

Planning & Development, Lebanon, NH.
May 9, 2024

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

Via E-Filing

Re: FERC No. P-1892-030, Wilder Dam, Great River Hydro LLC

Lebanon NH Conservation Commission's comments on Great River Hydro LLC's Application for a New License

Dear Secretary Reese:

The Lebanon NH Conservation Commission 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 Wilder Dam (FERC No. 1892), submitted in December 2020 and revised in June 2023. As one of the stewards of Lebanon's natural resources, including the Connecticut River and its eastern shorelands immediately north and south of the Wilder Dam, our comments are relevant to this project's relicensing process.

I. Description

The City of Lebanon NH is home to the Wilder Dam, and the City's entire 7.3 mile western border is defined by the Connecticut River. Lebanon includes roughly two miles of river frontage upstream of the Wilder Dam and about five miles of river frontage downstream of the dam. The City is lucky to have so many amazing natural resources located along the banks and in the waters of the Connecticut River in West Lebanon. Our Natural Resource Inventory identifies many rare plants and animals as well as plant communities on river islands and shores.

It is our understanding that 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. We do not feel that the Amended Final License Application adequately addresses all these areas. The City of Lebanon has separately submitted comments that more directly address recreational opportunities not addressed in the Application. Here we will highlight a few areas where habitat and water quality issues and improvements could be better addressed.

II. Comments

A. Erosion, Bank Stability, and Sediment and Nutrient Runoff

The shores of the Connecticut River in West Lebanon have experienced bank erosion, as evidenced by the undercutting of the banks along the shores of Alana Cole Conservation Area and Chambers Memorial Reserve, in the northwest corner of the City upstream of the Wilder Dam, as well as behind some of the plazas along 12A downstream of the Wilder Dam. This erosion limits safe access to the river, erodes riparian habitat, and degrades water quality. We would like to amplify the chorus of local voices, including those of the Connecticut River Conservancy and CRJC, contesting the assertion made by Great River Hydro (GRH) that project operations are not contributing to erosion. While we support the proposed operational change to run-of-the-river, we do not simply assume that this operational change will address all erosion issues. We request that FERC require GRH to ensure that it does. Thus, we hope that FERC will require monitoring of bank erosion and sediment transport changes. We hope that GRH will be required to hire a third party to independently study erosion, bank stability, and the impacts of sediment and nutrient runoff on water quality. These study results should be made publicly available, and GRH should be required to act to implement any recommended modifications based on potential findings.

B. Implementation of Wildlife Crossing Improvements

The Wilder Dam area of Route 10 is a significant wildlife crossing. The road is a barrier to wildlife movement in and out of the large unfragmented block to the east, known locally as Boston Lot and the Landmark Lands. The City of Lebanon's 2016 Wildlife Crossing Study recommended increased wildlife crossing signage especially at the end of the old byway at the southwest corner of the 33-acre Great River Hydro property (identified as W2B in Exhibit G, sheet 1 of 25) on the east side of Route 10, near the dam. The same study recommends that the road down to the canoe portage be maintained as a usable "ramp" to and from the river for wildlife.

We request that Great River Hydro coordinate with the City and NH DOT to make this section of Route 10 a safer wildlife crossing, with speed control measures and wildlife crossing signs, and by providing for safe wildlife

passage across the GRH lands on both sides of Route 10.

C. Invasive Species Management Plans

We agree with the CRC/AMC recommendation from 2019 that Great River Hydro develop invasive species management plans to survey and control invasive aquatic, wetland, and upland species in and along the river in the Wilder Dam project area. This has already happened at the Holyoke facility, in 1999 (amended in 2001), and a similar model could work here for the Wilder Dam. Emphasis should be made towards managing the species that either pose a risk to state-listed species or native vegetation along the riverbank and to recreational use.

The 2010 City of Lebanon Natural Resource Inventory identified numerous Significant Ecological Areas in or along the banks of the Connecticut River. These SEAs include areas with rare plants, silver maple forests, tiger beetle habitat, mussel beds, riparian habitat, migratory bird habitat, riverine shoreline, bluffs & shoals, and mussel beds. Many of these areas, the river islands in particular, are being impacted by invasive knotweed, purple loosestrife, multiflora rose, and other invasive plant species.

We respectfully request that GRH finance invasive plant management to actively control invasive species with an annual amount sufficient to support this effort, increasing with the rate of inflation through the life of the license.

