

Connecticut River Joint Commissions

Giving voice to New England's great river



New Hampshire - Connecticut River Valley Resource Commission

Vermont - Connecticut River Watershed Advisory Commission

10 Water Street, Suite 225 - Lebanon, NH 03766 - Phone: (603) 448-1680; Email: info@crjc.org; Website: www.crjc.org

VIA ELECTRONIC FILING

Attn: Debbie-Anne Reese, Secretary

Federal Energy Regulatory Commission

888 First Street, N.E. Room 1-A

Washington, D.C. 20426

Re: Great River Hydro, LLC; FERC Project Nos. P-1892-030, P-1855-050 and P-1904-078
Comments on the Draft Environmental Impact Statement for the Vernon,
Bellows Falls, and Wilder Hydroelectric Projects

August 25, 2025

Dear Secretary Reese,

The Connecticut River Joint Commissions (CRJC) herein provides comments on the draft Environmental Impact Statement (DEIS) for the above-mentioned projects, including a request to create a Mitigation and Enhancement Fund (MEF) in order to compensate for unavoidable adverse effects of project operations.

CRJC has a statutory duty, as a public entity, to comment on actions that affect the Connecticut River and advise public agencies in their decisions regarding the river. More than 35 years ago, the legislatures of New Hampshire and Vermont each established a commission to advise on matters affecting their shared resource, the Connecticut River. Serving together as the Connecticut River Joint Commissions, the commissions' longstanding role has been to assess projects and activities affecting the river, recommend necessary measures that safeguard the river and its natural environment, and ensure that the River continues to benefit adjacent communities and users.

CRJC and our bistate local river subcommittees have been involved in this relicensing effort since its onset in 2012 and are sensitive to the fact that one hundred and twenty miles of our lower Connecticut River between New Hampshire and Vermont will be affected by the proposed licenses. Of this 120-mile reach, 100 miles have been converted to impoundments, essentially lakes, to facilitate power generation by the three hydroelectric dams requesting new licenses.

CRJC's objectives, in this instance, are to ensure that: 1) during hydroelectric production river resources are not damaged, impacts are monitored, and if damages occur, they are promptly mitigated or the facility owners pay restitution; 2) the Connecticut River is recognized as an asset shared with communities, landowners, recreational users, and others; and, 3) a Mitigation and Enhancement Fund is established so that the economic returns from sale of hydroelectric power can benefit related uses.

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We strongly concur with the statement in the DEIS that “[t]he primary issues associated with licensing the Wilder, Bellows Falls, and Vernon projects are the effects of continued project operation on erosion along the Connecticut River and effects on aquatic and terrestrial resources, threatened and endangered species, recreation, and cultural resources.” (DEIS, p. xxx). We expect erosion and bank failures will not only be an ongoing problem but will increase as 1) the frequency and intensity of storms (and river flows) increase due to climate change, and 2) water surface elevations (WSE) are held constant at the dams by proposed operational changes.

We note that the DEIS neglects to address the cumulative impact of the five projects currently up for relicensing on the Connecticut River (Wilder, Bellows Falls, and Vernon projects in NH/VT; and, Turners Falls and Northfield Mountain in MA). Even though the Massachusetts projects are owned by a separate company and each (GRH and FirstLight) has submitted its own DEIS in order to meet the statutory page limits required for EISs (DEIS, p. xxv), these factors do not obviate the preparation of a cumulative impact analysis of all five projects.

To achieve our objectives, we support the FERC *Staff Alternative* in the DEIS over the *GRH Alternative* as it recommends more enhancement and other compensation measures. However, we believe that even the *Staff Alternative* is still grossly inadequate to compensate for adverse impacts. We think it is imperative that additional compensation measures, beyond those addressed in the DEIS, be incorporated into the license agreements. It is clear that renewable energy production from the three dams will be the dominant use of the Connecticut River for the next 30 to 50 years. But other users have important necessary rights and objectives too. Their uses must be supported, not precluded. So, GRH/ Hydro-Quebec (GRH) needs to offer more compensatory mitigation than is proposed in either of the alternatives.

