



ALEX TORPEY
TOWN MANAGER

Town of Hanover
OFFICE OF THE TOWN MANAGER

603.643.0701
ALEX.TORPEY@HANOVERNH.ORG

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

Re: FERC No. 1892, Wilder Dam, Great River Hydro LLC

Hanover, NH comments on Great River Hydro LLC's Application for a New License

Dear Secretary Reese:

Hanover is situated in the upper portion of the Connecticut River Valley, just north of the confluence of the Mascoma, White, and Connecticut Rivers. The Town of Hanover, NH, along with Lebanon, NH, and Hartford, Vt, is part of the Upper Valley micropolitan area and has a rich history that is tied to the Connecticut River. I am writing to express comments supported unanimously by our Selectboard, as well as a number of other local stakeholders.

Access to the Connecticut River has been the common thread in Hanover's past and should continue to be as we plan for our future. The Town has documented our continued interest in the protection of the river and our need for recreation around the river in multiple reports, including the Town of Hanover's Sustainable Master Plan.

The Wilder Dam is in West Lebanon and 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, the Town of Hanover supports Lebanon, NH's recommendation for a robust program to maintain the existing recreational facilities for the benefit of the public who recreation in our area of the Connecticut River.

Hanover Specific Master Plan Recommendations

Chapter 2 - Future Land Use: Complete a river walk trail - A walking path is envisioned along the Connecticut River and Mink Brook connecting Wilson's Landing with the City of Lebanon's Alana Cole Conservation Area. Other trails and public open spaces are planned within a 5- to 10-minute walk from every residence.

Chapter 9 - Chapter 9 Improving Health and Wellbeing For All: Public access park - Strategy 9-4.10: In collaboration with Dartmouth College, increase public access to the Connecticut River for swimming and car-top boats.

Chapter 6 - Advancing multi-modal transportation - Re-establishing a footbridge. A footbridge over the dam could carry pedestrians from Kilowatt Park to Boston Lot in Lebanon, and provide great value for our local residents and businesses.

Recommendations based on the CRC Connecticut River Management Plan's for Wilder Dam

The Federal Energy Regulatory Commission (FERC) should:

- Institute a "ramping rate" at Wilder Dam in the next operating license, to reduce soil piping in the riverbanks of the impoundment and to minimize negative effects on aquatic and riparian habitat.
- Include a provision for emergency gate operation, such as in the context of a "black start" when the dam is needed to provide immediate power in case of a blackout.
- Assess possible effects of sediment build-up behind Wilder Dam and the extent to which it has affected flood storage capacity.
- Require the company to maintain discharge at run-of-river levels at periods of low flow in the next FERC license, to protect aquatic life downstream.

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

The Town of Hanover agrees with the recommendations that were submitted on 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.**
located directly on Great River Hydro land, GRH does have flowage rights through these Town-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
- **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 is to maintain the picnic area parking lot and trailhead year-round.
- **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 with an area that allows for viewing of the river if handicapped parking is 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.

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

Finally, the Town of Hanover 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 it operates. 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,

Alex Torpey
Town Manager

Document Content(s)

Mgr - FERC wilder dam letter.pdf.....1