

IN REPLY REFER TO:

United States Department of the Interior

NATIONAL PARK SERVICE Lowell National Historical Park 67 Kirk Street Lowell, Massachusetts 01852-1029

February 3, 2021

Kevin M. Webb, Licensing Manager Central Rivers Power Boott Hydropower, LLC Subsidiary of Central Rivers Power US, LLC 670 N. Commercial Street, Suite 204 Manchester, NH 03102

RE: REQUESTED INFORMATION in response to Central Rivers Power letter dated 01/20/2021 2019-2020

Lowell Hydroelectric Project (FERC No. 2790-072) Water Level and Flow Effects on Historic Resources Study

Dear Mr. Webb:

We are in receipt of your January 20, 2021 letter regarding the Lowell Hydroelectric Project (FERC No. 2790-072) Water Level and Flow Effects on Historic Resources Study and Central Rivers Powers' request for *"records of previous damage, maintenance, or repairs to structures along the Upper Pawtucket or Northern canals that have resulted from Project-related flows or water levels."*

Lowell National Historical Park reviewed your request and the historical structures located in proposed licensing area at the Northern Canal and Upper Pawtucket Canalway for adverse effects to historical structures that have resulted from the Lowell Hydroelectric Project (Project) and related flows or fluctuations in water levels and water level events.

Changes to the elevation of water or flow rates throughout the system directly affect the condition of historic resources as well as public recreational access to and within the canals. Abnormally high-water levels in the Northern Canal, for example, have caused damage to wooden structural elements of the Northern Canal Waste Gatehouse and structural undermining of the Great River Wall. A high-water backflow event in August 2018 at the Northern Canal Gatehouse (also known as Pawtucket Gatehouse) damaged existing lock chamber gates that had been secured in the closed position for safety.

The combination of high-water levels and debris movement have also resulted in impact damage at Guard Gate Complex (Francis Folly) at the upriver side of the Guard Gate Complex Sluice

Gatehouse (Guard Dam) exterior siding, windows and lower level access doorway and granite steps.

Conversely, extended drain downs and low water levels have caused damage to historic turbines and waterwheels made of wood and leather elsewhere in the system. There is also a correlation between water levels and flows and trash accumulation and vegetation growth previously documented in other sections of the canal way system.

Documented damage to Historical Structures by Water Level and Flow Effects – Pawtucket Canalway and Guard Gate Complex

Upper Pawtucket Canal – Guard Gate Complex

The 1796 Pawtucket Canal was originally built as a transportation canal to circumvent the Pawtucket Falls of the Merrimack River in Lowell, Massachusetts. The Pawtucket Canal Guard Dam was designed to protect from flooding downstream into downtown Lowell. The first 1st dam on site was constructed in 1822; replaced after 1831 flooding; and raised higher in 1848 & rebuilt 1870. The Guard Gate Sluice Gatehouse incorporates hydraulic lift system developed by Eng. J. B. Francis. It is on the National Registry of Historical Buildings (LCS # 040588), Management Category A, must be preserved and maintained.

The park operates tour boats that travel through the complex locks as part of their presentation of the canal history, making the preservation, operation and interpretation of the complex essential to the operation of the park and integral to the cultural landscape of the Pawtucket Canalway.

High river water events and debris impacting the Guard Gate Sluice Gatehouse (Guard Dam) have caused damage to the upriver clapboard siding, mid-level windows and lower level access doorway and resulting in washout of existing granite steps. The Park is in the process of obtaining funding to perform a pre-design scoping report to be used in the preparation of contract documents for repairs and rehabilitation to the Guard Gate Sluice Gatehouse and the Lock House Gates and Lock Chamber.

The following supporting documents identifying areas of adverse effects are being transmitted for CRP's information and use:

- A. Guard Gate Complex, "Binder1 Francis Gate HAER Documents.pdf"
- B. Guard Gate Complex, "Guard Gate Sluice Gatehouse EX Photos.pdf"

Documented damage to Historical Structures by Water Level and Flow Effects – Northern Canal and Northern Canal Guard Gate and Northern Canal Waste Gate and Great Wall

Northern Canal Guard Gate Complex

The Northern Canal Guard Gate Complex is a multi-component site, parts of which, in one form or another, have been continuously operating or in place since 1792. This site contains the guard sluice gates, their brick gate house, and a navigation lock, all part of the northern canal construction project of 1846-1847. The ten sluice gates were operated by a mechanical system that consisted of a turbine located in a chamber beneath the deck of the School Street Bridge. The complex serves as the entrance to the Northern Canal from the Merrimack River for water

flow to the Project and in prior years for NPS interpretative and educational boat tours. The Guard Gatehouse contains Chief Eng. J. B. Francis' control system: inward-flow turbine worked 20 large hoisting screws to raise/lower sluice gates in 1848. The turbine is still in place under the bridge, but the gates now operate electrically.

It is on the National Registry of Historical Buildings (LCS #040593), Management Category A, must be preserved and maintained for its significance with industrial history.

The lock chamber gates were secured in place in the years leading up to a significant backflow water event, that pushed waters down the Northern Canal from the Project towards the Guard Gate Lock Chamber gates in August 2018 that resulted in damage to the gate ends where they overlap and preserve a water seal to the lock chamber. Since that event, the gates had been chained to secure and limit movement, but the seal was not intact due to timber damage. In Fall 2020, in coordination with NPS, the gates were removed to an off-site location for repairs and rehabilitation by CRP. CRP also removed a sunken barge and debris from the upriver side of the complex.

Historical gate construction document drawings were provided to CRP for repair and rehabilitation work on the gates. NPS continues to provide consultation to CRP, and their contractor, as the repairs and rehabilitation work progresses.

The following supporting documents identifying areas of adverse effects are being transmitted for CRP's information and use:

- A. Northern Canal Guard Gate, "Binder1-Pawtucket Gatehouse gate drawings 1.pdf"
- B. Northern Canal Guard Gate, "Binder1-Pawtucket Gatehouse gate drawings 2.pdf"
- C. Northern Canal Guard Gate, "Binder1-Pawtucket Gatehouse gate drawings 3.pdf"
- D. Northern Canal Guard Gate, "Binder1-Northern Canal Lock Gates EX Photos Fall 2020.pd

Northern Canal Waste Gate Gatehouse and Great Wall

The Northern Canal Waste Gate Gatehouse consists of a single-story, heavy-timber-framed building that measures approximately 70' by 15' in plan. The building was built circa 1872 atop a dam that was built circa 1847 and houses the canal gates, including the machinery that operates the Gatehouse gates. The Gatehouse straddles the top of the Great Wall. It is on the National Registry of Historical Buildings (LCS # 40602), Management Category A, must be preserved and maintained for its significance with industrial history.

This Gatehouse site, "which comprises the downstream end of the Great River Wall, originally included four waste gates and their manually powered operating machinery, along with a waste weir divided into multiple bays by cast iron standards. These works were completed in 1847 as part of the Great River Wall project. Major modification took place in 1872 when one of the scouring holes was converted into a wheel pit where a turbine was installed to power mechanical gate operating equipment which was added atop the original manually operated mechanisms. At the same time, a flat roofed heavy timber framed building was erected over the waste gates, and a hip roofed light timber framed building was built over the waste weir."

In 2017, NPS retained an architecture and engineering team from EYP, Inc. to perform a historic structure pre-design scoping report in order to prepare repair and rehabilitation contract documents for extensive damage to structural carrying timbers and foundation caused by years of high-water levels in the Northern Canalway that have undermined the timber carrying beams

through rot and also timber horizontal bending due to high water loading estimated as a condition occurring early 1990's up to installation of river bladder dam structure). EYP, Inc. developed a complete set of drawings and specifications and a Class-A government estimate of construction costs to repair the Gatehouse structure.

The following supporting documents identifying areas of adverse effects are being transmitted for CRP's information and use:

- A. Northern Canal Waste Gate Gatehouse EX Photos, (FOLDER W/ field photographs from 2017).
- B. Northern Canal Waste Gate Gatehouse, "NPS LOWE Northern Canal Waste Gatehouse Project Scoping Report 2017.pdf"
- C. Northern Canal Waste Gate Gatehouse, Construction Documents, NPS;
 - 1. "NCWG-2018-06-28 100% drawings.pdf"
 - 2. "NCWG-2018-06-28 100% specifications.pdf"
 - 3. "NPS Lowell Northern Canal Waste Gatehouse Class A Estimate 20180202.pdf"

The Study Summary for the Water Level and Flow Effects on Historic Resources states that the scope for study will include review of existing architectural and engineering documentation of the condition of the Great River Wall and various other historic structures. NPS has not studied the cumulative, long-term and potentially adverse effects of operating higher water levels and flows than the 1847 system was designed for in relation to the structural integrity of the Great River Wall. The details for this concern were filed in the April 9, 2020 NPS Comments on the Initial Study Report. In the study request and following filings, NPS requested a condition assessment of the Great River Wall by a structural engineer to understand the Project affects on the historic resource.

The Park also previously requested that future water levels and flows as a result of reasonably foreseeable changes to the Project operation, such as decommissioning certain facilities or modifying operations for fish passage, be evaluated for impacts to historic resources. These Project changes have not been evaluated by NPS and therefore, we do not have records to share out, but would like to see an evaluation in the study report.

On behalf of the Lowell National Historical Park, I would like to thank you for requesting the additional information that will assist in Central Rivers Powers' development of the Water Level and Flow Effects on Historic Resources Study section of the relicensing report.

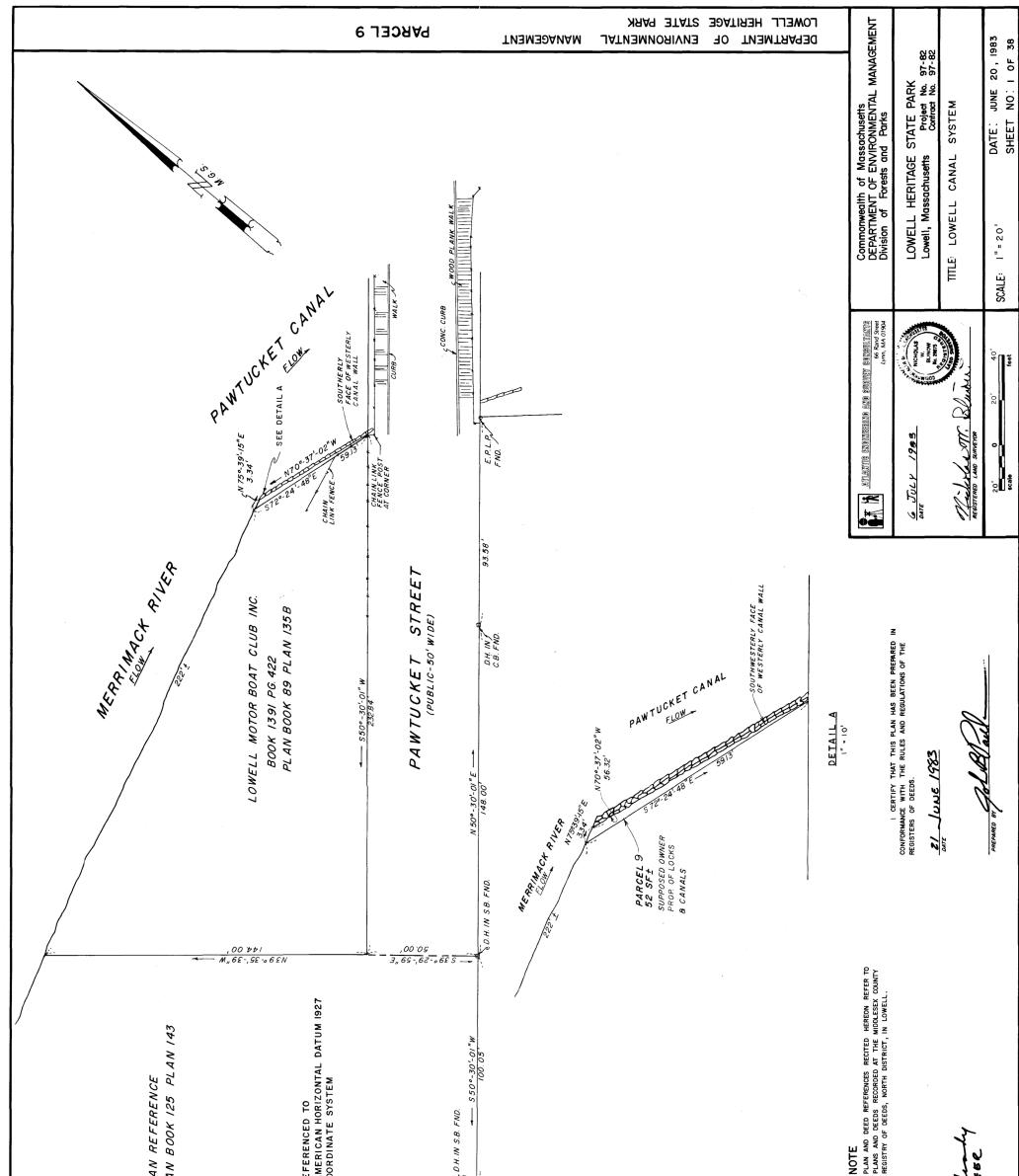
If you have any questions on the provided information, please contact David Michael Lieb, Historical Architect at (978) 423-6185.

