



LEBANON CONSERVATION COMMISSION
APRIL 11, 2024 - 6:30 PM
COUNCIL CHAMBERS, CITY HALL OR
REMOTE VIA VIRTUAL PLATFORM
LEBANONNH.GOV/LIVE

1. Call to Order

- A. To participate in this meeting, please [join live via Microsoft Teams](#) or call 929-229-5356 (access code: 858 233 155#). If you have trouble accessing this meeting, please [email mark.goodwin@lebanonnh.gov](mailto:mark.goodwin@lebanonnh.gov)

2. Approval of Minutes

- A. March 14, 2024

3. Open to the Public

4. Permit Review

- A. None

5. Study Items

- A. FERC - Wilder Dam Relicensing Comment Period Update
B. Property Stewardship Discussion (continued)
C. Boston Lot Review & Discussion

6. Committee Reports

- A. Biodiversity Group (Invasives)
B. Stewardship
- Ranger
-Trail Coordinator
-Monitors and Stewards
C. Wild about Lebanon
D. Amphibian Crossings
E. LUCT/Current Use
F. Other Subcommittees

7. Other Business

- A. FYIs
B. Follow Up
C. Workshops and Educational Opportunities

8. Future Agenda Items

9. Adjournment

The order of agenda items is subject to change.

Lebanon Conservation Commission Agenda
April 11, 2024

Meetings are open for in-person and remote attendance. Members of the public that wish to attend remotely may do so by going to LebanonNH.gov/Live where you will find instructions on how to enter the meeting. Members of the public will be able to participate and ask questions through the City's virtual platform or by phone. Please note: Should technical difficulties occur during the meeting that disrupts virtual or phone connection(s), the meeting will continue without remote access capabilities.

DRAFT

**LEBANON CONSERVATION COMMISSION
CITY COUNCIL CHAMBERS, CITY HALL OR
REMOTE VIA VIRTUAL PLATFORM
6:30PM THURSDAY MARCH 14, 2024**

MEMBERS PRESENT: Sarah Riley (Chair), Barbara Hirai, Erling Heistad (City Council Rep.), Ernst Oidtmann, Donald Lacey, Chris Johnson, Brandon Hill (Alt)

MEMBERS ABSENT: Sean Dittrich (Alt.), Bruce James (Vice Chair), Susan Almy (Alt.)

STAFF PRESENT: Mark Goodwin (GIS Coordinator); Rod Finley (City Engineer)

1. CALL TO ORDER

Chair Riley called the meeting to order at 6:35pm. Mr. Goodwin reviewed the City's meeting in-person and REMOTE attendance policies and procedures.

2. APPROVAL OF MINUTES February 8, 2024

Amendments:

Page 3, Line 34 & Pg 4, Line 34: Change "fall" to "default"

Page 4, Line 30: Change "work" to "use herbicides"

Page 4, Line 4&5: Change "Upper Valley Land Trust" to "easement holder"

Page 5, Line 9: Change "link to" to "to link on"

A MOTION was made by Erling Heistad to approve the February 8, 2024 Meeting Minutes as amended. The Motion was seconded by Chris Johnson.

** The Vote on the MOTION was approved (7-0).*

3. OPEN TO THE PUBLIC

No one from the public spoke.

Chair Riley moved **Study Item 5A** to the top of the meeting, which is out of the order on the meeting agenda.

5. STUDY ITEM

A. Cicotte Properties, LLC rezoning request (per 01/17/2024 City Council directive)

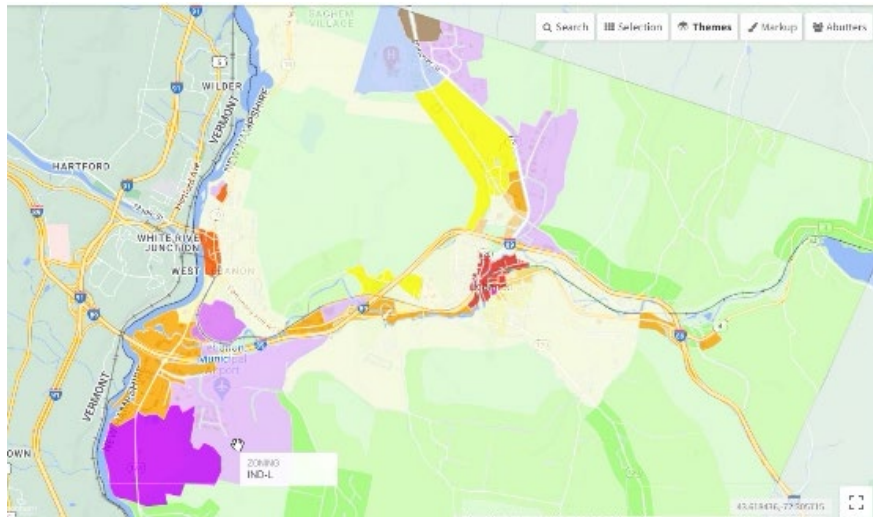
Dr. Oidtmann recused himself from the discussion about this agenda item.

