

April 11, 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. 1904-078, Vernon Dam, Great River Hydro LLC
FERC No. 1855-050, Bellows Falls Dam, Great River Hydro LLC
FERC No. 1892-030, Wilder Dam, Great River Hydro LLC
Thetford Vermont Conservation Commission comments on Great River Hydro LLC's Application for a
New License**

Dear Secretary Reese:

The Thetford Conservation Commission (TCC) is submitting comments in response to FERC's issuance of a "Ready for Environmental Assessment" and accompanying comment period for the Amended Final License Application (AFLA) for FERC No. 1904, Vernon Dam, No. 1855, Bellows Falls Dam, and No. 1892, Wilder Dam submitted in December 2020, revised in June 2023, and again in January 2024.

I. Description

Thetford is located in Orange County and is bordered on the east by the [Connecticut River](#). The [Ompompanoosuc River](#) flows through the town, meeting the Connecticut River. Our town contains approximately 8.5 frontage miles within the Project's impoundment. While our town abounds with wildlife areas, town managed forests, fields and wetlands, access to the Connecticut River for the 2,775 citizens of Thetford is limited. The only public access point is the North Thetford boat launch where access is limited to boaters and anglers. The river is a major migration route for waterfowl and its watershed contains premier fish and wildlife habitat.

Flooding on the Connecticut River causes costly damage through inundation or fluvial erosion. In Thetford, the level of the Connecticut River is controlled by the downstream Wilder Dam and several dams upstream. Erosion caused by frequent changes in water levels by dam operations and the action of boat wakes causes ongoing loss of our best agricultural soils. It is our understanding the FERC must give equal consideration to recreational opportunities, protection of habitat and water quality, and cultural and historic resources as well as power generation when issuing operating licenses. **We do not feel that the Amended Final License Application adequately addresses all these areas. Our concerns as they relate to the impact of The Project on our community and town planning are outlined below.**

II. Comments

A. The Application does not include monitoring of bank erosion and sediment transport changes after implementation of the proposed major operational change. This operational change is anticipated to impact both erosion and sedimentation on the banks of and in the channel of the Connecticut River as well as the tributaries feeding the Connecticut River. Of particular concern to our town is ongoing bank

erosion, and sedimentation changes that may impact land use, water quality, wildlife and plant communities. A town-wide survey conducted by the Thetford Conservation Commission in March of 2024 found that residents' top concerns relating to the dam relicensing and the Connecticut River were reducing erosion along the shoreline and conserving land along the shoreline. An example of an area of interest and concerns is the confluence of the [Ompompanoosuc River](#) where it meets the Connecticut River. The [Ompompanoosuc River Corridor Plan](#) was completed in 2014 to study and plan stream restoration activities, which may be impacted by changes in Project operations.

Our town contains significant acreage of agricultural lands bordering the river and within Great River Hydro's Flowage Rights (footnote to [Exhibit G](#)). Measurable and noticeable erosion of these lands have occurred over the course of the current license, and while ILP's Studies 1, 2 & 3 and Exhibit E of the AFLA are generally inconclusive as to the extent that daily fluctuations of the impoundment due to Project operations have initiated or exacerbated bank erosion (despite the widely recognized impact of impoundment fluctuations as a contributing factor in erosion), comments previously provided by the Connecticut River Conservancy (footnote to [Accession Number 20180423-5130](#)) indicate a number of flaws both in how the study was conducted and how the data were interpreted that undermine Great River Hydro's assertion that project operations are not contributing to erosion.

What is not arguable is that the lived experience of our town's residents includes erosion as a major concern. Bank erosion within our community limits safe access to the river, has contributed to the loss of agricultural land, and degrades water quality through excess sediment entrainment after storms. Erosion control and streambank stabilization are not addressed within the license application beyond the mention that the proposed operational changes resulting in an anticipated more stable surface water elevation "would further reduce the factors (e.g. stability in WSE, WSE fluctuations) that influence erosion and result in an overall reduction in erosive forces along project shorelines further minimizing Project related effects on rates of erosion" (footnote to Exhibit E, section 3.4.4.2). We should not have to wait another 40 years for the next license renewal to find out if this is true while our residents' properties continue to erode.