GRH will profit from the use of a public trust resource and offers operational changes as “the major enhancement and mitigation element” (Final License Application (FLA), p. 2; Revised Amended Final License Application, Exhibit E, January 2024, Section 2, p. 24). But this is avoidance and minimization, not enhancement nor compensatory mitigation. We agree that proposed operational changes will likely benefit the river’s biological community as these changes will provide a hydrological regime that more closely resembles natural pre-impoundment conditions. However, these changes will also have significant adverse effects on a variety of public interest factors. More compensatory mitigation is necessary to mitigate these unavoidable adverse effects and compensate for river-related activities that would likely flourish if the hydroelectric use did not predominate.

Our specific recommendations are as follows:

1. Public Participation in Developing License Conditions. The process should be transparent and collaborative, consistent with Integrated Licensing Process objectives. We are disappointed that the

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DEIS Public Comment Session on July 17, 2025 was not public – comments were kept private. During the “session” no one from FERC or GRH introduced the DEIS or gave any remarks. Stakeholders and community members were individually escorted, one by one, to rooms (in the basement) where comments (testimonies) were taken by a court reporter for later transcription. The hearing was neither public nor collaborative. And it did not promote transparency as the forum provided no opportunity for the public to be apprised of participant comments and the agency to provide feedback.

We are pleased to see proposed modifications to project operations to minimize water level fluctuations. This has been a priority for CRJC. However, we request that CRJC, the only public body specifically representing the interests of New Hampshire and Vermont regarding the Connecticut River, be included in any future negotiations with stakeholders regarding mitigation and enhancement, and that CRJC, as the representative for the communities along the river, be involved in the administration of the Mitigation and Enhancement Fund as outlined in **Section 5**.

Comments. CRJC was an essential stakeholder and a key participant in forging the Settlement Agreement of August 11, 1997 setting forth proposed changes to operational modes, minimum flow releases and a Mitigation and Enhancement Fund for the Fifteen Mile Falls hydroelectric facilities on the northern reach of the Connecticut River. This agreement for the Moore, Comerford, and McIndoes Falls dams was reached between thirteen partners, including the CRJC.

2. Document Environmental Impacts. We support the preparation of proposed *Riverbank Erosion Monitoring Plan*, the *Recreation Management Plan*, and the *Land Management Plan* in the *Staff Alternative*, but rather than just require the preparation of these plans GRH must be mandated to implement these plans by agreed-upon deadlines. Small deeds accomplished is better than great deeds planned!

No scientific evidence is presented in the DEIS on water quality, sediment transport, and riverbank erosion. And the DEIS provides little evidence on how the proposed operational changes will affect water temperatures, dissolved oxygen, pH, nutrients, bacteria and invasives (plant and animal), of impoundment and riverine reaches. Moreover, the Projects will still have other adverse effects such as accumulating toxic substances in both impoundment and riverine reaches (e.g., see Final License Application (FLA) dated December 2020, p. 955, 1144; revised in June 2023).

We request that impacts by the preferred alternative on these factors be closely monitored, accurately determined and annually published by a disinterested, independent entity during the life of the licenses. The data collected should be made available shortly after collection and annually published. As data are collected, GRH should be required to plan (in consultation with all stakeholders), execute and pay for the implementation of the plans. Data collection alone over the duration of the licenses before any measures are taken to mitigate adverse impacts is not acceptable.

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We respectfully request that this work be a required condition in each of the licenses and funding for the work be provided by GRH.

Comments. GRH's preferred alternative proposes operational changes that "will maintain water surface elevations at the dams at higher elevations within a narrower bandwidth more often than current operations" (Revised Amended FLA, Exhibit E, January 2024, Section 3.3.1.1, p. 21)¹. And since intense storms and river flows are projected to increase due to climate change (see **Section 3**), and flow velocities will increase due to water surface elevations (WSE) being held constant at the dams we anticipate erosion and bank failures will be an ongoing problem and likely increase.

