



TOWN OF PUTNEY
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May 16, 2024

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

Via E-filing: <https://www.ferc.gov/ferc-online>

Re: FERC No. 1904, Vernon Dam, Great River Hydro LLC
FERC No. 1855, Bellows Falls Dam, Great River Hydro LLC
Town of Putney comments on Great River Hydro LLC's Application for a New License

Dear Secretary Reese:

The Town of Putney 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 the Vernon Dam (FERC No. 1904) and Bellows Falls Dam (FERC No. 1855) submitted in December 2020 and revised in June 2023.

Putney is located in Windham County. The Connecticut River forms its eastern boundary. Our town contains more than six frontage miles within the Project's impoundment. Five significant brooks arise along the western Putney Mountain-Windmill Hill ridgeline and flow east through Putney directly to the Connecticut River. Of these, Chase Brook, East Putney Brook, and Sacketts Brook join the river in Putney. Two smaller brooks also enter the river in Putney: one just upstream from Sacketts Brook and the other near the intersection of Priest Road and River Road South. In addition to areas along the river, the area around each brook's confluence with the river is a flood hazard area encumbered by a Great River Hydro flowage easement. The Federal Emergency Management Agency (FEMA) also has designated the entire 373 acres of the historic Putney Great Meadows, located at the Chase Brook confluence, as both a floodway and a riparian area. The Great Meadows (Parcel 04-01-01), River View Farm (Parcel 08-03-21) and Stoneholm Farm (Parcel 08-03-43) are on the river and in farming use. Altogether, about two-and-one-half miles along the river are farmed. Farmland in these areas has been lost to erosion over the years.

About 2,600 people lived in Putney in 2020. Residents have only one public access to the river: Vermont Fish and Wildlife's Putney Landing. Residents also use the Dummerston Landing, located a half mile south in the next town. Vermont Fish and Wildlife allow only boat launching/landing and fishing on these lands. There is no public area along the river for

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swimming or other recreational activities. Steep drop-offs caused by past erosion hinder recreational access in some locations.

It is our understanding that the Federal Energy Regulatory Commission must give equal consideration to erosion prevention, recreational opportunities, protection of wildlife habitat, 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 documents are outlined below.

Recreational River Access: The Vermont Council on Rural Development coordinated a town wide discussion of town goals which kicked off with a meeting of 250 residents in November 2022 and ended with a report and action plan called *Our Future Putney* in February 2023. In the November discussion, residents identified the "Connecticut River" as a town asset and "lack of access to the river" as a town challenge. The final VCRD report highlighted "Improving River Access" as a key opportunity for the town. Community suggestions for river access improvement included "a bike path, river trail, and/or a pocket park with a bench and steps down to the river." (See pages 8 and 10.) Recreation ideas from our Conservation and Planning Commissions have added improving river boat launches and the quiet paddle from the river up Sacketts Brook. providing a place to swim and another landing for canoes and kayaks. Putney's new, eight-year *2023 Town Plan* also confirmed residents' interests in recreational activities related to the river. Following five topical community meetings and three public hearings, Putney issued its *2023 Town Plan*. The plan's *Natural Resources and Land Use Chapter* includes Policy Number 2.7 (page 6): "Encourage landowners to maintain public access to significant scenic and outdoor recreational areas (e.g., access to the Connecticut River and major Putney brooks, swimming holes, and hiking and skiing trails.)."

Riparian Area Contributions to Recreation: Our *2023 Town Plan* also states: "An appreciation of the natural beauty of the landscape and enjoyment of outdoor recreation are fundamental values shared by Putney residents." (See page 13.)

Forested Connecticut River Shorelands provide scenic views both for boaters on the river and walkers on River Road. The trail guide *Places to Walk, Hike, Bike and X-C Ski in Putney, Vermont* describes the walk down River Road to the Great Meadows as a "...beautiful route ... good for walking, running, biking, and birding. River Road was the first road in Putney, originally an Abenaki foot trail." The walk around the Meadows, with its mix of riparian forest, farmland, and edge habitat, is "Stop #18" on the *Connecticut River Biding Trail*. Two of the Meadows' numerous tall trees were winners of the "Big Tree Quest" sponsored by the non-profit Trees for Good and the Putney Public Library. Other riparian areas along the river and in the areas of brook confluence also have impressive large trees. Currently, large bottom land trees at the north end of the Great Meadows, including a Bitternut Hickory mast stand, are being stressed by Asiatic Bittersweet and may be lost. Bittersweet is also replacing native vines and shrubs in the forest edge and is spreading.

