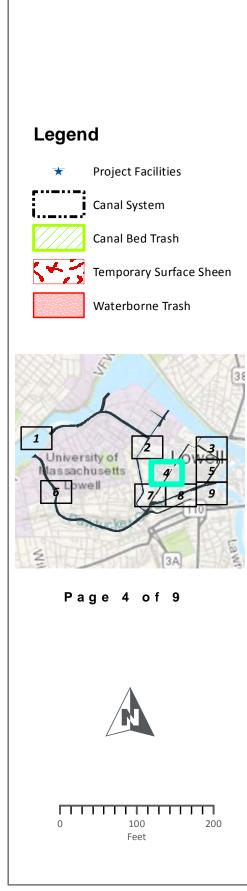
TRASH ASSESSMENT AND MAPPING STUDY

LOWELL HYDROELECTRIC PROJECT

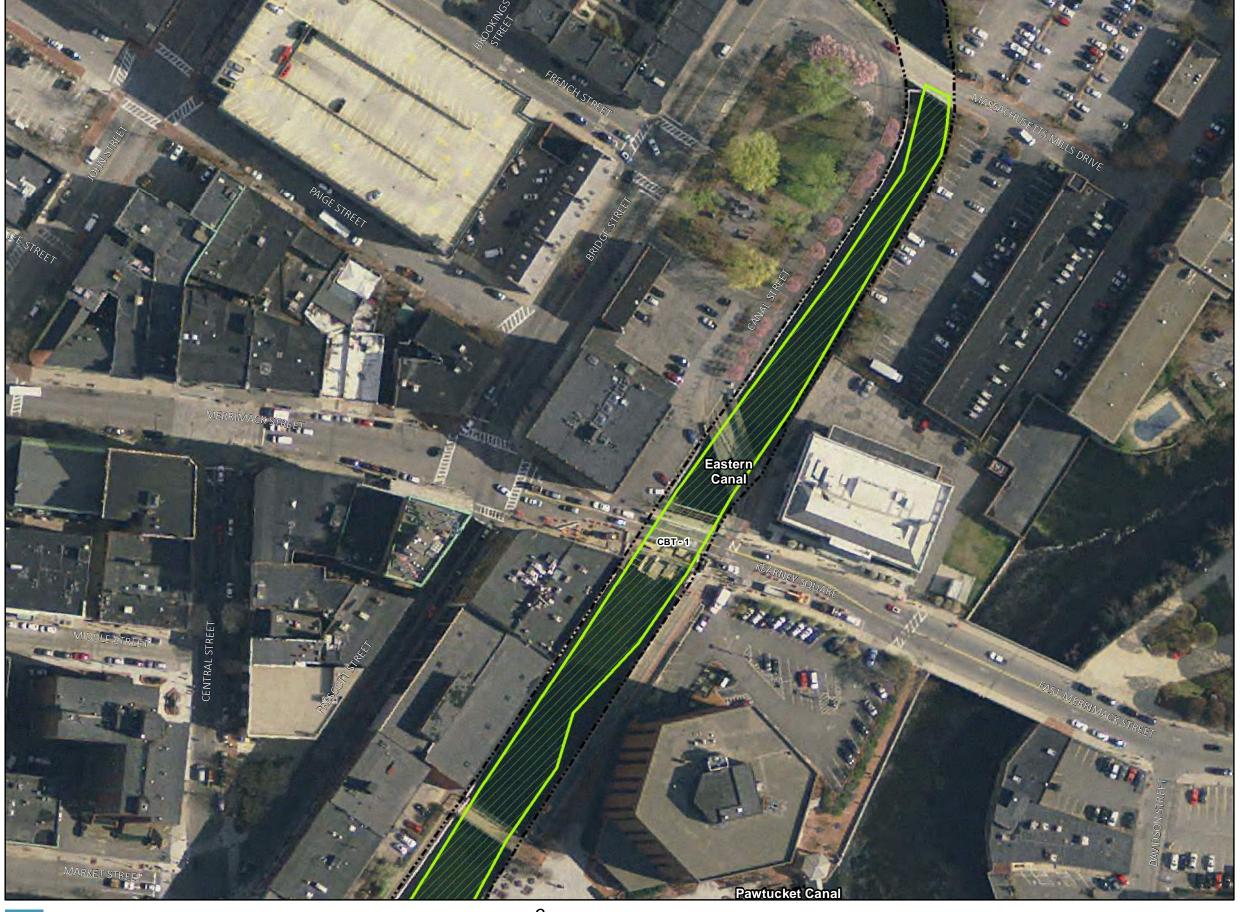
FERC NO. 2790

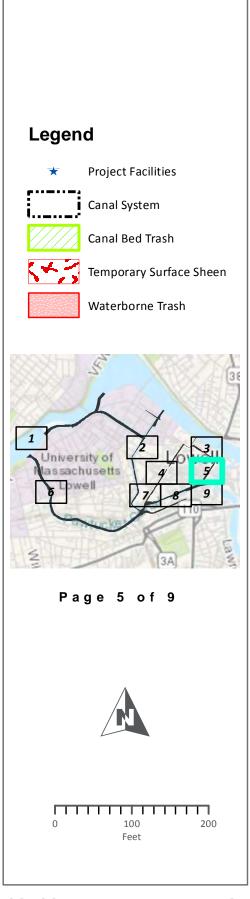
BOOTT HYDRO, LLC.





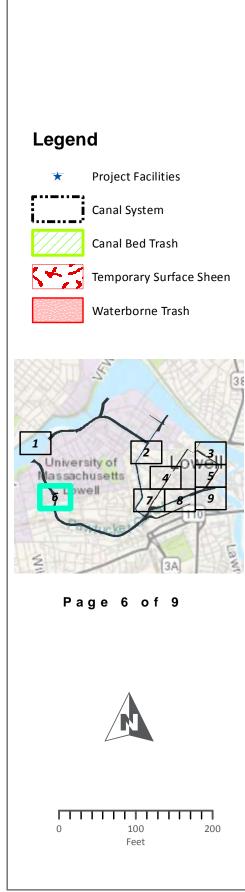
3





FOR BOOTT HYDRO, LLC.





BOOTT HYDRO, LLC.



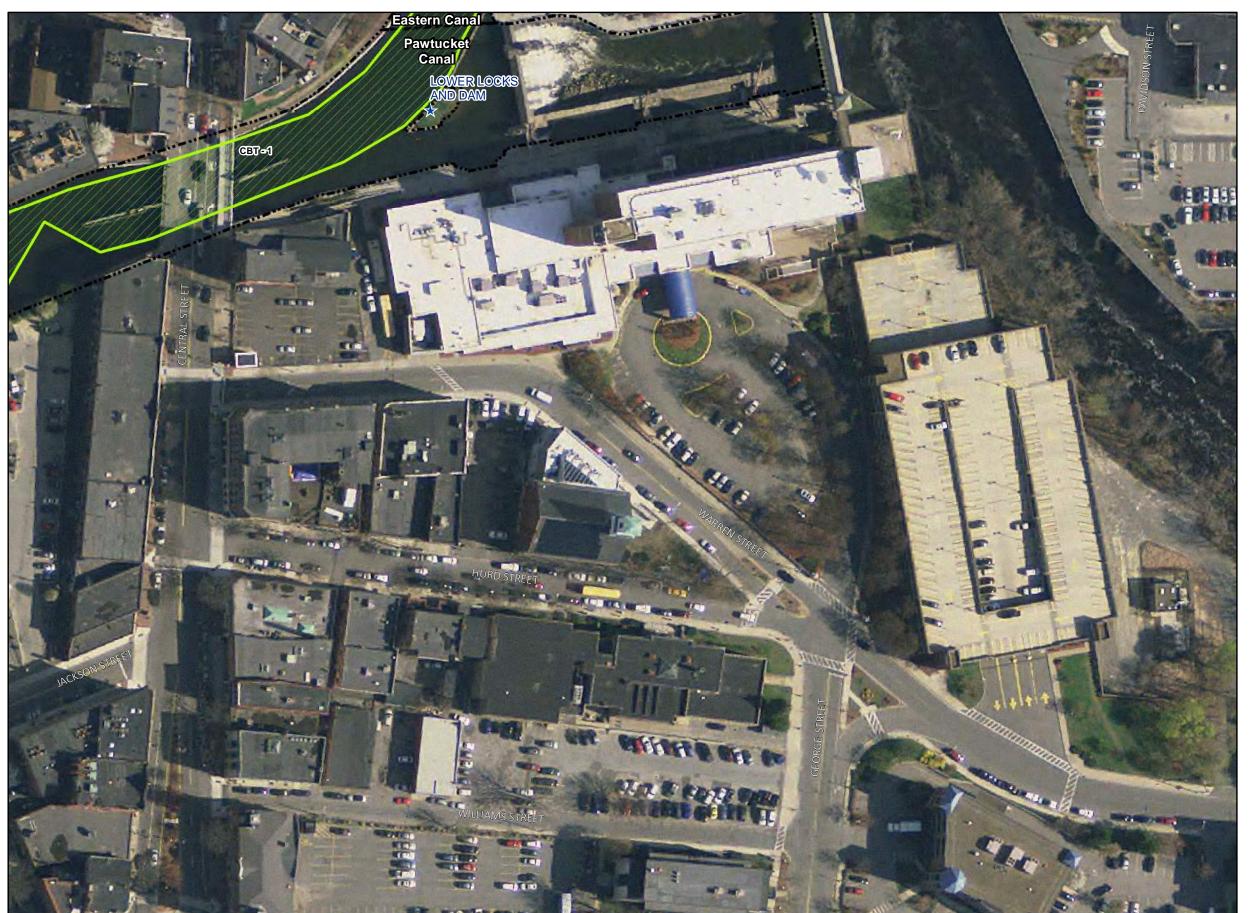
BOOTT HYDRO, LLC.

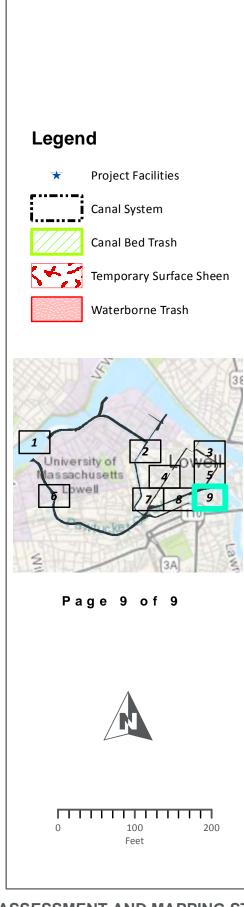
TRASH ASSESSMENT AND MAPPING STUDY

LOWELL HYDROELECTRIC PROJECT

FERC NO. 2790

BOOTT HYDRO, LLC.





BOOTT HYDRO, LLC.



Scott, Kelsey

From: Quiggle, Robert

Sent: Tuesday, May 7, 2019 2:08 PM

To: celeste_bernardo@nps.qov; Bob Nasdor (bob@americanwhitewater.org);

Kevin.hollenbeck@state.ma.us

Cc: Kevin_mendik@nps.gov; 'Kevin.Webb@enel.com'; Anderson, Elise (EGP North America);

Gibson, Jim; MacVane, Kelly; Scott, Kelsey

Subject: Lowell Hydroelectric Project (FERC No. 2790-072) -- Consultation Regarding the

Recreation and Aesthetics Study

Attachments: 20190507 Lowell Hydro Project Recreation Study Consultation.pdf

Ms. Bernardo, Mr. Nasdor, and Mr. Hollenbeck:

On behalf of Boott Hydropower, LLC (Boott), I am distributing the attached consultation request in support of the Federal Energy Regulatory Commission (FERC) relicensing of the Lowell Hydroelectric Project (Project). As described in the attached correspondence, Boott is consulting with the National Park Service, American Whitewater, and the Massachusetts Department of Conservation and Recreation to identify locations in the Project's vicinity to conduct visitor intercept surveys of recreationists for the approved Recreation and Aesthetics Study.

Should you have any questions regarding the attached correspondence, please contact Kevin Webb with Boott at 978-935-6039 or Kevin.Webb@enel.com.

Thank you,

Robert Quiggle, RPA

Regulatory and Environmental Section Manager

HDR

1304 Buckley Road, Suite 202 Syracuse, New York 13212-4311 D 315.414.2216 M 724.989.1579 Robert.Quiggle@hdrinc.com

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Boott Hydropower, LLC

A Subsidiary of Enel Green Power North America, Inc.

100 Brickstone Square, Suite 300 – Andover, MA 01810 – USA T +1 978 681 1900 – F +1 978 681 7727

Via Electronic Distribution

May 7, 2019

Celeste Bernardo Superintendent of Lowell National Historical Park National Park Service 67 Kirk Street Lowell, MA 01852

Robert Nasdor NE Stewardship Director American Whitewater 65 Blueberry Hill Lane Sudbury, MA 01776

Kevin Hollenbeck Metrowest District Manager DCR Great Brook Farm State Park 984 Lowell Street Carlisle, MA 01741

Re: Lowell Hydroelectric Project (FERC No. 2790-072);

Consultation Regarding the Recreation and Aesthetics Study

Dear Stakeholders:

Boott Hydropower, LLC (Boott), a subsidiary of Enel Green Power North America, Inc. (Enel), is the Licensee and operator of the 22.4 megawatt (MW) Lowell Hydroelectric Project (Project or Lowell Project). The Lowell Project is located on the Merrimack River in Middlesex County, Massachusetts, and in Hillsborough County, New Hampshire. The existing license for the Project was issued by the Federal Energy Regulatory Commission (FERC or Commission) with an effective date of May 1, 1973. The existing license expires on April 30, 2023. Accordingly, Boott is pursuing a new license for the Project pursuant to the Commission's Integrated Licensing Process (ILP), as described at 18 Code of Federal Regulations (CFR) Part 5.