Sincerely,

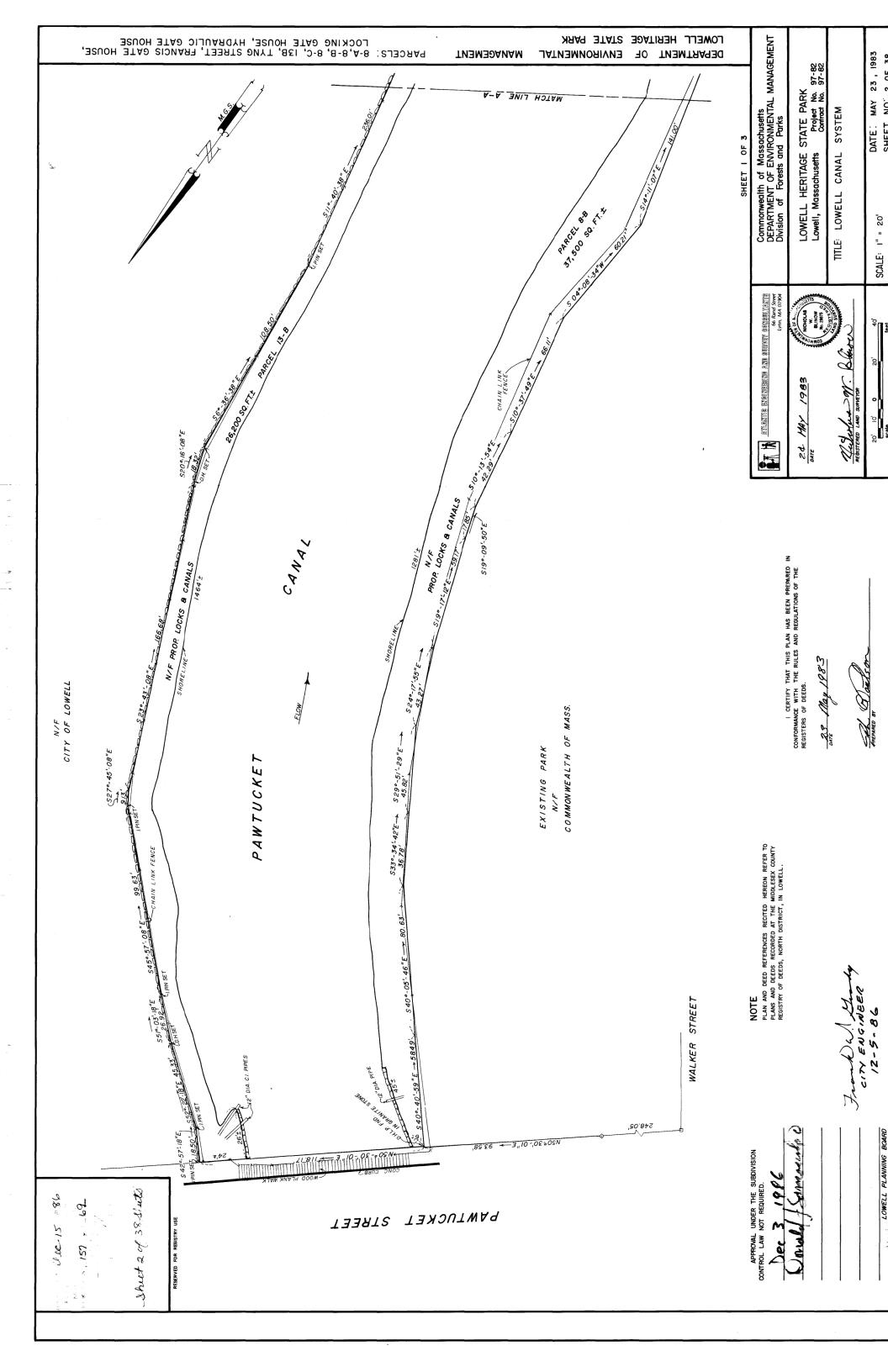
Celeste Bernardo

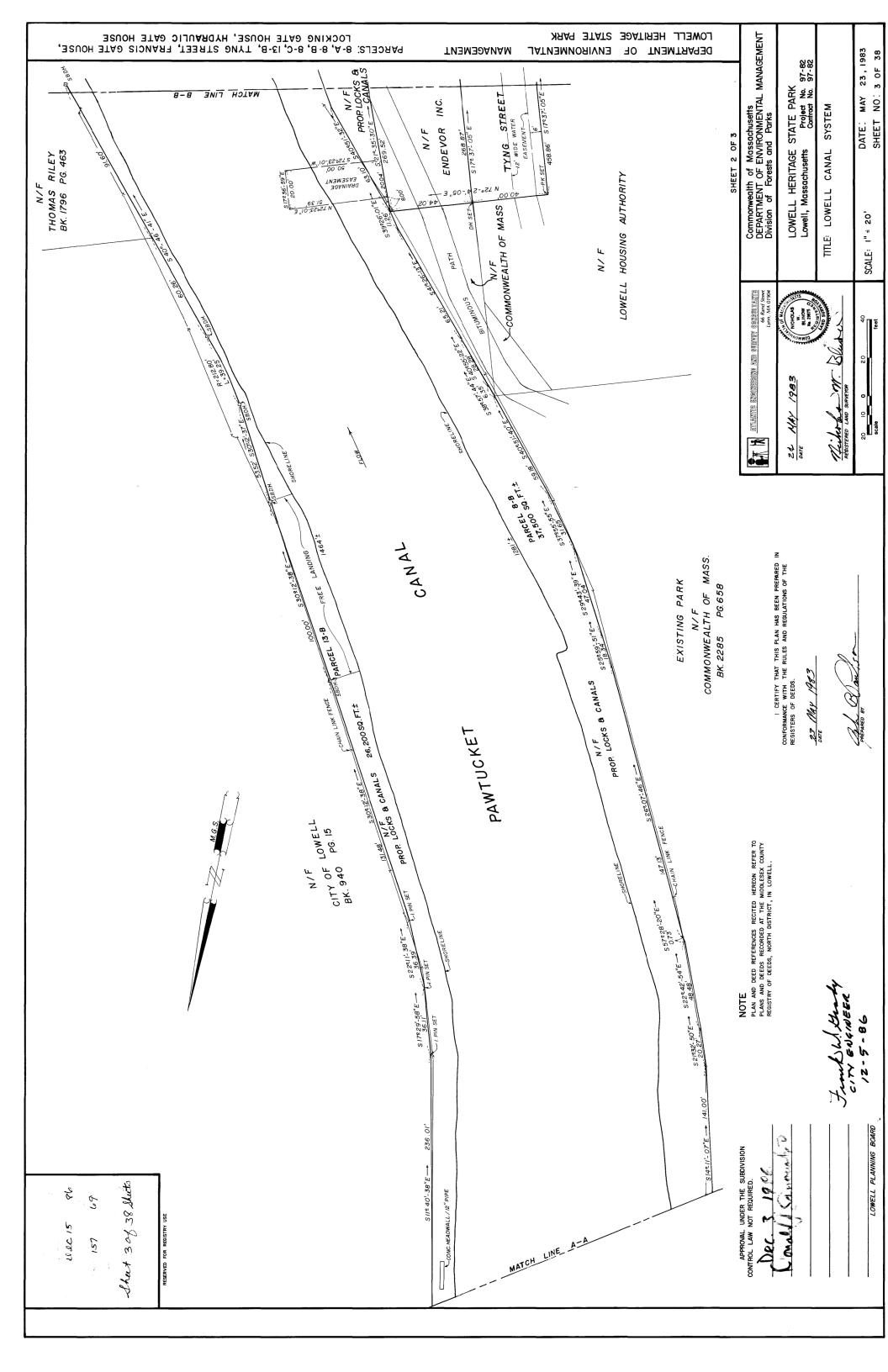
Celeste Bernardo, Superintendent

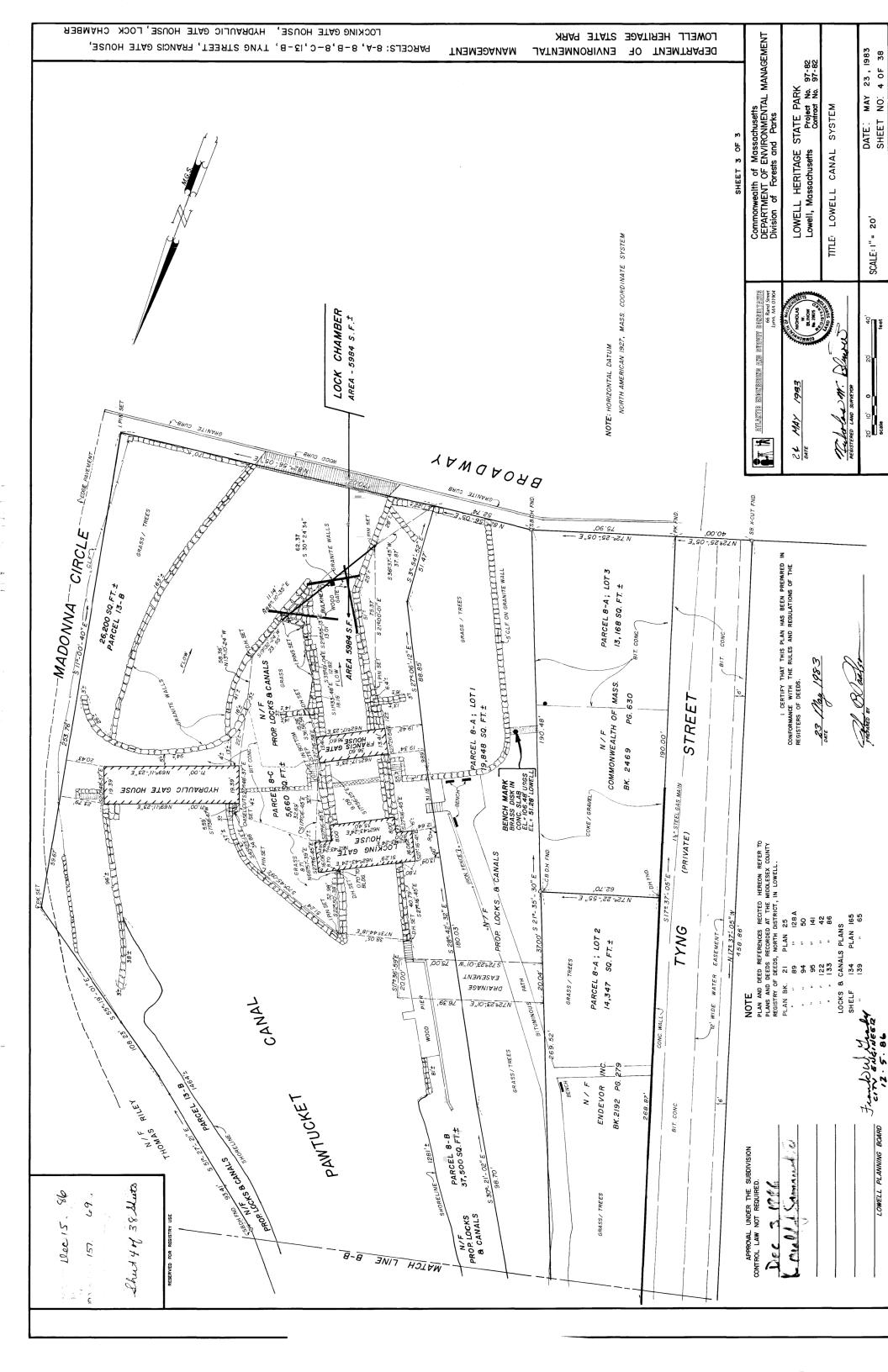
cc: FERC, Secretary (e-filed)
NPS, Brian Strack (via email)
NPS, Jonathan Meade (via email)
NPS, Kevin Mendik (via email)
NPS, Duncan Hay (via email)
NPS, Christine Bruins (via email)
NPS, David Uschold (via email)
DOI, Andrew Tittler (via email)
USFWS, Kenneth Hogan (via email)
MHC/SHPO, Brona Simon (via mail)