GRH/Hydro-Quebec should be required to pay for all mitigation measures so as not to place undue responsibility for mitigation on riverfront landowners, towns along the river, and state resources. GRH, which is using this public resource for private profit, should pay for costs associated with the loss of agricultural soils, flooding of developed areas, costs associated with maintaining and monitoring recreational use of the impoundments and associated access facilities, and threats to infrastructure (e.g., NH Route 12A between Charlestown and Walpole, and River Road in Lyme, New Hampshire, which have cost tax-payers tens of millions of dollars) caused by shoreland erosion.

3. Address Potential Climate Impacts. The DEIS does not incorporate scenarios and potential responses to more intense storm events and prolonged periods of drought that are based on recent data² and predicted by the preponderance of climate models. These might include, for example, specific provisions for reopening the permit if there are significant persistent changes in river flows, or if significant adverse impacts are discovered by environmental monitoring required under **Section 2. Document Environmental Impacts.** FERC has a long-standing practice of retaining the ability to reopen licenses to modify dam operations if justified by reliable data on climate change factors.³

The Federal Power Act (FPA) and the National Environmental Policy Act (NEPA) require that federal agencies must meaningfully "evaluate the impact of climate change on a project..." This has been

¹ "Changes include increased stability of WSEs (decreases in frequency, duration, and range of impoundment WSE fluctuation), and changes in flow and velocity through the impoundments." (Revised Amended Final License Application, Exhibit E, January 2024, Section 3.3.1, p. 20).

² USGCRP, 2023: Fifth National Climate Assessment. Crimmins, A.R., C.W. Avery, D.R. Easterling, K.E. Kunkel, B.C. Stewart, and T.K. Maycock, Eds. U.S. Global Change Research Program, Washington, DC, USA. <https://doi.org/10.7930/NCA5.2023>. November 2023. Figure 2.8.

³ Eagle Crest Energy Co., 153 FERC ¶ 61,058 (2015)

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upheld by the federal courts.⁴ The FPA requires FERC to describe any “known or potential adverse impacts...associated with the...operation”⁵ of the dam.

FERC and GRH do not address the relationship between climate change and the proposed dam operations in the DEIS. This is in contrast with previous instances where FERC has included terms in dam relicenses that require the dam operators to annually consult with listed stakeholders regarding climate change impacts on dam operations.⁶

Climate scenarios must be based on current state-of-the-art climate models, such as those used by the United Nations' Intergovernmental Panel on Climate Change. GRH must annually report on:

1. How predicted increased flows will be handled.
2. River levels that might be reached during intense storm events predicted by climate models.
3. How release of water from all the hydroelectric as well as flood control dams will be coordinated to minimize flooding and other adverse impacts.
4. What riparian communities can expect in terms of flooding and drought.

Landowners, municipalities and other stakeholders along the river where flowage rights exist must have warning, based on the most up-to-date climate modeling, of what to expect so they can plan and prepare. Therefore, we respectfully request that the EIS address climate impacts.

4. Establish a Revenue-Sharing Commitment in the Upcoming FERC License. Under the public trust doctrine, the State holds title to submerged land under navigable waters in trust for the benefit of the public. The public should benefit by sharing in the profits generated for use of our public trust resource by GRH. We expect that the anticipated Mitigation and Enhancement Fund (MEF) outlined in **Section 5** will be funded by revenues generated by this Commitment.

The DEIS does not address many of the real costs borne by local communities and landowners in unwilling service to a private enterprise whose profits derive from its use of our public resource. Meanwhile, investors in GRH benefit from recent sweeping changes to the tax code which increases their profits, while citizens of New Hampshire and Vermont riverfront communities struggle to pay some of the highest electrical rates in the country, which are projected to increase even further. These

⁴ See *Aqualliance v. U.S. Bureau Reclamation*, 287 F. Supp. 3d 969, 1031 (E.D. Cal. 2018); *Wild Fish Conservancy v. Irving*, 221 F. Supp. 3d 1224, 1233-34 (E.D. Wash. 2016).

