



CITY of LEBANON, NH

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April 4, 2024

Debbie-Anne Reese, Secretary
Federal Energy Regulatory Commission
888 First Street, NE
Room 1A
Washington, D.C. 20426

Via E-Filing

Re: FERC No. 1904, Vernon Dam, Great River Hydro LLC
FERC No. 1855, Bellows Falls Dam, Great River Hydro LLC
FERC No. 1892, Wilder Dam, Great River Hydro LLC
Lebanon NH comments on Great River Hydro LLC's Application for a New License

Dear Secretary Reese:

The City of Lebanon NH is a thriving micropolitan with a growing population and a rich history that is tied to the Connecticut River. The Abenaki people were the original settlers who were attracted to Lebanon's water accessibility, fertile land, and abundant wildlife. European colonists were also lured to Lebanon because of the benefits of the Connecticut River, and our population continued to grow as Industrial Age mills developed along our banks. Today our population is more diverse with people from different backgrounds calling Lebanon home as they seek quality of life and access to affordable recreation.

Access to the Connecticut River has been the common thread in Lebanon's past and should continue to be as we plan for our future. The City has documented our continued interest in the protection of the river and our need for recreation around the river in multiple reports, including the City of Lebanon Master Plan¹, Recreation Facilities Master Plan, and the Recreation Facilities Assessment. Additional public input related to access to the Connecticut River and surrounding recreational areas was also conducted by the Connecticut River Conservancy.²

The Wilder Dam is located in West Lebanon, and it is an indelible feature of our landscape. While we have been grateful for the recreational opportunities that are offered by Great River Hydro's provision of trailhead access to hiking trails and a somewhat functional portage trail, we fully disagree with their assertion that no new recreational improvements are warranted under this

¹ [Lebanon Master Plan | Lebanon, NH \(lebanonnh.gov\)](http://Lebanon Master Plan | Lebanon, NH (lebanonnh.gov))

² [eLibrary | File List \(ferc.gov\)](http://eLibrary | File List (ferc.gov))

relicensing process. Maintenance at existing recreational facilities is inadequate, and simple yet effective improvements can be made for the benefit of the public who seek refuge and recreation around our area of the Connecticut River.

Lebanon Specific Recommendations

Recommendation 1: Improve and maintain portage

The City of Lebanon Master Plan cites “access to the river” as a primary need for Lebanon’s future:

- Chapter 10: D-2 “One issue raised at the 1999 “Lebanon: A Look Ahead” forum was residents’ desire for more walking access to both the Mascoma and Connecticut Rivers. Improved public access to waterways must be achieved with minimal environmental harm, as laid out in the Addendum to the Recreation Facilities Master Plan.”
- Chapter 10: 1-8 “Improve public access to Mascoma Lake, the Mascoma River, and the Connecticut River.”

Similarly, from the Recreation Facilities Master Plan:

- Chapter 2:4.5 The CT river was crucial to the development of Lebanon, it should be an icon of community heritage; it should play a far more important role in Lebanon's future.
 - a. Opportunities: Expand and enhance river access. Improve ramp, expand picnicking at parking and ramp, accessible fishing/viewing pier at E Wilder Boat Launch. Shorten portage. Vehicular access to lower parking lot (below the dam)
 - b. Formal impact resistant access points to river for fishing, cartop boats, hiking.

Unfortunately, only 5% of the Wilder project shoreline is available for public use. A significant portion of that 5% is the portage trail around the dam which was not designed to a usable standard. The rock stairs that lead to the water are very difficult to navigate while trying to portage a boat, rendering the portage trail unusable for many people.

City recommends designing, building and maintaining a switchback trail or ramp system to allow gradual sloped access and secure footing for portages. We also encourage the addition of a portable restroom unit on site once these improvements are constructed.



**Rock stairs pictured here present tricky footing, especially when carrying a boat. A ramp or switch back path system would be more accommodating. Photo taken December 2023*



**Debris litters the portage area. Photo taken December 2023.*

Recommendation 2: Maintain the picnic area parking lot and trailhead year-round

The Recreation Facilities Assessment recognizes the public picnic area and paths around Wilder Dam as community assets that are owned and maintained by Great River Hydro.