While we are in support of the proposed operational change, we respectfully request that following implementation, FERC requires long-term monitoring of bank stability, erosion and sedimentation metrics at time intervals that enable nuanced interpretation of seasonal versus operational fluctuations and the past and future influence of these fluctuations on erosion. Should these studies indicate that the change in Project operations (in the short term) or continued Project operations (in the long term) have outsized influence on past, continued, or future erosion, mitigation measures must be instituted within the term of the renewed license before another generation of property owners loses more land. Assuming the operational change will address the erosion issues without ensuring it does is not adequate.

B. Town residents do not have adequate recreational access to the river. The Connecticut River is a popular destination for swimming, boating, fishing, and riverside camping. The only public access to the river in our town is provided via the North Thetford Fish and Wildlife Department boat launch, where access is limited to fishing and boating. In 2021, Federal COVID-19 stimulus funds were used to improve the boat ramp; however sustained funding will be needed to keep this site accessible to anglers and boats during the term of the license. Currently no public access for swimming in the river is provided in Thetford.

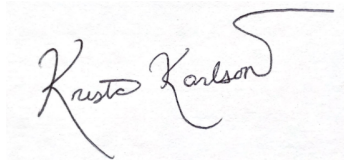
Our Town Plan ([Town Plan](#)) includes prioritizing native vegetation along our shoreline and increasing recreational opportunities for families. The townwide survey conducted by the TCC in March of 2024 found that residents are very interested in improving swimming access along the Connecticut River in Thetford. The AFLA includes little mention of increased or improved recreational facilities beyond what has previously been provided under the past license. This is not adequate for our growing community or to support shifting economies in our town and state. Additionally, we would like to express that the results of the Recreation Study (conducted over seven years ago) may no longer be representative of our community's needs, and the study does not fully explore why recreational facilities may not have been being fully utilized in the first place. We appreciate that Table D-1 (filed March 30 2021, ([Accession Number 20210330-5038](#))) indicates that Great River Hydro anticipates providing for recreational capital improvements on the property that they own, including desperately needed portage improvements. The project area defined by the Exhibit G maps includes about 175 miles of the river from the MA border to Newbury, VT and Haverhill, NH. The facilities impact that entire stretch of river, so considerations for mitigation for recreation should include this whole area and all 30 towns adjacent to the river.

Without a recreation mitigation and enhancement plan written into the AFLA, it is difficult for us to determine whether what GRH anticipates is in line with our town goals. We would like to see a comprehensive recreation plan that includes increased boat access areas, state of the art ADA improvements to recreation facilities, recreational assets maintained in optimal useable condition, investments in recreation mitigation, and enhancement benchmarked to company profits. Great River Hydro should be required to work with municipalities within the project boundaries to develop a Recreation Management Plan that provides recreational opportunities that are regionally beneficial, equitably distributed throughout the project area, and financially supported over the entire life of the license.

III. Conclusion

The Thetford Conservation Commission respectfully requests that monitoring of bank erosion and sediment changes be included in the license along with a commitment to intervene if land along the river continues to erode or if sediment changes negatively impact vegetation, water quality and wildlife over the term of the license. We also request that funds be allocated to not only address recreational capital improvements for areas previously provided for under the past license, but to also increase access to the Connecticut River for multiple uses, including swimming, and to provide funding for continued maintenance of all access points. A third request is to set aside funds for land conservation along the Connecticut River to secure access for the public, improve water quality and enhance wildlife conservation for towns along the river.

Sincerely,

A handwritten signature in blue ink that reads "Krista Karlson". The signature is written in a cursive style with a large, sweeping flourish at the end.

Krista Karlson, Co-Chair, on behalf of the Thetford Conservation Commission
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Document Content(s)

FERC comment_final for submission.pdf.....1