



Appalachian Mountain Club

June 20, 2017

submitted by e-mail comments@lowimpacthydro.org

Low Impact Hydropower Institute
329 Massachusetts Ave, Suite 2
Lexington, MA 02420

RE: Collins Project #88 Comments

Dear LIHI,

The Appalachian Mountain Club (AMC) on behalf of our 33,000 members in Massachusetts, respectfully submit the following comments concerning Ampersand's submission for LIHI recertification of its Collins Project. AMC's position is that recreational access, specifically a portage route around the dam, is not adequately addressed in the Application, based on present recreational use of the river at the dam site and LIHI's updated Certification Handbook's criteria. It is AMC's position that recertification cannot truly be considered "low impact" until safe and guaranteed portage around the dam is provided to meet the Recreation criteria.

Founded in 1876, AMC is the country's oldest conservation and recreation organization. We have deep roots in the Connecticut River Watershed as our members have been paddling and leading trips on the Connecticut River and its tributaries since the late 1800's. It is on these tributaries that AMC helped popularize paddling as a sport in North America.

For many years we have been a part of the Friends of Silvio O. Conte (FOC) (National Wildlife Refuge), and are heading up an effort to establish access points and campgrounds in Massachusetts and Connecticut as part of the Connecticut River Paddlers Trail.

Paddling Trails and Blue Trails connect people to their local rivers. The Chicopee 4Rivers Watershed Council is working on a Blue Trail through this area, which has the support of the Town of Ludlow, The Town of Wilbraham, AMC and many others. The outcome of these river outreach efforts has resulted in conditions that differ from when this project originally applied for and received LIHI certification under the old Handbook.

Specifically:

1. Small craft activity on the Chicopee River has multiplied over the past 10 years. Kayakers and canoers alike now paddle the Chicopee River above and below this hydro-electric project. Due to the overall increase in the interest of kayaking and canoeing as a wholesome outdoor recreation activity along with anglers who also use same craft, this section of the river has experienced a noticeable growth of these activities.
2. There is a state park with launch upstream at the Red Bridge hydro-electric project in Wilbraham. There is a town access point with a small craft launch area downstream near the Putts Bridge hydroelectric project in adjacent Ludlow, MA. Ludlow is planning a phase 2 river

Main office • Five Joy Street, Boston, MA 02108-1490 617-523-0655

Pinkham Notch Visitor Center • Route 16, Box 298, Gorham, NH 03581-0298 603-466-2721

Highland Center at Crawford Notch • General Delivery, Route 302, Bretton Woods, NH 03575-9999 603-278-4453

www.outdoors.org



Appalachian Mountain Club

walk near the Mills with an access being considered. These access points have a common impediment to joining together; Collins dam.

3. Concerned citizens, stewards, and Kayakers/canoers have formed formal groups such as the Chicopee 4Rivers Watershed Council. This has been in existence for the past several years and organizes formal paddles with public and members invited. Turnouts have been good and are growing. Additional groups include the Western Mass Kayakers, AMC, as well as the Connecticut River Conservancy (formerly known as the Connecticut River Watershed Council).
4. An informal portage trail now exists. However this path needs improvements and signage by the dam owner and a formal commitment to keep it opened and maintained.
6. Massachusetts General Law, MGL c. 21 sec 17C allows for this modest recreational utilization and absolves the owner of liability.
7. The Collins dam is over a 1/4 mile from its industrial neighbor (an LNG tank). There is no additional exposure from a security standpoint by providing adequate portage around this dam.
8. The Collins Dam has existed for decades. However, the river itself is publicly owned and its use as a navigable waterway and recreation resource is part of the public domain. It is the duty and obligation of the owners of the Collins Dam to allow persons with small craft to be able to safely and swiftly portage their craft around the dam in this navigable river reach.
9. The Collins dam currently allows anglers to use the tail race area. There is no valid reason to also not provide a permanent portage around the dam for human powered water craft.

In the LIHI updated Certification Handbook it states under the **Recreation Standard H3, Assured Accessibility and Use:** *“If agency recommendations and an enforceable recreation plan are not in effect, the facility demonstrates that it has been and will continue to be responsive to reasonable public interest group requests for adequate public access to land associated with the facility, to the reservoir and downstream reaches, and to appropriate recreational water flows and levels, without fees or charges.”* The present record contains reasonable public interest group requests for adequate portage around the dam. AMC further notes that in Section 4.2.8 of the Application, the Applicant acknowledges that *“ACH has made efforts to clear the pathway of the informal portage along with signage and fencing around the site to direct people around the dam.”* Adequate and long-term sustainable portage around the Project is not an unrealistic or unreasonable requirement to achieve LIHI certification.

We note what appears to be an error (typo?) in the Application. At page 5 it states the average annual flow at the dam to be 11,200 cfs, which appears to be an order of magnitude too high.



Appalachian Mountain Club

We sincerely appreciate LIHI considerations of these comments.

Sincerely yours,

Kristen Sykes
Director Conservation Strategies- Appalachian Mountain Club
37 South Pleasant Street #2N
Amherst, MA 01002