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Riparian Areas and Wildlife Habitat: The *2023 Town Plan* notes the importance of forested riparian areas: "Riparian areas are sensitive environments subject to flooding. Fertile soils transported from upslope and upstream have historically led to these areas being highly productive for agriculture. In Putney, the Great Meadows and low elevation lands along the Connecticut River remain used for agricultural production. These environments are also critical wildlife habitat and provide related ecosystem services." (See page 10.) The *2023 Town Plan* also requires protection of priority forest blocks and the wildlife corridors connecting them (See page 6).

Northeast Putney along the Connecticut River has been identified by the Vermont Department of Fish and Wildlife as the most likely place for southern Vermont wildlife to cross the river. Continuous forest cover along the river provides safety for crossing animals, then provides a way for them to move to larger forested areas.

Erosion control: We appreciate the significant operational change you have required of Great River Hydro to control erosion and sedimentation on the banks of and in the channel of the Connecticut River as well as the tributaries entering it. To ensure that this change has the positive outcome desired, we request that you also require post-licensing monitoring to confirm the change's effectiveness. Even if proved effective, we understand that the proposed operational change will not return the river to a totally natural flow condition. Also floods in Putney have increased over the years. We have had one 50-year and two 25-year floods in the last 14 years. Therefore, we expect some erosion and sedimentation will continue to need mitigation even after the proposed operational change begins and monitoring shows reasonable success. In the past, agricultural land in Putney not protected by robust riparian areas with large trees has been lost to erosion. Therefore, we respectfully request that you also require that Great River Hydro work with towns to protect and increase forested buffers along the river and its tributaries in the operational area. Large, deep-rooted trees are especially important in preventing erosion and should receive special protection.

Conclusion: As discussed above, we respectfully request that FERC require that Great River Hydro (1) develop a comprehensive **Recreation Plan** within three years after license issuance with robust input from local stakeholders in all of the towns in the project area; and, provide funds to implement town recommendations to improve, develop, and maintain publicly accessible recreational activities. In Putney these include projects listed under "Recreational River Access" above; (2) develop a **Shoreline Management Plan** to protect riparian buffers and important riparian habitats including increasing forest buffers along the river and its tributaries, and providing special protection for large riparian area trees, with funding provided for this work; (3) Following Great River Hydro's implementation of the required operational change, **monitor and publicly report bank stability and erosion metrics** at time intervals that enable nuanced interpretation of seasonal versus operational fluctuations and the past and future influence of these fluctuations on erosion in order to (a) measure the success of the change, and (b) inform additional action(s) to minimize river bank and erosion impacts associated with Great River Hydro operations.

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Thank you, in advance, for consideration of our comments and requests.

Sincerely yours,



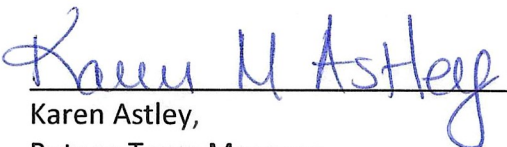
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Referenced documents can be found at:

- [Putney 2023 Town Plan](https://putneyvt.org/vertical/sites/%7BAFAACF45-D9AA-42F6-BFAF-8BC25D547B48%7D/uploads/Putney_Plan_lo_res(1).pdf)
[https://putneyvt.org/vertical/sites/%7BAFAACF45-D9AA-42F6-BFAF-8BC25D547B48%7D/uploads/Putney_Plan_lo_res\(1\).pdf](https://putneyvt.org/vertical/sites/%7BAFAACF45-D9AA-42F6-BFAF-8BC25D547B48%7D/uploads/Putney_Plan_lo_res(1).pdf)
- [Our Future Putney](https://www.vtrural.org/wp-content/uploads/ThePutneyCVReportWeb.pdf)
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Document Content(s)

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