



*Clean Water. Healthy Habitat. Thriving Communities.*

## Connecticut River Conservancy

### **Commenting Concerns for Great River Hydro Draft Environmental Impact Statement**

Thank you for commenting on the draft Environmental Impact Statement (dEIS) for the relicensing of the Wilder (P-1892-030), Bellows Falls (P-1855-050), and Vernon (P-1904-078) dams.

#### **Resources:**

- Link to the draft Environmental Impact Statement:  
[https://elibrary.ferc.gov/eLibrary/filelist?accession\\_number=20250530-3010](https://elibrary.ferc.gov/eLibrary/filelist?accession_number=20250530-3010)
- Link to information about the draft Environmental Impact Statement  
<https://www.ctriver.org/post/hydropower-environmental-impact-statements>

#### **What to Focus On:**

The dEIS is a long document with hundreds of pages of appendices. Do not be overwhelmed! We recommend downloading the dEIS and Appendices separately. You will find a Table of Contents on page 8 of the document. From the Table of Contents, you can skip directly to sections that you might want to focus on reading and commenting on. We suggest focusing on the following:

**2.3 STAFF ALTERNATIVE** – This section outlines what FERC is likely to require at this time. Is what you find in this section adequate or appropriate? What additional suggestions could be made?

**3.0 ENVIRONMENTAL ANALYSIS** – This section goes into details about the background information on specific issues and FERC’s analysis to justify their decision in the “STAFF ALTERNATIVE” above. Is the information accurate? Does their analysis of the issue make sense?

**5.0 CONCLUSIONS AND RECOMMENDATIONS**

**APPENDIX T—LICENSE CONDITIONS RECOMMENDED BY STAFF**

## What CRC Will Be Commenting On:

**Below are some examples of what CRC will be commenting on. We encourage you to read the draft EIS to identify other areas of concern to you.**

### Erosion:

- The Staff Alternative does not include a clear requirement from GRH to implement remedial stabilization measures if erosion worsens or continues due to project operations. There is a major **lack of enforceable mitigation in the DEIS**. While monitoring is proposed, there are no mandatory actions if worsening erosion is documented.
- While we are pleased to see the requirement of a riverbank erosion monitoring plan, erosion monitoring of existing high priority eroding sites may not be appropriate. Our concern is unintended disequilibrium in the system with the proposed IEO/flex operating model, so erosion might occur in other areas that were not previously identified.
- Additionally, there is nothing addressing the potential impact of movement of 40 years' worth of stored sediment that has been deposited behind the dams and at tributary mouths. The change in operations may redistribute that sediment – possibly impacting freshwater mussel beds and releasing legacy phosphorus.
- Furthermore, a five-year follow-up study timeline is not long enough to verify that the proposed project operational changes would not cause increased project-related erosion. We recommend the addition of more erosion surveys on a regular basis throughout the license period.

### Fish Passage

- The timeline to construct new fish passage facilities is too long. We are pleased that these improvements will happen but are concerned about the protracted timeline under which they will occur. FERC should implement license articles for safe, timely, and effective upstream and downstream fish passage, which will minimize continuing negative impact on migratory fish populations. CRC recommends:
  - Requiring consultations, studies, designs, and construction be completed in the shortest possible time line,
  - Requiring GRH to remove the low head salmon dam in the Bellows Falls bypass reach during or before installation of the new low flow turbine in the Bellows Falls dam.
  - Requiring that any ongoing evaluation of improvements to passage facilities should include financial support for long-term monitoring of fish passage at the counting windows.

### Shortnose Sturgeon

- Shortnose sturgeon are not adequately addressed in the dEIS.

- eDNA evidence from 2024 shows that they are in the project areas up to below the Bellows Falls dam. Commission staff indicate that implementing protective measures prior to direct observation would be premature. Notably, there was a direct observation in 2017 and a compelling sighting in 2022, in addition to multiple anecdotal accounts of anglers catching Shortnose sturgeon, further supporting the fact that fish are in the project areas.
- Expected upgrades to fish passage facilities at Turner's Falls will ideally enable the movement of shortnose sturgeon past this obstacle and into the GRH project boundaries. Regardless, there is a population of sturgeon documented in the project areas that have not been addressed at all in this draft EIS. There have not been any studies, and none are being required to better understand their existence and habitat in the GRH project areas.
- Lastly, we are shocked and disagree that a section 7 consultation is deemed unnecessary.

### Recreation

- There is a lack of specific definition and details in the Recreation Management Plan requirement. What is proposed is an after-the fact plan and is basically deferred maintenance for recreation facilities that were required under the last license, which primarily serves people in towns located next to the facility. The project area of these three dams encompasses 30 towns – there needs to be specific requirements to add and fund additional recreational amenities in more places throughout the project areas. For example, the Recreation study clearly indicates that more boat launches are needed and desired, and we advocate for ones that are ADA compliant.
- It is important to note that the Bellows Falls Portage trail put in, which was in use during the last license, is not included in the project boundary. The project boundary should be expanded to include this important existing recreational amenity.
- The Recreation Management Plan should be completed prior to issuance of the license in collaboration with stakeholders. Or, at a minimum clear specifications should be included in the license articles to indicate how many additional recreational sites should be added and in what locations, an expected timeline for implementation of these additional sites, and a detailed timeline as to how the facilities will be maintained and upgraded during the life of the license. The license needs to have clearly identified projects and timelines that can be monitored and enforced.

### Land Management Plan

- We support the measures for the Land Management Plan, as outlined in the Staff Alternative.
- Specifically, we agree with the need to include invasive plant species monitoring and control measures as part of a land management plan. As recommended by Commission Staff, there needs to be:

- o Monitoring measures for invasive aquatic plants, including an updated baseline survey, an early detection and rapid response protocol, and cyclical monitoring of existing populations
- o Control measures for existing infestations
- o Details that include locations and information on public signage about invasive species at boat launches and recreation facilities
- o Actions to prevent the spread of invasive plants associated with daily operations. Specifically, GRH acknowledges that “AIS might expand ranges under the new operation”. Therefore, it is imperative that GRH develop a clear protocol for addressing AIS.
- Included in this plan and license condition, we’d like to see financial assurances that GRH funds these monitoring, mitigation, and adaptation measures and we want to ensure that GRH engages with stakeholders (in addition to resource agencies) that are already or may be involved in AIS work in the project areas.

CRC has significant concerns regarding the inadequacy of protections outlined in the DEIS and the Staff Alternative. While some proposed measures are improvements over current conditions, they fall short of what is required to reverse decades of ecological degradation. Moreover, the DEIS fails to include sufficient commitments for mechanisms for accountability over a multi-decade license term. Due to the length of these licenses and the significant impact they have on a public trust resource, FERC should be requiring the most protective measures that ensure the long-term health and sustainability of the river, its species, and surrounding communities.

Due to the scope, scale, and intricacies of these projects, we advocate for the shortest possible license term of 30 years. We urge the Commission to incorporate these recommendations and strengthen environmental safeguards to protect the health of the Connecticut River and the communities, human and otherwise, who depend on it.