Comments from the **Appalachian Mountain Club**, headquartered in Boston, Mass., on riverwide issues in the proposed relicensing Connecticut River facilities.

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Since 1876, the Appalachian Mountain Club has promoted the protection, enjoyment, and understanding of the mountains, forests, waters, and trails of the Appalachian region. It is the largest conservation and recreation organization in the Northeast with more than 90,000 members.

Riverwide issues: cumulatively effected resources and incremental effect of licensing the five Connecticut River projects with other past, present and reasonably foreseeable future actions within the Connecticut River Basin. Comments and suggestions on issues and alternatives to be addressed in the EIS and studies that will help provide a framework for collecting pertinent information on the resource areas.

The AMC's interests in hydropower relicensing are mainly in the areas of conservation and recreation. We want to help TransCanada and FirstLight in preparing their license applications by improving their contributions to conservation and recreation.

We have an interest in the creation of improved opportunities for multiple-day canoe and kayak trips on the Connecticut River. New England generally does not have a lot of opportunities for multiple-day canoe trips when compared to other regions of the country, with the exception of areas of northern Maine such as the St. John and Allagash Rivers, which are many hours from population centers. The Connecticut River runs from northern New Hampshire to Long Island Sound. It passes through several population centers and is easily accessible from all the major cities in New England with populations in the millions.

The most serious obstacles to multiple-day trips are the hydropower dams themselves. The existing portage routes around the dams are grossly inadequate, too long, and dangerous. For example, the Bellow's Falls portage route is 1.5 miles long and for much of that distance follows the breakdown lane of a high-speed state highway. The only portage around Turner's Falls comes from calling the power company and requesting a truck. Campsites are scarce in Massachusetts. Access areas are closed for much of the year.

We need a study of the facilities that are necessary for canoe access to the river. Most of the existing facilities were designed for day use by motorboats. The ramps and other facilities are not particularly suited to canoeists, particularly those using wood-and-canvas canoes. Campsites are sometimes completely filled up by parties that arrive in motorboats and stay for a week.

We recommend a study of the quantity, quality, and adequacy of the land-based facilities associated with boating on the Connecticut River. This interest involves all of the facilities that are being relicensed. The study should coordinate all the facilities even though there are two hydropower owners. Flow changes that benefit recreation might have a generational impact on all the dams lower on the river. This study should examine put-in and take-out facilities especially for canoeing and kayaking, portage routes, campsites, parking and road access, seasons of operation, maintenance, and sanitary facilities. The study should include a projection of usage during the 30-year life of the licenses, and the opportunities for the project owners to buy land in order to increase recreational benefits.

In association with the above study, a study of the creation of the Connecticut River and Watershed National Blueway should be done, along with ways that the existing hydropower facilities can contribute to that effort.

On May 24, 2012, Secretary of the Interior Ken Salazar designated the Connecticut River and Watershed as the nation's first National Blueway. A Memorandum of Understanding signed in August by the departments of Interior, Agriculture, and the Army has as one objective "providing opportunities for scientific research, environmental education and outdoor recreation and access within the National Blueway to the extent compatible with agency missions." The National Blueway concept takes a watershed viewpoint and addresses the river from its source to the sea. The National Blueways System has as its goal "to advance a whole river and watershed-

wide approach to conservation, outdoor recreation, education, and sustainable economic opportunities in the watersheds in which we live, work, and play." The National Blueway designation includes all the tributaries in the watershed and involves several federal agencies.

The National Blueway engages several federal agencies including the U.S. Army Corps of Engineers, the Silvio Conte Refuge, U.S. Fish and Wildlife Service, the National Park Service, and the States of Connecticut, Vermont, New Hampshire, and the Commonwealth of Massachusetts, which have prioritized conservation, recreation, and restoration in the 7.2 million-acre Connecticut River Watershed.

Off-site mitigation for the loss of whitewater habitat by these four dams on the mainstem Connecticut River might take place on tributaries such as the West River, where the U.S. Army Corps of Engineers controls the flows. According to an MOU among Interior, Agriculture, and the Army signed in August, the Corps of Engineers "owns and operates 14 flood control dams and manages about 20,000 acres in the watershed to better manage the water supply, provide flood control and hydropower generation, and support recreation and environmental stewardship." Opportunities to engage these federal agencies and help them meet their obligations under the National Blueway System should be part of this study.

The Connecticut River Paddlers Trail and the Connecticut River Birding Trail cross several project boundaries. Their interests should be part of a framework that takes a river-wide viewpoint.

We have an interest in trails nearby and associated with project lands. A study should evaluate the adequacy and maintenance of existing trail systems for the next 30 years, and determine opportunities for additional hiking trails on project lands, and linking those trails to existing trails. Such trails in the watershed could cross project boundaries, and adding to them could involve requiring the Licensees to purchase additional land.