



Town of Rockingham

Municipal Manager, Scott Pickup

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April 12, 2024

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

**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
Rockingham comments on Great River Hydro LLC's application for a new license**

Dear Secretary Reese,

Bellows Falls, like many river towns, turned their backs to the river and using its power for industry, essentially gave up all access with the advent of hydroelectric power one hundred years ago. The incorporation of the Village of Bellows Falls in the Town of Rockingham was due largely in part to its proximity to the Connecticut River. The Town of Rockingham believes that **public access to the river should be highlighted and supported by Great River Hydro in all future planning and development projects within the Village of Bellows Falls, defined and funded through** protection, mitigation, and enhancement (PM&E) measures as detailed in the topic areas below.

Indigenous communities were drawn to the Great Falls thousands of years before the Village was incorporated. They summered on the banks of the river south of the hydroelectric station near what is now Riverfront Park, and returned each spring for abundant salmon fishing and to visit the pools under what is now the Vilas Bridge, leaving petroglyphs within this sacred ceremonial space. Over the centuries, the river attracted visitors of all ages, some for recreation and others for commerce as Bellows Falls became the epicenter for transportation, industry, and in the early twentieth century, hydroelectric power.

Abenaki Nation

Members of the Kchi Ponteguk study team support the Overlook trail in the Area Wide Plan (see Economic Development Chapter) and deem it an unobtrusive method to view the carvings on an already heavily compromised landscape of the land above the river. Any development must be respectful and not as a typical tourist attraction site. Kiosk and other signage should be of a design and should contain language regarding this spiritual place for all, specifically for the

elders of Indigenous communities and their families for generations to come. Kiosks and other signage should have natural colors of the water and of mountains, attractive and with a subtle natural look. Any signage or pathway should indicate the space is a sacred and ceremonial space and part of a contextual, living landscape and find an appropriate response to these realities.

In partnership with the Town, the Kchi Ponteguk team requests simple signage and safe passage for viewing of the petroglyphs and the falls, and offer ideas to conserve the location, make it accessible and aid in the interpretation. Any Indigenous cultural interpretation requires a close degree of consultation and circumspection with a wide range of Indigenous community members to achieve respectful and accountable results.

We request GRH clearly demarcate a pathway to the site linked to a longer river walk (See Area Wide Plan). The Overlook trail should enhance accessibility to view the petroglyphs that does not intrude upon sacredness of the site.

Build and install interpretive signs about the falls and Fall Mountain in relation to the petroglyphs. e.g. a major bump-out along the new Vilas Bridge rather than a cantilever bridge obstructing the connection between the carvings and the river.

Provide access to a safe and marked area where the Abenaki and other Indigenous communities can have ceremonies.

Clear obtrusive brush and trees. Provide and support landscaping along Bridge Street and the ridge along the top of the petroglyph site, maintained with additional plantings of native plants that are both attractive and useful for Native American medicinal and ceremonial purposes.

Remove the prior construction of riprap to uncover buried petroglyphs for study and viewing.

Maintain access control for the purpose of protecting aesthetic resources as well as human health and safety.

ADA accessible amenities

Economic Development-

The previous FERC license agreement, signed in effect in 1979 was not subject to the 1986 amendment to the Federal Power Act stating a requirement that FERC give “equal consideration to the purposes of energy conservation, the protection, mitigation of damage to, and enhancement of, fish and wildlife (including related spawning grounds and habitat), the protection of recreational opportunities, and the preservation of other aspects of environmental quality.”

The economy of Bellows Falls was built on the canal, first for transportation and then by powering the mills that made Bellows Falls the center for commerce. Today, the mills are gone, but the use of hydropower prohibits recreational activity from the canal which completely divides the Designated Downtown District in half. Recreational and commercial opportunities within Bellows Falls have been impaired for one hundred years, and with today’s focus in Vermont on the outdoor recreational economy, Rockingham should be allowed use and access for

destination tourism efforts in the Downtown, as much of the land in the Island District is owned by GRH.

GRH will cooperate with the BF Historical Society, Walk Bike Committee, and the Town to improve pedestrian/bicycle access related to all future projects throughout the Island and Under the Hill districts.

