



CITY MANAGER'S OFFICE

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TO: Mr. John Ragonese, Project Manager, Transcanada
(via email to john_ragonese@transcanada.com)

Mr. Kenneth Hogan, FERC
(via email to kenneth.hogan@ferc.gov)

FROM: Mayor Georgia Tuttle and Members of the Lebanon, New Hampshire City Council

DATE: July 3, 2013

RE: Federal Energy Regulatory Commission (FERC) Process – Relicensing of Wilder Dam.
City of Lebanon Support for Transcanada's Proposed Study Plan

The City of Lebanon, New Hampshire, is proud to be a host community to the Wilder Dam. City residents and visitors benefit not only from the tax revenue generated by the dam, but also from the river-based recreational opportunities that the dam provides. The City nevertheless has concerns that the operations of the dam may have negative impacts, not only on the Connecticut River and its ecosystem, but on the entire Connecticut River watershed.

The City of Lebanon welcomes the opportunity to participate fully in the re-licensing process and to foster a relationship with Transcanada. Around May 15, 2013, in response to the call for study requests and comments on the Transcanada re-licensing Pre-Application Document (PAD), the City of Lebanon submitted a number of requests including incorporating the Lebanon Natural Resources Inventory (NRI) and documentation of the mist community at the base of the Wilder dam to the project library. Further the City was a co-signer on a request to study piping erosion and worked with NH DES to include channel morphology in the benthic habitats study. The City requested a review of conditions at the Wilder Dam picnic area and portage as well as the inclusion of all existing and potential recreational facilities in the proposed recreation facilities study—in particular, the Westboro Railyard, which sits just one-tenth of a mile south of the project area boundary and which the City believes has significant recreational, cultural and historical potential for West Lebanon and the Upper Valley.

City of Lebanon representatives were able to attend all of the six Proposed Study Plan (PSP) meetings during May and June of 2013 as well as participate in follow-up telephone conferences to further refine the studies and methodologies. The City looks forward to participating on the study sub-committees for Erosion, Terrestrial, Recreation & Aesthetics, and Cultural & Historical. We understand that the sub-committees will meet for one to two years depending upon the subject areas.

We appreciate that all of the requests made by the City, to date, have been or will be addressed within the Study Plan. The following acknowledgements were made during the PSP review process and further address the City's concerns:

- All recreation facilities along the River will be included in the Study Plan rather than just those within the defined project areas. The City's riverfront municipal conservation areas at Chambers, Cole, and Two Rivers will be included, as well as New Hampshire Fish and Game's Trues/Blood Brook cartop boat launch. Westboro and River Park, both potential recreation facilities, will likely come under the section of the study pertaining to future needs. Maintenance of existing facilities and inclusion of interpretive/educational materials at the Wilder Dam Picnic Area and portage trail will be included in the first phase of the Recreation & Aesthetics study, which includes obtaining information regarding the condition and use of existing recreation facilities and public viewing areas.
- There are a number of sensitive cultural and historical sites along the River. The City encourages the protection of information relative to preserving the integrity of these sites while noting that the City does have artifacts (mostly railroading) that could be of interest for display at some point.
- In 2012, Transcanada commissioned a Rare, Threatened and Endangered Plant Species Study conducted in 2012 by Normandeau Associates. A "public" copy of this report, which does not include location of sensitive sites, was only recently made available on the FERC website for review.
- It was noted that a number rare/unusual habitats, similar to the mist community, had been identified already by Normandeau, the project consultants. Comments from the City's NRI Consultant, Dr. Rick Van de Poll, were included in the transcript and noted by the Normandeau's consultant Sarah Allen.
- The City supports the recommendation from NHFG fisheries biologist Gabe Gries to include Mascoma River and the White River among the 6 tributaries to be selected for the channel morphology and benthic habitats in addition to 12 locations on the mainstem.
- The City strongly recommends that the Hydraulic Modeling study place additional pressure-transducers (data-logging devices) along the Lebanon portion of the mainstem, particularly downstream of the White River. Suggested locations included the Chambers/Cole reach, the Westboro reach, the White and Mascoma confluences, and the Rt. 12A reach (below I-89).
- The White and Mascoma rivers will be included among the tributaries in the Operations Modeling study and the Mascoma River is among the 10 major tributaries that will be monitored at their respective confluences with the mainstem under the Water Quality study.
- The City will provide our available digitized aerial and historic maps in support of the Erosion and other studies.
- The City is reviewing areas of concern along the City's stretch of the river for potential transect locations for the Riverbank Transect Study and the Riverbank Erosion Study. We understand that the same transects will be used in both studies and that additional transects could be added.

The Lebanon City Council supports the revised Proposed Study Plan (PSP). We look forward to working with Transcanada and the Federal Energy Regulatory Commission to address issues of concern and to foster an ongoing, mutually beneficial relationship with Transcanada.

For the Lebanon City Council:

Georgia A. Tuttle, Mayor, Ward 1
Stephen M. Wood, Assistant Mayor, At Large
Bruce Bronner, Councilor, Ward 2
Nicole S. Cormen, Councilor, At Large
Carol W. Dustin, Councilor, Ward 3
Erling Heistad, Councilor, At Large
Karen Liot Hill, Councilor, Ward 3
Suzanne M. Prentiss, Councilor, Ward 1
Heather C. Vogel, Councilor, Ward 2

Georgia A. Tuttle (pm)
Georgia A. Tuttle
Mayor, City of Lebanon

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