Attorney Barry Schuster was present for the applicant. He gave a recap of the applicant's rezoning request, which is to add a Conditional Use of "vehicular sales and service" to zone IND-L. He said this request is the same as what was presented before the Commission in December for the RO-1 zone.

He asked the Commission if there were any changes to the MOTION made at the December 14, 2023, Conservation Commission meeting. He read the MOTION from that meeting, changing the zone to the IND-L zone and referring to the current meeting:

"A MOTION was made by Barbara Hirai that the Lebanon Conservation Commission has not identified any conservation issues and therefore does not recommend approval or disapproval for the proposed addition of a Conditional Use Permit in the IND-L Zone as presented this evening."

The group reviewed a map of the areas zoned IND-L, indicated by light purple. They discussed at length the fact that, if the request were granted, it would be easier for dealerships to be established in any of the IND-L zoned areas.



The group discussed drainage concerns and wildlife habitats that may be affected by the proposed zone change. Mr. Heistad noted that the Route 120 area around the IND-L zones is one of the most sensitive areas in the City which should be protected.

The group discussed how, if this request were granted, applicants would have to get approval from the Planning Board. Mr. Hill discussed the process for obtaining conditional use permits. He said if applications meet all the requirements of conditional use, they are generally approved without further restrictions.

A MOTION made by Don Lacey that the Lebanon Conservation Commission has not identified any conservation issues and therefore does not recommend approval or disapproval for the proposed addition of a conditional use permit in the IND-L zone as presented in the March 14, 2024 Meeting Agenda packet. The motion was seconded by Barbara Hirai.

Mr. Hill said, at its last meeting, the Planning Board (of which he is a member) had decided to wait for the results of the Route 120 Study before granting this request because the study may result in zoning changes. He said the study should be completed by July 2024.

Mr. Goodwin explained that, if the Commission does not permit this proposed zoning amendment because it thought the conditional use would have an adverse impact on the hydrology and natural resources in the area, a different application could come in tomorrow that is permitted that would have the same impacts.

*** The Vote on the MOTION was approved (6-0).**

Dr. Oidtmann rejoined the meeting discussion.

4. PERMIT REVIEW

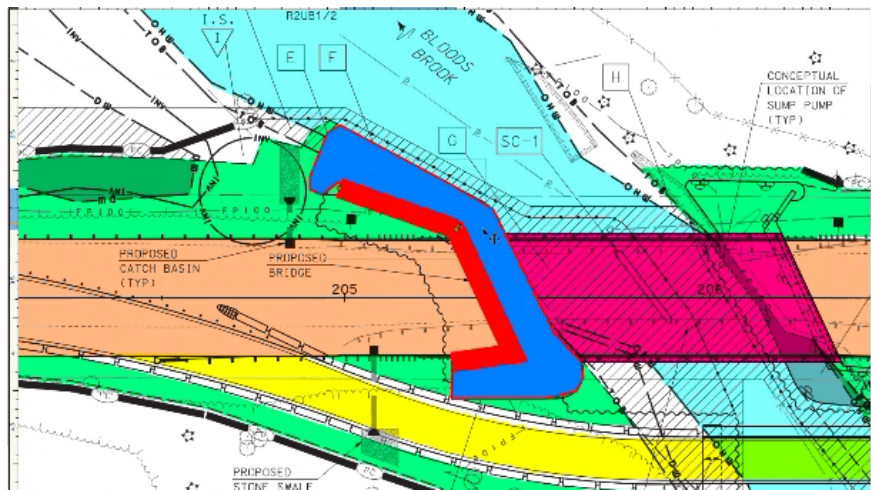
- A. City of Lebanon/Department of Public Works - City Trues Brook Bridge over Bloods Brook: Review and Comment on NHDES Wetland Permit application (major impact) for replacement of the existing bridge. The proposed replacement structure is an 85' long single span bridge, with concrete deck, steel stringers and cast-in-place concrete abutments. The improvements result in approx 8,935 sq ft of wetland impact, 7,391 sq ft of temporary impact and 1,544 sq ft of permanent impact. (NH DES #2024-00345)**

City Engineer Rod Finley introduced Kim Peace and Josif Bicja from Hoyle Tanner.

Mr. Bicja gave an overview of the project, which involves building a temporary bridge for traffic during construction of the existing bridge. He said the new bridge will be wider than the existing by approximately 22 feet.

Ms. Peace explained the temporary and permanent impacts to the wetlands in the area. She said rip rap (shown in red on the map) will be installed around the abutment (shown in blue) to prevent erosion on the bank and protect the stability of the road and bridge.

She said there will also be a change in the elevation in the road at the northeast corner to keep water from ponding and icing on the bridge.



The group discussed whether alternatives to rip rap were considered. Ms. Peace said they can infill the rip rap with stone or gravel and loam and seed over the top.

Chair Riley invited the public to comment.