DCR, Tom Walsh (via email)
City of Lowell, Eileen Donoghue (via email)

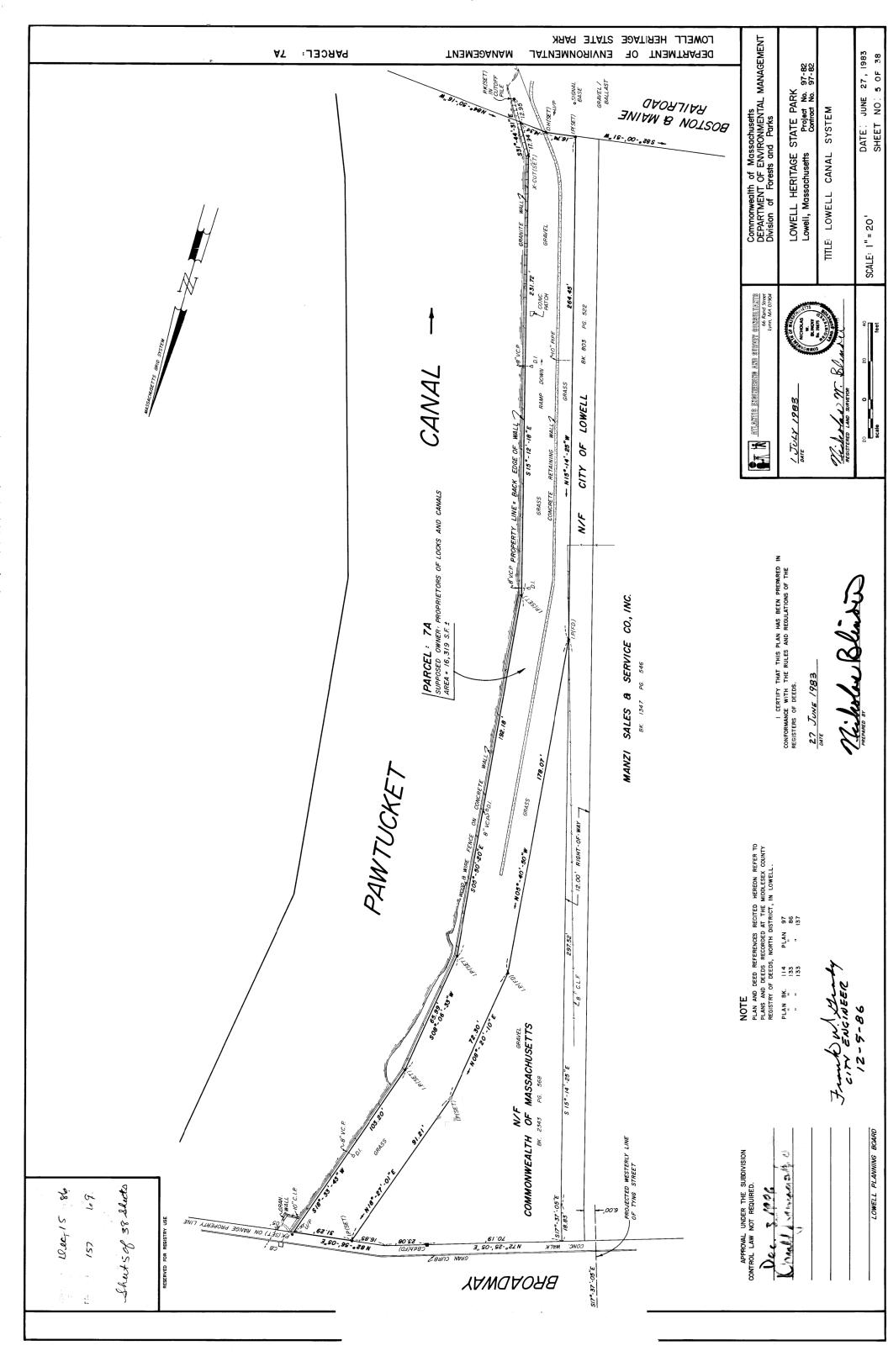


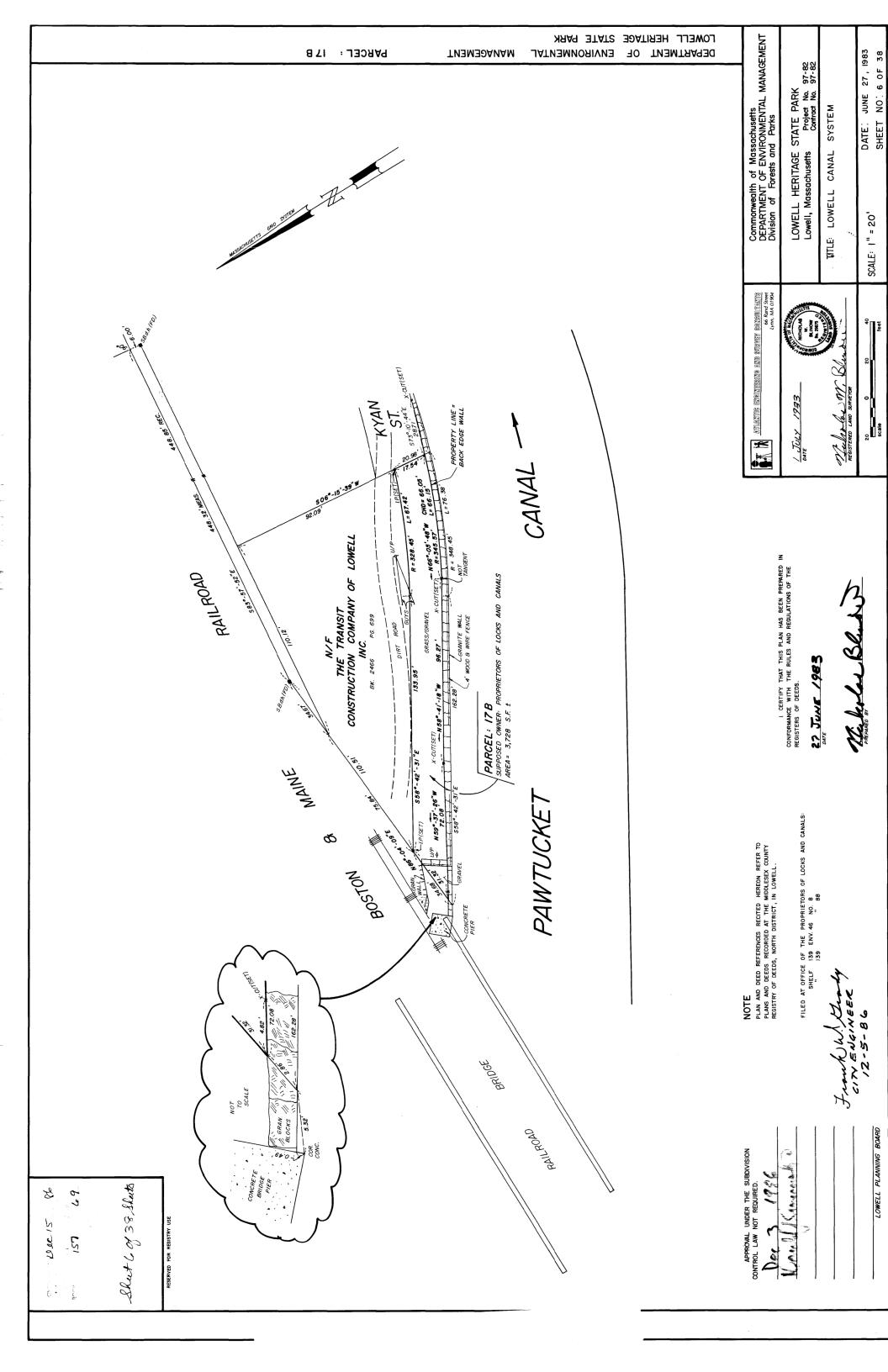
PL AN	NOTE: PLAN REFE NORTH AME MASS. COOR	LS MATKEN		Frenk W. M. H.
Norwin with LLC 15 86 Nor 31 Ray 157 11 19 LLLL 1 05 38 Sheets RESERVED FOR REDSTRY USE			APPROVAL UNDER THE SUBDIVISION CONTROL LAW NOT REQUIRED.	COMELL PLANNING BOARD
		· · · · · · · · · · · · · · · · · · ·	••••••••••••••••••••••••••••••••••••••	

