

Comments from the **Appalachian Mountain Club**, headquartered in Boston, Mass., on the proposed relicensing of the Wilder Dam on the Connecticut River.

Contacts:

Dr. Ken Kimball
Director of Research AMC
PO Box 298
Gorham NH 03581
Phone 603-466-2721
Email: kkimball@outdoors.org

Dr. Norman Sims
16 Linden Ave.
Greenfield, MA 01301
Phone 413-774-2970
Email: sims@honors.umass.edu

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.

Wilder Dam, P-1892-026—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 in preparing its license application by improving its contributions to conservation and recreation.

We have an interest in a controlled flow study of the whitewater reach seven miles below Wilder Dam at Sumner Falls. Controlled flow studies have been done on dozens of FERC projects. Sumner Falls is a popular kayak play spot used by paddlers from a wide region. The recreational values there would be improved by scheduled releases.

We have an interest in off-site whitewater mitigation because of impacts of the Wilder Dam that cannot be corrected as long as the facility remains. Such off-site mitigation could be in line with the watershed viewpoint taken by the Department of Interior in designating the Connecticut River and Watershed as the first National Blueway River. Other federal agencies such as the U.S. Army Corps of Engineers, which signed an MOU with Interior, could contribute to this off-site mitigation and further their commitment to the National Blueway System goals.

We have an interest in the creation of improved opportunities for multiple-day canoe and kayak trips on the Connecticut River. We suggest a study of the quantity, quality, and adequacy of the land-based facilities associated with the Wilder facility. 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 on all project lands. The portage trail around Wilder Dam, for example, is terrible and should be relocated.

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.

The study should examine the facilities to determine their usefulness 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.

We have an interest in the historical study of the river as it existed prior to the construction of the dams, including photographs of the natural riverbed. This will reveal what was lost during dam construction. With multiple changes in ownership, these historical records should be located and preserved soon.

We have an interest in the educational benefits provided to the public by the facility owners. How can the projects promote leadership training and outdoor recreation in area schools? Can informational signage and kiosks at project facilities promote education about invasive species, water flows, the history of the area, who to call with problems, and what to do to get involved?

We have an interest as well in the economic health of the owners of these hydropower dams on public waterways. Are they managed in a profitable manner that will permit them to do appropriate maintenance and to provide public benefits as required by their federal licenses? We would like to see a study of the financial production of each individual facility that is being relicensed.

In association with the above request, we recommend that the EIS look into creating an escrowed decommissioning fund for the Wilder Dam. In an age of international finance, deregulation, changing ownership, and

global warming, the financial health of ownership can be brought into jeopardy by distant events or by catastrophic failure of the dam. The public should not be burdened with decommissioning costs.