

CITY OF LEBANON ~ PLANNING OFFICE

18CFR Section 5.9b Submitted for the Wilder Hydro Electric Study Project, FERC 1892-026

Contacts: Andrew Gast-Bray City Planner (603) 448-1457 <u>Andrew.Gast-Bray@lebcity.com</u> Shelley Hadfield, Consultant (603) 469-3584 <u>Shelley.Hadfield@lebcity.com</u>

Comments referencing PAD Section 3.10 Recreational Resources and Section 3.12 Cultural Resources

The City of Lebanon requests that the Westboro Rail Yard be considered a part of the Wilder Dam "project" and added to the listing of recreational and cultural facilities in Tables 3.10-1 and 3.12-1. Located just a few hundred feet below the most southern point of the "project area" directly across from the confluence of the White River Westboro, this important facility is excluded from the PAD. Developing local and regional recreation and cultural resources at this site is mentioned in numerous local and regional studies including the CRJC Recreation and Water Management Plans (citations below), is consistent with the recently released 2013-2018 NH SCORP.

While the Westboro Rail Yard, a Brownfields site, is located slightly south of the Wilder Dam defined "project area", we believe that it is relevant to the Transcanada project and to Transcanada's commitment to supporting recreational and cultural facilities within its participating communities. We believe that this pivotal project provides an opportunity for a multi-jurisdictional effort including both public and private partnerships providing both land and river based recreation and cultural opportunities and assisting with revitalization efforts.

Introduction:

The Westboro Railroad Yard (Westboro) is located in downtown West Lebanon, New Hampshire approximately 3,000 feet south of the Wilder Dam and across from the mouth of the White River. Westboro was established in 1848 and was in continuous use for 120 years until the late 1970s. The yard was originally constructed by the Northern Railroad, which became part of the Boston and Maine Railroad in 1895. The Westboro Yard is a Lebanon landmark and has a considerable role in the economic history and future of the community. The Westboro Yard and roundhouse have been designated Historic landmarks by the Lebanon Historic District Commission. The Northern Railroad line, including the Westboro Yard has also been deemed eligible for the National Register of Historic Places as an historic district by the State Division of Historical Resources.

Early settlement in Lebanon concentrated along the Connecticut River in what is now West Lebanon, and along the Mascoma Lake region near Enfield. While Lebanon emerged as a mill-district

and became the center of town, West Lebanon grew into a railroad hub with a separate identity after lines entered from Boston. This rail center would become known as Westboro after two trains collided when West Lebanon was mistaken for Lebanon.

Westboro consists of 22 acres bounded by one of the most beautiful stretches of the Connecticut River on one side and a significant portion of downtown West Lebanon business district on the other. The City of Lebanon and local civic groups have long sought to utilize portions of the Yard for recreational and cultural uses including a park, car-top boat launch, a community facility for public events and interpretation and a riverfront trail for walking and bicycling. This trail will extend the full length of the rail yard and will connect Westboro to the City's existing trail system.

Brownfields:

The Yard was purchased by NH DOT in 1999 for anticipated future rail uses and in 2000 the state granted a 10 year lease to the Claremont Concord Railroad to operate a rail-cement facility on one portion of the Yard, that permit was renewed in 2010. Extensive contamination has been documented at various locations throughout Westboro Yard including on the banks of the Connecticut River itself. There are a number of monitoring wells on the property though the full extent of the contamination around the historic buildings is still unknown. Based on the historic use of the site by steam trains as opposed to electric, our hope is that the types of contamination present are likely consistent with oil, petroleum and asbestos rather than PCBs. A Brownfields Level I and Level II will be needed to ascertain the full extent.

Between 2005 and 2009, in a joint project with the New Hampshire Department of Transportation (NHDOT) and the New Hampshire Department of Environmental Services Brownfields (NHDES) program, the City of Lebanon remediated contamination at the north end of the yard and took ownership of a small parcel of land abutting the Route 4 Bridge. In 2014 and 2015, NHDOT will be replacing the Route 4 bridge and removing the temporary bridge currently located on the city owned property a leaving a small park. Facilities will include trailhead parking car-top boat launch, interpretive panels, a picnic area and possibly a fishing pier.