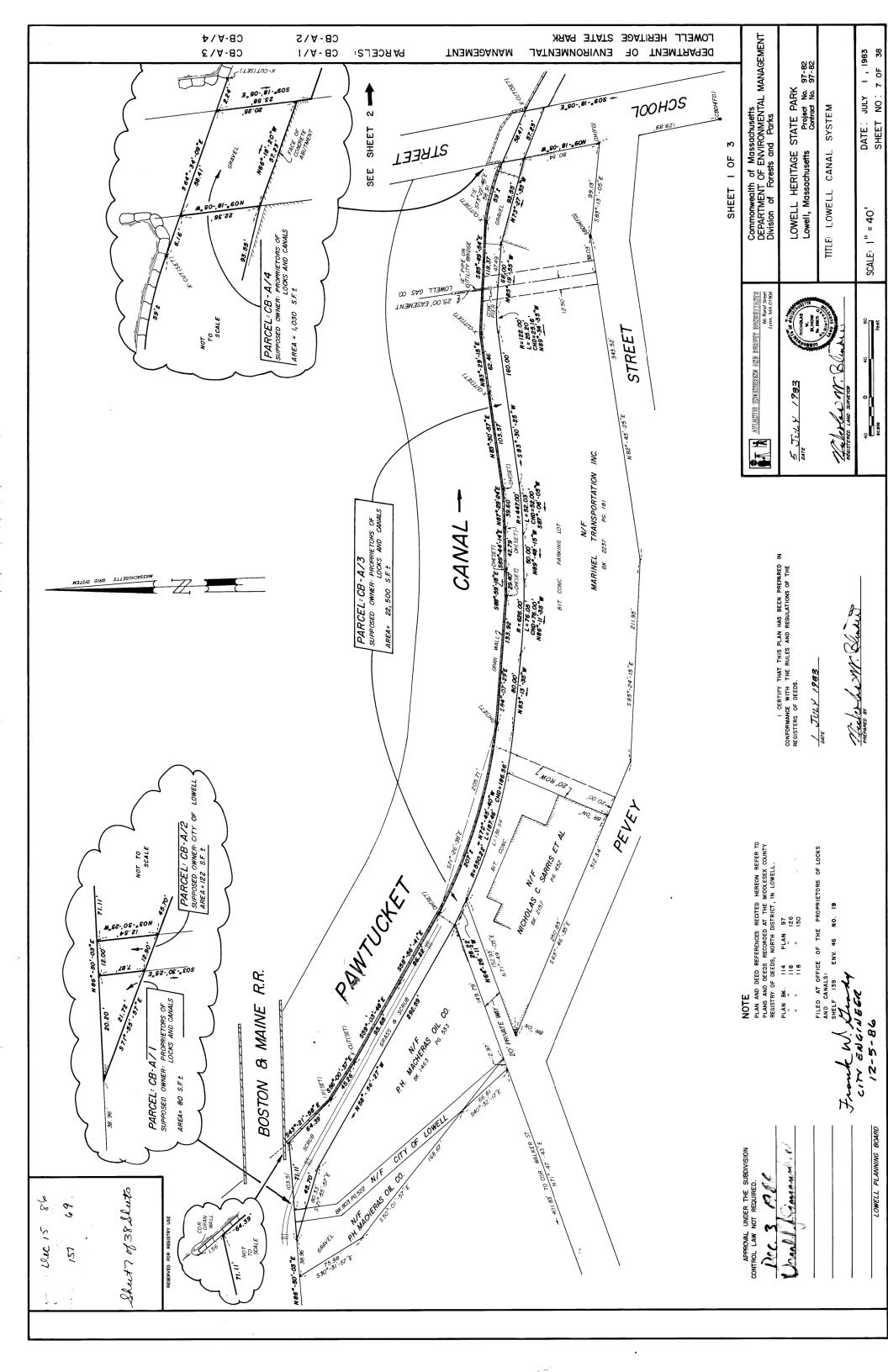


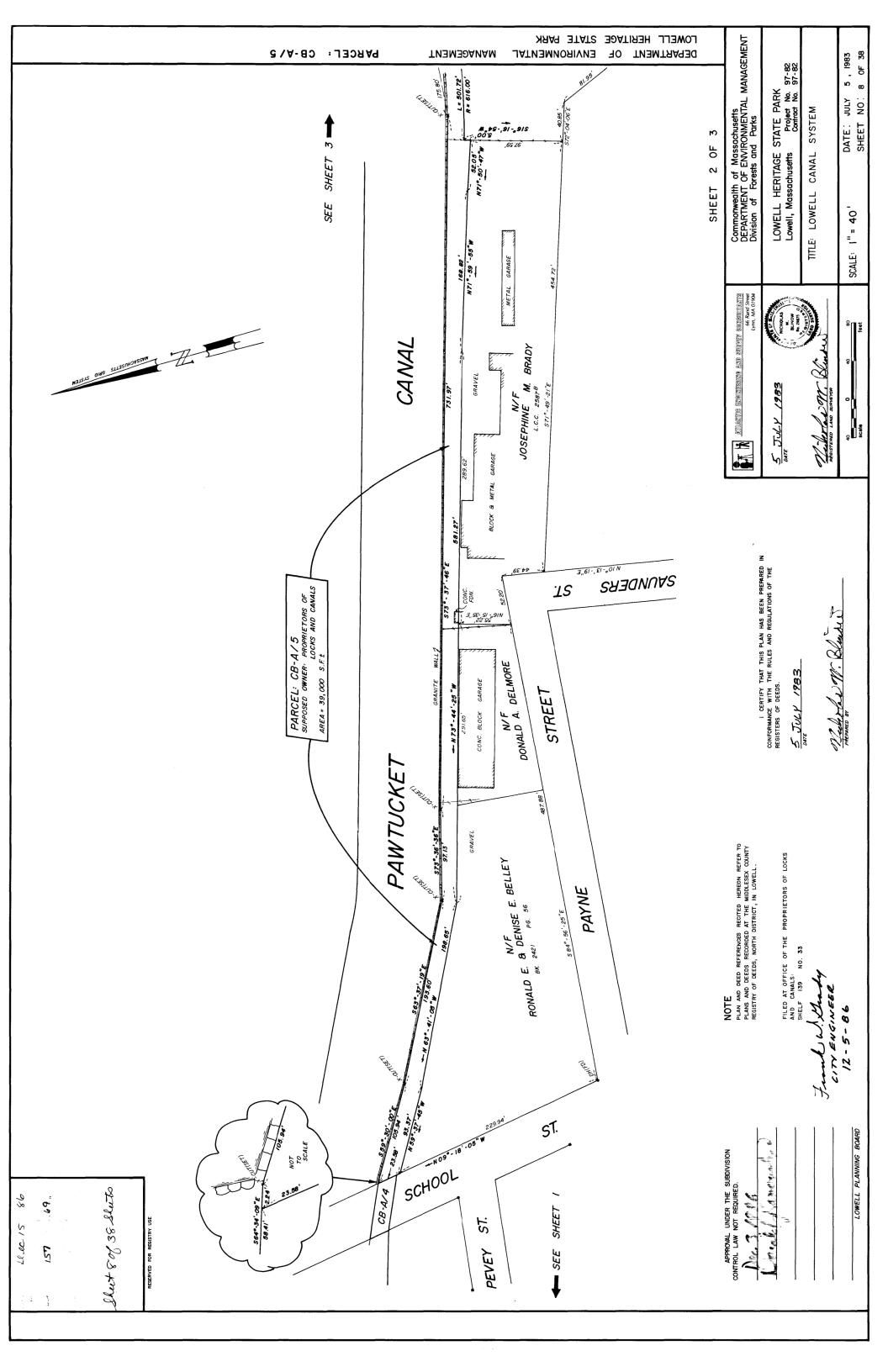


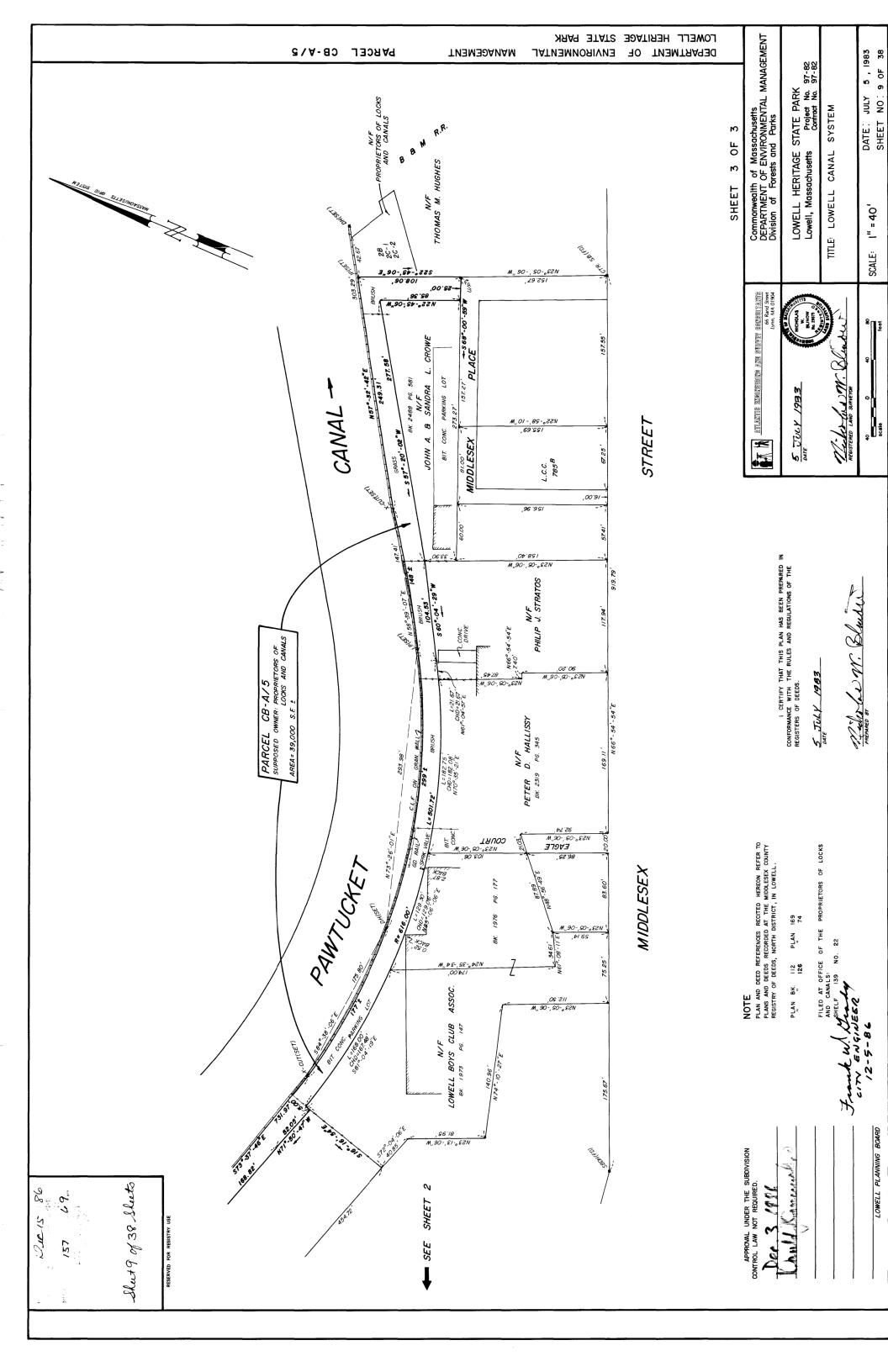




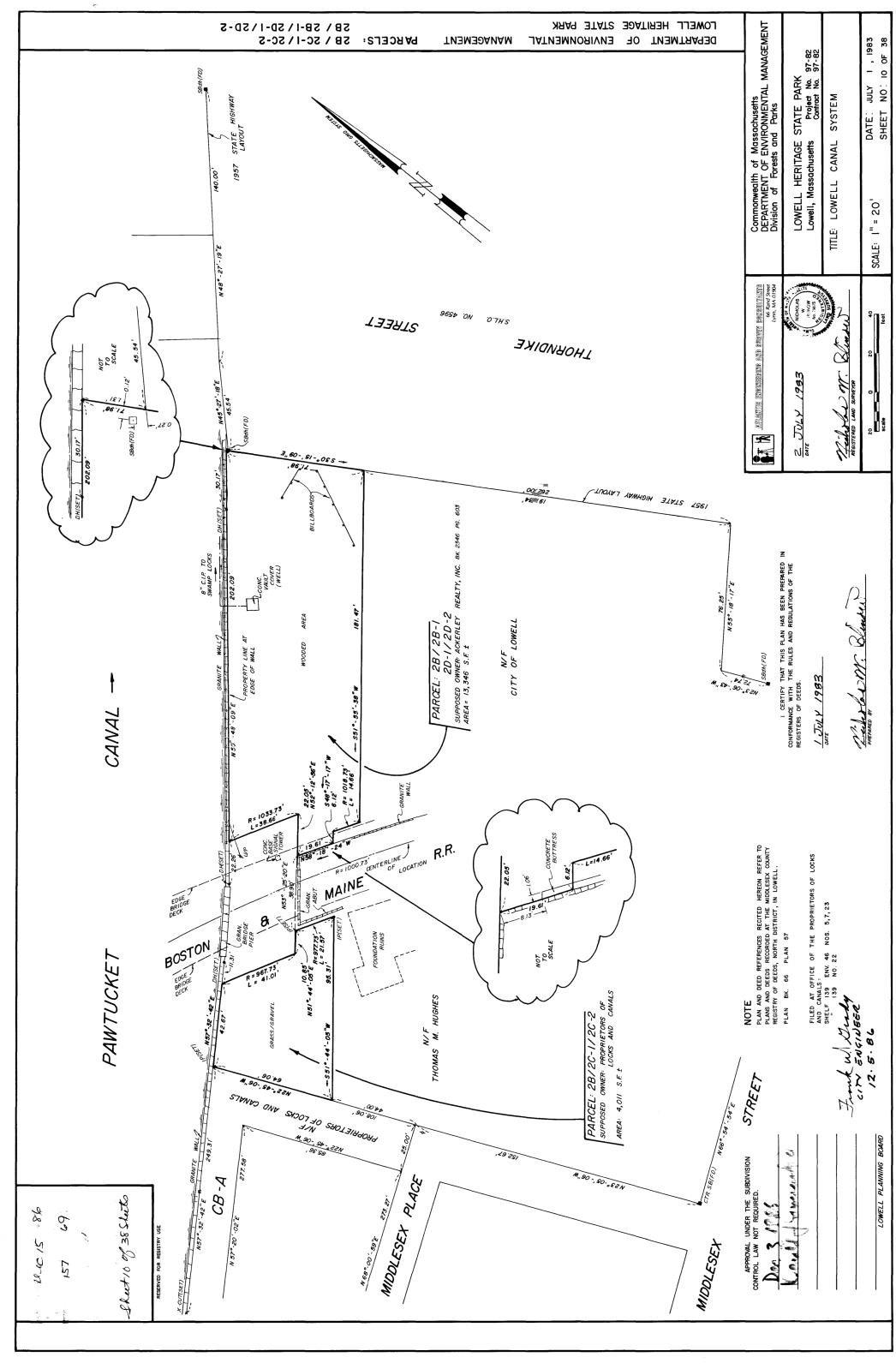


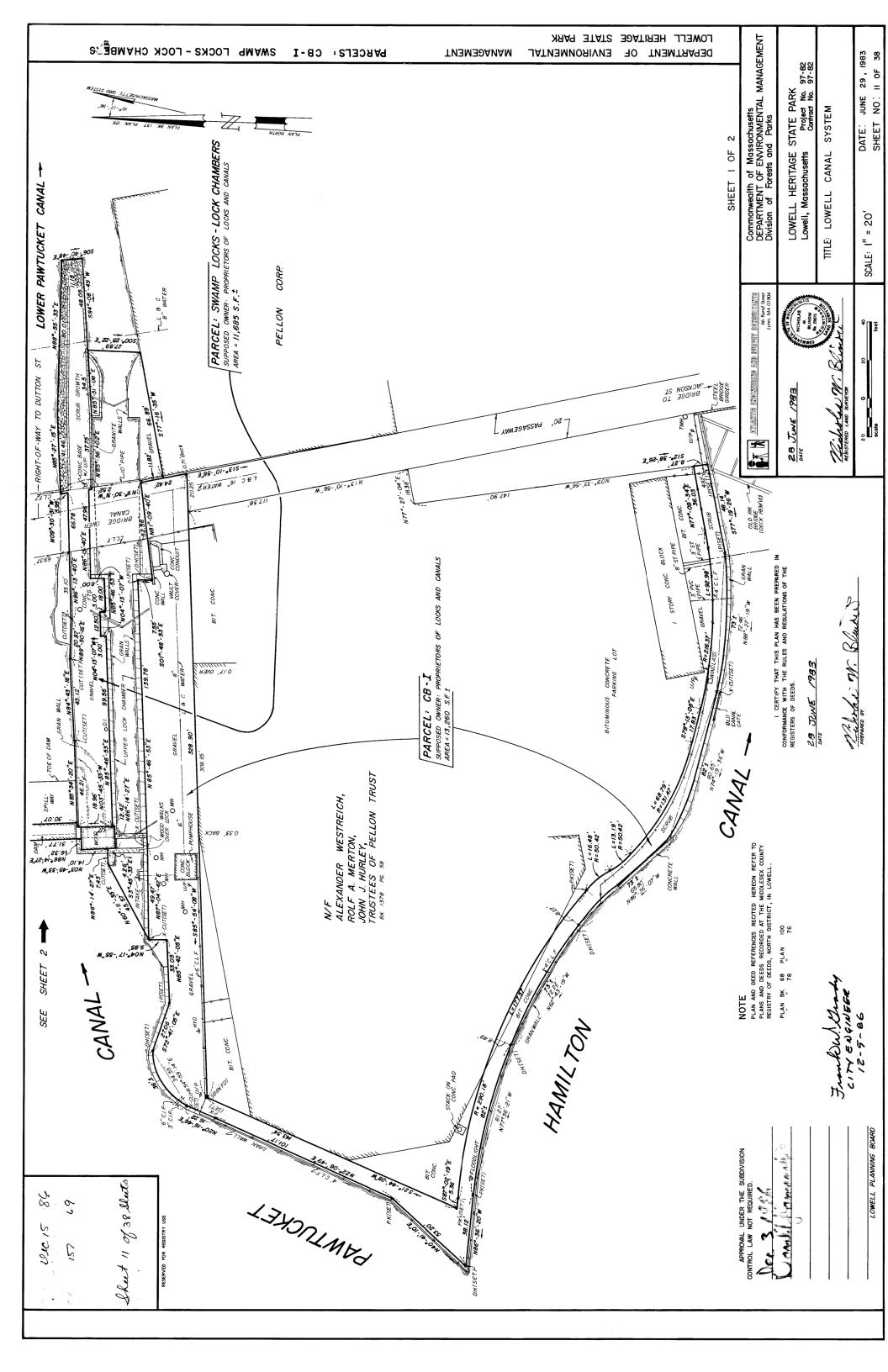