In accordance with the Commission's Study Plan Determination issued on March 13, 2019, Boott is initiating consultation with the National Park Service (NPS), American Whitewater, and the Massachusetts Department of Conservation and Recreation (MADCR) to identify specific locations for field reconnaissance and visitor-intercept surveys. As part of the Recreation and Aesthetics Study, Boott will conduct field reconnaissance and visitor-intercept interviews at specific recreational facilities during the prime recreational season from May 2019 through October 2019. Boott will interview recreationists visiting these locations to collect data relevant to visitors' recreational experience in the Project area, including but not limited to, data regarding demographics, types of recreational activities participated in or may participate in during their visit, and their reasons for choosing the site or area. As a separate component of the Recreation and Aesthetics Study, Boott is hosting an online version of the visitor-intercept survey to capture additional recreationists that would like to participate (the online version of the visitor survey is available at: https://hdrinc.co1.qualtrics.com/jfe/form/SV OAnPxTboxMRT8nX). Boott will install signage informing recreationists of the online survey at various locations determined in consultation with NPS. As shown in Figure 1 provided as Attachment A, Boott is proposing the following nine locations to conduct the reconnaissance and visitor-intercept surveys:

- Lowell Heritage State Park
- Merrimack Trail System

- Pawtucket Falls Overlook
- NPS Canal Walkways
- Lowell National Historic Park
- Lowell National Historic Park Visitor Center
- Chelmsford Boat Access
- Rourke Brothers Boat Ramp
- Merrill Park

Boott is also proposing ten locations¹ (as shown in Figure 1) to install the temporary signs informing recreationists of the online survey opportunity. Boott respectfully requests any comments regarding the proposed reconnaissance and visitor-intercept locations or the signage locations within 15 days of this letter (i.e., by May 22, 2019). Following consultation with stakeholders, Boott will develop the final list of reconnaissance and visitor-intercept locations and will file the final list with the Commission and distribute to American Whitewater, NPS, and the MADCR. If we do not receive a response from your office, Boott will move forward with the study to include the visitor-intercept survey locations as shown in the attached figure.

On behalf of Boott, I appreciate the opportunity to consult with your offices regarding this study. Please do not hesitate to contact me at (978) 935-6039 if you have any questions concerning this matter.

Sincerely,

Boott Hydropower, LLC

Kevin M. Webb

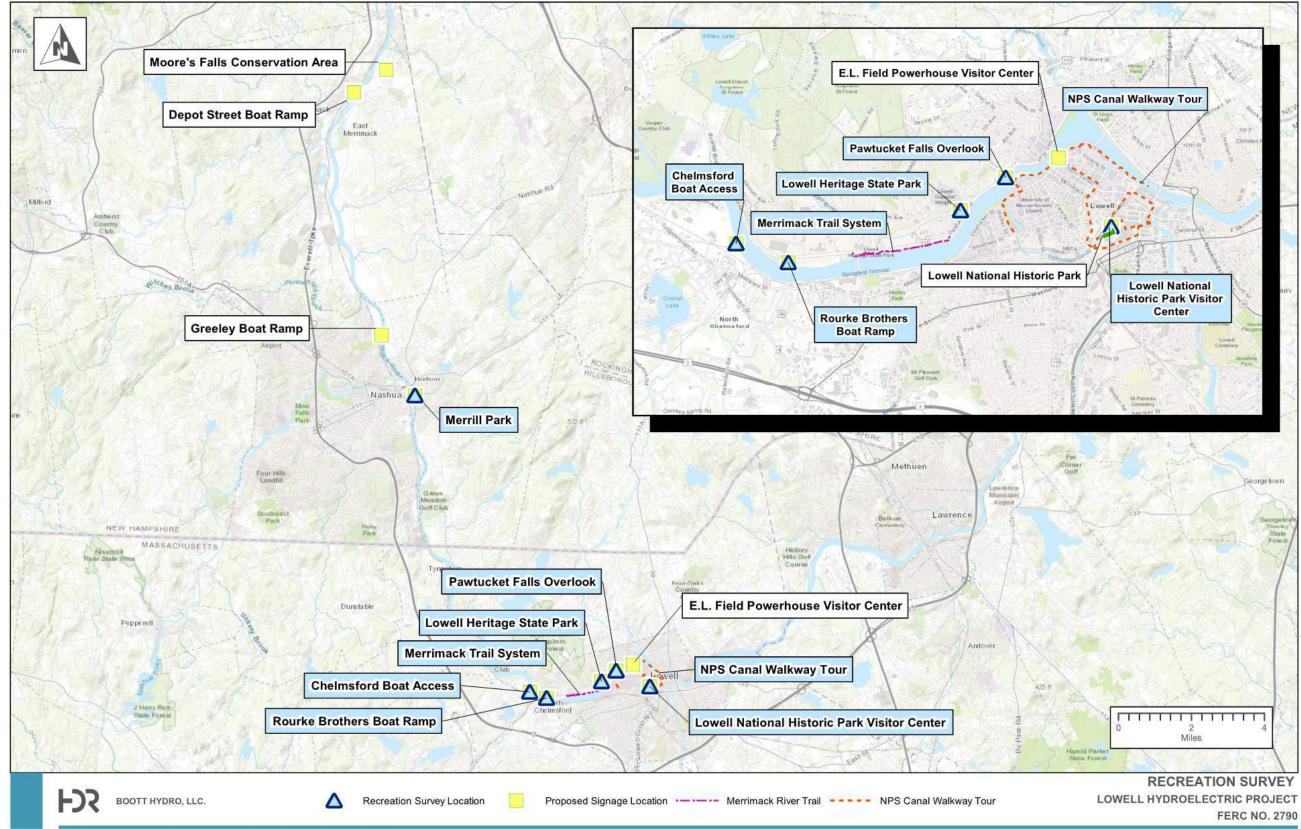
Hydro Licensing Manager

cc: K. Bose, FERC

K. Mendik, NPS

Attachment A - Figure 1

¹Boott will install temporary signs that will be removed at the completion of the study season. Boott will not affix signage to any historic structures or cultural resources without additional prior consultation with NPS and NPS partners.





Robert A. Nasdor Northeast Stewardship & Legal Director 365 Boston Post Road, Suite 250 Sudbury, MA 01776 617-584-4566 bob@americanwhitewater.org

www.americanwhitewater.org

May 17, 2019

Kevin Webb Enel Green Power 100 Brickstone Square, Suite 300 Andover, MA 01810

Dear Kevin,

I write in response to your letter of May 7, 2019 regarding the proposed locations for field reconnaissance user intercept surveys for the Lowell Hydroelectic Project Recreation and Aesthetics Study. Thank you for reaching out to us to solicit our feedback in accordance with the requirements of the Study Plan Determination.

While the proposed locations will provide useful information to better understand aspects of current and future recreational use in the project area, these proposed locations will not collect information that will enable the Licensee and FERC to evaluate recreational demand for flows, access, and facilities that would support whitewater boating opportunity in the bypassed reach or in other areas that are impacted by project operations. There is well established history of whitewater boating on the Concord River during the spring freshet, demonstrating that there is strong interest in whitewater boating opportunity in the project area. Given the current lack of flows, access and information that would provide for whitewater boating opportunity in the bypassed reach, we do not believe that the survey locations will adequately collect information that will be useful for determining future whitewater boating use.

We recommend that the Licensee utilize the online survey instrument to collect information from whitewater boaters to evaluate the demand for whitewater boating opportunity at the project. In addition, the Licensee should incorporate into this study the results of the planned whitewater boating study that will evaluate the suitability of the bypassed reach for whitewater boating. We also recommend that the licensee collect user intercept surveys at the whitewater takeout on the Merrimack River below the confluence with the Concord River during weekends during the spring freshet in 2020 in order to include information from whitewater boaters in this study.

Thank you for considering this information in the development of the survey plan.

We look forward to working with you throughout the relicensing process.

Very truly yours,

Bob Nasdor Northeast & Legal Stewardship Director 365 Boston Post Road, Suite 250 Sudbury, MA 01776 617-584-4566 bob@americanwhitewater.org

Scott, Kelsey

To: Jones, Scott

Subject: RE: [EXTERNAL] Lowell Project Recreation and Aesthetics Study

From: Bruins, Christine [mailto:christine_bruins@nps.gov]

Sent: Friday, June 14, 2019 10:15 AM **To:** Jones, Scott <Scott.Jones@hdrinc.com>

Cc: Quiggle, Robert <Robert.Quiggle@hdrinc.com>; Webb, Kevin (EGP North America) <Kevin.Webb@enel.com>

Subject: Re: [EXTERNAL] Lowell Project Recreation and Aesthetics Study

Scott,

The City of Lowell is carrying out a number of bridge construction project this year and the crew is experiencing issues controlling water. There is a moderate probability the entire canal system will be drained down next week to diagnose and resolve the problem. City is being fined thousands of dollars daily while work cannot not resume and the water control issue cannot be delayed. Is there any chance you could rework your schedule for the following week?

Christine Bruins | Community Planner

Lowell National Historical Park 978.275.1726 (office) | 978.954.1011 (cell)

On Fri, Jun 14, 2019 at 7:52 AM Jones, Scott < Scott.Jones@hdrinc.com > wrote:

Christine,

Right now we are scheduled for Tuesday (6/18) as I am also scheduled to be on another project on Wednesday and Thursday of that week. This other work is flow and weather dependent so if anything changes I will certainly let you know. Thanks for the update.

Regards,

Scott A. Jones, B.S., PWS

Senior Environmental Scientist/Project Manager

D 315.414.2205 M 315.317.6680

scott.jones@hdrinc.com

hdrinc.com/follow-us

From: Bruins, Christine [mailto:<u>christine bruins@nps.gov</u>]

Sent: Thursday, June 13, 2019 11:54 AM **To:** Jones, Scott <**Scott.Jones@hdrinc.com**>

Cc: Quiggle, Robert < Robert.Quiggle@hdrinc.com >; Webb, Kevin (EGP North America) < Kevin.Webb@enel.com >

Subject: Re: [EXTERNAL] Lowell Project Recreation and Aesthetics Study

Scott,

Now that the Eastern Canal is drained for bridge work, there is a lot of trash visible on the canal bottom. This includes electronics and other hazardous items. Our staff are in a required 2-day occupational hazard training Tuesday and Wednesday next week. Would it at all be possible to meet in the field with you Thursday instead?

Christine Bruins | Community Planner

Lowell National Historical Park

978.275.1726 (office) | 978.954.1011 (cell)

On Wed, Jun 12, 2019 at 2:47 PM Bruins, Christine < christine bruins@nps.gov > wrote:

We can arrange to take you by trolley/boat to efficiently get you to and around most of the canal areas.

Christine Bruins | Community Planner

Lowell National Historical Park

978.275.1726 (office) | 978.954.1011 (cell)

On Wed, Jun 12, 2019 at 2:44 PM Jones, Scott <Scott.Jones@hdrinc.com> wrote:

Christine,

Thank you for following up with us. I received your message but have been tied up this afternoon. I am still solidifying my plans for next week, but we envision either Tuesday or Wednesday and can certainly meet you/staff/partners during one of those afternoons. I should know for sure by the end of this week. Thank you also for the detailed map, it will certainly make our visit more efficient. I will let you know as soon as I confirm my schedule. Thanks again,

Scott A. Jones, B.S., PWS

Senior Environmental Scientist/Project Manager

D 315.414.2205 M 315.317.6680

scott.jones@hdrinc.com

hdrinc.com/follow-us

From: Bruins, Christine [mailto:<u>christine_bruins@nps.gov</u>]

Sent: Wednesday, June 12, 2019 2:34 PM

To: Webb, Kevin (EGP North America) < Kevin.Webb@enel.com>

Cc: Jones, Scott <<u>Scott.Jones@hdrinc.com</u>>; Quiggle, Robert <<u>Robert.Quiggle@hdrinc.com</u>>

Subject: Re: [EXTERNAL] Lowell Project Recreation and Aesthetics Study

Scott,

Celeste asked me to coordinate your trash survey next week with our staff and partners. I have gathered information from our staff on the areas where trash collects (see attached map). I am very interested in meeting with you to discuss the issues and problem areas. I'd also be interested in accompanying you and others for part of your field work. I'm collecting the availability of other staff and partners that would like to be involved in the study. Have you narrowed your field work within next week? My availability next week is as follows, will update you when I hear back from a couple of others.

