

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

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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.

Bellows Falls Dam, P-1855-045— 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 whitewater study of the dewatered bypass reach below the Bellow's Falls Dam. Controlled flow studies have been done on dozens of FERC projects. This whitewater reach is a prime opportunity to create a whitewater park that could be of enormous economic value to the community. A professional designer of such parks should be hired to assess the opportunities. The power company should be required to remove the low-head weir that now serves no function under the railroad bridge at the bottom of this reach.

We have an interest in off-site mitigation because of impacts of the Bellows Falls 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. 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. TransCanada and FERC are one puff of wind away from a catastrophic event.

We have an interest in a study of the quantity, quality, and adequacy of the land-based facilities associated with boating on the Bellows Falls reach of the Connecticut 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.

The study should examine 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.

We have an interest in the ownership of project lands at all the facilities. For one thing, some project lands could be added to existing park facilities, or placed under permanent conservation restrictions. One example includes project lands near the Herrick's Cove park in Rockingham, Vermont, which is part of the Bellows Falls Project lands.

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. It should include photos of the original riverbed and of the bypass reach. 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?

An economic analysis should be done of the recreational benefits possible during relicensing. This might involve a contingent valuation study of the value of water used for power generation versus the economic value of whitewater at the diversion facilities at Bellow's Falls, and the value of recreational improvements for multiple-day canoeing and boating trips on the river.

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 Bellows Falls Dam. In an age of international finance, changing ownership, and global warming the 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.