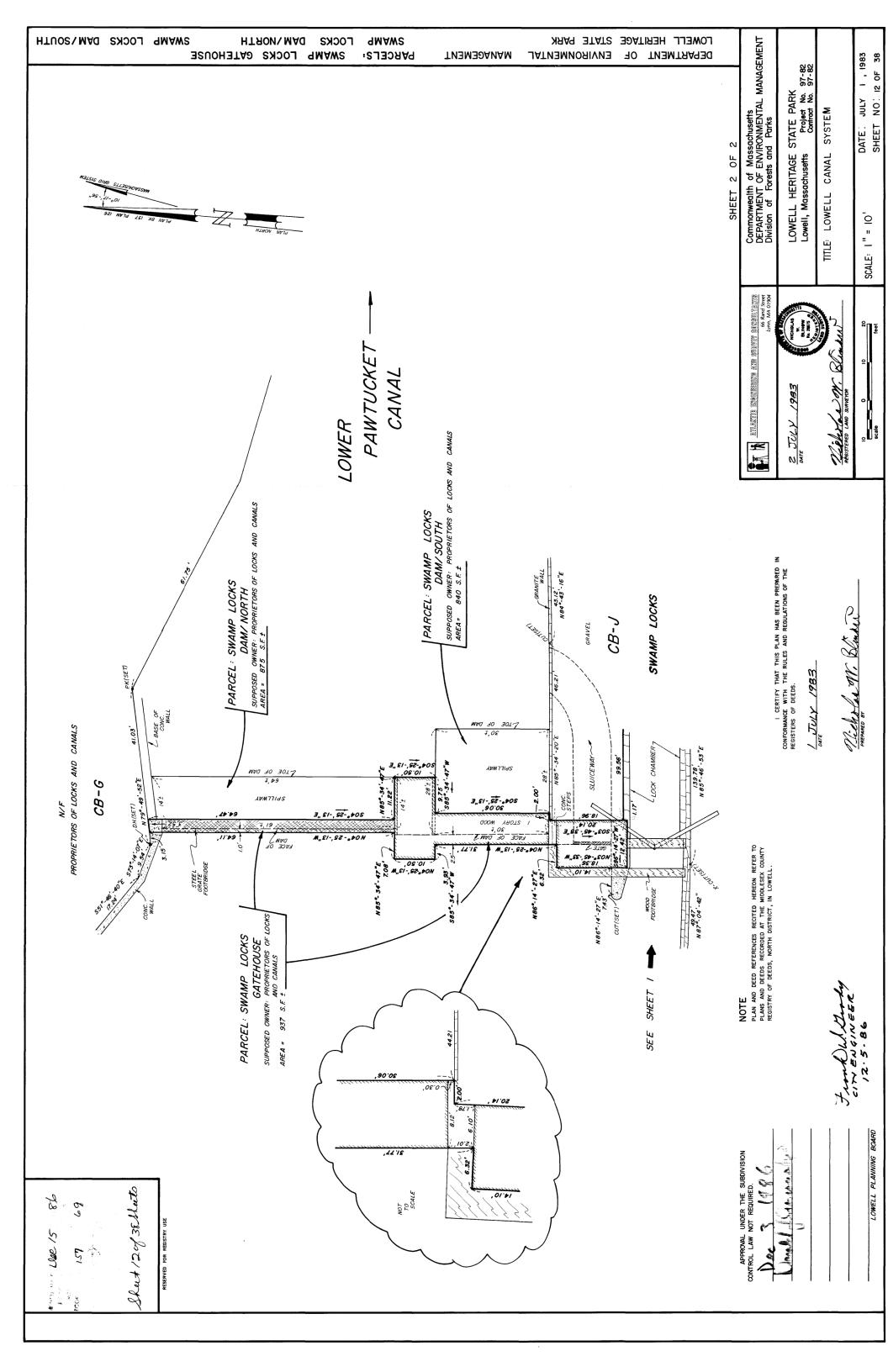


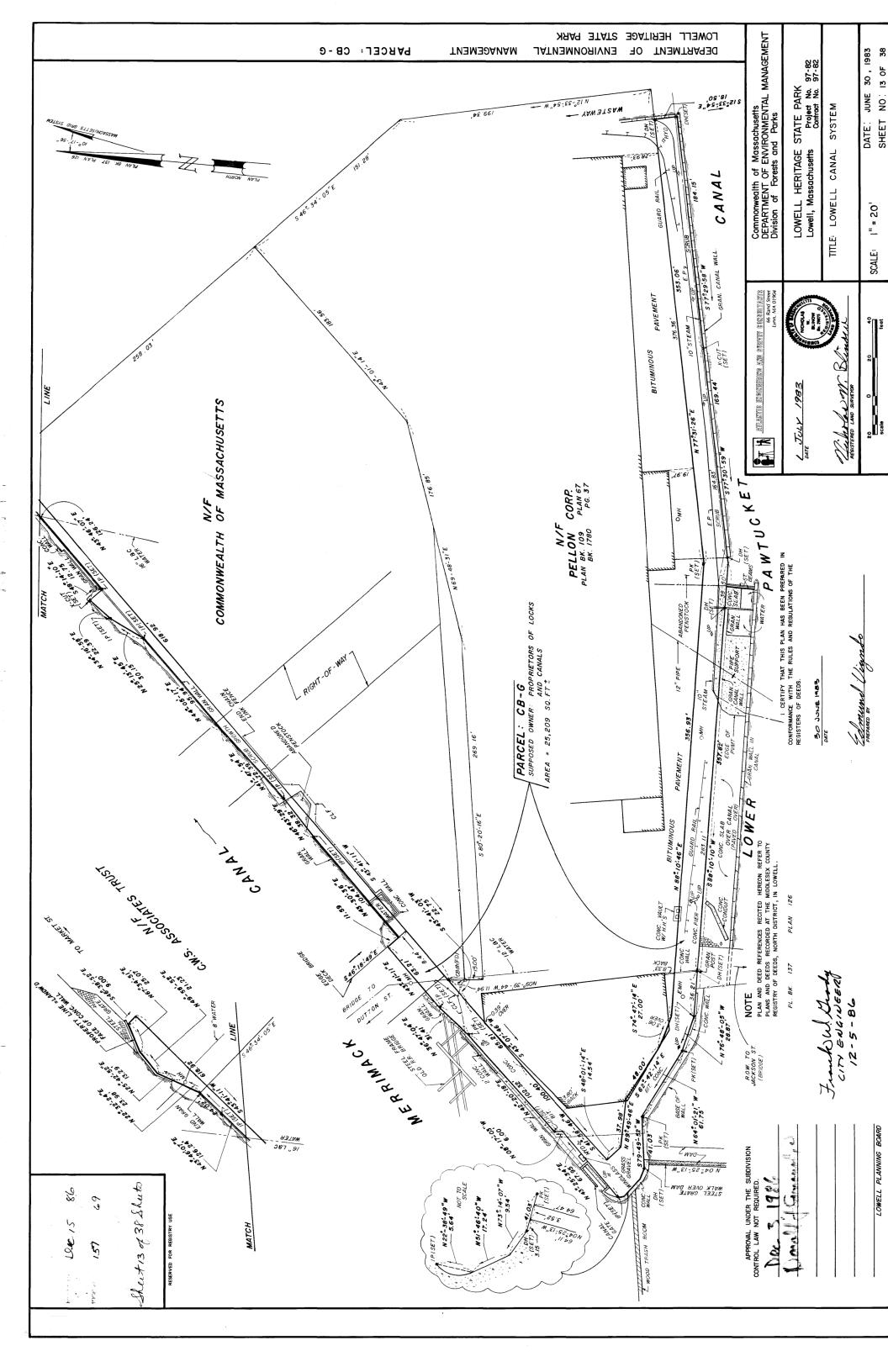


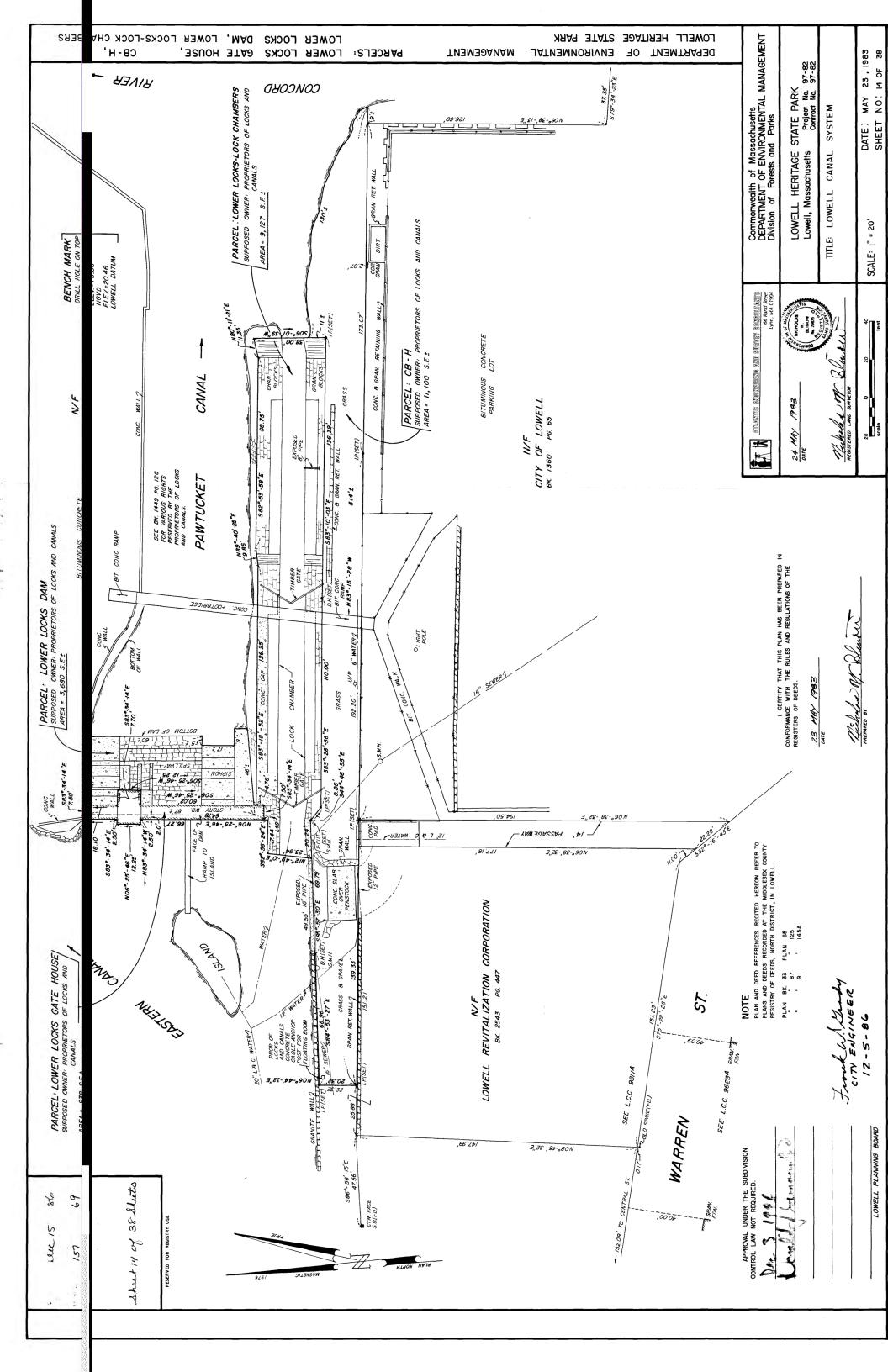


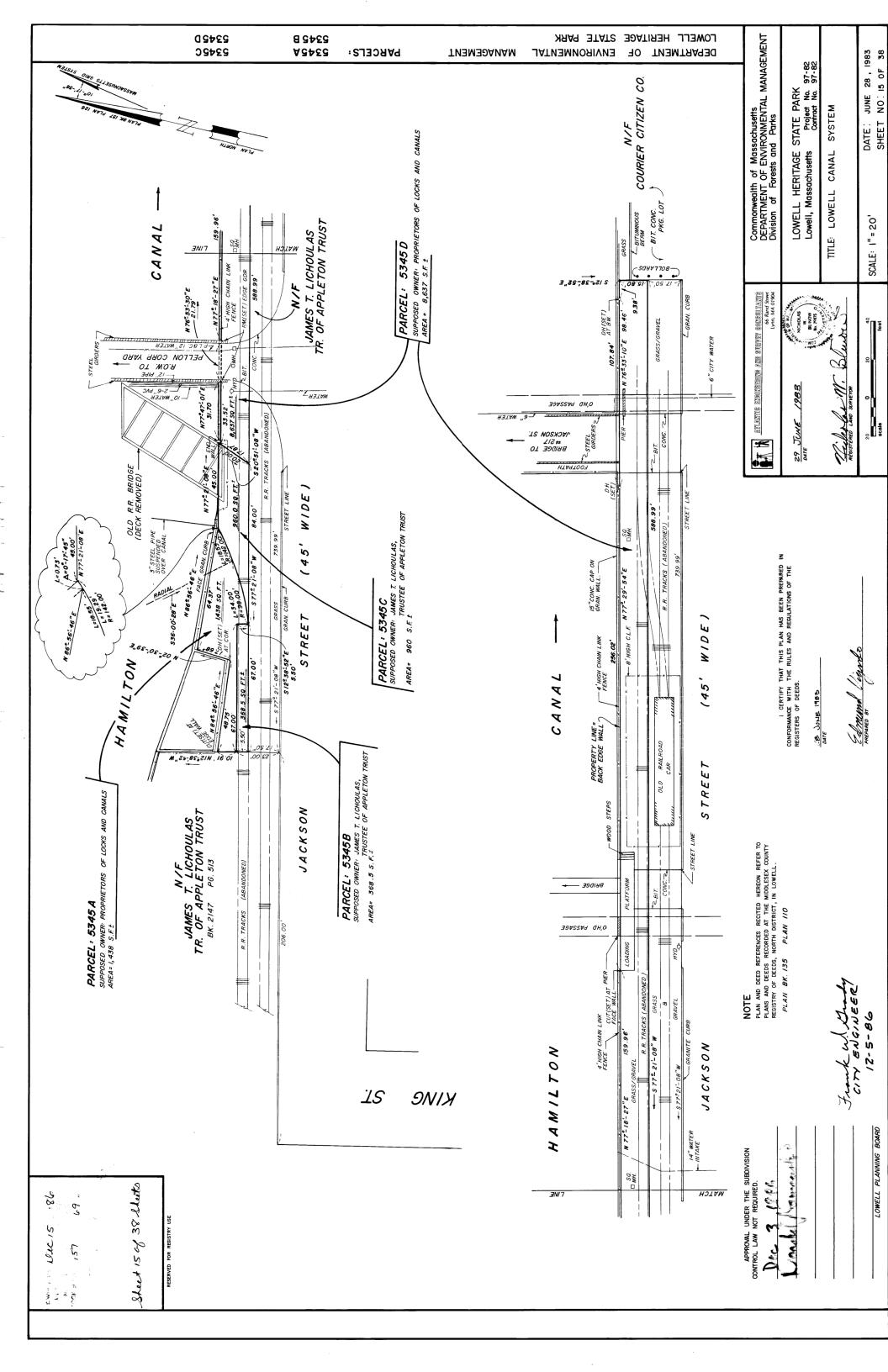