Mon 6/17 - After 2 pm

Tue 6/18 - after 12 pm

Wed 6/19 before 2 pm

Thurs - anytime
Fri - anytime
Christine Bruins Community Planner
Lowell National Historical Park
978.275.1726 (office) 978.954.1011 (cell)
On Tue, Jun 4, 2019 at 10:35 AM Bernardo, Celeste < celeste_bernardo@nps.gov > wrote:
Christine, in my absence, are you okay with coordinating with ENEL on this? I am fine with them attending a management team or biweekly meeting, although biweekly would be better since there are more supervisors. Or else you can set up a separate meeting. Can you check with Paul and Kevin and see who on their staffs should participate?
Celeste
Celeste Bernardo
Superintendent
Lowell National Historical Park
978 275-1703
celeste_bernardo@nps.gov
Like us on <u>Facebook</u>
Forwarded message From: Jones, Scott < <u>Scott.Jones@hdrinc.com</u> > Date: Mon, Jun 3, 2019 at 2:50 PM

Subject: [EXTERNAL] Lowell Project Recreation and Aesthetics Study

To: Bernardo, Celeste <celeste bernardo@nps.gov>

Cc: Kevin.Webb@enel.com <Kevin.Webb@enel.com>, Quiggle, Robert <Robert.Quiggle@hdrinc.com>

Celeste,

As part of the Lowell Recreation and Aesthetics Study, HDR is planning on visiting the Project the week of June 17-21, 2019 to survey and document waterborne trash as outlined in the study plan approved by the Federal Energy Regulatory Commission. In accordance with the approved plan, HDR is conducting this work in the spring of 2019 when higher flows typically push trash and debris downstream. Based on our meeting last week, HDR understands that NPS staff is very familiar with locations within the canal system where waterborne trash accumulates. In anticipation of our visit, HDR would like to coordinate with your office to identify these areas so that we can accurately document and record these locations.

Accordingly, we are hoping to meet with you or your staff to briefly review project maps prior to the start of fieldwork. If you could let me know a good time during the week of June 17 to meet with you or appropriate NPS staff, it would be greatly appreciated. Please note that NPS staff is also welcome to accompany us as we conduct this fieldwork (we expect the work to take about a day to complete).

Thank you,

Scott A. Jones, B.S., PWS

Senior Environmental Scientist/Project Manager

HDR

1304 Buckley Road, Suite 202 Syracuse, NY 13212 D 315.414.2205 M 315.317.6680 scott.jones@hdrinc.com

hdrinc.com/follow-us

From: Bernardo, Celeste <celeste_bernardo@nps.gov>

Sent: Wednesday, July 3, 2019 8:25 AM

To: Jones, Scott

Cc: Kevin.Webb@enel.com; Quiggle, Robert

Subject: Re: [EXTERNAL] Lowell Project Recreation and Aesthetics Study

That's great Scott. Thank you for the clarification. Look forward to assisting where we can.

Celeste

Celeste Bernardo
Superintendent
Lowell National Historical Park
978 275-1703
celeste bernardo@nps.gov
Like us on Facebook

On Tue, Jul 2, 2019 at 7:48 PM Jones, Scott < Scott.Jones@hdrinc.com> wrote: Celeste,

As the RSP and the FERC SPD indicates we will be surveying for water-borne trash after spring freshet, so with the unusual conditions this year we will be performing this component in 2020. Tomorrow we will be downloading the level loggers and installing recreational survey signs. Call or email me if you or Christine have any questions.

Sent via the Samsung Galaxy S9+, an AT&T 5G Evolution capable smartphone

From: Scott, Kelsey

Sent: Friday, November 1, 2019 2:24 PM

To: celeste_bernardo@nps.gov; christine_bruins@nps.gov; Paul_Fontaine@nps.gov;

kevin_coffee@nps.gov; laurel_racine@nps.gov; peter_reitchel@nps.gov; kevin_mendik@nps.gov; duncan_hay@nps.gov; Emily.Byrne@mail.house.gov; darryl.forgione@mass.gov; patrice.kish@mass.gov; thomas.m.walsh@mass.gov; william.cooksey@mass.gov; peter.hoffmann@mass.gov; dtradd@lowellma.gov; KKeefeMullin@lowellma.gov; cthomas@lowellma.gov; cclancy@lowellma.gov; jwinward@lowellma.gov; CRicker@lowellma.gov; chayes@lowellma.gov; CMcCall@lowellma.gov; scerand@hotmail.com; greenesh@comcast.net;

jcalvin@lowelllandtrust.org; ffaust@edgegroupinc.com

Cc: Quiggle, Robert; Webb, Kevin (EGP North America); elise.anderson@enel.com

Subject: Lowell Hydroelectric Project (FERC No. 2790) Study Workshop **Attachments:** November 2019_Lowell Hydro Project Workshop Agenda.pdf

Dear Stakeholders:

Boott Hydropower, LLC (Boott) is pursuing a new license from the Federal Energy Regulatory Commission (FERC) for the continued operation of the Lowell Hydroelectric Project (FERC No. 2790)(Project) located along the Merrimack River. In support of Project relicensing, Boott is conducting a Recreation and Aesthetics Study, a Historically Significant Waterpower Equipment Study, and a Water Level and Flow Effects on Historic Resources Study, as approved in FERC's March 13, 2019 Study Plan Determination for the Project. Boott intends to hold a two-day Lowell Hydroelectric Project Study Workshop (Workshop) with interested stakeholders to address data needs and conduct a Project site visit related to the above studies.

The Workshop will be held in Lowell, MA over two days in November 2019. The first day will focus on stakeholder consultation, information gathering, and data needs for the three studies mentioned above. Boott anticipates this first day will take place from 9am-4pm in Lowell, MA. Additional details regarding the meeting space to follow. The second day will consist of a site visit to target specific Project facilities associated with the studies.

Boott is proposing the following dates for the two-day Workshop:

November 12-13, 2019 November 13-14, 2019 November 14-15, 2019 November 19-20, 2019

Please notify Boott of the dates you can attend the Workshop by completing the poll here: https://www.surveymonkey.com/r/YQFX7LD. Boott has developed the attached Lowell Hydroelectric Project Study Workshop Agenda. In order to facilitate the scheduling of the Workshop, Boott is asking that all interested stakeholders complete the poll by November 6, 2019. If you have questions or need additional information, please contact Kevin Webb, Boott Hydro Licensing Manager, at (978) 935-6039 or via email at Kevin.Webb@enel.com.

Thank You -

Kelsey Scott, MS

Assistant Regulatory Specialist

HDR

1304 Buckley Road, Suite 202 Syracuse, NY 13212 D 315.414.2206 M 315.706.5176 kelsey.scott@hdrinc.com hdrinc.com/follow-us

Agenda

Project: Lowell Hydroelectric Project (FERC No. 2790)

Date/Time: TBD

Location: Lowell National Historic Park, Lowell MA

Subject: Lowell Hydroelectric Project Study Workshop

Boott Hydropower, LLC (Boott), a subsidiary of Enel Green Power North America, Inc., is the Licensee and owner of the 20.2 megawatt Lowell Hydroelectric Project (FERC No. 2790) (Project). The Project is located on the Merrimack River in Middlesex County, Massachusetts, and in Hillsborough County, New Hampshire. The existing license for the Project was issued by the Federal Energy Regulatory Commission (FERC or Commission) with an effective date of May 1, 1973. The existing license expires on April 30, 2023. Accordingly, Boott is pursuing a new license for the Project pursuant to the Commission's Integrated Licensing Process, as described at 18 Code of Federal Regulations Part 5.

In support of Project relicensing, Boott is proposing to hold a two-day study workshop in Lowell, MA to consult with the National Park Service (NPS), Massachusetts Department of Conservation and Recreation (MADCR), City of Lowell (City), and other partners regarding certain studies approved in the Commission's March 13, 2019 Study Plan Determination for the Project. As described in the approved study plan, Boott is seeking information from the NPS, MADCR, and other partners regarding the Recreation and Aesthetics Study, the Historically Significant Waterpower Equipment Study, and the Water Level and Flow Effects on Historical Resources Study. The proposed two-day workshop will be an opportunity for consulting parties to share information and to identify the specific focus for field activities.

Day One: Data Needs and Information Gathering

The first day of the proposed workshop is intended to allow Boott, the NPS, MADCR, City, and other participating parties to discuss data needs and review available documentation. A proposed agenda for this day one of the workshop is presented below.

1. Introduction

- Welcome and introduction
- Overview and status of FERC relicensing process

2. Recreation and Aesthetics Study

Study-specific Data Needs and Information Gathering

- Recreation opportunities and access along the canal system;
- Future use or planning documents that address anticipated or desired changes to the Lowell National Historic Park and Lowell Heritage State Park (e.g., The Foundation Report, or 5-year and 10-year plans);
- Documentation of any reoccurring public safety issues or incidents within the parks associated with the canal infrastructure related to public recreation;
- Annual maintenance schedules for the canal system;
- Management or operations plans for the parks; and
- Annual use records.

3. Historically Significant Waterpower Equipment Study

Study-specific Data Needs and Information Gathering

- Historically significant waterpower equipment owned and operated by Boott Hydropower
 of interest to the NPS for potential future interpretation, exhibition, or as scrap equipment
 to maintain and operate other historic machinery;
- Engineering reports, drawings, and/or photographs related to historically significant waterpower equipment owned and operated by Boott Hydropower of interest to the NPS;
 and
- Components of historically significant waterpower equipment owned and operated by Boott Hydropower that will require photography and documentation.

4. Water Level and Flow Effects on Historic Resources Study

Study-specific Data Needs and Information Gathering

- Engineering reports or evaluations of historic canal structures, including documentation of previous maintenance and/or repairs related to canal water levels;
- Descriptions and/or photographs of properties that have been previously affected by canal operations; and
- Engineering and architectural drawings, maintenance records, and structural modifications
 of the Great River Wall.

5. Action Items and Next Steps

Day Two: Site Visit

Day two of the proposed workshop is focused on a site visit at the Project. The purpose of the site visit is to view locations identified during day one of the workshop, including:

- Areas of potential recreation enhancements and potential recreational access areas;
- Historically significant waterpower equipment selected by the NPS for documentation, including specific equipment to be photographed;
- Canal features that have been previously impacted by flows and water levels; and
- Areas along the canal system where waterborne trash collects.

To: Racine, Laurel

Subject: RE: [EXTERNAL] Lowell Hydroelectric Project (FERC No. 2790) Study Workshop

From: Racine, Laurel [mailto:laurel_racine@nps.gov]

Sent: Monday, November 4, 2019 8:09 AM **To:** Scott, Kelsey <Kelsey.Scott@hdrinc.com>

Subject: Re: [EXTERNAL] Lowell Hydroelectric Project (FERC No. 2790) Study Workshop

Kelsey,

I'm writing because the NPS blocked my access to your poll. My participation would be most useful for the first day, not the site visits. Days I'm available for the day 1 workshop are November 12 or November 13, so either of the first two options are good for me. Thanks.

Laurel

Laurel A. Racine, Chief of Cultural Resources Lowell National Historical Park 67 Kirk Street Lowell, MA 01852

Desk: 978-970-5055 Cell: (978) 423-3081



On Fri, Nov 1, 2019 at 2:24 PM Scott, Kelsey < Kelsey. Scott@hdrinc.com> wrote:

Dear Stakeholders:

Boott Hydropower, LLC (Boott) is pursuing a new license from the Federal Energy Regulatory Commission (FERC) for the continued operation of the Lowell Hydroelectric Project (FERC No. 2790)(Project) located along the Merrimack River. In support of Project relicensing, Boott is conducting a Recreation and Aesthetics Study, a Historically Significant Waterpower Equipment Study, and a Water Level and Flow Effects on Historic Resources Study, as approved in FERC's March 13, 2019 Study Plan Determination for the Project. Boott intends to hold a two-day Lowell Hydroelectric Project Study Workshop (Workshop) with interested stakeholders to address data needs and conduct a Project site visit related to the above studies.

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Thank You -

Kelsey Scott, MS

Assistant Regulatory Specialist

HDR

1304 Buckley Road, Suite 202 Syracuse, NY 13212

D 315.414.2206 **M** 315.706.5176 kelsey.scott@hdrinc.com

hdrinc.com/follow-us

From: Hayes, Christopher <chayes@lowellma.gov>
Sent: Monday, November 4, 2019 9:59 AM

To: Scott, Kelsey

Cc: Ricker, Claire V.; McCall, Christine

Subject: RE: Lowell Hydroelectric Project (FERC No. 2790) Study Workshop

Follow Up Flag: Follow up Flag Status: Flagged

Hi, Kelsey,

Should I forward this to other potential interested stakeholders, or is the invitation limited to this list?

Thanks so much, -Chris

Christopher Glenn Hayes | *Neighborhood Planner*

The City of Lowell Department of Planning and Development 50 Arcand Drive Lowell, MA 01852 t: 978.674.1405 | f: 978.970.4262 http://www.lowellma.gov

LOWELL Alive. Unique. Inspiring.

