



By e-mail

October 1, 2021

Maryalice Fischer
Certification Program Director
Low Impact Hydropower Institute

**Re: Gardner Falls Hydroelectric Project (LIHI Project #80);
Recreational Features Update**

Dear Maryalice:

The following information supplements our prior submittals and initial recertification questions from LIHI dated June 4, 2021. This update concerns exclusively recreation features of the Gardner Falls project, owned by licensee Central Rivers Power MA, LLC (CRP).

Our recreation features upgrades and maintenance have recently resumed in earnest, after having been impacted beginning in April, 2020 by the Covid-19 pandemic¹. Nonetheless, we are successfully resolving many items noted from 2017-19 communication with the Connecticut River Conservancy (CRC), and have listed the below updates in the order used by CRC in their August 5, 2021 comment letter²:

BUCKLAND AREA

1. At the picnic area, a small sign will be erected noting the project-associated river access trail, distinguishing it from the neighboring private property. The grill and toilet noted in the plan were subject to vandalism, likely due to the secluded nature of the area and easy vehicle access. A portable toilet for public use is planned for the picnic area location, and all efforts will be taken to prevent vandalism and misuse.
2. CRP is making access easier (signage, grading, vegetation removal, gate/wall access) at the impoundment hand-carry boat launch. The adjacent concrete pier is a high-hazard area downstream of the boat safety barrier and adjacent to the project canal intake. Given the established access provided by the boat launch, CRP does not believe that safe public access/use of the pier is feasible, given its proximity to flowing water (of the intake) and the dam.
3. The nature trail at head-of-canal, a loop trail crossing the tailraces, has been re-opened and stabilizing rock fill is being added to make the trail entrance more user-friendly. Additionally, one (of three) of the new project signs has been installed at the trailhead and includes project recreation features and updated licensee and 18 CFR Part 8 accessibility language, see photos.
4. At the powerhouse, all construction material and debris have been removed, and river access is available to pedestrians. Due to vandalism (as at the picnic area upstream), trash receptacles have been removed and users are expected to "carry in, carry out" their trash, an education effort successfully implemented at many recreation sites nationwide.
5. CRP acknowledges concern over the road condition at Gardner Falls; and is conducting legal and engineering assessment to determine responsibility and technical solutions for repair. Due to the large expenditure inherent in road maintenance, any upgrades (other than spot repairs) will be planned and budgeted for future years.

¹ Scheduling of contractors and staff, establishment of social distancing protocols (compared to typical team work efforts), and absences due to quarantine (staff, contractors and/or family members) have all resulted in less timely completion of work.

² Our response to CRC items does not diminish the FERC-approved Recreation Plan. We feel that local dialogue and responsiveness remains the most effective means to meet needs of project recreationists.

We understand CRC's concern about gradual impacts to recreation amenities over the many years (and multiple licensee's) since Recreation Plan approval; and recognize the value of these project features to the Buckland community. CRP's newly-installed maps, and additional maintenance and upgrades noted above, evidence our commitment to continued pleasant, safe and accessible use of project features by the public. All items not yet implemented will be completed by Thanksgiving, 2021.

SHELBURNE/WILCOX HOLLOW AREA

Access road condition and history is the only item noted in CRC's August comment letter to LIHI for Wilcox Hollow. CRP has also received public inquiry concerning the road, and has been proactive and participatory since first being alerted by a local citizen in 2020. We have conducted site visits, invited other roadway owners to develop solutions, and (most recently) installed a new recreation sign and completed road maintenance on the parcel owned by the licensee. Subject to shared road access and permitting, CRP may complete maintenance within the Mohawk Trail (MA DOT Right-of-Way) road entrance to accommodate our maintenance vehicles, improvements which could benefit all users.

CRP has conducted joint calls with the other access road owners following its 2020 letter (attached) highlighting conditions and expectation; each party is planning and budgeting for the necessary permitting and repairs to its road sections.

CRP remains receptive to all concepts and solutions, with other roadway owners, to provide safe, effective public access to the Wilcox Hollow area. We have led the effort since initial notice in 2020 to engage other parcel owners to repair their roadway sections and have completed updates and repairs to project road sections and recreation features.