In 2021, the Town created a Brownfields Program Area Wide Plan for the Island and Under the Hill Districts. GRH participated in the public engagement process and helped delineate the safety and operational restrictions on canal access, as well as issues in certain areas with high tension power lines. The opportunities for cooperation and collaboration with GRH on the Area Wide Plan are immense, and Rockingham requests GRH collaborate with and support the following:

A. Within the Island District:

- lease and access including engagement with New England Power Company.
- mixed-use transit-oriented redevelopment will boost the economy and provide additional housing needs with easements for parking, and GRH will contribute **a microgrid for the mixed-use transit-oriented development efforts on the Island.**
- easements granted for a canal walk with lighting to match the Downtown, and approval for light shows over the canal
- easements and financial support to build and maintain an overlook trail around the Island (see Abenaki Nation) connecting the Canal Walk and ADA amenities and parking
- contribute match money to leverage grants and offer easements for access and redevelopment of Upper and Lower Mills of Moore & Thompson

B. Within the Under the Hill District

- contribute over ten years \$1.5M toward capital improvements for infrastructure redevelopment including easements, access road, and parking for the Center.
- commercial redevelopment of the CT River Cultural Heritage Center on sites adjacent to GRH.
- contribute to an exhibit for the history of the Canal, hydroelectric and power generation of the river.
- GRH Collaboration with the Town, Sustainable Valley Group and the BF Historical Society to redevelop the sites of the Adams Grist Mill Museum, the TLR buildings, and the Wyman Flint Mill into the CT River Cultural Heritage Center with support of matching funds for redevelopment grants on upfront capital. This center will connect the primary themes of cultural history of the Abenaki Nation, Paper Mills and hydroelectric history on the Canal
- Financial participation in the further development of the Fish Ladder for design and operation to connect with the CT River Cultural Heritage Center. GRH will commit to \$25K per year to continue the fish ladder and center operations.
- An ADA accessible overlook with interpretive signage at the Riverfront Park

The Town of Rockingham requests that GRH incorporates the Area Wide Plan into the FERC process and includes commitments for financial participation and collaboration. Rockingham requests design enhancements of the aesthetics of the canal wall and

include recreation features such as the Canal walk and a microgrid for mixed-use transit-oriented development efforts on the Island.

Municipal

The Town of Rockingham expects continued collaboration between the Town of Rockingham, Great River Hydro, New England ISO on the upcoming Depot Street Bridge project, 2028-2038 Vilas Bridge rehabilitation and 2030-2035 rehabilitation of the Bridge Street Bridge. Both vehicular bridges to the Island are owned and maintained by the Town, and rated poor by the VT Agency of Transportation and will be rehabilitated and replaced in the next ten to fifteen years. They provide access across the Bellows Falls Canal and present severe complications by the proximity to the turbines, and projected scarcity events of construction periods. Rockingham requests GRH and New England ISO collaborate on all options of mitigation to prevent undue scarcity events.

Designated Downtown

The Bellows Falls Designated Downtown boundary spans the Island and Canal, and we are grateful for the portion of black iron fencing that was built along the northern portion of the canal in the early 2000's. The Bellows Falls Downtown Development Alliance supports the completion of the same fencing on both sides of the canal, as it is a beautiful, low maintenance fence that highlights the canal and matches the Downtown aesthetics of the lamp posts and benches. **We request the black iron fencing project be completed south to the Bridge Street bridge on both sides of the Canal, using the same product which has demonstrated longevity and its attractive and low maintenance qualities.**

The Bellows Falls Downtown Square once welcomed visitors from New Hampshire on Bridge Street with numerous four-story buildings, and a large power station adjacent to the canal. Comparing historic photographs, the area is almost unrecognizable now, featuring a green space located between the Canal and the new Fireman's Memorial Park. The Town is grateful for the absence of the power station but has not been allowed to use this green space for Downtown events. As the only green space in the Downtown Square, adjacent to the commercial center of Bellows Falls, we request GRH enable us to host temporary weekly, monthly, and annual events. **We request temporary public use of the green space adjacent the Canal on Bridge St, to connect with residents and visitors as we host ceremonies, concerts, and farmers markets which will help to mitigate the loss of economic development in our Downtown.**

Recreation at Herrick's Cove

Herrick's Cove management for recreation and wildlife with management oversight by VT. Department of Fish & Wildlife.

Herrick's Cove, described on CT River Paddler Trail as a peaceful park with two-laned concrete boat launch with two docks. The dirt road is a heavily used road, easily accessed off Route 5 and close to Exit 6 on Interstate 91, and the only public river access for boats in Rockingham. The road to the boat launch and the public space on

the river is poorly maintained. There are no public facilities for the increasing number of visitors. Rockingham requests the installation at Herrick's Cove of two vault toilets. Favored by the U.S. Forest Service, unlike other toilets, they do not need water or heat, nor release toxins into the ground. The maintenance is occasional pumping which can be contracted by local septic companies.