1 Mr. Dave McLaughlin of 38 Hall Road asked if there were changes to the abutment planned. Mr.
2 Bicja said the abutment will not change and the rocks next to the bridge would not be blasted or
3 removed, which might impact the swimming/fishing hole nearby. Mr. McLaughlin expressed his
4 concern that if the City makes the existing stream wider, it will slow the water down, so the
5 aeration for the fish would be reduced in that hole. He asked if they could guarantee the deep
6 hole would not be filled in by the water after the changes to the bridge are made. Ms. Peace said
7 there are no guarantees with stream flow.

8
9 Mr. Bicja explained that the sump pumps on the bridge are there to control water that may collect
10 on the top of the bridge during construction and will be removed when the project is completed.
11 He said the pumps would be emptied into a dewatering bag and not dumped into the brook.

12
13 Chair Riley asked if the hemlock trees next to the bridge would have to be cut or removed. Mr.
14 Bicja said the utility company may need to cut trees to place the utility wires. Chair Riley asked
15 if the poles could be located upstream to eliminate the need to cut the trees. She said the
16 hemlocks provide shade for the brook.

17
18 The group discussed whether widening the bridge/road makes it safer for drivers, pedestrians, or
19 bikers, or whether wider roads encourage drivers to drive faster. Mr. Sam Armstrong of 44
20 Winter Street said he has been a driver and a pedestrian over the bridge and he said cars drive
21 faster than they should and he was not sure the wider bridge would make a difference.

22
23 ***A MOTION was made by Don Lacey that the Lebanon Conservation Commission***
24 ***recommends approval of the City of Lebanon/Department of Public Works application***
25 ***regarding the City Trues Brook Bridge over Bloods Brook, regarding the permit application***
26 ***with a major impact for replacement of the existing bridge. The proposed replacement***
27 ***structure is an 85' long single span bridge, with concrete deck, steel stringers and cast-in-***
28 ***place concrete abutments. The improvements result in approximately 8,935 square feet of***
29 ***wetland impact, 7,391 square feet of temporary impact and 1,544 square feet of permanent***
30 ***impact. (NH DES #2024-00345)***

31 ***With the following additional condition that the rip rap is infilled with smaller material, and***
32 ***then native excavate, and then loam and seed for more wildlife friendly passage. The***
33 ***MOTION was seconded by Chris Johnson.***

34 **** The Vote on the MOTION was approved (7-0).***

35 Mr. Finley said the City Council Site Walk and Public Hearing will be held on April 17, 2024 at
36 5:30pm.

37
38 Ms. Hirai said she continues to be concerned that the Conservation Commission is brought into
39 discussions for projects like this too late and said she is hoping that the City could be more
40 proactive in thinking about how to ensure wildlife conductivity under bridges in the future.

41
42 Chair Riley called for a five minute break at 8:27pm.
43 The meeting resumed at 8:33pm.

1
2 **5. STUDY ITEM**

3 **B. Sachem Village – DHMC Connector Concept Update**

4 Chair Riley said she, Mr. James, and Mr. Goodwin met with the City Manager to get an
5 update on the multiuse path through the Indian Ridge Conservation Easement, which was
6 included in the Upper Valley Lake Sunapee Regional Planning Commission's
7 Walk/Bike/Ride Lebanon plan. She said City Manager Mulholland told them he knows of no
8 actual plan, and it should not be a cause for worry by the Commission. Mr. Johnson said the
9 Lebanon Fire Department spoke about this path at the Citizens Academy class he attended.
10 He said the Fire Department is interested in it for fire safety access to the area.

11
12 Chair Riley she and Mr. James suggested that it would be beneficial to have similar
13 collaborations or cross-communications between the Conservation Commission and the
14 Planning Department and its boards, such as the Pedestrian/Bike Committee, in the future.

15
16 **6. COMMITTEE REPORTS**

17
18 **A. Biodiversity Group (Invasives)**

19 Mr. Lacey said he has been cutting and removing downed trees on Bakers Crossing. He
20 said he has been trying to extend the snowmobile trail in that area also. He said he
21 removed a flooded, abandoned tent from the area. Mr. Hill said he had some chainsaws
22 so he could help with the cleanup.

23
24 Ms. Hirai said discussions about the Forest Health Group meetings, led by Barbara
25 McElroy, are continuing. She said the group is planning an initial series of workshops,
26 which will include hands-on workshops and field days:

- 27
 - Forest Heath in General
 - 28 • Deer from the Hunting Perspective
 - 29 • Invasives

30
31 Chair Riley said she would email the group with the tentative dates for the workshops.

32
33 Mr. Lacey asked about the status of a new pesticide applicator and Chair Riley said there
34 has been no further progress.

35
36 Chair Riley noted that garlic mustard season is approaching, and plans are being made to
37 address it next month.

38
39 **B. Stewardship**

40 No update

41
42 Chair Riley noted that she tentatively set a date for blueberry pruning at Jackson Conservation
43 Area for April 7, 2024.

C. Wild About Lebanon

Chair Riley said there will be a Wild About Lebanon on April 22, 2024 at 4:00pm at the Wheatley Trailhead on Star Hill Conservation Land.

