

June 2, 2011

Low Impact Hydropower Institute  
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Email: [info@lowimpacthydro.org](mailto:info@lowimpacthydro.org)



Re: West Dudley Hydroelectric Project (FERC No. 7254)

The Last Green Valley, Inc. (TLGV) is the nonprofit organization charged with managing the Quinebaug and Shetucket Rivers Valley National Heritage Corridor. The West Dudley Hydroelectric Project is located within this National Heritage Corridor.

Our comments are focused on the recreational assets of the Quinebaug River and the Low Impact Hydropower Institute's Recreation Criteria. While West Dudley Hydro, LLC has stated in its application that "Minimal hiking and boating occurs within a safe distance of the Project," we believe recreational use in the Project area will increase exponentially over the next few years. We request the applicant's cooperation in developing safe, functional, and aesthetic paddling and hiking access points in the vicinity of the Project in order to meet the Recreation Criteria's goal of providing free access to the water and accommodating recreational activities on the public's river.

The Last Green Valley has worked with many partners over the last few years to develop a water trail system on the Quinebaug River. We have developed a water trails website page (<http://www.tlgv.org/preserve/watershedprojects/water-trails.html>); published draft paddler's guides to multiple segments of the Quinebaug River; installed informational kiosks; and hosted dozens of paddles on the Quinebaug, including a 2009 Source to Sea Expedition that portaged the West Dudley Hydroelectric Project. Our goal is to create a network of close-to-home paddling opportunities that are family-friendly.

Some of our members have been in contact with municipal officials in Southbridge to discuss establishing a launch area a few miles upstream of the Project, off Dudley River Road in Southbridge. Paddlers leaving Southbridge will be treated to a beautiful 10+ mile stretch of the Quinebaug River if they can conveniently portage the West Dudley Hydroelectric Project. Paddlers interested in shorter trips need to be able to park and leave cars at the Project so they can either take-out above or put-in below the dam.

Our collective efforts have led to increased recognition of the river's assets. A five-mile section of the Quinebaug River just downstream of the project site (from Fabyan to W. Thompson Lake in Thompson, CT) was designated a National Recreation Canoe Trail this spring. That segment complements the existing National Recreation Canoe Trail upstream on the Quinebaug River in

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Holland and Brimfield, Massachusetts. We expect to file an application this fall to designate another 20 miles of the Quinebaug River as a National Recreation Canoe Trail. With these designations will come increased publicity and use by residents and tourists.

Likewise, the hiking community has been working hard to develop a network of inter-connected trails along the Connecticut and Massachusetts border. Many of these trails follow old rail and trolley lines and are suitable for multiple user groups (i.e. hikers, mountain bikers, and equestrian users). The West Dudley Hydroelectric Project is at the center of these trail connections.

The Dudley Trail & Greenway Network has submitted detailed comments outlining specific enhancements to the area for hikers and paddlers, and has requested public rights-of-entry from West Dudley Hydro, LLC over a number of parcels. We fully support the specific comments and requests submitted by the Dudley Trail & Greenway Network and trust the applicant will consider them in order to accommodate recreational activities on the public's river.

While we have no regulatory authority, we recommend the proposed enhancements because they are consistent with, and help to further, the National Heritage Corridor's Ten-Year Management Plan. The Management Plan supports efforts to develop trail linkages to form an easily-accessible, inter-regional and intra-state network that can be used for many activities, and to promote safe and convenient water access and water trails for activities such as paddling and fishing. We request the Low Impact Hydropower Institute incorporate the Dudley Trail & Greenway Networks' recommendations into its certification for the Project.

Please contact me if you need additional information or clarification. Thank you for the opportunity to comment.

Sincerely



Lois Bruinooge  
Deputy Executive Director