There are issues that require policing through the summer, and illicit activities have continued to be reported as a problem. Rockingham has limited resources for rural policing, but would like to see strategic sign placement, i.e., "no soliciting, no illegal activities", "See something, say something", or "Neighborhood watch". This recreation site is an asset that can be better maintained and supported through annual funding support of \$6,000 provided by GRH

Rockingham would like to collaborate with GRH on identifying the best locations for camping opportunities along the 24-mile impoundment area, to offer boat-in and hiker-only sites that provide semi-primitive type experiences.

Rockingham requests GRH contribute to a shared cost for Planning, Development and Implementation of the exploration of a trail from Herrick's Cove, north to the Wilder Dam Project creating connectivity to the Appalachian and Long Trails.

Erosion prevention should be sought, with maintaining the understory of honeysuckle, a top priority for wildlife habitat for birders and hikers. We ask GRH to further prevent erosion by avoiding any clearing, or opening for views of the river that may impinge on this important habitat. In order to enhance erosion mitigation, the Town of Rockingham requests GRH build and install a boardwalk and platform blind on "the point", which would give accessibility and an advantage point for birders, while better preserving the plants and native species that provide cover for migratory birds. Rockingham would like to collaborate with GRH using guidelines from the VT Dept of Fish & Wildlife.

The Town of Rockingham requests mitigation compensation from GRH for necessary maintenance to the access road to Herrick's Cove, police enforcement in summer months, a boardwalk to prevent erosion and allow accessibility at "the Point" , additional interpretive signage, permanent facilities, i.e. two (2) vault toilets within the boundary of parking lot, and temporary use port-a-potties at the "point" and establishing a collaborative maintenance plan. We request collaboration and funding support identifying camping locations, and exploring design, engineering and implementation of a trail connecting Herrick's Cove with Wilder Dam enhancing connectivity with the Appalachian and Long Trails.

Recreation in the Village of Bellows Falls

The Village of Bellows Falls, though defined by the river, has limited river access and the closest boat launch is .8 miles from the Square, over the Arch Bridge in New Hampshire on Route 12. Currently, the Riverfront Park south of the Square enables kayaks and canoes river access, but to go north, boaters must walk 17 minutes, carrying their boat across the bridge, and share access with power boats in North Walpole.

Because of its location on the river, Bellows Falls desires a Downtown portage north of the canal and dam. Future development and grant funding has been sought by the Rockingham Walk Bike Committee and the Downtown Alliance in a project to widen the sidewalks on Rockingham Street north of the Arch Bridge and include a promenade for all to enjoy the vistas along the river. **Rockingham requests Village access to the river on Rockingham St. through a set of steps and conveyance system for kayaks and canoes.**

Even with the addition of steps to access the river on Rockingham Street, there is still roughly .7 miles between the Riverfront Park on Mill St. and Rockingham St. The portage on Pine St in North Walpole, NH north of the dam is 1.5 miles to the other Rt 12 Walpole, NH portage site below the tail race. To access Bellows Falls recreational opportunities, like the connection between the Riverfront Trail for hiking and the existing canoe launch on the trail, boaters must navigate the sidewalks of the Square or busy roads while carrying kayaks. **We request GRH mitigate this divide, by providing an electric powered vehicle to connect the two portages, as well as carry boaters and visitors to and from Rockingham's various recreational opportunities and Herrick's Cove.** When the canal was first built, a series of locks enabled boats of a certain size to be navigable from the north and south. Once the canal became strictly for hydropower, Bellows Falls lost the ability to use the river for recreation or transport. We believe GRH should mitigate and compensate the economic and recreational impacts with our **requested northern portage and electric powered vehicle.**