From: Scott, Kelsey [mailto:Kelsey.Scott@hdrinc.com]

Sent: Friday, November 01, 2019 2:24 PM

To: celeste_bernardo@nps.gov; christine_bruins@nps.gov; Paul_Fontaine@nps.gov; kevin_coffee@nps.gov; laurel_racine@nps.gov; peter_reitchel@nps.gov; kevin_mendik@nps.gov; duncan_hay@nps.gov; Emily.Byrne@mail.house.gov; darryl.forgione@mass.gov; patrice.kish@mass.gov; thomas.m.walsh@mass.gov; william.cooksey@mass.gov; peter.hoffmann@mass.gov; Tradd, Diane; Keefe Mullin, Kara; Thomas, Craig; Clancy, Christine; jwinward@lowellma.gov; Ricker, Claire V.; Hayes, Christopher; McCall, Christine; scerand@hotmail.com; greenesh@comcast.net; jcalvin@lowelllandtrust.org; ffaust@edgegroupinc.com

Cc: Quiggle, Robert; Webb, Kevin (EGP North America); elise.anderson@enel.com

Subject: Lowell Hydroelectric Project (FERC No. 2790) Study Workshop

Dear Stakeholders:

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Thank You -

Kelsey Scott, MS

Assistant Regulatory Specialist

HDR

1304 Buckley Road, Suite 202 Syracuse, NY 13212 D 315.414.2206 M 315.706.5176 kelsey.scott@hdrinc.com

hdrinc.com/follow-us

To: Scott, Kelsey

Subject: RE: Update - Lowell Hydroelectric Project (FERC No. 2790) Study Workshop

From: Scott, Kelsey

Sent: Thursday, November 21, 2019 4:42 PM

To: 'celeste_bernardo@nps.gov' <celeste_bernardo@nps.gov>; 'christine_bruins@nps.gov'

<christine bruins@nps.gov>; 'Paul Fontaine@nps.gov' <Paul Fontaine@nps.gov>; 'kevin coffee@nps.gov'

<kevin coffee@nps.gov>; 'laurel racine@nps.gov' <laurel racine@nps.gov>; 'peter reitchel@nps.gov'

<peter_reitchel@nps.gov>; 'kevin_mendik@nps.gov' <kevin_mendik@nps.gov>; 'duncan_hay@nps.gov'

<duncan hay@nps.gov>; 'Emily.Byrne@mail.house.gov' <Emily.Byrne@mail.house.gov>; 'darryl.forgione@mass.gov'

<darryl.forgione@mass.gov>; 'patrice.kish@mass.gov' <patrice.kish@mass.gov>; 'thomas.m.walsh@mass.gov'

<thomas.m.walsh@mass.gov>; 'william.cooksey@mass.gov' <william.cooksey@mass.gov>; 'peter.hoffmann@mass.gov'

<peter.hoffmann@mass.gov>; 'dtradd@lowellma.gov' <dtradd@lowellma.gov>; 'KKeefeMullin@lowellma.gov'

<KKeefeMullin@lowellma.gov>; 'cthomas@lowellma.gov' <cthomas@lowellma.gov>; 'cclancy@lowellma.gov'

<cclancy@lowellma.gov>; 'jwinward@lowellma.gov' <jwinward@lowellma.gov>; 'CRicker@lowellma.gov'

<CRicker@lowellma.gov>; 'chayes@lowellma.gov' <chayes@lowellma.gov>; 'CMcCall@lowellma.gov'

<CMcCall@lowellma.gov>; 'scerand@hotmail.com' <scerand@hotmail.com>; 'greenesh@comcast.net'

<greenesh@comcast.net>; 'jcalvin@lowelllandtrust.org' <jcalvin@lowelllandtrust.org>; 'ffaust@edgegroupinc.com'

<ffaust@edgegroupinc.com>; 'Euris Gonzalez (DCR) (Euris.Gonzalez@mass.gov)' <Euris.Gonzalez@mass.gov>

Cc: 'Anderson, Elise (EGP North America)' <elise.anderson@enel.com>; 'Webb, Kevin (EGP North America)'

<Kevin.Webb@enel.com>; Quiggle, Robert <Robert.Quiggle@hdrinc.com>

Subject: RE: Update - Lowell Hydroelectric Project (FERC No. 2790) Study Workshop

Dear Stakeholders:

Based on the results of recent scheduling polls, we are confirming that the Lowell Hydroelectric Project Study Workshop (Workshop) with interested stakeholders will occur over two days from December 18—19, 2019. The first day will focus on stakeholder consultation, information gathering, and data needs for the three studies listed in the attached agenda. Boott anticipates this first day will take place from 9am-4:30pm in Lowell, MA at the National Park Service Headquarters for the Lowell National Historical Park. The second day will consist of a site visit to target specific Project facilities associated with the studies. Boott anticipates this second day site visit to occur from 9am-12pm.

Additional information will follow this email in the weeks ahead of the Workshop meeting. Should you have any questions about the Workshop, please contact me at the phone number or email address below, or contact Mr. Kevin Webb, Enel Hydro Licensing Manager, at 978-935-6039 or via email at Kevin.Webb@enel.com.

Thank You -

Kelsey Scott, MS

Assistant Regulatory Specialist

HDR

1304 Buckley Road, Suite 202 Syracuse, NY 13212 D 315.414.2206 kelsey.scott@hdrinc.com hdrinc.com/follow-us From: Scott, Kelsey

Sent: Friday, November 8, 2019 11:17 AM

To: 'celeste_bernardo@nps.gov' < celeste_bernardo@nps.gov' >; 'christine_bruins@nps.gov'

<christine bruins@nps.gov>; 'Paul_Fontaine@nps.gov' <Paul_Fontaine@nps.gov'>; 'kevin_coffee@nps.gov'

< kevin coffee@nps.gov >; 'laurel_racine@nps.gov' < laurel_racine@nps.gov >; 'peter_reitchel@nps.gov'

<peter reitchel@nps.gov'>; 'kevin_mendik@nps.gov' <<u>kevin_mendik@nps.gov</u>>; 'duncan_hay@nps.gov'

<<u>duncan_hay@nps.gov</u>>; 'Emily.Byrne@mail.house.gov' <<u>Emily.Byrne@mail.house.gov</u>>; 'darryl.forgione@mass.gov'

<darryl.forgione@mass.gov>; 'patrice.kish@mass.gov' <patrice.kish@mass.gov>; 'thomas.m.walsh@mass.gov'

 $<\!\!\underline{\text{thomas.m.walsh@mass.gov}}; \text{'william.cooksey@mass.gov'} <\!\!\underline{\text{william.cooksey@mass.gov}}; \text{'peter.hoffmann@mass.gov'} <\!\!\underline{\text{william.cooksey@mass.gov}}; \text{'peter.hoffmann@mass.gov'} <\!\!\underline{\text{william.cooksey@mass.gov}}; \text{'peter.hoffmann@mass.gov'} <\!\!\underline{\text{william.cooksey@mass.gov}}; \text{'peter.hoffmann@mass.gov'}$

<peter.hoffmann@mass.gov>; 'dtradd@lowellma.gov' <dtradd@lowellma.gov>; 'KKeefeMullin@lowellma.gov'

 $<\!\!\underline{\mathsf{KKeefeMullin@lowellma.gov}}; \mathsf{'cthomas@lowellma.gov'} <\!\!\underline{\mathsf{cthomas@lowellma.gov}}; \mathsf{'cclancy@lowellma.gov'}$

<cclancy@lowellma.gov'>; 'jwinward@lowellma.gov' <jwinward@lowellma.gov'>; 'CRicker@lowellma.gov'

< <u>CRicker@lowellma.gov</u>>; 'chayes@lowellma.gov' < <u>chayes@lowellma.gov</u>>; 'CMcCall@lowellma.gov'

< <a href="mailto:com/

<greenesh@comcast.net>; 'jcalvin@lowelllandtrust.org' <jcalvin@lowelllandtrust.org>; 'ffaust@edgegroupinc.com'

<ffaust@edgegroupinc.com>

Cc: 'Anderson, Elise (EGP North America)' < elise.anderson@enel.com >; Webb, Kevin (EGP North America)

< Kevin.Webb@enel.com >; Quiggle, Robert < Robert.Quiggle@hdrinc.com >

Subject: Update - Lowell Hydroelectric Project (FERC No. 2790) Study Workshop

Dear Stakeholders -

Due to scheduling conflicts, Boott is resurveying this group for available dates to hold the two-day Lowell Hydroelectric Project Study Workshop (Workshop) with interested stakeholders. The first day of the Workshop will focus on stakeholder consultation, information gathering, and data needs. Boott anticipates this first day will take place from 9am-4:30pm in Lowell, MA. Additional details regarding the meeting space to follow. The second day will consist of a site visit to target specific Project facilities.

Boott is proposing the following dates for the two-day Workshop:

December 4-5, 2019

December 5-6, 2019

December 9-10, 2019

December 10-11, 2019

December 11-12, 2019

December 17-18, 2019

December 18-19, 2019

Please notify Boott of the dates you can attend the Workshop by completing the Doodle Poll here: https://doodle.com/poll/dp2qb9232aq66awg

In order to facilitate the scheduling of the Workshop, Boott is asking that all interested stakeholders complete the poll by November 13, 2019. If you have questions or need additional information, please contact Kevin Webb, Boott Hydro Licensing Manager, at (978) 935-6039 or via email at Kevin.Webb@enel.com.

Thank You -

Kelsey Scott, MS

Assistant Regulatory Specialist

HDR

1304 Buckley Road, Suite 202 Syracuse, NY 13212 **D** 315.414.2206 **M** 315.706.5176 kelsey.scott@hdrinc.com

From: Scott, Kelsey

Sent: Monday, December 9, 2019 3:55 PM

To: 'celeste_bernardo@nps.gov'; 'christine_bruins@nps.gov'; 'Paul_Fontaine@nps.gov';

'kevin_coffee@nps.gov'; 'laurel_racine@nps.gov'; 'peter_reitchel@nps.gov'; 'kevin_mendik@nps.gov'; 'duncan_hay@nps.gov'; 'Emily.Byrne@mail.house.gov'; 'darryl.forgione@mass.gov'; 'patrice.kish@mass.gov'; 'thomas.m.walsh@mass.gov'; 'william.cooksey@mass.gov'; 'peter.hoffmann@mass.gov'; 'dtradd@lowellma.gov'; 'KKeefeMullin@lowellma.gov'; 'cthomas@lowellma.gov'; 'cclancy@lowellma.gov'; 'jwinward@lowellma.gov'; 'CRicker@lowellma.gov'; 'chayes@lowellma.gov'; 'CMcCall@lowellma.gov'; 'scerand@hotmail.com'; 'greenesh@comcast.net'; 'jcalvin@lowelllandtrust.org'; 'ffaust@edgegroupinc.com'; 'Euris Gonzalez (DCR)

(Euris.Gonzalez@mass.gov)'

Cc: 'Anderson, Elise (EGP North America)'; 'Webb, Kevin (EGP North America)'; Quiggle,

Robert

Subject: RE: Update - Lowell Hydroelectric Project (FERC No. 2790) Study Workshop

Attachments: December 2019 Lowell Study Workshop Agenda.pdf

Dear Stakeholders:

The agenda is attached for the upcoming December 18 – 19, 2019 Study Workshop & Site Visit for the Lowell Hydroelectric Project. Boott appreciates the opportunity to consult with stakeholders and we look forward to seeing you next week.

Should you have any questions about the Study Workshop, please contact me at the phone number or email address below, or contact Mr. Kevin Webb, Enel Hydro Licensing Manager, at 978-935-6039 or via email at Kevin.Webb@enel.com.

Thank You -

Kelsey Scott, MS

Assistant Regulatory Specialist

HDR

1304 Buckley Road, Suite 202 Syracuse, NY 13212 D 315.414.2206 kelsey.scott@hdrinc.com hdrinc.com/follow-us

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Sent: Thursday, November 21, 2019 4:42 PM

To: 'celeste_bernardo@nps.gov' <celeste_bernardo@nps.gov>; 'christine_bruins@nps.gov' <christine_bruins@nps.gov>; 'Paul_Fontaine@nps.gov' <Paul_Fontaine@nps.gov>; 'kevin_coffee@nps.gov' <kevin_coffee@nps.gov>; 'laurel_racine@nps.gov' <laurel_racine@nps.gov>; 'peter_reitchel@nps.gov' <peter_reitchel@nps.gov>; 'kevin_mendik@nps.gov' <kevin_mendik@nps.gov>; 'duncan_hay@nps.gov' <duncan_hay@nps.gov>; 'Emily.Byrne@mail.house.gov' <Emily.Byrne@mail.house.gov>; 'darryl.forgione@mass.gov' <darryl.forgione@mass.gov>; 'patrice.kish@mass.gov' <peter.hoffmans.m.walsh@mass.gov>; 'peter.hoffmann@mass.gov' <peter.hoffmann@mass.gov>; 'dtradd@lowellma.gov' <dtradd@lowellma.gov>; 'KKeefeMullin@lowellma.gov' <chomas@lowellma.gov>; 'cclancy@lowellma.gov'

<cclancy@lowellma.gov>; 'jwinward@lowellma.gov' <jwinward@lowellma.gov>; 'CRicker@lowellma.gov' <CRicker@lowellma.gov>; 'chayes@lowellma.gov' <chayes@lowellma.gov>; 'CMcCall@lowellma.gov' <CMcCall@lowellma.gov>; 'scerand@hotmail.com' <scerand@hotmail.com>; 'greenesh@comcast.net' <greenesh@comcast.net>; 'jcalvin@lowelllandtrust.org' <jcalvin@lowelllandtrust.org>; 'ffaust@edgegroupinc.com' <ffaust@edgegroupinc.com>; 'Euris Gonzalez (DCR) (Euris.Gonzalez@mass.gov)' <Euris.Gonzalez@mass.gov> Cc: 'Anderson, Elise (EGP North America)' <elise.anderson@enel.com>; 'Webb, Kevin (EGP North America)' <Kevin.Webb@enel.com>; Quiggle, Robert <Robert.Quiggle@hdrinc.com> Subject: RE: Update - Lowell Hydroelectric Project (FERC No. 2790) Study Workshop

Dear Stakeholders:

Based on the results of recent scheduling polls, we are confirming that the Lowell Hydroelectric Project Study Workshop (Workshop) with interested stakeholders will occur over two days from December 18—19, 2019. The first day will focus on stakeholder consultation, information gathering, and data needs for the three studies listed in the attached agenda. Boott anticipates this first day will take place from 9am-4:30pm in Lowell, MA at the National Park Service Headquarters for the Lowell National Historical Park. The second day will consist of a site visit to target specific Project facilities associated with the studies. Boott anticipates this second day site visit to occur from 9am-12pm.