The New Hampshire Department of Environmental Services continues to monitor the yard and is conducting additional studies in the area around the roundhouse. For this Brownfields site to be used for public recreation the land will need to be transferred to the City of Lebanon and an extensive clean-up effort will be necessary. The City is working with NHDOT and NH DES to explore options.

Nexus:

While the Westboro Rail Yard is located slightly south of the Wilder Dam defined "project area", we believe that it is relevant to the Transcanada project and to Transcanada's commitment to supporting recreational and cultural facilities within its participating communities. We believe that this challenging project provides an opportunity for a multi-jurisdictional effort including public and private partnerships and investment to develop land and river- based recreation, increase cultural opportunities



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and support revitalization efforts. The City would welcome the opportunity to work with Transcanada to that end.

The City of Lebanon is concerned that Transcanada's Wilder Dam operations which result in the artificial raising and lowering of water levels and changes in velocity in the Connecticut River combined with increased flow from the White River is possibly accelerating the erosion process and may be eroding the contaminated river bank along the Westboro Rail Yard. Further, despite the remediation of the Tidewater parcel at the north end of the yard, there is still a plume of contamination emanating from a gasoline spill at the old T & R Sidings facility to the north across Bridge Street which runs under the property in a south westerly direction towards the Connecticut River. We suspect the changes in velocity and raising and lowering of the water levels increases capillary action drawing contaminants toward and into the Connecticut River at a rate faster than normal attenuation. The City has advised the New Hampshire Department of Environmental Services (NH DES) of these concerns and DES continues to study the contamination in the yard particularly in the area of the roundhouse and along the river bank.

The current approach to dealing with the contaminants in the yard is attenuation; given the city's intent to repurpose portions of the yard to include public use and river access which will likely involve a transfer of property, a Brownfields Level I and level II study will be necessary and should include a study correlating the dam operations with contaminant levels shown in monitoring wells.

The City's vision for the south end of the yard includes an amphitheater and interpretive center to celebrate the river and railroading history of West Lebanon and to reconnect Westboro with the downtown. The yard is visible from many locations on both sides of the Connecticut River. Unfortunately the deterioration associated with the derelict historic railroad buildings contribute to an aura of blight and decay permeating the downtown, overshadowing attempts to revitalize West Lebanon and generate new investment. Despite the efforts of the local civic groups, each year the yard gets shabbier and the historic buildings come one step closer to collapsing. West Lebanon has little green space or public areas, gaining access to and redeveloping at least a portion of the Westboro Yard is essential to the re-vitalization of this struggling downtown. The irony is not lost that the thriving railroad yard that once contributed to the expansion of West Lebanon is today the symbol of neglect.

The need for this recreational and cultural facility is already supported by numerous studies and plans. The project is listed in the City of Lebanon Master Plan, Recreation Plan, and Strategic Plans as well as being referenced in the CRJC Recreation and Water Resources Plans, goals and recommendations including:

CRJC Water Resources Plan

• The City of Lebanon and the local Rotary Clubs should continue to pursue redevelopment of the Westboro Rail Yard, including a riverside path and a car-top boat launch.

- Encourage additional car-top boat access for the use of canoes and other small craft, on the mainstem and on tributaries, because of their low impact on the river.
- Assist towns in creating bike paths; promote the use of abandoned railroad rights-of-way as bike paths while continuing to permit landowners to access their land across tracks.
- Identify opportunities, when land use is changed, to retain easements for public access for trails, birding, car-top access, or other low impact public recreation.
- Explore federal and state funding programs, such as SAFETEA, to create trails and other new recreation opportunities.