While not yet in the Wilder Dam area to our knowledge, water chestnut is found in the vicinity of both the Vernon and Bellows Falls facilities. The movement of hydrilla is also a huge concern. Our CRC river steward reports that it is currently found from the Massachusetts border south but has been spreading outside of the Connecticut River into some lakes in Connecticut, so it is clearly being transported by boats. Monitoring and education on prevention in NH/VT is needed. We request that GRH fund a river equivalent of the Lake Hosts to monitor boats at popular launch sites to prevent the further spread of aquatic species.

D. Land Stewardship and Conservation

Land owned by GRH, just east of the Wilder Dam in West Lebanon, is contiguous with a larger, mostly unfragmented block of open space.

We request that this parcel be placed under a permanent conservation easement. This request is in line with that made by CRC and AMC in 2019, that all lands not associated with facilities be protected with conservation easements.

There are invasive species impacting that parcel, as well as GRH lands on the west side of Route 10. We request that GRH invest in the proper stewardship of its Lebanon holdings, to include invasive species management.

E. Education and Outreach

We echo the recommendations of CRC/AMC and request that GRH develop an educational visitor center at Wilder Dam to educate the public about local history and the natural, cultural, and recreational resources of the river.

There is currently no web-based information on the status and trends of migratory fish species despite extensive data being collected at fishways at these facilities. Given the operational and facility improvements that will be required with this license, passage numbers will improve, so a well-designed and engaging website that hosts and interprets migratory and passage data for the entire watershed would be a significant public engagement tool.

As mentioned by CRC/AW/ATC, VT and NH lack river cruise opportunities. Great River Hydro should operate or fund the establishment and operation of a boat service to provide educational eco-cruises within their project areas. These educational experiences should be provided to local schools and the general public to increase community knowledge of the river, riverine species and habitat considerations, function of the hydroelectric facilities, and the impacts of dams on river systems.

F. Mitigation Fund

This relicensing will give GRH four decades of control over this important natural and cultural resource. It is hard to predict what will happen during this tenure. It is important that funds are available to study and act on emerging issues and to address them in real time, and not wait until the next relicensing process. Furthermore, public engagement and education about riparian and riverine habitats, river hydrology, and the role of hydro-power is greatly needed in this area and not well funded.

We would like to see FERC require that Great River Hydro create a Mitigation Fund to support research, water quality and wildlife habitat improvements, and additional educational programs. This fund should be proportional to GRH's revenue, and not a fixed sum.

III. Conclusion

The Lebanon Conservation Commission respectfully requests that FERC require the following of GRH as conditions of the relicensing of the Wilder Dam:
- Hire a third party to independently study the impacts of the operational change on erosion, bank stability, and the impacts of sediment and nutrient runoff on water quality; that these study results be made publicly available;

and that GRH be required to act on any recommended modifications based on potential findings.

â-Actively work with the City of Lebanon and NH DOT to make the section of Route 10 at the Wilder Dam a safer wildlife crossing, with speed control measures and wildlife crossing signs, and by providing for safe wildlife passage across the GRH-owned lands on both sides of Route 10.

â-Finance invasive plant management to actively control invasive species with an annual amount sufficient to support this effort, increasing with the rate of inflation through the life of the license.

â-Fund a river equivalent of the Lake Hosts to monitor boats at popular launch sites to prevent the further spread of aquatic species.

â-Place their land east of Route 10 in West Lebanon under a permanent conservation easement.

â- Invest in environmental stewardship of its West Lebanon holdings, to include invasive species management.

â-Develop an educational visitor center at Wilder Dam.

â-Develop a wellâ€designed and engaging website that hosts and interprets fish migration and passage data for the entire watershed to serve as a public engagement tool.

â-Operate or fund the establishment and operation of a boat service to provide educational ecoâ€cruises within their project areas, for local schools and the general public to increase community knowledge of the river, riverine species and habitat considerations, function of the hydroâ€electric facilities, and the impacts of dams on river systems.

â-Create a Mitigation Fund to support additional educational programs, research, and water quality and wildlife habitat improvements. This fund should be proportional to GRHâ€™s revenue, and not a fixed sum.

We hope that FERC will incorporate our comments and requests into the final relicensing agreement, and that these changes help to protect and improve the integrity of this section of the Connecticut River now and in the future.

Sincerely,

Sarah Riley
Chair, Lebanon Conservation Commission
On behalf of the Lebanon Conservation Commission

Exhibits:
Lebanon NH's 2016 Wildlife Crossing Study
Lebanon NH's 2010 Natural Resource Inventory

Document Content(s)

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