

April 17, 2014

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
Dummerston comments on Great River Hydro LLC's Application for a New License**

Dear Secretary Reese,

On behalf of residents in the town of Dummerston, Vermont, the Dummerston Conservation Commission appreciates this opportunity to share our thoughts on the Amended Final License Application from Great River Hydro LLC (GRH). The Conservation Commission is supportive of the operational changes as agreed upon by GRH for the purpose of more closely adjusting flow through Vernon and Bellows Falls Dams to reduce major fluctuations and simulate a more "natural flow." We believe this change is crucial to restoring the river as an ecosystem for plant and animal life. It is imperative, however, that the town can feel assured that GRH will not stop there but will act to mitigate lasting impacts of persistent and ongoing bank erosion and its direct effect on the recreation, personal property, wildlife migration and ecosystem balance along the 8 miles of Connecticut River bank that abuts the eastern border of our town.

The town of Dummerston lies ten miles north of the Vernon Dam (FERC No. 1904) and 15 miles south of the Bellows Falls Dam (FERC No. 1855). The town is equally influenced both by water releases from Bellows Falls Dam and alternatively by impoundment of the River during times of reduced flow through Vernon Dam. It is our understanding that 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. The town of Dummerston asks that FERC hold future permitting and resulting profitable operation of these facilities contingent upon the continued improvement to the health of these areas as monitored by a number of conservation organizations including but not limited to the Connecticut River Conservancy. The long term positive feedback of these changes to flow regimes can not be realized in the short term, and therefore the town considers the permit application deficient, pending further discussion of strategic benchmarks of improvement and compensation for floodplain and riparian damage from the past. Perhaps this could take the form of modest, yet reasonable, flood resilience and erosion control infrastructure improvements along the river and health monitoring in perpetuity. To accomplish this purpose, we suggest that FERC require, and

GRH commit to, allocating funds and creating an action plan to monitor and address any erosion issues as they occur (or already exist).

Our town places a great deal of importance on the Connecticut River and its effects on our daily lives. We believe that the river is a public resource to which we are all entitled access, and are clearly stakeholders in. Dummerston residents want to know what repercussions GRH will incur if the situation does not continue to improve. If one party benefits financially from the use of a common resource, while others are forced to deal with the repercussions of damage to our boat launches, trail systems, agricultural lands, wild areas and public parks, we are then forced to wait another 30 to 50 years until our public commentary can once again draw attention to the type of situation described by the 1968 Garret Hardin Science Magazine article "The Tragedy of the Commons."

Great River Hydro should be required to provide public meetings and 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.

Additionally, we ask the GRH to increase recreational capital improvements on public access properties that they own, including desperately needed portage improvements. We understand that GRH has already agreed to maintain a small number of public areas along this stretch of River during the course of the historical permitting settlements. We appreciate this ongoing compliance. Dummerston residents do not have adequate recreational access to the river. The one public access boat launch is not able to accommodate boats over the size of a common canoe due to awkward orientation on a heavily silted tributary to the main river. Our town would like to see increased maintenance and equitable recreational river access in the future vision for our residents.

The town of Dummerston is thankful for BOTH the clean energy provided by these hydroelectric facilities and the recreational and economic opportunities afforded us by the Connecticut River. We hope that FERC will consider these requests to ensure that GRH can successfully strike a balance between healthy investment in our riverside community and profitable power generation.

In sum, we strongly support returning the river to a natural rate of flow. However, we believe that in order to be granting continuing private rights to the public resource, GRH should make additional concrete commitments to work with local organizations and allocate funds to address erosion and water quality issues and to ensure community recreational access to the river for fishing, boating, and other activities.

Thanks for your time,

Sincerely,

-The Dummerston Conservation Commission

C/O The Town of Dummerston
1523 Middle Road
East Dummerston, Vermont 05346

Document Content(s)

FERC_ GRH Public Commentary for Final Ammended License Application .pdf .1