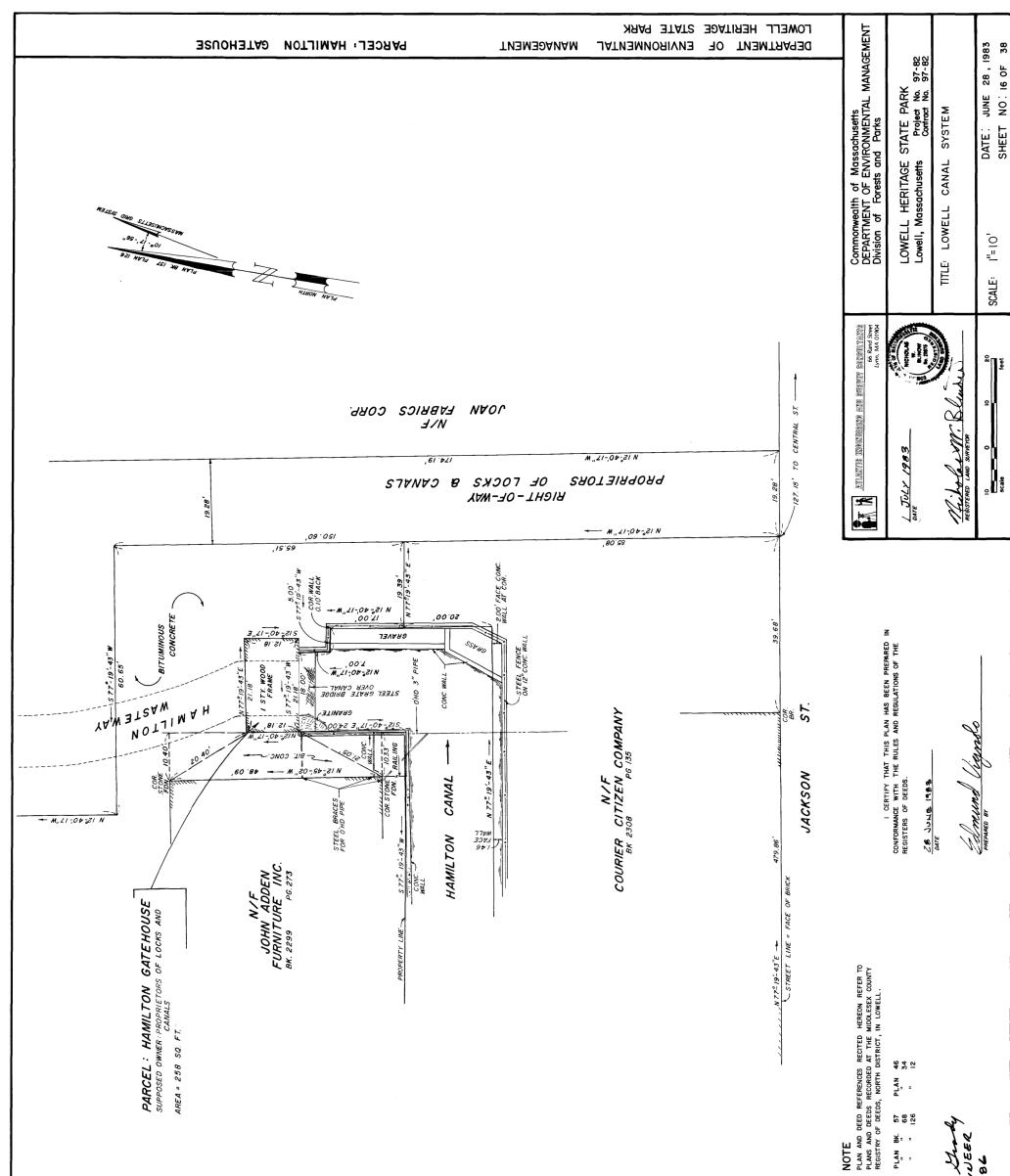




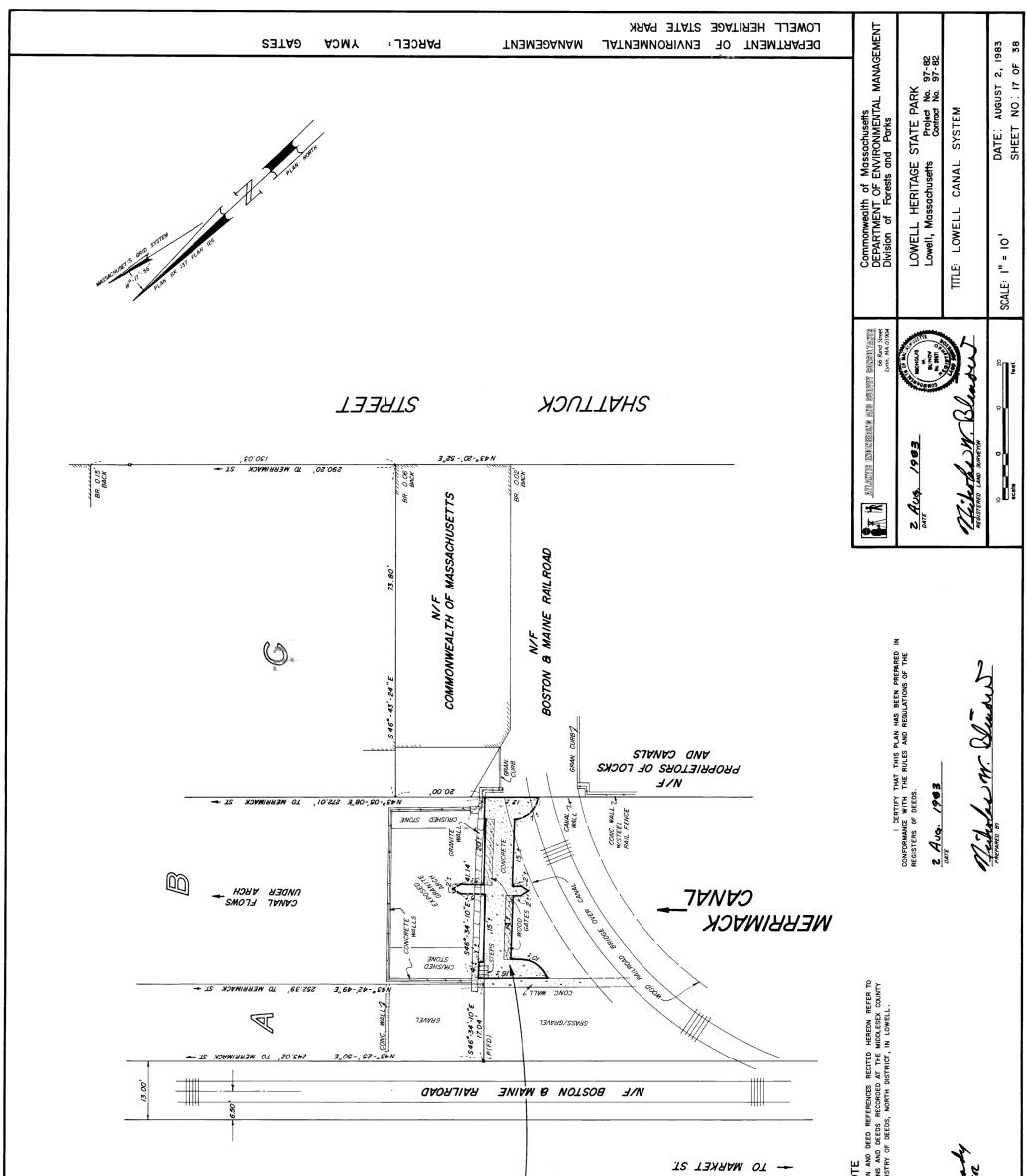




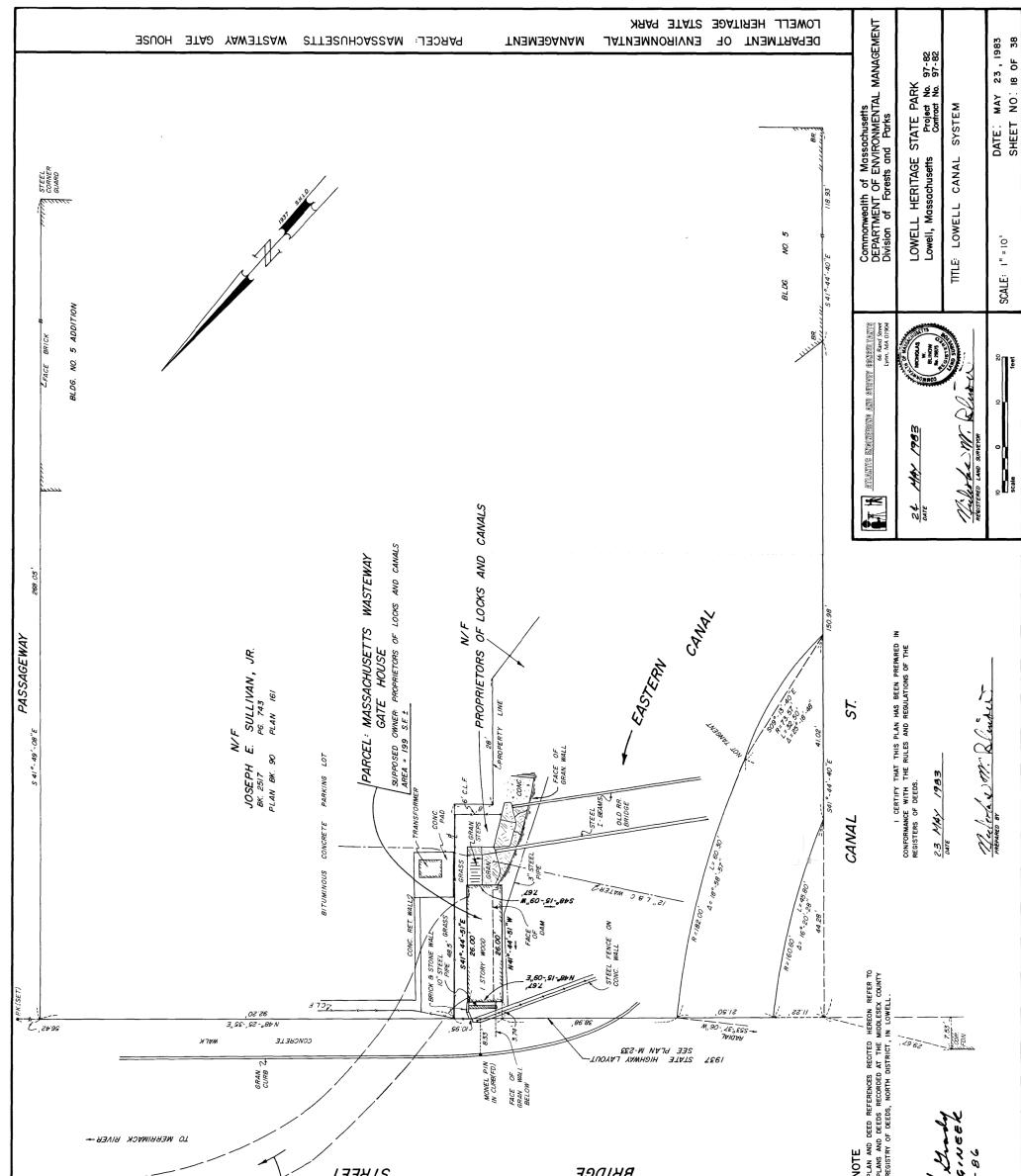




Junk (1) Jun CIX EDGIDE LOWELL PLANNING BOARD and the second and the line APPROVAL UNDER THE SUBDIVISION CONTROL LAW NOT REQUIRED. Dec 3 1966 HOWEN WE LICE IS IN 86 997 NOT NO 2010 NOT 100 Sheet 16 of 38 Sheets RESERVED FOR REGISTRY USE Service and the service of the servi