⁵ 18 C.F.R. § 5.6(d)(3)(i)(C)

⁶ See *J. Curtis Idaho Aviation Found.*, 175 FERC ¶ 62,001 (2021); *Pac. Gas & Elec. Co. Nev. Irrigation Dist.*, 177 FERC ¶ 61,111 (2021)

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high electrical rates are a major impediment to local economic development. The public is the largest stakeholder in this project, but currently stands to receive the least economic benefit. In fact, the DEIS does not address many of the public costs of these facilities.

We respectfully request that the license permit applications include a condition that establishes a Revenue-Sharing Commitment and designates a group of stakeholders to negotiate the details. As a preliminary recommendation, we suggest GRH make an annual contribution of at least one million dollars and 2% to 5% of its annual profits to support the MEF.

Comments. This concern and request are exemplified by the reluctance of TransCanada, GRH's predecessor-in-title, to compensate municipalities for the assessed values of dam properties or expenses related to their operations. TransCanada's challenges of local property tax assessments required expenditures by municipalities to defend. No private business should reasonably expect to operate rent-free on a publicly-owned property. These licenses grant GRH monopolistic revenue-generating use of the river, a public trust resource, over the next 30 to 50 years. The DEIS documents riverfront communities will not adequately benefit from the generation of electricity on their river.

The lease of the State-owned Sunapee Ski Area to a private enterprise is a precedent for revenue-sharing agreements between the State and a private company for the use of a publicly-owned resource. The Fifteen Mile Falls Settlement Agreement in 1997 is also an appropriate and specifically relevant precedent where a portion of the revenue generated from hydroelectric generation on the river is designated for public use.

5. Establish a Mitigation and Enhancement Fund (MEF). As use of the river for power generation continues along with adverse impacts, we respectfully request that a Mitigation and Enhancement Fund be established that, at a minimum, compensates for foreseeable and unforeseen future impacts that are not mitigated by other license conditions.

To compensate for unavoidable adverse effects, GRH needs to establish a MEF that will be used to mitigate adverse impacts and enhance river-related activities that are diminished by use of the river for hydroelectric production. MEF awards will go to communities and organizations undertaking protection and restoration efforts.

Comments. Previously, the CRJC was involved with relicensing the Fifteen Mile Falls hydroelectric facilities on the northern reach of the Connecticut River, resulting in the establishment of a \$18 million Connecticut River Mitigation and Enhancement Fund (with those funds provided by the licensee). This fund has been a major asset for the northern reach of the Connecticut River and adjacent New Hampshire and Vermont communities and should serve as a precedent for these projects.

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In the FLA filed in December 2020, GRH proposed specific recreation enhancements but did not propose a mitigation fund. Afterwards, ArcLight-backed-GRH conveyed their operating portfolio to Hydro-Quebec in 2022, after owning them for only six years.⁷ Consequently, Hydro-Quebec had no input into the applications. So, at this time, we now call upon Hydro-Quebec to concur with the establishment of a MEF to compensate for their use of the river which will cause unavoidable adverse impacts on public interests.

It is anticipated the MEF will be used for projects that are not addressed and funded by other permit conditions. Potential project types include:

- a) update or establish watershed management plans for the river corridor, water quality, and recreation;
- b) protect and improve habitats for fish and wildlife in the contributing watershed;
- c) monitor fish populations;
- d) protect, re-connect and restore floodplains
- e) remove dams on tributaries;
- f) monitor and document invasive species, conduct public education, and eradicate the invasive species where feasible;
- g) establish and plant riparian buffers on suitable sections of riverbanks;
- h) conduct a comprehensive economic assessment of the impacts due to dam operations;
- i) establish accessible recreation facilities such as docks, picnic sites, boat launches, trails for marine patrol, hikers, bikers, and walkers that improve access and enjoyment of the river;
- j) protect and interpret early American and Native American assets in the vicinity of the river;
- k) provide public education about natural resources and wise use of the river and nearby lands; and,
- l) augment emergency patrol services.