D. Amphibian Crossings

Chair Riley noted that a volunteer at Old Pine Tree Cemetery said she has seen amphibians (peepers and wood frogs) crossing from north to south towards the river.

E. LUCT/Current Use

No update

F. Other Subcommittees

No update

7. OTHER BUSINESS

None

8. FUTURE AGENDA ITEMS

- **Property Stewardship Discussion, continued**
- **Farnum Hill Review**

9. ADJOURNMENT

The meeting adjourned at 9:00pm.

Respectfully submitted,
Paula Roux
Recording Secretary



CITY OF LEBANON ~ PLANNING OFFICE

MEMORANDUM

TO: Lebanon Conservation Commission

FROM: The Planning & Development Office

RE: FERC Wilder Dam Relicensing – Comment Period

DATE: April 4, 2024

Folks: As you will recall, the Connecticut River Conservancy, including most recently CRC's Kate Buckman, has been in communication with the City of Lebanon regarding the dam relicensing process. Kate's most recent email included a notice that the license comment period is now open, with comments due by April 21st.

Kate has provided a template comment document, as well as a resource document, both included within the agenda packet. At our April meeting we will discuss the interest and availability of submitting comments. On a parallel track, Lebanon Parks, Recreation & Arts Director Paul Coats has generated commentary that will be submitted on the City's behalf. Paul's memo is shared as part of the agenda packet and as you will observe, is primarily focused on recreation and access.

In summary the task would be to assess whether commentary in addition to what Paul will be providing is warranted and follow through with such. The logistics include a specific comment submission portal and I will chase down that detail.

Thank You,
-Mark

Attachment: 2024-03-10_CRC_Email
Attachment: Comment Template Towns GRH 20231213
Attachment: GRH relicensing resource links
Attachment: Wilder Dam public Comment

Hello, thank you for your interest in the relicensing of the Wilder, Bellows Falls, and Vernon hydro facilities. I am reaching out to let you know that the Federal Energy Regulatory Commission issued the notice opening the final comment period on the license applications and starting the state level 401 water quality certification process.

The FERC comment period is open until April 22 and is the final opportunity to relay your concerns to FERC in this relicensing process. If your town is interested in submitting a comment to FERC, the time is now!

I have attached two Word documents; one is the compiled list of resources that I had previously provided a link to after our meeting. The second is a commenting template that CRC has drafted. Obviously, the language should be altered to fit your specific town's needs and concerns, but we recognize that knowing where to start can be a challenge, so hopefully it is helpful should you choose to submit a comment to FERC. Please don't hesitate to reach out if you need more information or assistance in navigating the commenting process or just have additional questions.

Thanks!

Kate B

Kate Buckman
She/Her/Hers
River Steward, NH

Connecticut River Conservancy, formerly *Connecticut River Watershed Council*
PO Box 445 | Alstead NH 03602 | www.ctriver.org
413-772-2020 ext. 205 | 603-931-2448 (cell)

Clean Water, Healthy Habitat, Thriving Communities.

Comments are general statements, complaints, or petitions on current applications. A comment communicates to FERC local concerns, desires, and provides additional information that FERC can consider as they are making decisions in a relicensing process.

<DATE>

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

Via E-Filing

**Re: FERC No. 1904, Vernon Dam, Great River Hydro LLC
FERC No. 1855, Bellows Falls Dam, Great River Hydro LLC
FERC No. 1892, Wilder Dam, Great River Hydro LLC
<TOWN or ORGANIZATION> comments on Great River Hydro LLC's Application for a New License**

Dear Secretary Reese:

Introduction stating who you are and why your comments are relevant to FERC as part of this license application

<Name of person/town/org> 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 <facility of interest and FERC number> submitted in December 2020 and revised in June 2023.

I. Description *(this is an opportunity to describe "the project" i.e. the hydro facility's interaction with your town and your town's current and future vision for interaction with the river in general)*

The <Town/City of> is located in <county of> and is bordered by the Connecticut River on the <west/east>. <Description of town and population> Our town contains <river frontage mileage> within the <Project's> impoundment and is host to <Project facilities and/or GRH owned properties>. It is our understanding the 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. Our concerns as they relate to the impact of The Project on our community and town planning documents are outlined below.

II. Comments *(here specifically lay out the areas where you view the application as deficient or not addressing the concerns of your town and your requests as to how Great River Hydro could address the issue – below are some example areas but please add/delete/amend as best fits your town's concerns)*

A. The Application does not include monitoring of bank erosion and sediment transport changes after implementation of the proposed major operational change

Our town contains significant acreage of agricultural lands bordering the river and within Great River Hydro's Flowage Rights (footnote to [Exhibit G](#)). Measurable and noticeable erosion of these lands have

occurred over the course of the current license, and while ILP's Studies 1,2 & 3 and Exhibit E of the AFLA are generally inconclusive as to the extent that daily fluctuations of the impoundment due to Project operations have initiated or exacerbated bank erosion (despite the widely recognized impact of impoundment fluctuations as a contributing factor in erosion), comments previously provided by the Connecticut River Conservancy (footnote to [Accession Number 20180423-5130](#)) indicate a number of flaws both in how the study was conducted and how the data were interpreted that undermine Great River Hydro's assertion that project operations are not contributing to erosion.