Additional information will follow this email in the weeks ahead of the Workshop meeting. Should you have any questions about the Workshop, please contact me at the phone number or email address below, or contact Mr. Kevin Webb, Enel Hydro Licensing Manager, at 978-935-6039 or via email at Kevin. Webb@enel.com.

Thank You -

Kelsev Scott. MS

Assistant Regulatory Specialist

1304 Bucklev Road, Suite 202 Syracuse, NY 13212 D 315.414.2206 kelsey.scott@hdrinc.com hdrinc.com/follow-us

<ffaust@edgegroupinc.com>

From: Scott, Kelsey

Sent: Friday, November 8, 2019 11:17 AM

To: 'celeste_bernardo@nps.gov' <celeste_bernardo@nps.gov'; 'christine_bruins@nps.gov' <christine bruins@nps.gov>; 'Paul Fontaine@nps.gov' <Paul Fontaine@nps.gov>; 'kevin coffee@nps.gov' <kevin coffee@nps.gov>; 'laurel racine@nps.gov' <laurel racine@nps.gov>; 'peter reitchel@nps.gov' <peter reitchel@nps.gov>; 'kevin mendik@nps.gov' <kevin mendik@nps.gov>; 'duncan hay@nps.gov' <duncan hay@nps.gov>; 'Emily.Byrne@mail.house.gov' <Emily.Byrne@mail.house.gov>; 'darryl.forgione@mass.gov' <darryl.forgione@mass.gov>; 'patrice.kish@mass.gov' <patrice.kish@mass.gov>; 'thomas.m.walsh@mass.gov' <thomas.m.walsh@mass.gov>; 'william.cooksey@mass.gov' <william.cooksey@mass.gov>; 'peter.hoffmann@mass.gov' <peter.hoffmann@mass.gov>; 'dtradd@lowellma.gov' <dtradd@lowellma.gov>; 'KKeefeMullin@lowellma.gov' <KKeefeMullin@lowellma.gov>; 'cthomas@lowellma.gov' <cthomas@lowellma.gov>; 'cclancy@lowellma.gov' <cclancy@lowellma.gov>; 'jwinward@lowellma.gov' <jwinward@lowellma.gov>; 'CRicker@lowellma.gov' <CRicker@lowellma.gov>; 'chayes@lowellma.gov' <chayes@lowellma.gov>; 'CMcCall@lowellma.gov' <CMcCall@lowellma.gov>; 'scerand@hotmail.com' <scerand@hotmail.com>; 'greenesh@comcast.net' <greenesh@comcast.net>; 'jcalvin@lowelllandtrust.org' <jcalvin@lowelllandtrust.org>; 'ffaust@edgegroupinc.com'

Cc: 'Anderson, Elise (EGP North America)' <elise.anderson@enel.com>; Webb, Kevin (EGP North America) <Kevin.Webb@enel.com>; Quiggle, Robert <Robert.Quiggle@hdrinc.com>

Subject: Update - Lowell Hydroelectric Project (FERC No. 2790) Study Workshop

Dear Stakeholders -

Due to scheduling conflicts, Boott is resurveying this group for available dates to hold the two-day Lowell Hydroelectric Project Study Workshop (Workshop) with interested stakeholders. The first day of the Workshop will focus on stakeholder consultation, information gathering, and data needs. Boott anticipates this first day will take place from 9am-4:30pm in Lowell, MA. Additional details regarding the meeting space to follow. The second day will consist of a site visit to target specific Project facilities.

Boott is proposing the following dates for the two-day Workshop:

December 4-5, 2019 December 5-6, 2019 December 9-10, 2019 December 10-11, 2019 December 11-12, 2019 December 17-18, 2019 December 18-19, 2019

Please notify Boott of the dates you can attend the Workshop by completing the Doodle Poll here: https://doodle.com/poll/dp2qb9232aq66awg

In order to facilitate the scheduling of the Workshop, Boott is asking that all interested stakeholders complete the poll by November 13, 2019. If you have questions or need additional information, please contact Kevin Webb, Boott Hydro Licensing Manager, at (978) 935-6039 or via email at Kevin.Webb@enel.com.

Thank You -

Kelsey Scott, MS

Assistant Regulatory Specialist

HDR

1304 Buckley Road, Suite 202 Syracuse, NY 13212 D 315.414.2206 M 315.706.5176 kelsey.scott@hdrinc.com

Agenda

Project: Lowell Hydroelectric Project (FERC No. 2790)

Subject: Lowell Project Study Workshop & Site Visit

Date: December 18 – 19, 2019

Location: Lowell National Historical Park Visitor Center (246 Market Street), Lowell, MA.

Pursuant to the Federal Energy Regulatory Commission's (FERC or Commission) Study Plan Determination (SPD) for the relicensing of the Lowell Hydroelectric Project (FERC No. 2790) (Project), Boott Hydropower, LLC (Boott) will conduct a Recreation and Aesthetics Study, a Water Level and Flow Effects on Historic Resources Study, and a Historically Significant Waterpower Equipment Study (collectively Studies). This Study Workshop to consult with stakeholders regarding these Studies will be held from 9:00 AM until 4:00 PM at the Lowell National Historical Park Visitor Center (246 Market Street) in Lowell, MA. The adjacent parking at 304 Dutton Street is free. On the following day after the Study Workshop, stakeholders are invited to participate in a site visit of the Project to consult on the field portion of the Studies, which is expected to end at noon. The proposed agenda for the Study Workshop is as follows:

Welcome and Introductions	9:00 AM – 9:30 AM
Discussion of FERC Relicensing and ILP Study Process	9:30 AM – 10:00 AM
Break	10:00 AM – 10:15 AM
Recreation and Aesthetics Study Needs	. 10:15 AM – 11:15 AM
Water Level and Flow Effects on Historic Resources Study Needs	. 11:15 AM – 12:00 PM
Lunch Break	12:00 PM – 1:00 PM
Historically Significant Waterpower Equipment Study Needs	1:00 PM – 2:00 PM
Open discussion/Break	2:00 PM – 3:00 PM
Upcoming ILP Schedule (2020-2021)	3:00 PM – 3:30 PM
Action Items and Next Steps	3:30 PM – 4:00 PM

From: Bruins, Christine <christine_bruins@nps.gov>
Sent: Thursday, December 19, 2019 9:22 AM

To: Webb, Kevin (EGP North America); Scott, Kelsey; Quiggle, Robert

Cc: Mendik, Kevin; Duncan Hay

Subject: Lowell NHP Exotic Species Treatment Schedule - Vegetation Mgmt

Attachments: 2018.9.11 EXOTIC SPECIES TREATMENT LOWELL.docx

Hi folks,

Thank you so much for hosting a meeting with the canal stewardship partners. I'm attaching a document from our maintenance department which outlines the exotic species that exist along the canals and treatment schedules.

Christine Bruins | Community Planner

Lowell National Historical Park 978.275.1726 (office) | 978.954.1011 (cell)

EXOTIC SPECIES TREATMENT CALENDAR FOR LOWELL NATIONAL HISTORICAL PARK

Prepared by Lars Boyd, Sept 11, 2018.

OUTLINE

- I. Purpose of document
- II. Target species for 2019
- III. Tentative Treatment Calendar
- IV. Best Management Practices
- V. Brief description of each species with photos and treatment strategies

I. PURPOSE

This document provides a series of tables and exotic plant management information to aid in organizing of a 2019 treatment schedule for Lowell NHP.

This document will present an appropriate species to be focused on in a park for the given, and a potential control method. Often other species may be treated at the same time as the target species if the appropriate treatment method is able to be performed concurrently. For foliar spraying, a generic herbicide mixture can be used to treat a broad spectrum of species within the same day. A generic herbicide mixture can be applied to multiple species for basal bark and cut stem/stump treatments as well. Refer to the individual species treatment guides (Table 6-13) to determine if the application method is appropriate within the given time window before treating other species in the area with herbicide.

II. TARGET SPECIES FOR 2019 LOWELL NHP

Table 1: Reported Target Species W/ Locations for FY 2019

Species	NCW	BSS	FG	SW/JS	DSC&T	KP	vcc	TT	KSH	wcw
Ailanthus altissima (Tree of Heaven)	Х		X		X					Х
Alliaria petiolata (Garlic mustard)		Х	X	Х		Х			X	
Celastrus orbiculatus (Asiatic Bittersweet)	X		X		X	Х				Х
Convolvulus arvensis (Bind Weed)										Х
Cynanchum louiseae (Black Swallow-wort)	Х			Х	Х	Х	Х	Х		Х
Fallopia japonica (Japanese Knotweed)		Х		Х	Х					
Lythrum salicaria (Purple Loosestrife)	Х			Х						Х
Rosa multiflora (Multiflora Rose)										Х

NCW- Northern Canal Walkway

BSS- Black Smith Shop

FG- Francis Gate

SW/JS- Swamp Locks/Jackson St

DSC&T- Dutton St Canal & Tracks

KP- Kerouac Park

VCC- Visitor Center Courtyard

TT- Tremont St Tracks

KSH- Kirk St Headquarters

WCW- Western Canal Walkway

III. TENTATIVE CALENDAR FOR LOWELL NHP EXOTIC PLANT REMOVAL

Table 2: Foliar Spray Treatment Sequencing

Species	M A R	A P R	M A Y	JUN	JUL	A U G	SEP	0 C T	N O V
Rosa multiflora (Multiflora Rose)			X	X					
Ailanthus altissima (Tree of Heaven)				Х	Х	Х			
Cynanchum louiseae (Black Swallow-wort)				Х	Х				
Convolvulus arvensis (Bindweed)					Х	Х	Х		
Fallopia japonica (Japanese Knotweed)						Х	Х		
Lythrum salicaria (Purple Loosestrife)						Х			
Alliaria petiolata (Garlic mustard)							Х	Х	
Celastrus orbiculatus (Asiatic Bittersweet)								Х	Х

IV. BEST MANAGEMENT PRACTICES (ADOPTED FROM THE EXOTIC SPECIES TREATMENT CALENDAR FOR BOSTON METROPOLITAN PARKS by Lyndon Langthorne)

Non-chemical Treatment

Non-chemical treatment, when appropriate for the target species, should be attempted before chemical treatment. In most situations, chemical treatment can be made more effective when applied in conjunction with non-chemical management strategies. Non-chemical management strategies are generally labor intensive, but can be performed in most areas, including areas where chemical treatment would not be advisable.

Table 3. Non-chemical Treatment Methods

Hand pulling	Manual removal of top growth of plant, and as much of the root system as possible. Extensive, deep, and large root systems are not removable by hand. Hand pulling will prevent the formation of seed pods if consistently implemented throughout the growing season. This method is often not effective in managing regenerative species. Rhizomatous species are not generally manageable through this strategy alone.
Digging	Manual or mechanical removal of root system when hand pulling alone is not sufficient in removing the root system. Species that re-

	sprout from roots must have the root system removed. Digging is labor intensive. This method is not viable when managing regenerative plants with extensive, deep, or large roots. Digging disturbs the soil, encouraging colonization by other exotic species.
Cutting	Manual removal of the entire top growth of the plant by cutting the stem close to the ground. Plant matter removed by cutting may, depending on the species and desired conditions, be allowed to compost (either where it is cut or moved to another location), or destroyed to prevent reshooting of roots. Cutting can be effective on annuals or biennials if done before seeding, but in most perennial species, cutting alone is not capable of achieving control. Stump grinding of larger, woody stumps can prevent reshooting (e.g. <i>F. alnus</i> , <i>R. cathartica</i> , <i>A. altissima</i>). Herbicide can be applied to the cut surface to destroy the roots and prevent reshooting.
Flower clipping / Seed-heading	Manual removal of flowers or seed heads to prevent seeding or seed spread, but not removal of the plant top growth; seeds collected are destroyed. This method will limit the ability of the plant to spread through seeding, but will not prevent vegetative spread by the root system.
	Some plants do not rely on seeds as the primary vector of spread (e.g. <i>F. japonica</i>).
Mulching / Mats / "Buckthorn Bags"	Covering of a disturbed or treated area to limit the ability of exotic species to grow and recolonize an area. Mulch can be layered over soil, and possible supplemented with a permeable material, like cloth or paper, to limit the ability of exotics to reshoot while also providing an area that can be used for planting. Reshooting may still occur with mulch, and monitoring is advisable.
	Mats of rubber or black plastic can be layered on the soil as an impervious surface. This surface cannot be used for planting, but is more likely to prevent any regrowth. If the mats are in an area of direct or partial sunlight, the heat collected will kill covered roots.
	"Buckthorn bags" can be placed over stumps of <i>F. alnus</i> and <i>R. cathartica</i> that are over two inches in diameter. Left in place for two years, these bags will prevent regeneration and destroy the root system of the plant.
Mowing	Mechanical removal of top growth of plants. Able to be applied quickly to large areas. Mowing is less precise than most manual methods, and is most viable on land that is already managed land. Will not destroy the root system of most plants, but often stresses the plant and prevents seed production if done consistently. Herbicide applied after mowing will often be more effective, either applying immediately after mowing as cut stem/stump treatment, or upon regrowth as a foliar spray.

Seeds forming on exotic plants should always be removed when observed. Removal of seeds can be a valuable management strategy in areas of lower priority, or where other management strategies are inadvisable. Seed removal will not disrupt existing plants, but will limit growth and spread of these populations. Seed removal also prevents exotics from further contributing to the soil seed bank, all the viable seeds existing within the soil of an area. Seeds of exotics should be burned or bagged and disposed of in a landfill to prevent further contamination.