We respectfully request that the license permit applications include a condition that establishes an MEF. The establishment of this fund is supported by New Hampshire Fish and Game, and other stakeholders.

⁷ <https://enerdatiics.com/blog/renewable-energy-m-and-a-arclight-backed-great-river-hydro-sells-589-mw-operating-portfolio-in-new-england-to-hydro-quebec-for-2-billion/>; This acquisition likely means Great River Hydro no longer files financial statements independently, limiting the availability of such data. Great River Hydro, LLC, is privately held, and detailed financial figures—especially profit—are typically not made public. Industry research platforms estimate that Great River Hydro's annual revenues fall between \$100 million and \$500 million.

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6. Support Recreational Enhancements. We support proposed recreational opportunities and the *Recreation Management Plan* (RMP) in the *Staff Alternative*, but GRH needs to fund additional initiatives to increase public engagement with the river and adjacent riparian areas (e.g., walking trails, bird watching, boat launches, and river access opportunities). GRH needs to provide firm timelines with construction and development to commence immediately for the fish ladders and recreational facilities.

A significant existing body of work documents these needs and opportunities. The National Blueway designation and the Connecticut River Paddlers Trail are two under-funded and unincorporated opportunities. The demand for recreational uses continues to grow, and more opportunities to accomplish those on-river and riverside have been thoughtfully identified, proposed, and developed by local municipalities, stakeholder groups, and non-profit organizations, such as the Connecticut River Conservancy. GRH seemingly overlooks these significant interests among the riverside communities and ignores CRJC's comprehensive plans as what GRH offers is inadequate.

Project compensatory mitigation should fund additional initiatives to increase public engagement with the river through the creation and improvement of accessible walking trails, boat launches, and river access opportunities. The 2013 Connecticut River Recreation Management Plan documents these needs and opportunities.

Both FERC and the Army Corps of Engineers adopted these plans to establish the long-term recreational goals and propose implementation strategies to adopt them. Those recommendations are not acknowledged in the 2020-FLA. The years of work and investment by stakeholders on this mutually agreed upon management plan should be the guidance document of recreational enhancement.

Comments. Use of the Connecticut River has substantially evolved over the last 50 years, and more change can be expected over the next 50. Recreation will continue to be a primary objective of many river stakeholders and the renewed licenses need to accommodate that expectation.

The New Hampshire Marine Patrol is understaffed and facilities along the river are inadequate. These are major barriers to the protection and use of the river for recreation. Meanwhile, the riverfront communities continue to pay their share and do their part by making significant investments according to agreed-upon wastewater management and water-quality goals. GRH needs to offer support to the Marine Patrol.

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7. Prepare a Toxic Substances Management Plan. Because the towns of Charlestown, Norwich, Lyme and other riverfront towns withdraw municipal drinking water from an aquifer under the river, toxic substance management is of vital concern. Additionally, subsistence fishing by lower income residents, among others, along the river needs to be protected. We respectfully request that FERC require each of the licenses include a *Toxic Substances Management Plan*, acceptable to stakeholders, which provides for the funding of studies, plans, and mitigation measures for mercury and other toxic substances. As an example, measures need to be drafted to address bio-accumulation of mercury in fish in the project area. Twenty-five years ago, CRJC participated in a watershed-wide fish tissue monitoring program which documented conditions at the time (<https://crjc.org/pubs/>). This study needs to be updated.

Section 5-12 of the DEIS, *Consistency with Comprehensive Plans*, states “[n]o inconsistencies were found” with comprehensive plans for improving, developing, or conserving a waterway or waterways affected by the project. However, On May 1, 2025, FERC finally acknowledges that seven of CRJC’s plans are legitimate comprehensive plans that need to be reviewed for consistency with its licensing decisions. This is significant as CRJC has repeatedly requested that FERC compel GRH to provide a *Toxic Substances Management Plan* (which they have refused to do) and cites the Connecticut River Corridor Management Plan, Volume I, Riverwide Overview (p. 12) (http://www.crjc.org/wp-content/uploads/2017/12/VolumeI_RiverwideOverview.pdf) as its authority. The Management Plan states the need for the facility owners to “fund the monitoring for toxic substances in the water, fish, and sediments, and inform the public about the results.”