What is not arguable is that the lived experience of our town's residents includes erosion as a major concern. Bank erosion within our community limits safe access to the river, has contributed to the loss of agricultural land, and degrades water quality through excess sediment entrainment after storms. Erosion control and streambank stabilization are not addressed within the license application beyond the mention that the proposed operational changes resulting in an anticipated more stable surface water elevation "would further reduce the factors (e.g. stability in WSE, WSE fluctuations) that influence erosion and result in an overall reduction in erosive forces along project shorelines further minimizing Project related effects on rates of erosion" (footnote to Exhibit E, section 3.4.4.2). We should not have to wait another 40 years for the next license renewal to find out if this is true while our residents' properties continue to erode.

While we are in support of the proposed operational change, we respectfully request that following implementation, FERC requires 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 the change in project operations (in the short term) or continued Project operations (in the long term) have outsized influence on past, continued, or future erosion, mitigation measures must be instituted before another generation of property owners loses more land. Assuming the operational change will address the erosion issues without ensuring it does is not adequate.

B. Town residents do not have adequate recreational access to the river
Our town's <Planning Document if available> includes increased and equitable recreational river access in the future vision for our residents. While we appreciate Great River Hydro's maintenance of <current facility if applicable?>, the AFLA includes little mention of increased or improved recreational facilities beyond what has previously been provided under the past license. This is not adequate for our growing community or to support shifting economies in our town and state. Additionally, we would like to express that the results of the Recreation Study (conducted over seven years ago) may no longer be representative of our community's needs, and the study does not fully explore why recreational facilities may not have been being fully utilized in the first place. We appreciate that Table D-1 (filed March 30 2021, ([Accession Number 20210330-5038](#))) indicates that Great River Hydro anticipates providing for recreational capital improvements on the property that they own, including desperately needed portage improvements. The project area defined by the Exhibit G maps includes about 175 miles of the river from the MA border to Newbury, VT and Haverhill, NH. The facilities impact that entire stretch of river, so considerations for mitigation for recreation should include this whole area and all 30 towns adjacent to the river.

Without a recreation mitigation and enhancement plan written into the AFLA, it is difficult for us to determine whether what GRH anticipates is in line with our town goals. We would like to see a

comprehensive recreation plan that includes increased boat access areas, state of the art ADA improvements to recreation facilities, recreational assets maintained in optimal useable condition, investments in recreation mitigation and enhancement benchmarked to company profits, dramatically improved portage conditions *<whatever else fits the bill for your town – use specific examples>*. Great River Hydro should be required to provide public meetings and work with municipalities within the project boundaries 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.

III. <other issues that you may want to bring up>

The Exhibit G maps indicate that Great River Hydro owns flowage easements on properties adjacent to the river in the project areas that encompass 175 miles or so affected by the project operations. We believe that the project boundary should be inclusive of all parcels where the company owns flowage rights. If they can flood these properties as needed, they are clearly part of the project area, and the project boundary and Exhibit G maps should reflect that.

IV. Conclusion *Reiterate a summary of your asks*

Sincerely,

<Name, Title, and Address of signing official>

Exhibits:

Include maps, diagrams, documents, etc. that support your positions. CRC would also recommend that you link to or include any relevant town planning documents as FERC will have to consider them as well if they have access to them.

Links to GRH relicensing documents:

Great River Hydro Relicensing website:

All documents created by Great River Hydro can be found here:

<https://relicensing.greatriverhydro.com/overview/documents/>

(This website does not contain comments provided by others. Those can be found in the FERC docket)

In FERC eLibrary:

[2020 Amended Final License Application](#)

A – project description

B – project operations and resource utilization

C – construction history and proposed construction

D – statement of project costs and financing – provides some information about proposed cultural and recreation investments

E – consolidated environmental report (all facilities together) – this contains summary reports of study findings as they relate to the require sections; it also includes GRH’s assessment of how proposed operational changes will impact things differently than current operations and any proposed protection, mitigation, and enhancement measures other than operational changes

F – general design drawing and supporting design report

G – project area maps and boundary descriptions – this can be useful for evaluating whether any GRH lands might be good suggestions for conservation easements in line with your town’s conservation plan

[CRC’s 2021 additional information request on Amended Final License Application](#)

[2022 Fish Passage Settlement Agreement](#)

[CRC’s comments on Fish passage settlement](#)

[GRH response to comments on Fish Passage Settlement](#)

2023 Revised Amended Final License Application (incorporates Fish Passage settlement agreement and addition of a min flow turbine at Bellows Falls)

[Use for Bellows Falls Exhibits A-D, F, G](#)

Recommend using Exhibit E from this revision for all facilities, as it includes the latest GRH estimates of impacts and PME measures

GRH March 29, 2021 Response to Additional Information Request

[Estimated cost of mitigation being offered over 40 years in D-1 Tables](#) (see first PDF document)

