

April 11, 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. 1892, Wilder Dam, Great River Hydro LLC
Hanover Conservancy comments on Great River Hydro LLC's Application for a New License

Dear Secretary Reese:

The Hanover Conservancy 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 for Wilder Dam (FERC No. 1892), submitted in December 2020 and revised in June 2023.

The Hanover Conservancy is the oldest local land trust in the State of New Hampshire. We own and manage the 112-acre Mink Brook Nature Preserve and the 35-acre Lower Slade Brook Natural Area on Connecticut River tributaries which are directly affected by operations at Wilder Dam. We are currently engaged in conserving lands along other Connecticut River tributaries and headwaters, and also advise our community on issues related to environmental policy.

I. Description

Our service area, the town of Hanover, is located in Grafton County and borders the Connecticut River on the west, with 8.1 miles of frontage on the Wilder Dam impoundment. We understand that relicensing decisions by FERC must give equal consideration to protection of habitat and water quality, recreational opportunities, and cultural and historic resources as well as power generation. We believe that the Amended Final License Application falls short of adequately addressing all these areas. Our concerns are outlined below.

II. Comments

The Hanover Conservancy applauds the proposed major operational change from a daily peaking cycle that follows the energy market to an inflow=outflow model that more closely reflects precipitation and snowmelt in the river's watershed and the resulting natural flow of the river system. This will have important benefits in restoring water levels in the lower reaches of Mink and Slade Brooks (and Hanover's other tributaries) to a more natural regime, returning free-flowing conditions to longer reaches of these streams.

However:

A. Bank erosion remains a strong concern. Great River Hydro's assertion that project operations are not contributing to erosion is not credible. It is clear to any observer that over the last 74 years, water level fluctuations in the Wilder impoundment have caused bank slumping and erosion due to soil piping and pressure differences, leading to bank failure and measurable loss of land. A riverfront landowner in our community discovered that even heavily forested parts of the impoundment shoreline "have been undercut, forming cavities that reach back five to six feet. Since these cavities remove physical and nutritive support for the trees above, they could result in bank failure." (*Connecticut River Water Resources*

Management Plan, Upper Valley Region, p. 34, published by the Connecticut River Joint Commissions, 2009)

Riverbank erosion within our community limits safe access to the river, has contributed to the loss of residential and agricultural land, and degrades water quality through excess sediment entrainment after storms. The lived experience of those intimately familiar with the observable effects of dam operations on riverfront lands should be sought and considered when fact-finding for the current and future licensing of these facilities. This includes the highly credible observations of riverfront farmers like Steven Stocking of Birch Meadow Farm in Fairlee, VT, riverfront homeowners such as John Mudge of Lyme, NH and local governing bodies.

Erosion control and streambank stabilization are not adequately addressed within the license application. The Application does not include monitoring of bank erosion and sediment transport changes after the proposed operational change is put into effect.

While we support the proposed operational change, we respectfully request that FERC require long-term monitoring of bank stability and erosion metrics at time intervals that enable nuanced interpretation of seasonal versus operational fluctuations and the past and future influence of these fluctuations on erosion. Should these studies indicate that either the change in project operations or continued dam operations have outsized influence on past, continued, or future erosion, mitigation measures must be instituted.

B. Hanover residents do not have adequate recreational access to the river. The Connecticut River is the most important visual, ecological, and recreational feature of our town. Hanover's draft 2024 Master Plan notes, "Access to the Connecticut River is insufficient relative to the demand for swimming and boating. There is no Town-owned swimming facility on the River. Wilson's Landing is often too crowded to accommodate both trailered and car top boat launching."

The only Town-owned boat access is at Wilson's Landing. Years ago, the Town had a second boat landing inside the mouth of Mink Brook at the wastewater treatment facility, but that was closed after changes to the plant. A new canoe/kayak access point should be provided at Town property along Mink Brook just west of Route 10, following the recommendation of the Connecticut River Joint Commissions' 2008 *Connecticut River Recreation Management Plan* for Hanover.

While we appreciate Great River Hydro's plan to maintain access points and campsites elsewhere, the company's proposal includes little mention of increased or improved recreational facilities beyond what was provided under the past license. This is not adequate for our growing community, which is strongly oriented toward outdoor recreation.

People on both sides of the Connecticut River are strongly oriented toward outdoor recreation, including walking and bicycling. A bike/ped crossing of the river linking Lebanon's Boston Lot trailhead parking area to Kilowatt Park in Wilder would be a most welcome amenity and greatly expand the diversity of river-related recreation opportunities in our region.

Great River Hydro should be required to provide public meetings and work with municipalities such as ours to develop a Recreation Management Plan that provides recreational opportunities that are regionally beneficial, equitably distributed throughout the project area, and financially supported over the entire life of the license. The Connecticut River Joint Commissions' 2008 *Connecticut River Recreation Management Plan* provides a good template.

III. The need for headwater and tributary conservation is urgent and requires a mitigation fund.

Climate change is bringing stronger, more severe storms that are placing heavier stress on headwater streams and threatening downstream flooding in these tributaries and the Connecticut River. The pace of conservation investments in protecting naturally forested headwaters cannot keep up with the development pressure on such lands, including from climate migrants seeking to relocate in the beautiful Connecticut River Valley. A source of funds is critically needed to help land trusts continue the important work of protecting the natural hydrology of the watershed by conserving headwater wetlands, seeps, and first-order streams in particular.

The Hanover Conservancy is currently embarked on the most ambitious and expensive conservation project in our 63 year-history, the protection of 140 acres on Moose Mountain and the sources of both Mink and Hewes Brooks. A key motivator for this project is to provide some flood security for Etna Village just downstream. Assembling a funding package for this project has been challenging. An essential contribution is a 2024 grant of \$115,000 from the Upper Connecticut River Mitigation and Enhancement Fund. This fund, administered by the NH Charitable Foundation, was created as part of a Supplemental Agreement during the relicensing of the Moore, Comerford, and McIndoe Falls dams in the river reach known as Fifteen Mile Falls.

It should be central to the mission of both Great River Hydro and FERC to help protect our region against the worst effects of climate change, including protecting the natural hydrology and forest cover of the watershed. Such efforts also benefit company operational planning by assuring a more predictable streamflow. This can be done through land conservation, but the support of private individual donors and state-sponsored grant programs is not enough, as we have learned. A mitigation fund aimed at providing conservation assistance in the watersheds supplying the Wilder, Bellows Falls, and Vernon Dams makes sense from both an environmental perspective and for business and dam operational planning.

IV. Conclusion – The Hanover Conservancy respectfully requests that FERC require

- (A) bank erosion monitoring and mitigation;
- (B) assistance to communities to provide river-related recreational opportunities, and
- (C) a mitigation fund to support permanent conservation of headwater streams and tributaries.

Sincerely,

Adair Mulligan
Exec. Director

Richard Howarth
Lands Committee Chair

Exhibits:

Draft Hanover Master Plan: <https://hanovernhmasterplan.com/>

Connecticut River Water Resources Management Plan: <https://crjc.org/river-plan/water-resources-management-plan/>

Connecticut River Recreation Management Plan: <https://crjc.org/river-plan/recreation-management-plan/>