Thank you for your diligent review of the Gardner Falls project recertification materials; we look forward to continued certification by LIHI and remain available for any further questions.

Sincerely,
CENTRAL RIVERS POWER MA, LLC

Skip Medford

Skip Medford
Manager Stakeholder Relations

Attachments

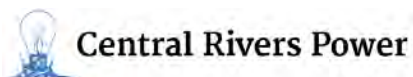
cc: J. Robichaud, CRP
L. Wright, WRP
C. Mooney, CRP

ATTACHMENT A



Photograph of installed public-info sign at Buckland canal trailhead.

ATTACHMENT B



Central Rivers Power MA, LLC

670 N. Commercial Street, Suite 204
Manchester, NH 03101

September 29, 2020

Jennifer Howard
MA Dept of Conservation & Recreation
136 Damon Road
Northampton, MA 01060

NStar Electric Company
DBA Eversource Energy Tax Dept
PO Box 270
Hartford, CT 06141-0270

**Re: Gardners Falls Hydroelectric Project (FERC Project No. 2334-MA);
 Recreation and Access Road Condition**

Dear Addressee:

As you may be aware, public recreation access to the Deerfield River in Shelburne, Massachusetts has been specified in the Recreation Plan¹ of the Gardners Falls project, through the Wilcox Hollow area and to riverside land owned by the project owner/operator and licensee, Central Rivers Power MA, LLC² (CRP). Recreation features of the Wilcox Hollow area and river appear well used in-season, and CRP plans to continue maintaining existing recreational features to ensure safe, enjoyable use of the area by the public.

Following recent inquiry from a local resident about access road conditions, and CRP's on-site assessment of same, it is apparent that access road maintenance and repair are warranted to continue safe public vehicle access on the road, leading to the established parking area and to the Deerfield River. Parcel and map depictions of the access road and ownership details (from Shelburne records) are below and attached. Photographs of the existing road conditions are also attached for reference.

| Parcel ID | Parcel | Owner | Location |
|-------------------|--------|--|----------------------|
| 011.D-0006-0000.0 | 6 | NStar Electric Company DBA Eversource | "upper" access road |
| 016.D-0003-0000.0 | 3 | Commonwealth of Mass, Dept of Conservation & Recreation | "middle" access road |
| 011.D-0007-0000.0 | 7 | EP Energy Massachusetts, LLC (now CRP) | "lower" access road |
| | | | |

While CRP conducts maintenance, repair and improvements to its "lower" access road (parcel 7), signage and other recreation features, we hope that your organizations can each repair the access road sections within your parcels (3 and 6).

Thank you for your cooperation in our efforts to provide safe public access to the Wilcox Hollow area and the Deerfield River. Please contact me by phone at (978) 621-9489, if you have any questions.

¹ 97 FERC ¶ 62,051 Order Approving Revised Recreation Plan (Article 406), October 18, 2001

² Although shown in Shelburne records as EP Energy Massachusetts, LLC, the present owner of the Gardners Falls project and all project-related parcels is Central Rivers Power MA, LLC.

Sincerely,
CENTRAL RIVERS POWER MA, LLC

Skip Medford

Skip Medford
Manager Stakeholder Relations

cc: M. Stanley, CRP
L. Wright, CRP
J. Robichaud, CRP
A. Harris, Shelburne
Deerfield River Watershed Association