Trails in Lebanon are used year-round, so access to those trails should also be offered year-round. Great River Hydro's parking lots are not currently plowed during the winter or maintained for year-round use, which makes their recreation offering valid only 9 months of the year. The public still tries to access the trail system during the snow months, which creates a dangerous environment for drivers as they pull in and out of a snow packed or icy parking area. Maintenance during the warm months could also improve.

City recommends GRH maintain the picnic area parking lot and trailhead year-round with snowplowing and sanding after snow events, drainage improvements, and annual grading with new material. Alternatively GRH could pave the parking area allowing for all weather/all season use without regrading maintenance. We would also like to see the addition of a portable restroom unit in the parking area.



** Poor drainage and long established potholes. Photos taken December 2023.*

Additional Recommendations based on the “CRC and AMC Recreation, Public Access, Education, and Land Management Recommendations for Great River Hydro”, July 30, 2019

The City of Lebanon agrees with the recommendations that were submitted July 30, 2019 by the CRC and AMC, and we would like to highlight a few:

- **Substantial capital and annual operating investments in recreation facilities, programs, and public access that are benchmarked to annual revenue and energy generation, indexed for inflation.**

The City of Lebanon has several active projects that will help provide access to the Connecticut River area, including: Westboro Park Development, Mascoma River Greenway expansion to Westboro Park, Rt 12A trail along the CT River, and future development of the West Lebanon Greenway from Westboro Park north along Rt 10. While these projects are not located directly on Great River Hydro land, GRH does have flowage rights through these City owned projects that directly impact the recreational facilities around the project area, thus contributing to the GRH and FERC objectives. We would mutually benefit from financial contributions from GRH if there were a fund developed for recreation facilities, programs, and public access that is benchmarked to annual revenue.

- **Significantly increase the percentage of land within each project area that is accessible to the public.** The most logical way to make significant gains on this objective has already been listed as Recommendation 2: Maintain the picnic area parking lot and trailhead year-round. This improvement would increase public access to project area land by 33% (gaining 3 months of access).

- **Improve and create ADA accessible facilities.**

The portage area below the dam, the East Wilder Boat Launch, and additional land based projects like Westboro Park and Greenway developments should all be improved or constructed with ADA compliant design. The portage area behind the dam has the potential to become ADA compliant to an area that allows for viewing of the river if handicap parking

would be allowed on-site. Currently the parking lot near the portage is posted as employees only.

The East Wilder Boat Launch has the potential to attract people living with disabilities if the surfacing of the launch could be improved to accommodate them, and if a durable surface could be added to the waterfront for ADA compliant picnicking.

- **Fund the development and implementation of a coordinated marketing plan for the recreational opportunities of the Ct River.**

The portage signage is not visible from the road, and the only signage that many visitors see is a “No Parking Private Property” sign next to a GRH gate. This is a good example of why there is a lack of knowledge about recreational amenities that already exist, evidenced by public comment on surveys³ and “well below capacity on average during the peak season” counts from GRH’s Study 30 report.⁴ There are numerous ways that marketing and signage could be improved for public benefit, and the recommended marketing plan would identify reasonable steps towards that improvement.

- **Support the creation of new educational programs and facilities to interpret the history and archeological resources of the project area;**

The City of Lebanon Master Plan Chapter 11: D-9 states “As Lebanon is on the Connecticut River Byway, there are opportunities to promote its cultural heritage.” The introduction of interpretive signage and kiosks at the portage, parking area, and East Wilder Boat Launch, and an online resource educating potential visitors about the existence of recreational areas and the cultural heritage of the sites would go a long way to improve what currently exists.

- **Other recommendations that have already been elaborated upon by the CRC that the City of Lebanon would like to support include:**

- **Maintain recreational facilities in optimal condition throughout the license term;**
- **Improve fish viewing facilities and programs, and create a website to host fish migration data;**
- **Improve flow and condition notification systems for river users.**

The City of Lebanon has been encouraged by the Recreation Settlement Agreement from the FirstLight Turner Falls and Northfield Mountain Projects. Those improvements present a meaningful effort from the utility to invest in the community where they operate. We are grateful to FERC and GRH for likewise considering our recommendations, and we hope that our concerns can be addressed through the remainder of the relicensing process.

Respectfully submitted,


Shaun Mulholland (Apr 4, 2024 10:00 EDT)

Shaun Mulholland

City Manager

³ Accession Number 20160505-5135 for survey responses

⁴ Accession Number 20160301-5331 for study 30 report; Accession Number 20161215-5280 for study 30 supplement