Bare patches of soil, particularly those remaining after soil is disturbed by digging or hand pulling, is vulnerable to colonization by new exotic species. To mitigate this threat, new plants and grasses should be added to bare areas whenever possible. If a bare patch was the site of chemical treatment that will be repeated the following year, seed of an inexpensive annual ryegrass can be planted to limit the cost of further chemical treatments.

Chemical Treatment

Use pesticides at rates recommended by the label, and never exceed labeled rates. Mitigate damage to other plants and ecosystems by taking care for herbicide drift. Only apply herbicides on calm, dry days, and never any closer to standing water than is specified on the label. Herbicide applicators should always be properly fitted with Personal Protective Equipment (PPE) required by label, which represents the **minimum** PPE required for use. When applying chemicals, it is advisable to add a dye to the mix, unless otherwise stipulated, to better mark which plants have been treated. Dyes also allow contaminated gear to be easily identified for safety reasons.

Table 4. Chemical Treatment Method Overview

Foliar Spray	Broadcast or spot application of herbicide with a sprayer targeting foliage of species, wetting the leaves with herbicide to be absorbed into the root system. Apply to intact, green leaves. This is often the most efficient herbicide application method. Lower concentrations are used with foliar spray than other application methods. Foliar spray has the greatest potential to unintentionally damage surrounding plants, and may not be preferred for this reason. Foliar application is best for treating large, dense stands of invasive plants where risk of damaging surrounding plants can be minimized. When spraying, herbicide should wet leaves without dripping, as excessive spraying can harm nontarget species.
	The extent of the application depends on the size of the area being treated. Spot spraying is application of herbicide in one location,

-	
	generally to one plant. This type of application minimizes damage to surrounding plants. Broadcast application is more extensive than spot spraying for heavier infestations.
	Foliar spraying should not be performed on wet weather days as any herbicide may not be absorbed into plants, instead being washed away as runoff. Foliar spraying should not be performed on days when wind speeds are greater than 5 mph to prevent pesticide drift. Foliar spraying should also not be performed in areas where damage to nontarget species is a concern. Large trees should not be treated by foliar spray.
Cut Stem/Stump	Application of herbicide either by brush or spray bottle to a cut surface to be absorbed into the root system. After cut, herbicide should be applied to the cut surface immediately for best effect, and not more than 15 minutes later; this time limit is particularly important for the best absorption of water-based herbicides, and oil based herbicides can be applied longer after cutting.
	Cut stump applications are more effective than basal bark on woody stems greater than 5" diameter, and thick barked species.
Basal Bark	Application of herbicide to the bark with a sprayer, from surface to 12-18 inches above the root collar, to be absorbed into root system. Useful in precisely controlling woody species. Treatment can be performed while herbaceous species are dormant. Uses oil-based herbicides that penetrate bark, mixed with a carrier (basal oil). The entire surface area of the trunk should be coated within the 12-18 inch range, and rough bark requires more spray. Application should be stopped short of runoff.
Stem Injection	Application of herbicide into the stems of hollow plants via specialized injection equipment. This method ensures absorption of the herbicide into the roots of the plant, and limits exposure to and contamination by pesticides.
Hand Wicking ("Glove of death")	Application of herbicide to the leaf surface with an absorbent cotton glove coated in herbicide layered over a chemical resistant glove. Small spray bottles are used to wet the fingertips and palm of the glove, which is then wiped directly on the plant, coating the leaves. This method is precise, faster than cut stem/stump treatment, and limits exposure of herbicide to other plants.
	Cuff the ends of the glove to prevent dripping. Gloves used for this method will becomes saturated with herbicide and should not be stored with other equipment.

Herbicides

Use with caution.

Be aware of local regulations before use.

Always read the label thoroughly before use, and follow all requirements (including PPE, site location, concentration, etc.).

Chemicals should be chosen based on a variety of factors, including: effectiveness on target species, environmental impact (toxicity to animals, persistence in soil, activity in water), and safety. The correct herbicide should be chosen for the site, and herbicide labelling will list use sites.

Table 5. General Overview of Commonly Used Herbicides

Glyphosate	(Rodeo®)	Glyphosate is a non-selective systemic post-emergent herbicide, damaging to most plants, including broadleaf plants and grasses. Pure glyphosate is generally environmentally safe, essentially non-toxic to mammals and fish, and mildly toxic to birds. Glyphosate is quickly absorbed into soil, and has negligible lasting environmental effects, and leaching to other areas is not expected to occur. Glyphosate has a short half-life in soil and water. Glyphosate may or may not be metabolized by plants, and potentially persists in plants where it was applied, including in the roots. Be aware that not all glyphosate herbicides are registered for aquatic use, and some formulations are contain adjuvants that make them highly toxic to aquatic life. If using in an aquatic area, be sure to use a product that omits these toxic ingredients (eg. <i>Rodeo®</i>). Pure glyphosate has low human toxicity, but is often made more hazardous to humans with adjuvants that disseminate the chemical into plants. Causes significant eye irritation.
Triclopyr amine	(Garlon® 3A)	Triclopyr is a selective systemic post-emergent herbicide. It is relatively non-toxic to humans and terrestrial mammals, and some formulations are registered for aquatic use. Triclopyr should generally be used in areas where it is desired to protect surrounding grasses and sedges. Triclopyr amine is preferred for foliar applications over triclopyr ester.

Triclopyr ester	(Garlon® 4 Ultra)	Triclopyr is a selective systemic post-emergent herbicide. It is relatively non-toxic to humans and terrestrial mammals. It is not registered for aquatic use. Triclopyr ester is only recommended as a foliar spray prior to full leaf-out of the target plant. After leaf out, other herbicides would be preferred. Good for basal barking when mixed with a basal oil. Cannot be used within 35 ft. of wetland.
Imazapyr	(Plateau®, Habitat®)	Imazapyr is a non-selective, systemic, pre- and post- emergent herbicide. Imazapyr formulations can be registered for aquatic use. Imazapyr has a low human toxicity in skin contact or if ingested. Harmful if inhaled and may cause irreversible eye damage.

A good strategy for foliar application efficiency is to mix a general formulation of triclopyr amine and glyphosate. This mixture can be applied on a wide spectrum of species, and allow more treatment to occur during a single application session.

V. BRIEF DESCRIPTION OF EACH TARGET SPECIES (ADOPTED FROM THE EXOTIC SPECIES TREATMENT CALENDAR FOR BOSTON METROPOLITAN PARKS by Lyndon Langthorne)

Ailanthus altissima (Tree of Heaven)

Description

A. altissima is a large non-native short-lived deciduous perennial tree. The trunk grows up to eighty feet tall, and is straight and gray, with smooth to bumpy bark that fissures with age. Leaves are silvery-green and pinnately compound, with alternate leaflets on one to four foot leaf veins. Leaves produce a foul smell if crushed. Five-petaled flowers are small, yellow-green, and grow in dense clusters. Reddish-brown seed pods are produced in



https://www.extension.iastate.edu/forestry/iowa_t rees/trees/tree_of_heaven.html

late summer, and are twisted like helicopters, each containing one seed

The tree is resilient, and will grow in a wide range of environments, including urban where the root system can disrupt hardscaping and cause damage to structures. *A. altissima* crowds out native trees quickly with its ability to spread quickly to new areas. The roots are toxic and may limit growth potential for native plants.

Non-chemical Treatment

Seedlings and root suckers should be dug consistently to control spread. Any remaining stumps and roots will continue to generate new shoots. Cutting and mowing alone are not an effective form of management, and may increase density and spread potential. Mechanical measures that remove top growth are most effective when followed up by chemical treatment.

Chemical Treatment

Foliar spraying is the most common form of treatment for *A. altissima*¹ Foliar treatment best applied between full canopy and fall color. Foliar application cannot be applied to larger trees, and is most effective in treating dense stands of saplings.

Cut stump treatment is a more labor intensive method, but may be necessary in treating larger trees. After cutting tree, immediately apply herbicide to cut surface. Cutting alone will lead to increased suckering, and should be mitigated with herbicide application

Basal bark used for follow up treatments or small infestations. Root injury is maximized when used after full canopy to fall color. Following basal bark treatment, the tree is left in place to be cut at a later time. *A. altissima* may require multiple applications.

To maximize root damage, any chemical treatment should be performed within the time window where the tree has developed its full canopy and before the leaves have turned to fall colors.

Table 6: A. altissima Treatment Guide

Application Method	Herbicide	Brand	Selectivity	Concentr ation	Time	Notes					
Non-chemical Treatment											
Hand pulling					Apr - Jun	Seedlings and saplings					
Chemical Trea	atment										
Foliar	Glyphosate	Rodeo®	Non-selective	2%	Late Jun -	Surfactant					
	Triclopyr	Garlon® 3A	Selective	2%	Aug						
		Garlon® 4 Ultra		1.5%							
	Imazapyr	Habitat®	Non-selective	1%							
Cut stem/stump	Triclopyr	Garlon® 3A, Garlon® 4 Ultra	Selective	50%	Late Jun - Aug						
Basal bark	Triclopyr ester	Garlon® 4 Ultra	Selective	20-25%1	Mar - Oct ¹	Basal oil					
Notes: 1. Contributed by BM											

Alliaria petiolata (Garlic Mustard)

Description

A. petiolata is a nonnative biennial herb. First year plants are immature and resemble many native plants, such as Viola. In its first year leaves stay green all year long. A. petiolata is much easier to identify in the second year after bolting. In the second year, the leaves take on a garlicky odor and the stem forms up to three feet in height. Leaves are alternate,



https://www.michigan.gov/invasives/0,5664,7-324-68002_71240_73853-379483--,00.html

sharply toothed, and triangular. Flowers bloom early in the season and are white with four petals. Seed pods develop atop the stem and burst to project seeds up to five feet from the plants, leading to rapid expansion of patches. *A. petiolata* produces more seeds in wet environments.

A. petiolata populations can grow rapidly when unchecked. Roots of A. petiolata have an allelopathic effect on native plants, limiting growth potential in areas of infestation. The plant provides no benefits as a food source for native animal species.

Non-chemical Treatment

Stems are attached to a single root, and plants can be removed entirely by pulling, particularly in moist and loose soil. Plants can also be dug. These methods can be an effective for control, but disturbs soil and leaves bare patches, which can be recolonized. Roots must be removed completely to prevent resprouting and are easily broken.

Mowing or cutting of *A. petiolata* in its second year after bolting can also be an effective management strategy, destroying plants, especially those already under stress, and preventing seed development.

Clipping and removing of flowers will prevent the formation of new seeds, and will reduce population growth rates.

These methods must be repeated over many years until seed bank is depleted. Size of the seed bank depends on the age of the population. When utilizing these methods, it is important to clean any equipment used or worn in order to prevent seed spread.

Chemical Treatment

Foliar spray is the recommended method for chemical treatment of A. petiolata, if chemical treatment is deemed necessary. Leaves should be cleaned of debris prior to application to ensure absorption into the plant. Glyphosate and triclopyr amine application to rosettes is most effective in late fall, and is best used only on dense stands where non-chemical treatment would be prohibitively laborious. Triclopyr amine can be used to avoid damaging surrounding grasses.

Table 7. A. petiolata Treatment Guide

Method	Herbicid e	Brand	Selectivi ty	Concent ration	Time	Notes		
Non-chemical Treatment								
Hand pulling					Apr - Oct			
Mowing					Aug - Oct	Most effective if plants are already under stress (drought, etc.)		
Flower clipping					Apr - Jun			
Chemical Treatment								
Foliar spray	Glyphos ate	Rodeo®	Non- selective	0.5-1% ¹	Sep - Oct			
	Triclopyr amine	Garlon® 3A	Selective	0.5-1%1				
Notes: 1. Contributed by BM	•		•	•	•	•		

Celastrus orbiculatus (Asiatic Bittersweet)

Description

C. orbiculatus is a non-native deciduous woody perennial that grows as either a vine or a shrub. Stem is woody with smooth brown bark. Leaves are alternate, glossy, and round with a pointed tip and shallow toothed margins. The leaves grow from two to five inches in length. Small greenish-yellow flowers with five petals form at leaf axils in clusters. Fruits are distinctive, in round orange capsules that split open in fall revealing fleshy red fruits with one or two seeds each.



https://orleansconservationtrust.org/asiatic-bittersweet-celastrus-orbiculatus/

The fruits persist throughout winter, and are highly attractive to birds and other animals, and to humans who often use vines and fruits in decorative manners. *C. orbiculatus* can spread far as seed, and is also capable of root suckering.

C. orbiculatus looks very similar to *C. scandens* (American Bittersweet), particularly when young. As the plant matures, it distinguishes itself with the placement of the fruit: *C. scandens* develops fruit on the tips of its branches, whereas *C. orbiculatus* develops fruits on the leaf axils. *C. scandens* leaves are also less round. Hybridization makes identification difficult. *C. orbiculatus* may be sold as *C. scandens* due to the difficulty in identification.

C. orbiculatus displaces native species through competition, and also displaces C. scandens through hybridization, potentially threatening C. scandens genetic identity. C. orbiculatus grows rapidly and can quickly dominate areas it is introduced into. C. orbiculatus also twines around native trees, increasing the load on limbs and contributing to failure.

Non-chemical Treatment

Smaller plants can be hand pulled or dug out. The entire root should be removed to prevent resprouting.

Vines climbing into trees can be cut at a comfortable height to kill any of the vine in the canopy and relieve trees. The base of the vine will continue to grow, and will require

continued treatment to manage. When cutting vines from trees, take care to limit damage done to the bark of the tree as much as possible, for the sake of continued tree health.