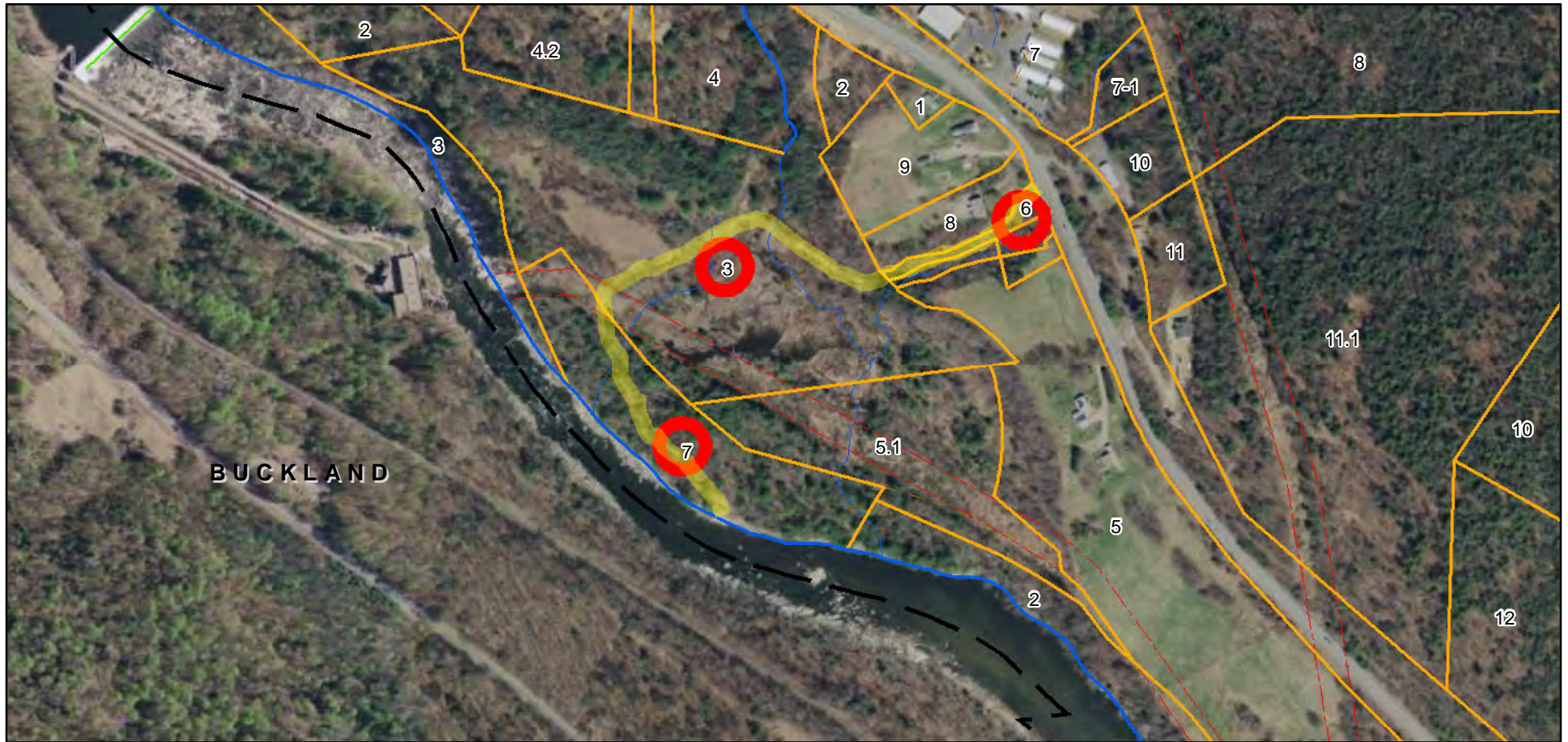
Wilcox Hollow Access Road (yellow)

Shelburne, MA

1 inch = 500 Feet



September 24, 2020



| | | |
|---------------|-------------|---------------|
| Large Scale | Public Road | Property Hook |
| CAI Town Line | Utility | WaterLines |
| PWater | Tract Line | |
| Property Line | Bridge | |

Data shown on this map is provided for planning and informational purposes only. The municipality and CAI Technologies are not responsible for any use for other purposes or misuse or misrepresentation of this map.

ACCESS ROAD PHOTOGRAPHS



Photo 1: Steep, eroded section at access road entrance, close to Rt 2. Part of parcel 6



Photo 2: Detail of steep, eroded road section near Rt 2. Part of parcel 6



Photo 3: View of eroded area, view north towards Rt 2. Part of parcel 6



Photo 3: Fallen trees across access road. Part of parcel 6



Photo 5: Eroded roadbed over culvert. Part of parcel 3