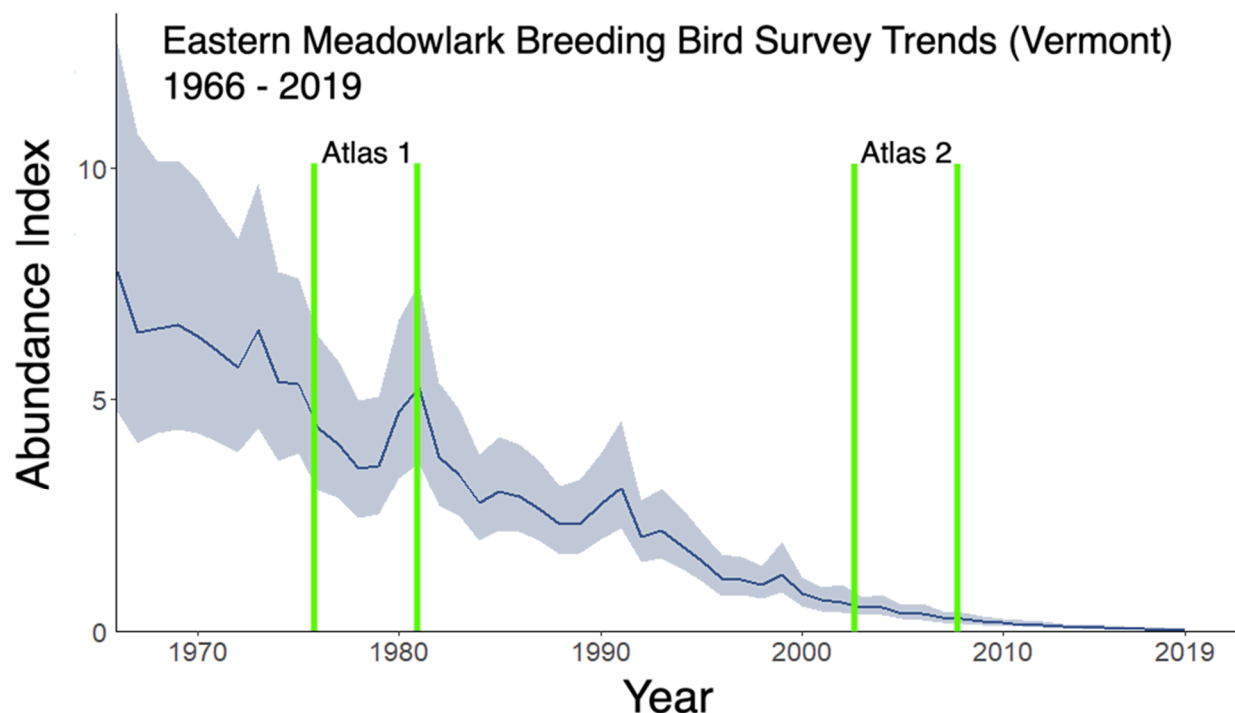
- Mitigation of flood plains and a restoration project in the Riverfront Park/ Herrick's Cove
- All public areas enhance with ADA amenities
- Installation of interpretive signage
- Portage on the VT side of the river on Rockingham Street to connect with the Riverfront Trail
- Land donations and Collaboration with Town for restoration/conservation/recreation easements for all land owned by GRH

Environment

Great River Hydro owns and manages several hundred acres of vital wildlife habitat at the confluence of the Williams River, Commissary Brook, and the Connecticut River. Herrick's Cove, Roundy's Cove, and the Upper Meadows have been designated as an Important Bird Area by the National Audubon Society. A diverse mosaic of habitat types provides ideal stop-over sites for migratory birds with over 236 species of birds documented to date. Herrick's Cove has become a mecca for birdwatching, drawing birders from across our region, and it is rated as the fourth most important in Vermont. U.S. birders spend on average \$1,500 per person on travel and expenses with over \$20 billion spent annually.

The Town of Rockingham recognizes that the Upper Meadows provide ecologically important habitat to species that have been identified as high conservation priorities by Vermont's Agency of Natural Resources. Vermont Species of Greatest Conservation Need including Bobolink, Eastern Meadowlark, American Woodcock, and Northern Harrier rely on grassland habitat at Upper Meadows.

Vermont Conservation Design, a Vermont Fish and Wildlife Service planning document, identifies grassland habitats as a high conservation priority, necessary to maintaining an ecologically functional landscape. The State of Vermont's 2015 Wildlife Action Plan states that "grassland-dependent species, which are declining throughout the Northeast, are finding less and less suitable habitat in Vermont as farms are managed more intensively or sold". The Plan calls for the promotion of "bird-friendly practices ... on active agricultural fields ... along the Connecticut River. Grassland management must maintain quality grassland, while not destroying nests during the breeding season... Mowing and other management should take place after August 1."



Graph courtesy VT Center for Ecostudies

Local conservationists, birders, and farmers have been working with GRH to implement these management practices and enhance grassland bird nesting habitat at Upper Meadows. Thanks to a grant provided by the Natural Resources Conservation Service the Upper Meadows fields are currently being managed under delayed mow. By delaying the hay harvest until August 1, juvenile birds have time to develop the flight skills needed to avoid farm equipment. This cost-share program ensured that the entire Upper Meadows was managed as grassland bird habitat

last summer. Breeding bird surveys documented higher-than-ever numbers of nesting females. Scores of young bobolinks and other grassland birds successfully fledged.

Consistent management is critical to ensure that these priority grassland bird populations hold steady. The NRCS funding to delay mow will expire in 2025. If Upper Meadows were to return to conventional management, including early summer haying, the site would quickly revert to a decline in grassland bird population.