Chemical Treatment

Foliar spraying of triclopyr is recommended for large, dense patches. Foliar spray is best applied in autumn or early winter, after most other species are dormant. If the vine is fully leafed out at the time of spraying, it is recommended to use triclopyr amine over the ester form. Foliar spray should only be applied on calm days when ambient air temperature is above the required sixty-five degrees Fahrenheit.

Vines of the plant that grow up into the canopy cannot viably be treated with a foliar application. The cut stump method is preferable for *C. orbiculatus* vines that climb trees, as well as for vines that are in close proximity to desired plants. When cutting, cut the vine six inches above the ground, in case more cut stump applications are required. Immediately apply the herbicide with a brush or spray bottle. Cut stump treatment can be used at any time in the year as long as the ambient air temperature is above the necessary temperatures: forty degrees Fahrenheit for glyphosate application, and sixty-five degrees Fahrenheit for triclopyr application. The ground should not be frozen at the time of application.

Basal bark treatment with triclopyr ester can also be applied at any time in the year, if the ambient air temperature has been above the required sixty-five degrees Fahrenheit for several days. Basal bark treatment should also not be done if there is snow on the ground, or if any part of the application area is wet from rain or flooding. Before applying, cut any stems sprouting from the vine within the twelve to eighteen inch application range to reveal the bark, and apply the treatment to cover the entire of that area.

Systemic herbicides should destroy an entire *C. orbiculatus* plant in a week.

Table 8. C. orbiculatus Treatment Guide

Method	Herbicide	Brand	Selectivity	Concentra tion	Time	Notes		
Non-chemical Treatment								
Hand pulling					Mar - Nov	Small plants		
Cutting					Mar - Nov	Will kill any climbing vines in canopy to relieve tree, will not destroy roots		
Chemical Tr	Chemical Treatment							
Foliar spray	Triclopyr	Garlon® 3A, Garlon® 4 Ultra	Selective	2%	Oct - Nov	Use late season so most native species are dormant; ambient temperature should still be above 65 degrees F		
Cut stem/stum p	Glyphosate	Rodeo®	Non- selective	25%	Year round	Ambient air temperature above 40°F		
	Triclopyr	Garlon® 3A, Garlon® 4 Ultra	Selective			Ambient air temperature above 65°F, no frozen ground		
Basal bark	Triclopyr ester	Garlon® 4 Ultra	Selective	20%	Year round	Should only be performed when ambient air temperature has been above 65°F for several days		

Cynanchum Iouiseae (Black Swallow-wort)

Description

C. louiseae is a non-native rhizomatous perennial milkweed. Stems are yellowish-green, long and thin, vine-like and twining. The stems tend to climb and twist around other plant stems or themselves. Leaves are opposite, smooth, shiny, dark green, and elliptic or heart shaped with sharp tips. Flowers are small and dark purple, with five petals. C. louiseae has milkweed-like seed pods, with many small brown seeds attached to fluffy white hairs.



https://www.maine.gov/dacf/mnap/features/invasive_plants/cynan chum.htm

C. louiseae is spread long distances by its seeds, which float in wind, and many seeds will drop into already infested areas, increasing the density of *C. louiseae* in patches.

C. louiseae outcompetes native species and forms sprawling and dense mats of plant matter that completely cover areas, limiting the growth potential for native species. It will also twine around native species, stressing those plants and limiting ability to grow.

Non-chemical Treatment

Non-chemical treatment of C. louiseae has limited effects for control. Hand pulling or mowing the part of the plant above soil prevents the development of seed pods, limiting the ability of the plant to spread; this is not an effective method of long-term control.

Digging the roots of the plant is labor intensive, and any control established is limited as the plant will resprout from any remaining rhizomatous matter. The entire crown and root system must be removed in order to control by digging.

Any seed pods that do form should be pulled by hand and bagged or burned to prevent propagation.

Chemical Treatment

C. louiseae is a pervasive species and will require multiple years of treatment to achieve control. It is very important to not apply herbicide too early in the season when treating C. louiseae. While the shoots emerge in the early spring, herbicide should only be applied after the plants have begun to flower in June or July, and must be applied before the formation of seed pods. Foliar spraying before the formation of seed pods will greatly reduce seed viability in affected plants.

Foliar spray is optimal when treating large monotypic stands of *C. louiseae*. If the exotic plants are surrounded by desired grasses, then triclopyr can be used minimize damage to grasses. Plants will appear sick one to two weeks after herbicide treatment, exhibiting yellowed leaves, and dead spots. Do not reapply herbicide to plants that are sick, as sick plants cannot effectively absorb herbicides into roots.

For particularly sensitive areas, cut stem treatment of *C. louiseae* is a viable control method. Stems should be cut to about two inches from the ground, and non-selective herbicide should be applied immediately.

Table 9. C. louiseae Treatment Guide

Method	Herbicide	Brand	Selectivity	Concent ration	Time	Notes	
Non-chemical Treatment							
Hand-pulling			Aug - Nov	Target seedpod s			
Chemical Treatment							
Foliar spray	Glyphosate	Rodeo®	Non-selective	3-5%	June - July	Spray as plants begin to flower	
	Triclopyr	Garlon® 3A, Garlon® 4 Ultra	Selective	1%			
	Imazapyr	Habitat®					
Cut stem/stump	Glyphosate	Rodeo®	Non-selective	50-100%	June - July	Cut stems to two inches from the	

					ground before applicati on
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Fallopia japonica (Japanese Knotweed)

Description

F. japonica is a nonnative rhizomatous perennial that is a particularly difficult exotic species to manage. The stems emerge in early spring and grow tall, up to ten feet. The stems are reddishbrown and hollow, resembling bamboo. Heart-shaped leaves are large, growing four to seven inches in length. Clusters of small, greenish-



https://www.hortweek.com/network-rail-loses-japanese-knotweed-court-ruling/landscape/article/1486930

yellow to white flowers are formed in July. Fruits mature in August or September, and are winged to increase seed dispersal.

The seeds rarely germinate, and North American knotweed is presumed to be a sterile male clone. It is still possible to produce viable seeds, usually through hybridization. F. japonica mainly spreads vegetatively, extending its massive woody rhizome system and sending up new shoots. Any piece of rhizome material moved to a new area can lead to new infestation. As such, it is generally contained in defined patches, and will not cross impervious surfaces like roads easily.

F. japonica offers no ecological benefits to native species other than dense cover. It can colonize a variety of ecosystems, swiftly converting them to monocultures, and degrading habitat value.

Non-chemical Treatment

Digging is an ineffective method of management, as *F. japonica* grows from a thick rhizome, forming large crowns that are extremely difficult to fully remove.

Mowing of *F. japonica* alone is not an effective means of control, and must be coupled with chemical treatment.

Small stands of *F. japonica* can be managed by mowing the area and covering it with impervious mats, thick enough that *F. japonica* is unable to grow through. Leaving the mats in place for several years will prevent the root system from sending up new shoots in the covered area, preventing photosynthesis. If in an area of full or partial sun, the heat will also damage the root system.

F. japonica is limited in its ability to spread across impervious surfaces, and will be more easily contained closer to roads.

Chemical Treatment

The most effective method of chemical treatment is first to mow *F. japonica* at the beginning of July, and follow with herbicide application. At least six weeks should pass between mowing and herbicide application, and when herbicide is applied the height of *F. japonica* is limited to its regrowth: three to four feet tall instead of six to ten feet tall.

Glyphosate can be applied as a foliar spray. Glyphosate is a non-selective herbicide, and patches with *F. japonica* are generally monocultures. Glyphosate should be applied twice in the first year of treatment, first in early August, and following up in September before the first frost. Grass can be seeded in the area if it is necessary for erosion control. As knotweed requires multiple years of treatment, an inexpensive annual rye grass would be optimal.

F. japonica can also be treated by stem injection, where herbicide is injected at the nodes, the location where the leaves meet the stem. Stem injection directs as much chemical as possible to the root system, but is labor intensive and requires specialized injection equipment.

F. japonica thrives in a range of soils, from sandy roadsides to moist wetlands. In wetland areas, use mechanical methods to the greatest extent feasible (such as thick mats). Work from the upstream seed source to downstream populations. If chemical treatment is used, care should be taken to use an herbicide that will not injure amphibian food sources and rare species such as Blanding's turtle. The table below provides guidance on using Rodeo®.

Application should not exceed the regulated rate per acre, of particular concern when filling hollow stems or injecting herbicide.

Herbicide should not be applied after the first frost, as *F. japonica* is frost sensitive and will die back, leaving any herbicides applied after frost unabsorbed.

Table 10. F. japonica Treatment Guide

Method	Herbicid e	Brand	Selectivi ty	Concent ration	Time	Notes		
Non-chemical Treatment								
Mowing					Aug; Sep			
Chemical Treatment								
Foliar spray	Glyphos ate	Rodeo®	Non- selective	2-4%1	Early Aug - Late Sep	Surfacta nt; first applicati on: Add surfactan t, must wait 6 weeks after early July mowing, second applicati on: add surfactan t, must be applied before first frost		
Stem injection	Glyphos ate	Rodeo®	Non- selective	100%	August	Injected at the stem nodes		
Notes: 1. Contributed by BM								

Convolvulus arvensis (Bindweed)

Description

"Deep rooted perennial vine that grows along the ground until it comes in contact with other plants or structures; then climbs aggressively. Smooth, arrowhead-shaped leaves. Slender, twining stems that can grow to 6 feet long. Trumpet-shaped flowers, light pink to white. Two small leaf bracts about one inch below the flower. Fleshy pale roots that travel deeply and widely" https://www.nwcb.wa.gov

"Reproduces vegetatively from roots, rhizomes, stem fragments and by seeds that can lie dormant in the soil for up to 20 or more years. Roots spread widely underground, both vertically and horizontally,



https://www.swcoloradowildflowers.com/White%20Enlarged%20Photo%20Pages/convolvulus%20arvensis.htm

forming dense mats. Flowering is indeterminate, so flowers continue to develop along stems until the first frost" https://www.nwcb.wa.gov

Non-chemical Treatment

"Avoid digging or tilling the soil around mature field bindweed roots; roots or rhizome fragments left behind may resprout. Repeated hand pulling works eventually, but is highly labor intensive. It is best to limit hand pulling and tilling to seedlings; do in early spring when the ground is wet. Smothering plants with mulch, black plastic or plastic-fiber mats (geotextiles) is another option, but the covering must be kept in place for several years. Success may be somewhat limited as field bindweed can persist without light, sending its underground roots beyond the edge of the covering to start a new infestation. If using coverings, check often for cracks or openings; pull or spot spray any new growth coming up through the covering. Cutting alone will not control this plant and is not recommended." https://www.nwcb.wa.gov

Chemical Treatment

"Herbicides can be painted or brushed on leaves to avoid drift onto desirable plants. Products containing glyphosate are effective when applied in the summer and fall before the leaves die back. However, glyphosate is "non-selective" and will injure any foliage that it comes in contact with including grass. Selective broadleaf herbicides with the active ingredients triclopyr and 2,4-D work well for lawn areas as they won't harm most grasses. Repeat on regrowth as needed. All these herbicides are absorbed by foliage and moved throughout the plant to kill the roots and shoots. If retreating with glyphosate in the same season, allow plants to grow and produce flowers before each application." https://www.nwcb.wa.gov

Table 11. C. arvensis Herbicide Treatment Guide

Method	Herbicide	Brand	Selectivity	Concent ration	Time	Notes		
Non-chemical Treatment								
Hand-pulling					Mar - Sept			
Digging					Mar - Sept			
Mowing					Mar - Sept			
Chemical Trea	Chemical Treatment							
Foliar spray	Glyphosate	Rodeo®	Non-selective	2%	July - Sept			
	Triclopyr	Garlon® 3A	Selective	3-5%				
	Imazapyr	Habitat®	Non-selective	2%				

Lythrum salicaria (Purple Loosestrife)

Description

L. salicaria is a non-native herbaceous perennial forb that is an aggressive invader of wetlands. Several four-sided square erect stems grow from a single plant, two to six feet in height. Leaves are opposite on the stem or in whorls around the base, and are smooth, elongated, and heart-shaped. Flower spikes are showy and magenta, made up of many small, five-petaled individual flowers, blooming late in the growing season. The fruit is a capsule developed in autumn containing small seeds.

L. salicaria is spread by seed, which are viable for many years, and remain dormant in the soil until conditions are right for growth.

L. salicaria can dominate areas where it is introduced, displacing native species and reduces biodiversity. L. salicaria



https://www.minnesotawildflowers.info/flower/purple-loosestrife

also degrades wetlands, catching sediment that fills in wetlands, leading to reduced water flow, and decreased flood retention.

Non-chemical Treatment

L. salicaria populations can be partially managed by pulling and digging as long as the entire taproot is removed. This is time consuming and labor intensive, and should only be implemented on small pioneer populations that can be removed efficiently.

Biological control is the best method for long term large scale. Insect species can be introduced to feed on the plants, preventing *L. salicaria* from seeding and weakening, eventually destroying the plant.

Chemical Treatment

L. salicaria most commonly is found in sensitive wetland areas. The two most effective herbicides are glyphosate and triclopyr. Glyphosate and triclopyr amine, both registered for aquatic use, are commonly applied when managing *L. salicaria*. Treatment should occur prior to seed set to prevent future spread of the species.