GRH Jan 31, 2024 Response to Additional Information Request

[Updated Exhibits](#) including requested information on Bellows Falls minimum flow turbine, effects on fish, and cultural resource information

Specific Resources for Recreation mitigation

[CRC 2018 Recreation Survey and Public Meetings Report](#)

[July 2019 CRC AMC recreation recommendations comment](#)

Example of [Recreation Settlement Agreement](#) from FirstLight (for projects in MA)

Specific Resources and comment examples for Erosion concerns

Last updated 27 Feb 2024

2018 [CRC comments on final erosion study](#)
2018 [Comments of Ross McIntyre](#)
2018 [Comments of CRJC on erosion studies](#)
2018 [Comments of Larry Scott on erosion](#)
2019 [comments of Connecticut River Watershed Farmers Alliance on erosion](#)
2023 [Letter from John Mudge regarding erosion](#)

Additional Examples of Comments by Individuals and Towns (may not be related to these projects):
[Feb 2016 Town of Montague MA Comments regarding First Light Draft License Application](#)

Other resources:

FERC's [advice for crafting effective comments](#)
CRC's [FERC comment guide](#)
CRC's [general hydro page](#)

GRH responses to Additional Information Requests

2021:

[Water surface elevation and discharge current and modeled](#)
[Updated WSE and discharge current and modeled and flex simulation](#)
[Wilder simulation supporting data](#)
[Corrected historic 2016 Vernon WSE data](#)

REA Notices:

Wilder: https://elibrary.ferc.gov/eLibrary/filelist?accession_num=20240222-3023
Bellows Fall: https://elibrary.ferc.gov/eLibrary/filelist?accession_num=20240222-3017
Vernon: https://elibrary.ferc.gov/eLibrary/filelist?accession_num=20240222-3015

Study Results:

Studies 1, 2, & 3 – Historical riverbank and erosion, riverbank transect, and erosion

[Nov 2017 updated supplement](#)
[Feb 2017 additional logger data 1](#)
[Feb 2017 revised appendix C & F](#)
[Feb 2017 revised transect and erosion final report and appendices](#)
[Aug 2016 transect and erosion consolidated report and appendices](#)
[March 2016 historical study report](#)

Study 4 – Hydraulic modeling

[June 2016 Revised Final Report](#)
[March 2016 study report](#)

Study 5 – Operations Modeling

[Aug 2016 study report and appendices](#)

Study 6 – Water Quality Monitoring

[Dec 2016 final report and appendices](#)

Last updated 27 Feb 2024

- [Aug 2016 revised study report and appendices](#)
[March 2016 study report](#)
[Jan 2013 2012 water quality monitoring](#)
- Study 7 – Aquatic Habitat Mapping
[Sep 2015 hobo logger data and overwinter data](#)
[March 2015 study report and hobo data](#)
- Study 8 – Channel Morphology and Benthic Habitat
[May 2016 revised final study report](#)
[March 2015 study report](#)
- Study 9 – Instream Flow
[May 2019 revised final report and appendices](#)
[March 2017 updated Instream Flow Final Report and appendices](#)
[March 2016 interim report](#)
- Study 10 – Fish assemblage
[Nov 2016 supplements](#)
[Aug 2016 revised final report and appendices](#)
[March 2016 study report and appendices](#)
- Study 11 – American Eel
[March 2016 survey report and appendices](#)
- Study 12 – Tesselated Darter
[Aug 2016 revised final report and appendices](#)
[March 2016 survey report and appendices](#)
- Study 13 – Tributary and Backwater habitat
[June 2016 Revised Tributary Access Report and appendices B & C](#)
[Sep 2015 logger data](#)
[Sep 2014 initial study report](#)
- Study 14 & 15 – Resident Fish Spawning
[Nov 2016 revised Final Study Report and appendices E & F](#)
[Aug 2016 study report and appendices](#)
[March 2016 interim report](#)
- Study 16 – Sea Lamprey Spawning
[Aug 2016 study report and appendices](#)
[March 2016 interim report and appendices](#)
- Study 17 – Upstream Riverine Fish Passage
[Nov 2016 Final Study Report and appendices](#)
[May 2016 report and appendices](#)
- Study 18 – Eel Upstream
[May 2019 supplemental report](#)
[Feb 2018 supplemental report](#)
[Nov 2016 supplement](#)
[March 2016 study report](#)
- Study 19 – Eel Downstream
[April 2017 revised Appendix F](#)
[Feb 2017 final report and appendices](#)
[Aug 2016 passage discharge data](#)
[May 2016 report](#)
- Study 20 – Eel Migration Timing
[June 2016 report](#)

Last updated 27 Feb 2024

Study 21 – Shad telemetry
[Feb 2018 refiled supplement and appendices](#)
[Feb 2017 final study report and appendices](#)
[Aug 2016 study report and appendices](#)

Study 22 – Juv. Shad Downstream
[Jan 2017 revised study report and appendices](#)
[Aug 2016 operations data](#)
[May 2016 report and appendices](#)

Study 23 – Fish Impingement, Entrainment, & Survival
[Feb 2017 supplement](#)
[Nov 2016 Final Study Report](#)
[May 2016 report](#)

