



Friends of the West River Trail
138 Elliot Street
Brattleboro VT 05301

September 21, 2022

Kimberly D. Bose, Esq. Secretary
Federal Energy Regulatory Commission
888 First Street, N.E., Room 1A
Washington, DC 20426

Re: Wilder Dam Project No. 1892
Bellows Falls Project No. 1855
Vernon Dam Project No. 1904

**Comments by the Friends of the West River Trail-Lower Section on
Amended Final License Application (hereafter AFLA) dated December 7, 2020**

Dear Secretary Bose,

We (The Friends of the West River Trail - Lower Section) are writing to comment on Great River Hydro, LLC's relicensing application for the Wilder, Bellows Falls and Vernon Dam Projects. This relicensing application is to allow Great River Hydro to continue to use the public resource of the Connecticut River to produce hydroelectric power.

As the representative of current and future users of the West River Trail, we would like Great River Hydro to be required to develop a comprehensive Recreation Management Plan to include enhanced recreational benefits at a level commensurate with Great River Hydro's use of the waters of the West River and the Connecticut River. This management plan should be developed through a collaborative process with recreation stakeholders and updated at least every 10 years.

The West River joins the Connecticut River at the Retreat Meadows in Brattleboro, Vermont, seven and one-half (7.5) miles north of the Vernon Dam. The impoundment of water caused by the Vernon Dam Project extends to this area and approximately one and one-half (1.5) miles upstream on the West River.

Since its inception in 1992, the Friends of the West River Trail has developed almost 20 miles of safe and scenic public trails along the West River. We create, connect, maintain, and advocate for outdoor recreational facilities on behalf of individual users as well as for the region, which we believe is positively impacted economically by these amenities. Attached is a map showing the existing trail network as well as desired connections and extensions in the southern area of the Trail.

After 30 years of planning and implementation, there are still significant gaps in this trail system, and these points of non-connection have an effect disproportionate to their size. The mitigation of impacts to recreation required of Great River Hydro could make a tremendous impact on the usability of the trail and the opportunity for residents and visitors to have access to the West and Connecticut Rivers. We have reviewed the recreation analysis in the Great River Hydro AFLA and ask that these three requests be included in the application:

West River Trail Connector: Currently there is not an off-road route from the southern terminus of the West River Trail (near the confluence of the West River and the Connecticut River) connecting with downtown Brattleboro and other recreational resources near downtown Brattleboro. These resources include: Wantastiquet Mountain just across the Connecticut River; hiking trails that connect to Mt. Monadnock and beyond; bike trails connecting to Hinsdale, Keene and the southern NH region; and on-road connections in Vermont along the Connecticut River.

The Friends of the West River Trail has recently submitted an application to New England Central Railroad to develop an off-road connection (rail with trail) along the Connecticut River on land owned by the railroad. We have also been working with the Town of Brattleboro and the Windham Regional Commission to determine the type of trail to best make this connection. We request that Great River Hydro significantly support this regionally important effort. ***This support should include: support for access to this land, technical support related to trail location and river levels, financial support to construct the project, and financial and people power support to maintain the trail once constructed.***

Retreat Meadows Boat Launch: Great River Hydro lists the boat ramp at the Retreat Meadows on Route 30 as a recreational resource (Table 3.8-16, Vernon Project recreation site parking lot use). It is our understanding that the boat ramp is not a formal, permitted ramp and that there is no entity responsible for the maintenance of the ramp. Additionally, based on Exhibit G for the Vernon project, it is clear that the boat ramp is within the Project Boundary (Exhibit G Sheet 7). We agree with Great River Hydro that the ramp is a valuable recreational resource and believe that Great River Hydro should be required to improve the ramp and take responsibility for ongoing maintenance over the course of the license. Further, Great River Hydro indicates that peak usage was recorded June 8, 2014 as 11 parked vehicles, but our observation is that the peak usage is during the winter months, rather than in June. For example, on January 29, 2017, we observed 43 cars parked along the roadway to access this area within the Project Boundary for ice skating and ice fishing.

General Assistance with connectivity through contributions to the trail network: As the map of the future desired trail network shows, there are sections not yet connected, including completing the Hogle Wildlife Sanctuary Trail around the Meadows. From downtown, the trail should be connected east to Mt. Wantastiquet, south to the 82-mile Fort Hill network, and west to the Whetstone path. Having the support and advocacy of Great River Hydro would help encourage support by other groups and agencies.

Thank you for your consideration of these requests, and please let us know if we can provide any additional information or clarification that would be helpful to the process. We reiterate that given the scale and impact of the Vernon hydro facility, we believe a Recreation Management Plan including mitigation for recreation improvements, should be a requirement of relicensing.

Sincerely,



Jason Cooper



Elia Hamilton



Lester Humphreys



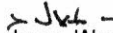
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Friends of the West River Trail Lower Section Steering Committee

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