

Comments from the **Appalachian Mountain Club**, headquartered in Boston, Mass., on the proposed relicensing of the Vernon 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.

**Vernon Dam, P-1904-073— 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 study of the quantity, quality, and adequacy of the land-based facilities associated with the Vernon Dam, from the campsite immediately below the dam and upstream to the Bellows Falls Dam. 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 proposed license, and the opportunities for the project owners to buy land in order to increase recreational benefits.

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.

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 creation of improved opportunities for multiple-day canoe and kayak trips on the Connecticut River. 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 inadequate and sometimes completely filled up by parties that arrive in motorboats and stay for a week. The portage trail around the Vernon facility is the best of the three TransCanada facilities, yet it is far short of satisfactory.

We have an interest in off-site mitigation because of impacts of the Vernon 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 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?

Studies could assess the flows in the river from Bellows Falls to Vernon, and below Vernon, and their impacts on boating recreation. Given the in-stream flows that are controlled by hydropower facilities, such a study might recommend priority use by motorboats or canoes in certain reaches. The study should assess potential and existing conflicts between different types of boating on the Connecticut 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 Vernon Dam. In an age of international finance, 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. (We hear the Vernon nuclear plant will seek relicensing because they cannot afford the costs of decommissioning.) The public should not be burdened with decommissioning costs.