



State of Vermont
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*Agency of Commerce and
Community Development*

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May 21, 2024

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

**Re: VT SHPO Comments on Great River Hydro, LLC Final License Application for
Vernon Hydroelectric Project No. 1904, Bellows Falls Hydroelectric Project No. 1855, and
Wilder Hydroelectric Project No. 1892 in Vermont and New Hampshire. Federal Energy
Regulatory Commission.**

Dear Secretary Reese:

Thank you for the opportunity to comment on the above referenced projects. The Vermont State Historic Preservation Office (VT SHPO) is providing the Federal Energy Regulatory Commission (FERC) with the following comments pursuant to 36 CFR 800.4, regulations established by the Advisory Council on Historic Preservation to implement Section 106 of the National Historic Preservation Act (NHPA). Project review consists of assisting FERC in identifying the project's potential impacts to historic buildings, structures, districts, landscapes and settings, and known or potential archeological resources that are listed in or may be eligible for inclusion in the National Register of Historic Places (NRHP).

The VT SHPO has reviewed Great River Hydro, LLC's (GRH) amended Final License Application distributed on January 31, 2024. VT SHPO offers the following comments regarding the proposed measures related to Cultural Resources.

1. VT SHPO is supportive of GRH's proposal in section 2.2.2 *Proposed Non-Operational Protection, Mitigation, and Enhancement Measures* to develop and sign a Programmatic Agreement for managing historic resources, develop/update Historic Property Management Plans (HPMP) for the three projects, continue archaeological studies, and expand and support educational and cultural programs.
2. In section 3.11.1.1 *Area of Potential Effects* the large scale and poor resolution of the area of potential effects (APE) maps make deciphering the specific locations of the APE boundaries challenging. These figures will need to be revised for the



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proposed HPMP's and narrative describing the methodology of the APE boundaries would be beneficial for all consulting parties and GRH implementation of the proposed HPMPs. Additionally, the HPMP should include narrative to address the potential for the APE boundaries to shift as erosional events change the impoundment boundaries.

3. Section 3.11.2.2 *Historic Architectural Properties* stated that VT SHPO has not yet issued a formal opinion of effects. It is the opinion of VT SHPO that the proposed license does have the potential to cause effects to historic properties, for both the known NRHP eligible project related facilities and other historic properties in the APE that are not project related and have not been discussed in detail in this application. These potential effects can be due to ongoing operations, needed maintenance, and potential future modifications and upgrades. Procedures to manage these effects, develop proactive measures for monitoring building conditions, and develop preservation and maintenance priorities should be included in the proposed HPMPs for the three projects.
4. VTSHPO does not agree with the conclusions in sections 3.11.4 *Cumulative Effects* and 3.11.4 *Unavoidable Adverse Effects* that no effects or adverse effects are associated with the GRH proposal. The archaeological investigations identified multiple areas of erosion adjacent to and directly impacting known archaeological sites and archaeologically sensitive areas. Due to the extended length of these proceedings and the absence of interim monitoring of archaeological sites, VT SHPO is concerned that adverse effects are actively occurring and may continue under the GRH proposal. The HPMP should include specific Protection, Mitigation, and Enhancement Measures for all known historic sites and effects as well as procedures to identify project effects that may occur over the term of the proposed license to historic sites, known and yet to be identified, in the APE.
5. As stated in our May 15, 2017 comment, it is imperative that mitigation measures to protect and preserve the eligible or potentially eligible archaeological sites evaluated to date be implemented immediately. All six of the sites are situated adjacent to eroding scarps and significant deposits in the National Register eligible sites extend to the top of bank, indicating there has likely been substantial data loss. In addition, GRH needs to renew efforts to obtain landowner permissions to complete Phase I site identification and Phase II evaluation studies in un-sampled portions of the APE within the Wilder, Vernon, and Bellows Falls Projects.



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Thank you for your cooperation in protecting Vermont's irreplaceable historic and archeological heritage. R. Scott Dillon and Elizabeth Peebles reviewed this project and prepared this letter. I concur with the findings and conclusions described above.

Sincerely:

VERMONT STATE HISTORIC PRESERVATION OFFICE

DocuSigned by:
Laura V. Trieschmann
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State Historic Preservation Officer



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