Comments. CRJC recommends the monitoring for toxic substances in the water, fish, and sediments, within the impoundments and free-flowing reaches of the project areas and inform the public about the results. The need to provide this monitoring is even more crucial now that we are becoming aware of new toxic substances (e.g., PFAS) and the New Hampshire Legislature is requiring the New Hampshire Department of Environmental Services (DES) to raise its fees so they can be self-supporting. In this austere political environment, we can’t expect DES will have the resources to monitor toxic substances that rightfully should be the responsibility of GRH.

8. Establish a Capital Reserves and Investment Fund. GRH acknowledges that “[t]here would be significant costs involved with decommissioning the projects and/or removing project facilities” (FLA, p. 691). These costs are not discussed in the DEIS. CRJC believes it is imperative that GRH establish a long-term escrow fund to ensure the facilities have adequate capital on-hand to reinvest into the facility to address the known and future improvement needs of these man-made facilities which have real, known, anticipated lifespans. This Capital Reserve Fund would serve towards the renovation and/or replacement of these facilities as expected over the course of this license and allow for the dams to be decommissioned and dismantled if they become obsolete.

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As many dams built in the early/mid-20th century come up for their 2nd or 3rd FERC relicensing, it is imperative that the financial and operational structure of these new licenses be informed by regional and national case studies that address and inform the true long-term costs of these facilities. If these costs are allowed to be externalized by the facility owner and operator, the impacts will continue to be unduly borne by the general public. The inevitable reality of significant future costs was ignored by the original project licensing. It would be irresponsible for FERC to grant another 30-50-year license that does not adequately allocate funds and protective measures for the now-known and likely future costs.

We respectfully request that each of the license permit applications include a condition that requires the establishment of a capital reserve and investment fund for normal wear-and-tear and decommissioning, and proof of adequate insurance coverage for catastrophic property damage.

Comments. Neither the States of New Hampshire and Vermont, nor riverfront towns should be liable for the cost of impoundment mitigation/removal and river restoration efforts should the dams fail or outlive their usefulness.

GRH needs to provide a financial assurance plan, including a draft of the financial assurance mechanism (e.g., bond, standby trust), to ensure funds are available for maintenance and eventual decommissioning of the dams.

9. Summary

We understand operational changes of the hydroelectric facilities in conjunction with changes in precipitation events and many other known and unknown factors will affect communities along the Connecticut River for many decades. Therefore, the Connecticut River Joint Commissions recommends that the omissions cited above be addressed and that the forthcoming renewal licenses for the dams at Wilder, Bellows Falls, and Vernon include conditions that specifically require Great River Hydro/Hydro-Quebec (or its successors) to: 1) document environmental impacts, 2) address potential climate change impacts, 3) establish a revenue-sharing commitment in the upcoming FERC Licenses, 4) establish a Mitigation and Enhancement Fund, 5) support recreational enhancements, 6) prepare a toxic substances management plan, and 7) establish a capital reserves and investment fund.

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We appreciate your consideration of these comments and strongly encourage you to contact either of us if you have any questions or need additional information.

Sincerely,

A handwritten signature in cursive script, appearing to read 'Marie Levesque Caduto'.

Marie Levesque Caduto, President, Connecticut River Joint Commissions
Chair, Vermont Connecticut River Watershed Advisory Commission
marie.caduto@vermont.gov

A handwritten signature in cursive script, appearing to read 'Edmond S. Cooley'.

Edmond S. Cooley, Vice-President, Connecticut River Joint Commissions
Chair, New Hampshire Connecticut River Valley Resource Commission
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