



NEW HAMPSHIRE NATURAL HERITAGE BUREAU

DIVISION OF FORESTS & LANDS - DNCR

172 PEMBROKE ROAD, CONCORD, NH 03301

(603) 271-2214 <https://www.nh.gov/nhdfl/>

October 17, 2019

Low Impact Hydropower Institute
329 Massachusetts Avenue
Suite 6
Lexington, MA 02420
comments@lowimpacthydro.org

RE: Dodge Falls Hydroelectric Project (LIHI #42) Low Impact Recertification

To Whom it May Concern:

Thank you for contacting the NH Natural Heritage Bureau to solicit comments relative to the Low Impact Recertification of the Dodge Falls Hydroelectric Project in Bath, NH.

The NH Natural Heritage Bureau (NHB) finds, tracks, and facilitates the protection of New Hampshire's rare plants and exemplary natural communities. Our mission, as mandated by the Native Plant Protection Act of 1987 (RSA 217-A), is to determine protective measures and requirements necessary for the survival of native plant species in the state, to investigate the condition and degree of rarity of plant species, and to distribute information regarding the condition and protection of these species and their habitats.

NHB also maintains information on rare wildlife in cooperation with the NH Fish & Game Department's Nongame & Endangered Wildlife Program, which has legal jurisdiction over New Hampshire wildlife. Please note that all comments contained herein pertain only to State or Federally-listed Threatened and Endangered plant species and/or exemplary natural communities, as wildlife is outside of NHB's jurisdiction. NHB recommends contacting the NH Fish & Game Department for comments relative to wildlife impacts.

The NHB database contains a record for a State Threatened plant species in the immediate vicinity of the Dodge Falls Hydroelectric Project. This species, balsam groundsel (*Packera paupercula*), is documented downstream of the dam on the NH side of the Connecticut River, on a rocky riverside outcrop. Due to its location, the population may be subject to scour and flooding during high flows and releases; this rare plant population was last inventoried in 1994, and its current status is unknown. NHB recommends that the relicensing effort include an inventory of the balsam groundsel population, in order to:

- a. Determine the current size and condition of the population, and remove its "historical" status (i.e., a population last reported over 20 years ago);
- b. Record observations of any stressors on the population;
- c. Analyze whether any observed stressors have resulted from or are exacerbated by operation of the Dodge Falls Hydroelectric Project; and
- d. Develop measures, as appropriate, to mitigate any negative effects of the dam on the balsam groundsel population.



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Prior to undertaking such a survey, NHB recommends obtaining an official environmental review letter through the NHB DataCheck Tool, at https://www2.des.state.nh.us/nhb_datacheck/tool.htm. Such a letter will provide additional information about the rare species population, including a map of its precise location, details from previous survey(s), and habitat information. NHB recommends that rare plant location information remain confidential and be omitted from public documents.

Sincerely,

Amy Lamb, Ecological Information Specialist
NH Natural Heritage Bureau

cc: Peter Drown, application reviewer, CleanTech Analytics, LLC,
peter.drown@cleantechanalytics.com