Glyphosate can damage surrounding grasses and sedges, leaving new opportunities for colonization by *L. salicaria*. Pesticide should be selected based on density of the stands being treated, and whether or not surrounding plants are desirable. If surrounding plants are desirable grasses and sedges, triclopyr amine should be selected. If there are many exotic plants, glyphosate should be used, or a mixture of glyphosate and triclopyr. Follow up treatments will be required for years until the seedbank is depleted.

Table 12. L. salicaria Herbicide Treatment Guide

Applicatio n Method	Herbicide	Brand	Selectivity	Concentra tion	Time	Notes			
Non-chemical Treatment									
Hand pulling					Apr - Sep				
Digging					Apr - Sep				
Cutting					Apr - Sep				
Biological					Apr - Jun	Introduced insect species to feed on plant			
Chemical T	reatment								
Foliar spray	Glyphosate	Rodeo®	Non- selective	1-2%	Late Aug	Apply after peak bloom; cut			
	Triclopyr amine	Garlon® 3A	Selective	1%		and dispose of flower heads prior to application			
Hand wicking					Late Aug				

Rosa multiflora (Multiflora Rose)

Description

R. multiflora is a thorny non-native perennial shrub. The plants is tolerant of many conditions and can grow ten feet tall and ten feet wide. Stems are long, green to brown, with hooked thorns that make hand removal hazardous. Leaves are opposite with five to eleven leaflets, and leaflets are one to two inches in length.



https://production.wordpress.uconn.edu/cipwg/wp-content/uploads/sites/244/2014/04/RobRoutledgeSaultCollegeBugwood.jpg

White to pinkish five petal flowers form in clusters in the summer. The plant produces bright red fleshy fruits (hips).

R. multiflora can generate new stems to spread, but it is predominantly spread by seed.

R. multiflora is easily distinguished from native *Rosa* species. In R. multiflora the base of leaf where it is attached to the thorny stem is fringed, and the plant's white to pinkish five petalled flowers occur in branched structures.

Benefits of the plant include the food and cover it provides to native animals. However, the overall effect this shrub has on habitat value is negative. *R. multiflora* crowds out native species and creates dense, impenetrable stands. *R. multiflora* can also act almost as a vine, and choke out native trees.

Non-chemical Treatment

Controlling small populations is much easier than attempting control dense stands. Hand pulling can be effective if the entire root of the plant is removed.

Cutting or mowing alone will not control *R. multiflora*, but are useful in preparation for herbicide treatment. Cut stem application would be impossible on dense stands, so mowing leads to better control.

Chemical Treatment

Foliar applications are made in summer when *R. multiflora* is flowering, with peak bloom being in early June. Spray should thoroughly cover the foliage of the plant, wetting as many leaves as possible without dripping. Glyphosate is less effective on multiflora rose than other herbicides but may be desirable if soil activity is a concern, or to avoid damaging surrounding grasses. Triclopyr can be applied as a foliar spray, and will eliminate top growth; future applications may be necessary to destroy the root system.

Triclopyr can also be applied to cut stems or as basal bark, and is most effective when applied in the dormant season. Cut stem use when mowing or cutting is practical; remove the top growth of the shrub and wet the stubble. This method can be applied year round. Basal bark is only feasible when the base of the plant can be accessed. It is best applied from January to autumn color. Wet the lower twelve inches of plant stem without causing runoff.

Table 13. R. multiflora Treatment Guide

Method	Herbicide	Brand	Selectivity	Concentration	Time	Notes			
Non-chemical Treatment									
Hand pulling					Mar - Nov	Remove entire root			
Cutting/Mo wing					Mar - Nov	Effective when followed immediatel y by chemical treatment			
Chemical Tr	Chemical Treatment								
Foliar spray	Glyphosate	Rodeo®	Non-selective	2%	May - Jun				
	Triclopyr	Garlon® 3A, Garlon® 4 Ultra	Selective	1%					
Cut stump/stem	Triclopyr	Garlon® 3A, Garlon®	Selective	50%	Year round				

		4 Ultra				
Basal bark	Triclopyr ester	Garlon® 4 Ultra	Selective	20-25%	Jan - Aug	Basal oil

Important Note: Mention of specific products in this document does not constitute endorsement. Specific product names are mentioned in the resources used to create this document. This document is meant to serve as a guideline for exotic plant management, and is not a legal authority. By law, pesticides must be applied according to their labeling.

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Scott, Kelsey

To: Quiggle, Robert

Subject: RE: Lowell Heritage State Park information

From: Quiggle, Robert

Sent: Friday, December 20, 2019 3:28 PM

To: Harris, Jeffrey (DCR) < jeffrey.harris@state.ma.us>

Cc: Scott, Kelsey <Kelsey.Scott@hdrinc.com>

Subject: RE: Lowell Heritage State Park information

Jeffrey:

It was good to meet you this week, and thanks for providing this information so quickly. We'll look through this and let you know if we have additional questions, etc.

Have a great holiday,

Robert Quiggle, RPA

Regulatory and Environmental Section Manager

HDR

1304 Buckley Road, Suite 202 Syracuse, New York 13212-4311 D 315.414.2216 M 724.989.1579 Robert.Quiggle@hdrinc.com

hdrinc.com/follow-us

From: Harris, Jeffrey (DCR) [mailto:jeffrey.harris@state.ma.us]

Sent: Friday, December 20, 2019 12:33 PM

To: Quiggle, Robert < <u>Robert.Quiggle@hdrinc.com</u>> **Subject:** Lowell Heritage State Park information

Rob-

Thank you for your presentation on the Boott Hydro relicensing project on Wednesday. As a follow-up, I wanted to provide you with some additional information that may be helpful in the various studies that are planned.

The first is a 2014 Resource Management Plan for the broader complex that includes Lowell Heritage State Park. This addresses DCR ownership, recreation, and other issues within the park. The document is available here: https://www.mass.gov/service-details/lowell-great-brook-planning-unit

Secondly, our GIS team undertook a major effort a number of years ago to clarify DCR ownership of parcels within the City of Lowell. This data is currently available through Mass GIS: https://docs.digital.mass.gov/dataset/massgis-data-protected-and-recreational-openspace

Let me know if you have any questions!

Jeffrey

Jeffrey Harris, Preservation Planner

Office of Cultural Resources Department of Conservation and Recreation 251 Causeway Street - Suite 700 Boston, MA 02114

P: 617-626-4936 F: 617-626-1349

DCR's Office of Cultural Resources

Protecting the legacy and experience of history in Massachusetts state parks.

Scott, Kelsey

From: Bruins, Christine A < Christine_Bruins@nps.gov>

Sent: Friday, March 13, 2020 2:13 PM

To: Quiggle, Robert

Cc: Scott, Kelsey; Jones, Scott

Subject: Re: [EXTERNAL] Lowell Hydro Relicensing Waterborne Trash Mapping

CAUTION: [EXTERNAL] This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

The COVID 19 situation is evolving rapidly. I don't think we can realistically schedule something this month. Let's set a tentative date 30+ days out? Week of 4/20? Monday, Thursday, Friday are free.

Christine Bruins | Community Planner

Lowell National Historical Park 978.275.1726 (office) | 978.954.1011 (cell)

From: Quiggle, Robert

Sent: Friday, March 13, 2020 12:03 PM

To: Bruins, Christine A

Cc: Scott, Kelsey; Jones, Scott

Subject: [EXTERNAL] Lowell Hydro Relicensing Waterborne Trash Mapping

Christine: We are looking to schedule our waterborne trash survey and mapping, and I wanted to check in with you to see if there were any specific dates that we should target or avoid. We'd like to get the fieldwork completed before mid-April, and we'd like to meet briefly with NPS staff that may have relevant information on waterborne trash issues while we're at the project.

We can be pretty flexible in terms of scheduling the fieldwork, but just let us know what makes sense on your end.

Thanks,

Robert Quiggle, RPA

Regulatory and Environmental Section Manager

HDR

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Iffert, Kelsey

From: Iffert, Kelsey

Sent: Tuesday, May 10, 2022 9:18 AM

To: Galonska, Juliet L

Cc: Lonsway, Peter; Kevin Webb; Richard Malloy; Gibson, Jim; Cassidy, Lisa A;

pat_egan@nps.gov; michael_fernandes@nps.gov; tess_shatzer@nps.gov

Subject: RE: Lowell Hydro Project - Recreation and Aesthetics Study

Attachments: April_2022 NPS Discussion on Boat Tours.pdf; Boott Recreation and Aesthetics

Consultation 20220405.pdf

Good morning -

As a follow-up to our April conversation regarding the Recreation and Aesthetics Study Report, please find attached the meeting minutes. Over the next few weeks, it would be appreciated if NPS can provide any information or documentation deemed relevant to the NPS canal boat tours including maps, pictures, prior consultation, schedules, or canal tour manuals. Thank you,

Kelsey Scott Iffert, MS

Environmental/Regulatory Section Lead

HDR

231 Salina Meadows Parkway, Suite 210 Syracuse, NY 13212

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From: Iffert, Kelsey

Sent: Tuesday, April 5, 2022 10:09 AM

To: Galonska, Juliet L < Julie Galonska@nps.gov>

Cc: Lonsway, Peter < Peter_Lonsway@nps.gov>; Kevin Webb < kwebb@centralriverspower.com>; Richard Malloy

<RMalloy@centralriverspower.com>; Gibson, Jim <jim.gibson@hdrinc.com>

Subject: Lowell Hydro Project - Recreation and Aesthetics Study

Julie -

As detailed in the attached letter, Boott is requesting further consultation with NPS regarding the Recreation and Aesthetics Study for the Lowell Hydroelectric Project. Specifically, Boott is seeking records associated with NPS' historical and current boat tours throughout the Lowell canal system. This could include tour maps, pictures, reports, prior consultation, schedules or canal tour manuals, or other documentation deemed relevant. Boott is requesting this information by early May 2022 to incorporate into the updated Recreation and Aesthetics Study Report.

Additionally, a conference call with NPS staff that manage boat tour operations would be beneficial. I started a <u>Doodle Poll for a call on April 14/15</u>, but I recognize this may be too short of notice for the NPS. If so, can coordinate for an alternate time in later April. Looking forward to hearing from you, thank you.

Kelsey Iffert, MS

Environmental/Regulatory Section Lead

HDR

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Boott Hydropower, LLC

Subsidiary of Central Rivers Power US, LLC 670 N. Commercial Street, Suite 204 Manchester, NH 03101

Via E-Mail April 5, 2022

Superintendent Lowell National Historical Park National Park Service 67 Kirk Street Lowell, MA 01852 Julie Galonska@nps.gov

Re: Lowell Hydroelectric Project (FERC No. 2790-074); Recreation and Aesthetics Study Report Information Request

Dear Ms. Galonska:

Boott Hydropower, LLC (Boott), a subsidiary of Central Rivers Power US, LLC, is the Licensee, owner, and operator of the 20-megawatt Lowell Hydroelectric Project (Project) (FERC No. 2790). Boott operates and maintains the Project under license from the Federal Energy Regulatory Commission (FERC or Commission). The Project's existing license expires on April 30, 2023. Boott is pursuing a new license for the Project using the Commission's Integrated Licensing Process (ILP) as defined in 18 Code of Federal Regulations (C.F.R.) Part 5.

In support of Project relicensing, Boott is conducting a Recreation and Aesthetics Study. Boott filed with the Commission the Initial Recreation and Aesthetics Study Report on September 30, 2020. Commission staff's February 2, 2021 issuance found that Boott's initial study report should be updated to include a recreation access evaluation in the updated study report, including: (1) locations where recreation access should be restricted due to Project operation, property rights, dam safety, or public safety; (2) locations where recreational use of canals could be compatible with ongoing Project operation; and (3) an evaluation of the effects of Project operation on access to the Northern Canal and National Park Service (NPS) boat tours. On February 25, 2021, Boott filed an updated Recreation and Aesthetics Study Report to include this information.

In response to NPS' comments filed in December 2021, the Commission issued a *Determination on Requests for Study Modifications for the Lowell Hydroelectric Project* (2022 Study Determination) on March 1, 2022, specifically recommending the Recreation and Aesthetics Study Report be updated with the following: (1) a description of boat tour routes used by NPS (past or present) within the Northern and Pawtucket Canal system, including a description of locks or other navigational features that the tours pass through; (2) an evaluation of the effects of

Project operation on NPS boat tours in the Northern Canal; (3) an evaluation of the effects of Project operation on NPS boat tours, in relation to Boott's proposal to remove the majority of the canal system from the Project boundary; (4) an evaluation of the potential for expanding access to the canals for recreation (including NPS boat tours) in light of the results of Study 13 (Resources, Ownership, Boundaries, and Land Rights Study) and in consideration of Project operation under normal and high flow conditions (including an assessment of surge gate and shut down options); and (5) an analysis of the effects of Project operation on NPS boat tours and recreational rights, in relation to Boott's proposal to remove the majority of the canal system from the Project boundary.

In order to facilitate the timely completion of the Recreation and Aesthetics Study, Boott respectfully asks that the NPS provide any information or documentation deemed relevant to the above items specified in the 2022 Study Determination including NPS boat tour maps, pictures, prior consultation, schedules, or canal tour manuals. Boott requests this information on or before May 6, 2022. Boott also intends to coordinate a conference call with the NPS if it would assist your office in responding to this request or in identifying the types of specific information relevant to this study.

Please do not hesitate to contact me at (978) 935-6039 or kwebb@centralriverspower.com if you have any questions concerning this submittal.

Sincerely,

Boott Hydropower, LLC

Kevin M. Webb Licensing Manager

cc: R. Malloy, CRP P. Lonsway, NPS