



Chicopee 4Rivers

Chicopee-Ware-Quaboag-Swift
Watershed Council

One River System

www.Chicopeewatershed.org

Low Impact Hydropower Institute
 PO Box 194
 Harrington Park
 New Jersey 07640

6/17/17

RE: Collins Project #88 Comments

Dear LIHI,

The Chicopee 4Rivers Watershed Council, C4R, respectfully wishes to submit the following comments concerning Ampersand's submission for recertification through LIHI. C4R feels one major item has not been adequately addressed based on present conditions in the area of the communities near the dam site: recreational access. *We therefor feel that recertification can not truly be termed "low impact" due to this deficiency.*

C4R was founded in 2014 to be a voice for the local rivers. We have a modestly growing constituency and have identified the need at Collins for a portage. C4R conducts basic water quality monitoring, river clean ups, education, and creates Blue Trails to connect people to their local rivers. One project is a Blue Trail through this area. We have support from AMC, the Town of Ludlow, The Town of Wilbraham, and many others as we pursue a DCR grant to complete trail work. So cooperation on a portage will serve the benefit of the local community.

Here is our main area of concern:

- C4R feels that the proper LIHI standard for this application in section 4.1.8 should require an upgrade to **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.
- Also in 4.2.8, C4R would like to refer to a submission to FERC a list of action items in the 2013 "Collins Hydro Recreational Needs Assessment" for this project:
 - In reviewing the available documentation it appears that the one area that Collins to contribute to the area's recreation supply is through canoe access and portage.
 - Accordingly Collins will undertake the following site improvements to enhance recreation.
 - Locate and evaluate areas that could be used for canoe put-in/take-out areas above and below the project site

- Improve the pathway of the informal portage around the dam that runs between the upstream end of the safety buoys that connects to the tailrace where fishermen love to angle.
- Set out a picnic table at the near the area used by fishermen where they go down to the river.
- Create storage and a fenced area used for storage of boat buoys, their river chains, hydro equipment in the public parking lot beside the entrance to the hydro site.
- Install signage (summer 2013) to direct people on a safe route around the project dam.
- Continue consulting with local groups to determine if there are other potential recreational opportunities.
- Consult with Columbia Gas regarding their on-going plans for security upgrades in the area.

These actions areas have not been implemented, even after the owner was approached by C4R in 2016.

C4R also submits these reasons for consideration:

1. The small craft activity upon the Chicopee River has multiplied many times over the past 10 years. Kayakers and canoers alike constantly ply 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 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. With respect to specifics for portage of small craft (kayaks and canoes only – no motor boats etc), the definition of portage is to carry around, period. Portage is NOT to park on the property. Portage is NOT to loiter. Portage is NOT to fish or recreate in any way, just to portage the small craft around the dam safely, quickly and exit the property.
5. A portage would use a pathway somewhat already established and not involve any significant modifications or alterations to the property. Path needs simple improvement.
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 ¼ mile from its industrial neighbor (an LNG tank). There is no material exposure from a security standpoint from allowing simple small craft portage to this neighbor. Furthermore, there is no pedestrian use of the small private road leading

to the LNG tank. No person will need this to portage their small craft. The river itself is paddled upon regularly now, the area just needs this portage.

8. The Collins dam has enjoyed many decades of service in this river. However, the river is a public space and its use as a navigable waterway and recreation resource is part of the public domain. It is the duty and obligation of the Collins dam to allow persons with small craft to be able to safely and swiftly carry their craft around the dam upon the land aside this project. This is safer and better for all parties to prevent persons from attempting to do this in an unsafe manner.
9. The Collins dam currently allows anglers to participate in their recreation at the tail race area. If anglers are being allowed, and since kayakers/canoers who would not linger on site, it seems reasonable then to permit carry through for portage by paddlers, there is no valid reason to not allow portage for these and the other reasons as outlined in items 1-8 above.
10. Additionally, groups like the Chicopee 4Rivers Watershed Council organize cleanups and its members alert authorities having jurisdiction of any potential problems such as illegal disposal in the area. A code of responsibility for conservation and responsible recreation is central in this group's code of ethics. There is a willingness to work collaboratively to ensure all parties are well served.
11. C4RWC feels that as part of any benefit that the owner may receive from LIHI certification, it should also convey a public benefit: a paddler portage trail around the dam.

C4R sincerely appreciates LIHI considerations of these comments. We hope it leads to recommendations and action for the creation of suitable recreational access/portage. If we can provide further information, please let us know.

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