



## Connecticut River Conservancy

*Clean water. Healthy habitat. Thriving communities.*

15 Bank Row, Greenfield, MA 01301  
413.772.2020 · [www.ctriver.org](http://www.ctriver.org)

June 20, 2017

Low Impact Hydropower Institute  
PO Box 194  
Harrington Park, NJ 07640

Re: LIHI Project #88 – Collins Hydroelectric Project FERC P-6544

Dear LIHI,

The Connecticut River Conservancy (CRC) submits the following comments on the evaluation of the Collins Hydroelectric Project's (Collins) adherence to LIHI's certification criteria. CRC is the principal nonprofit environmental advocate for protection, restoration, and sustainable use of the Connecticut River watershed. The Chicopee River is a major tributary of the Connecticut River, and we therefore take interest in this re-certification.

We support the construction of a paddler's portage trail around the Collins dam as recommended by our partner, the Chicopee 4Rivers Watershed Council. We agree the Collins dam ought to address the increase in small craft activity on the Chicopee River by building a path for paddlers to carry their canoes and kayaks around the dam. This recommendation for action fits with LIHI certification guidelines, which state directly that facilities accommodate recreational activities on its lands and waters. LIHI requests that facilities be responsive to recreational group interest for access. Creating this portage trail represents a straightforward way, without major construction, to enable a growing number of paddlers to enjoy a longer stretch of river.

The Collins "Recreational Needs Assessment Consultation Report" dated 2013 and filed with FERC listed several "Action Items" that they said they will undertake. These included a commitment to improve the pathway of the informal portage around the dam and to install signage to direct people on the safe route around the dam. CRC believes that the interest in a portage trail is a new issue of concern that was not thoroughly considered in the first round of LIHI certification. CRC recommends that LIHI not approve of re-certification until portage is addressed around this dam.

CRC appreciates the opportunity to provide comments. I can be reached at [adonlon@ctriver.org](mailto:adonlon@ctriver.org) or (413) 772-2020 x.205.

Sincerely,

Andrea F. Donlon  
River Steward

Cc: Keith Davies, Chicopee 4Rivers

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