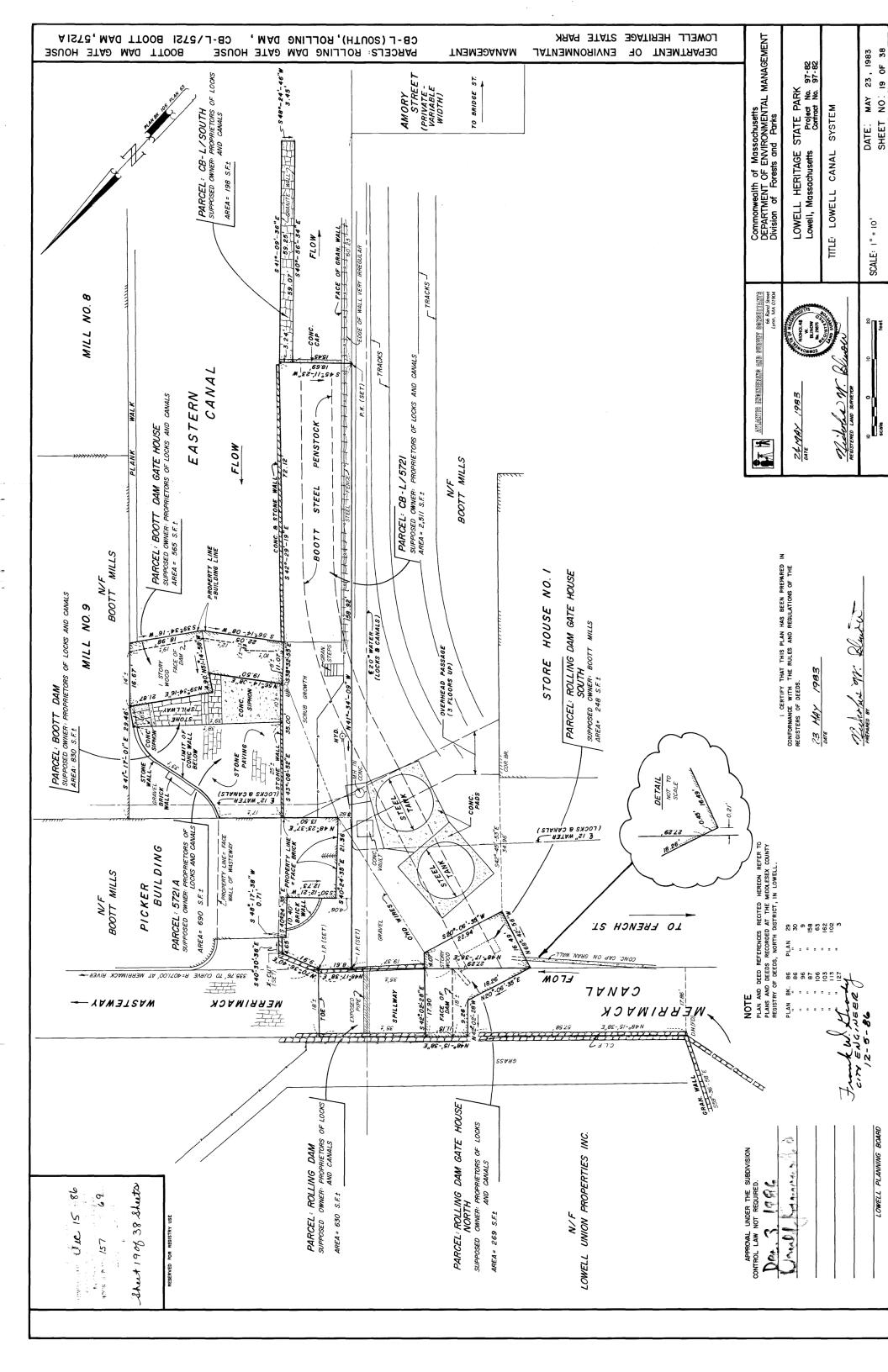


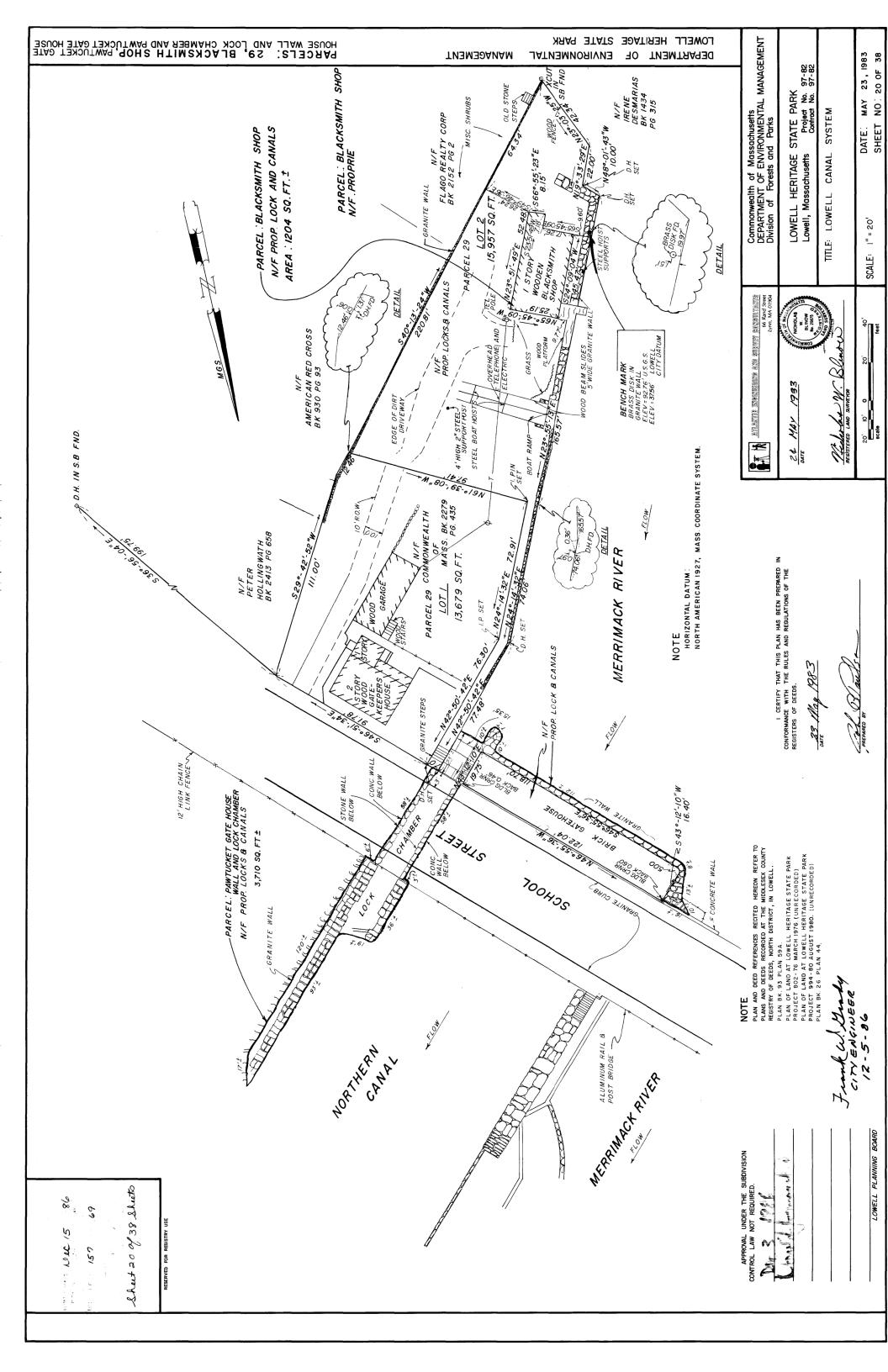
Fronk W. Ma PLAN PLAN PLANS REGIS TAARE NOLLNO 12-5-86 PARCEL: Y.M.C.A. GATES SUPPOSED OWNER: PROPRIETORS OF LOCKS AREA = 300 S.F.± LOWELL PLANNING BOARD Ċ APPROVAL UNDER THE SUBDIVISION CONTROL LAW NOT REQUIRED. Set any the cardy Here Lie 15 86 Sheet 17 of 38 Sheets 196 69 USE RESERVED FOR REGISTRY Dac 3. MAR # 157

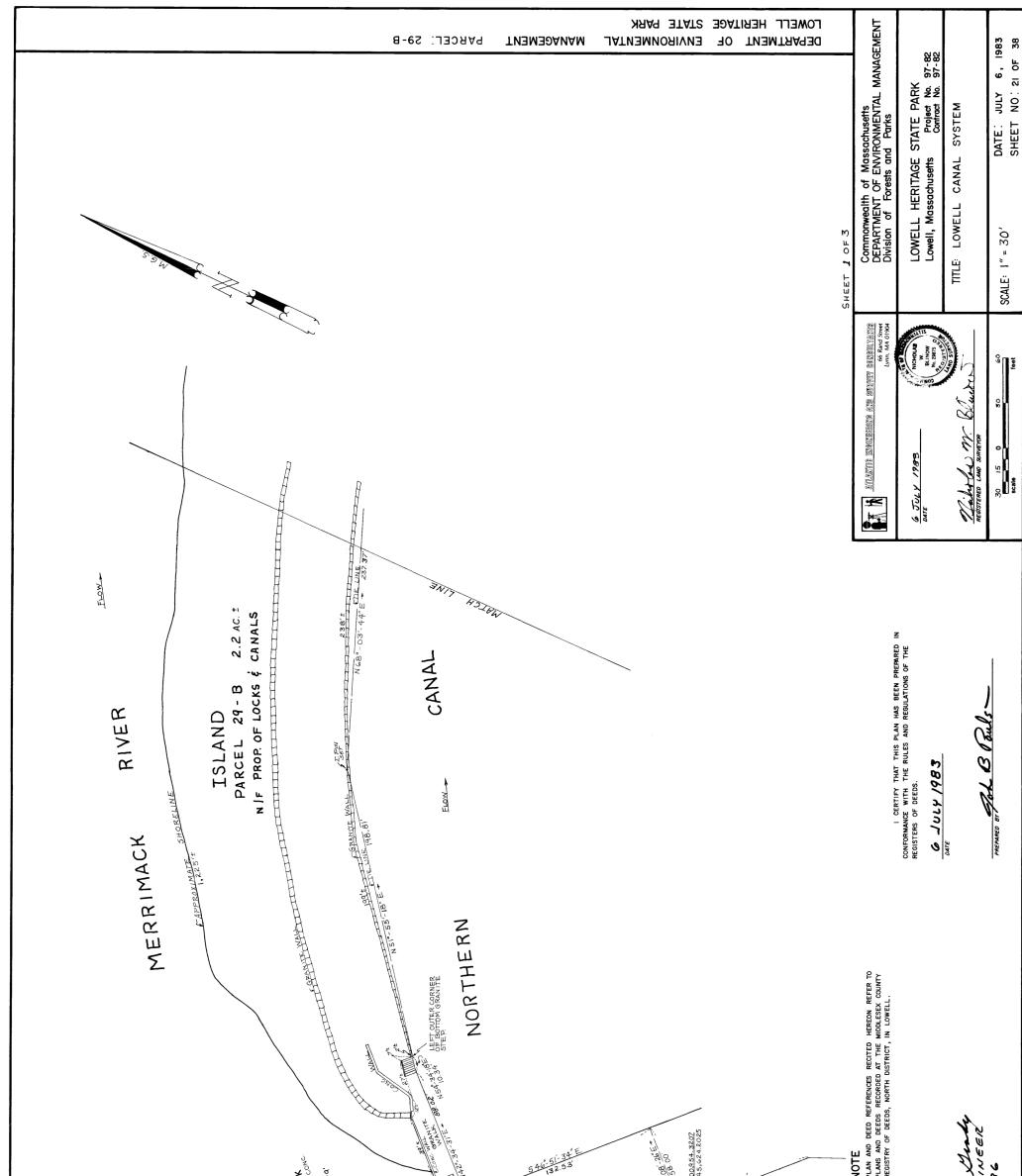


	MASSACHUSETTS WASSEMAY WASSEMAY STREET	39018 8	NON PLANK L
Active the Land 15 86 Active to 157 69 Start 18 of 38-21 at	SK.		APPROVAL UNDER THE SUBDIVISION CONTROL LAW NOT REQUIRED.
			· · · · · · · · · · · · · · · · ·

LOWELL PLANNING BOARD







	ET SCHOOL STREET	BULL CONTRACTOR CONTRA	French un M
Sheet 21 of 38 Sheets REENED FOR REDISTRY USE		APROML UNDER THE SUBDIVISION CONTROL LAW NOT REQUIRED.	TA TIEMOT