Study 24 – Dwarf Wedge & other mussels
[March 2017 updated study report co-occurring mussels](#)
[May 2016 dwarf wedge interim report](#)
[March 2015 phase II public report](#)

Study 25 – Dragonfly & Damselfly
[July 2017 study supplement](#)
[Dec 2016 final report](#)
[June 2016 report and appendix D](#)

Study 26 – Tiger Beetles
[June 2016 public report](#)

Study 27 – Floodplain, Wetland, & Riparian Vegetation
[Nov 2016 supplement](#)
[Aug 2016 final study report](#)

Study 28 – Fowler’s Toad
[June 2016 public report](#)

Study 29 – Northern Bulrush
[June 2016 public report](#)

Study 30 – Recreation Inventory Use & Needs
[Dec 2016 supplement](#)
[May 2016 CRC recreation survey responses](#)
[March 2016 study report](#)

Study 31 – Whitewater Boating
[March 2016 study report](#)

Study 32 – Bellows Falls Aesthetic Flow
[Aug 2016 revised final report](#)
[March 2016 study report](#)

Study 33 – Cultural and Historic Resources
[May 2016 study report](#)

[Mar 2016 supporting geodata](#)
[Sep 2015 site selection reports and data](#)

All GRH filed documents on GRH site, organized by type:
<https://relicensing.greatriverhydro.com/overview/documents/>

Last updated 27 Feb 2024



CITY of LEBANON, NH

City Manager's Office

51 North Park Street

Lebanon, NH 03766

(603) 448-4220

www.LebanonNH.gov

April 4, 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. 1904, Vernon Dam, Great River Hydro LLC
FERC No. 1855, Bellows Falls Dam, Great River Hydro LLC
FERC No. 1892, Wilder Dam, Great River Hydro LLC
Lebanon NH comments on Great River Hydro LLC's Application for a New License

Dear Secretary Reese:

The City of Lebanon NH is a thriving micropolitan with a growing population and a rich history that is tied to the Connecticut River. The Abenaki people were the original settlers who were attracted to Lebanon's water accessibility, fertile land, and abundant wildlife. European colonists were also lured to Lebanon because of the benefits of the Connecticut River, and our population continued to grow as Industrial Age mills developed along our banks. Today our population is more diverse with people from different backgrounds calling Lebanon home as they seek quality of life and access to affordable recreation.

Access to the Connecticut River has been the common thread in Lebanon's past and should continue to be as we plan for our future. The City has documented our continued interest in the protection of the river and our need for recreation around the river in multiple reports, including the City of Lebanon Master Plan¹, Recreation Facilities Master Plan, and the Recreation Facilities Assessment. Additional public input related to access to the Connecticut River and surrounding recreational areas was also conducted by the Connecticut River Conservancy.²

The Wilder Dam is located in West Lebanon, and it is an indelible feature of our landscape. While we have been grateful for the recreational opportunities that are offered by Great River Hydro's provision of trailhead access to hiking trails and a somewhat functional portage trail, we fully disagree with their assertion that no new recreational improvements are warranted under this

¹ [Lebanon Master Plan | Lebanon, NH \(LebanonNH.gov\)](http://LebanonMasterPlan|Lebanon,NH(LebanonNH.gov))

² [eLibrary | File List \(ferc.gov\)](http://eLibrary|FileList(ferc.gov))

relicensing process. Maintenance at existing recreational facilities is inadequate, and simple yet effective improvements can be made for the benefit of the public who seek refuge and recreation around our area of the Connecticut River.

Lebanon Specific Recommendations

Recommendation 1: Improve and maintain portage

The City of Lebanon Master Plan cites “access to the river” as a primary need for Lebanon’s future:

- Chapter 10: D-2 “One issue raised at the 1999 “Lebanon: A Look Ahead” forum was residents’ desire for more walking access to both the Mascoma and Connecticut Rivers. Improved public access to waterways must be achieved with minimal environmental harm, as laid out in the Addendum to the Recreation Facilities Master Plan.”
- Chapter 10: 1-8 “Improve public access to Mascoma Lake, the Mascoma River, and the Connecticut River.”

Similarly, from the Recreation Facilities Master Plan:

- Chapter 2:4.5 The CT river was crucial to the development of Lebanon, it should be an icon of community heritage; it should play a far more important role in Lebanon's future.
 - a. Opportunities: Expand and enhance river access. Improve ramp, expand picnicking at parking and ramp, accessible fishing/viewing pier at E Wilder Boat Launch. Shorten portage. Vehicular access to lower parking lot (below the dam)
 - b. Formal impact resistant access points to river for fishing, cartop boats, hiking.

Unfortunately, only 5% of the Wilder project shoreline is available for public use. A significant portion of that 5% is the portage trail around the dam which was not designed to a usable standard. The rock stairs that lead to the water are very difficult to navigate while trying to portage a boat, rendering the portage trail unusable for many people.