CRJC Recreation Plan – Upper valley River Subcommittee

- Some of the most interesting paddling in the Upper Valley segment is in the five miles below the dam and past heavily developed West Lebanon, where foliage on the riverbank largely spares the paddler a view of the commercial strip close to the river, and the forested Vermont bank and riffles at Johnson Island fill the scene. The City of Lebanon and the local Rotary Clubs are considering a plan to create recreational trail and car-top boat access in West Lebanon's historic Westboro Rail Yard.
- Lebanon looks forward to a new public car-top river access, trail, and river overlook in or near historic downtown West Lebanon. While plans have been proposed for the amenities at the historic Westboro Railyard for several years, progress has been stalled by soil contamination, ownership issues, funding, and the question of compatibility betwwen public recreation and active rail operations onsite. The city's recent receipt of a DES brownfields grant bodes well for petroleum cleanup and eventual establishment of river access. The City of Lebanon and the NH Bureau of Rail & Transit should continue working with all stakeholdrs to provide public recreational acess in West Lebanon that enhances the downtown and provides stewardship of the river.
- Northern Rail Trail Twenty-five miles of a former 59 –mile rail trail from Lebanon to Boscawen have become a trail through the efforts of local volunteers, and another 34 miles are under development. Abandoned railroad rights-of-way can serve as bike paths as long as abutting landowners' access remains. For part of its route, the trail follows the Mascoma River. The trail is open for hiking, horseback riding, bicycling, snowmobiling, cross-county skiing, and dog-sledding.
- A potential pedstrian and bicycling connection between Lebanon and White River Junction exists across the railroad bridge linking these two communities (note that a marsupial bridge is now under consideration).

Trails Connector:

The Mascoma River Greenway (MRG) is referenced above in the CRJC Upper Valley River Subcommittee Recreation plan; this four mile long section of the Northern Rail Trail terminating at the Westboro Rail Yard, is the highest recreation and transportation priority for the City of Lebanon. Following the former Boston and Maine corridor from the Lebanon/Enfield Town line to the Westboro Railyard in West Lebanon and, ultimately, to Vermont, the Northern Rail Trail has been named one of the top 100 trails in the United States. In addition, the beautiful Mascoma River winds itself back and forth across the trail all the way to its final destination, the Connecticut River. The strategic east-west



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alignment of the Northern Rail Corridor provides this unprecedented opportunity to create a scenic, multi-use path running the entire breadth of the city. The MRG will be the core transportation corridor for bikes and pedestrians through the heart of Lebanon and West Lebanon, connecting Lebanon's neighborhoods with workplaces, schools, child care center, open spaces, shopping areas, a medical center and transit stops.

The MRG can take on a greater transportation role in Lebanon accommodating commuting, school, and other non-work trips in addition to recreational uses. Linkages into the Greenway from the City's bike and pedestrian network are located at several junctions along the Greenway and include the String of Pearls, the Riverside Community Park, the Memorial Pool and the Upper Valley Loop Trail which provides trail connections to the central Upper Valley towns of Lebanon, Hanover, Hartford, and Norwich as well as a connector to the State of NH north-south bicycle route.

Consultation:

The City of Lebanon met on February 20, 2013 with NH DOT Bureau of Rail and Transit and the NH DES Brownfields program to review the status of the southern portion of the yard where the City envisions access to the yard from Route 12A dry bridge, an amphitheater and parking as well as a riverfront trail which will connect with the small park at the north end of the yard. A marsupial bridge under the existing Connecticut River rail bridge would connect the Park (name to be determined) with trails on the Vermont side of the river.

Studies:

In additional to the related request to study the impact of the flow and capillary action on this Brownfield's site, a number of studies are needed: an engineering study to assess the status of the rail buildings including the round house, the bunk house and the sand shed, and a Level 1 and Level II brownfields assessment for the area of the yard needed for the project. The City expects to apply to NH DES and the US EPA for the Brownfields Assessments.

Funding:

Beyond that we anticipate that funding will be needed to assist with Brownfields clean-up, demolition of the structures (which we believe at this point are not salvageable), construction of a new facility and development of interpretive materials; and finally, construction of the riverside trail to connect to the north end of the yard. To date, we have raised funding to complete the Plan for the yard (LCHIP), the remediation at the north end of the Yard (over \$700,000) was funded by the NH DOT and the NH DES Brownfield's grants, the City has funded the development of plans for the park at the north end of the yard and is applying for LWCF funds to complete the Park.

Though the City continues to work with stakeholders and will continue to submit grant applications, a project of this magnitude cannot be accomplished without capital infusion from multiple partners. The City of Lebanon requests that a Mitigation Enhancement fund be established for recreation and cultural facilities needs and that the Westboro Rail Yard be considered a part of the "project".

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