Request: Given the importance of the Upper Meadows to grassland bird conservation, we request that GRH be required to continue delayed mow management. Delayed-mow management benefits priority grassland birds including bobolinks and eastern meadowlarks, as well as myriad other species such as wood turtles, small mammals, and pollinators. Ideally GRH will develop a plan to inventory species diversity on all their lands and define how they will manage lands to protect priority species. **We request that delayed mowing of the Upper Meadows be a requirement of FERC relicensing as mitigation and compensation for the environmental impacts, thus assuring the protection of this vital grassland bird habitat.**



Bobolink Pair at Upper Meadows (Cat Abbott).



Bobolink fledgling at Upper Meadows (Cat Abbott)



Aerial view of Upper Meadows Complex



Juvenile Northern Harrier Upper Meadows (Coleen Lawlor)



2020 Cohort of three meadowlark fledglings (Coleen Lawlor)



Male Meadowlark Singing Upper Meadows (Daron Tansley)

Erosion caused by the Wilder and Bellows Falls dam projects negatively impacts water quality in violation of state and federal clean water laws, harms fish and wildlife habitat, causes the loss of land along the river including the loss of prime agricultural land, increases flood risks, and damages important historical, cultural and potential recreational resources, particularly activities such as canoeing, recreational fishing, boat usage on the river, swimming, and the picnicking area. This erosion also contributes to the loss of prime farmland, aquatic and riparian habitat for rare and endangered species, and affects the water quality. The FERC license for this facility should include conditions that will prevent erosion harms from occurring.

In Summary:

Town of Rockingham recommendations for GRH relicensing protection, mitigation, and enhancement (PM&E) measures

- Public access to the river should be highlighted and supported by financial mitigation by Great River Hydro, and additional funding and collaborative support for future planning and development projects within the Village of Bellows Falls.

Abenaki Nation

- Clearly demarcate a pathway to the site linked to a longer river walk. The Overlook Trail as referred by the Area Wide Plan should enhance accessibility to view the petroglyphs that does not intrude upon sacredness of the site
- Build and install interpretive signs about the falls and Fall Mountain in relation to the petroglyphs.
- Provide access to a safe and marked area where the Abenaki and other Indigenous communities can have ceremonies.
- Clear obtrusive brush and trees, provide landscaping along Bridge Street and the ridge along the top of the petroglyph site, and support the maintenance with additional plantings of native plants
- Remove the prior construction of riprap to open the buried petroglyphs for study and viewing.
- Maintain access control for the purpose of protecting aesthetic resources as well as human health and safety.
- Provide ADA compliant parking and access

Recreation

- Maintenance to the access road to Herrick's Cove
- Police enforcement funding in the summer months at Herrick's Cove -\$6,000 annual
- Installation of two (2) vault toilets, and other public sanitation at Herrick's Cove.
- Identification of best locations for campgrounds
- Building of a boardwalk & blind for accessible bird viewing to prevent erosion
- Village access to the river on Rockingham St
- An electric powered vehicle connecting visitors and residents to the portages, other recreational opportunities and two and from Herrick's Cove
- Connecting trail North of Herrick's Cove to provide connectivity to the Appalachian and Long Trails

Environment

- Request of delayed mowing of the Upper Meadows be a requirement of FERC relicensing as mitigation and compensation for the environmental impacts, thus assuring the protection of this grassland bird habitat.
- Erosion efforts and mitigation activities to include keeping understory and
- Installation of a boardwalk and blind for bird viewing and accessibility

Economic Development

- Collaboration with the Walk Bike, Town and BFHS on bike/pedestrian access
- lease and access including engagement with New England Power Company.

- mixed-use transit-oriented redevelopment will boost the economy and provide additional housing needs with easements for parking, and GRH will contribute **a microgrid for the mixed-use transit-oriented development efforts on the Island.**
- easements granted for a canal walk with lighting to match the Downtown, and approval for light shows over the canal
- easements and financial support to build and maintain an overlook trail around the Island (see Abenaki Nation) connecting the Canal Walk and ADA amenities and parking
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- contribute over ten years \$1.5M toward capital improvements for infrastructure redevelopment including easements, access road, and parking for the Center.
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- Financial participation in the further development of the Fish Ladder for design and operation to connect with the CT River Cultural Heritage Center. GRH will commit to \$25K per year to continue the fish ladder and center operations.
- An ADA accessible overlook with interpretive signage at the Riverfront Park

Designated Downtown

- Black iron fencing project complete to the Bridge Street bridge on both sides of the Canal, using the same or better product as before
- Temporary public use of the green space adjacent the Canal on Bridge St. which will help to mitigate the loss of economic development in our Downtown.

Document Content(s)

FERC comments to Secretary Reese.docx.....1