City recommends designing, building and maintaining a switchback trail or ramp system to allow gradual sloped access and secure footing for portages. We also encourage the addition of a portable restroom unit on site once these improvements are constructed.



**Rock stairs pictured here present tricky footing, especially when carrying a boat. A ramp or switch back path system would be more accommodating. Photo taken December 2023*



**Debris litters the portage area. Photo taken December 2023.*

Recommendation 2: Maintain the picnic area parking lot and trailhead year-round

The Recreation Facilities Assessment recognizes the public picnic area and paths around Wilder Dam as community assets that are owned and maintained by Great River Hydro.

Trails in Lebanon are used year-round, so access to those trails should also be offered year-round. Great River Hydro's parking lots are not currently plowed during the winter or maintained for year-round use, which makes their recreation offering valid only 9 months of the year. The public still tries to access the trail system during the snow months, which creates a dangerous environment for drivers as they pull in and out of a snow packed or icy parking area. Maintenance during the warm months could also improve.

City recommends GRH maintain the picnic area parking lot and trailhead year-round with snowplowing and sanding after snow events, drainage improvements, and annual grading with new material. Alternatively GRH could pave the parking area allowing for all weather/all season use without regrading maintenance. We would also like to see the addition of a portable restroom unit in the parking area.



** Poor drainage and long established potholes. Photos taken December 2023.*

Additional Recommendations based on the “CRC and AMC Recreation, Public Access, Education, and Land Management Recommendations for Great River Hydro”, July 30, 2019

The City of Lebanon agrees with the recommendations that were submitted July 30, 2019 by the CRC and AMC, and we would like to highlight a few:

- **Substantial capital and annual operating investments in recreation facilities, programs, and public access that are benchmarked to annual revenue and energy generation, indexed for inflation.**

The City of Lebanon has several active projects that will help provide access to the Connecticut River area, including: Westboro Park Development, Mascoma River Greenway expansion to Westboro Park, Rt 12A trail along the CT River, and future development of the West Lebanon Greenway from Westboro Park north along Rt 10. While these projects are not located directly on Great River Hydro land, GRH does have flowage rights through these City owned projects that directly impact the recreational facilities around the project area, thus contributing to the GRH and FERC objectives. We would mutually benefit from financial contributions from GRH if there were a fund developed for recreation facilities, programs, and public access that is benchmarked to annual revenue.

- **Significantly increase the percentage of land within each project area that is accessible to the public.** The most logical way to make significant gains on this objective has already been listed as Recommendation 2: Maintain the picnic area parking lot and trailhead year-round. This improvement would increase public access to project area land by 33% (gaining 3 months of access).

- **Improve and create ADA accessible facilities.**

The portage area below the dam, the East Wilder Boat Launch, and additional land based projects like Westboro Park and Greenway developments should all be improved or constructed with ADA compliant design. The portage area behind the dam has the potential to become ADA compliant to an area that allows for viewing of the river if handicap parking

would be allowed on-site. Currently the parking lot near the portage is posted as employees only.

The East Wilder Boat Launch has the potential to attract people living with disabilities if the surfacing of the launch could be improved to accommodate them, and if a durable surface could be added to the waterfront for ADA compliant picnicking.

- **Fund the development and implementation of a coordinated marketing plan for the recreational opportunities of the Ct River.**

The portage signage is not visible from the road, and the only signage that many visitors see is a “No Parking Private Property” sign next to a GRH gate. This is a good example of why there is a lack of knowledge about recreational amenities that already exist, evidenced by public comment on surveys³ and “well below capacity on average during the peak season” counts from GRH’s Study 30 report.⁴ There are numerous ways that marketing and signage could be improved for public benefit, and the recommended marketing plan would identify reasonable steps towards that improvement.

- **Support the creation of new educational programs and facilities to interpret the history and archeological resources of the project area;**

The City of Lebanon Master Plan Chapter 11: D-9 states “As Lebanon is on the Connecticut River Byway, there are opportunities to promote its cultural heritage.” The introduction of interpretive signage and kiosks at the portage, parking area, and East Wilder Boat Launch, and an online resource educating potential visitors about the existence of recreational areas and the cultural heritage of the sites would go a long way to improve what currently exists.

- **Other recommendations that have already been elaborated upon by the CRC that the City of Lebanon would like to support include:**

- **Maintain recreational facilities in optimal condition throughout the license term;**
- **Improve fish viewing facilities and programs, and create a website to host fish migration data;**
- **Improve flow and condition notification systems for river users.**

The City of Lebanon has been encouraged by the Recreation Settlement Agreement from the FirstLight Turner Falls and Northfield Mountain Projects. Those improvements present a meaningful effort from the utility to invest in the community where they operate. We are grateful to FERC and GRH for likewise considering our recommendations, and we hope that our concerns can be addressed through the remainder of the relicensing process.

Respectfully submitted,

³ Accession Number 20160505-5135 for survey responses

⁴ Accession Number 20160301-5331 for study 30 report; Accession Number 20161215-5280 for study 30 supplement

BOSTON LOT CITY FOREST

436 Acres of Conservation Land
& 7.5 Miles of Trail

