

Riverbend Local River Subcommittee

of the Connecticut River Joint Commissions

New Hampshire - Lancaster, Dalton, Littleton, Monroe, Bath, Haverhill
Vermont - Guildhall, Lunenburg, Concord, Waterford, Barnet, Ryegate, Newbury



March 22, 2022

Low Impact Hydropower Institute
1167 Massachusetts Avenue, Office 407
Arlington, MA 02476
Email: comments@lowimpacthydro.org

RE: Fifteen Mile Falls Project Comments

To whom it may concern,

On March 17, 2022, the Riverbend Local River Subcommittee agreed to submit the following recommendations and observations to be considered in relation to LIHI recertification for the Fifteen Mile Falls Project.

Recommended Recertification Conditions:

- Fund invasive species greeters at all boat launches on Moore with particular attention at events. It is nearly universal on all Vermont lakes now and has been for some years.
- Education and outreach, including posting of warnings about elevated mercury levels in fish, at the boat launches on both the Moore and Comerford Reservoirs. Conduct additional studies of mercury levels within and beyond the reservoirs.
- Provide additional funding for the Upper Connecticut River Mitigation and Enhancement Fund based on the revenues generated from the new low flow turbine at Moore and the LIHI recertification. One time funding based on projected revenue enhancements. If this is not done, then using the MEF as a plus in the recertification should not be allowed as no substantial additions to the fund have been provided for decades.
- Ensure that best management practices for the protection for threatened and endangered species, including northern long eared bat, are addressed in management plans.
- Update freshwater mussel study.
- Work with river towns to improve access to the river.
- Conduct a recreation use survey to understand economic impact of recreation in the area.
- Provide additional paddlers trail sites around Moore or Comerford reservoirs that do not conflict with the conservation easement.
- Provide access to conservation easement monitoring reports to the Local River Subcommittees.
- Provide addition of remote Campsites on the 2nd and 3rd Connecticut lakes.
- Provide better maintenance of recreation access areas, including portable restrooms.
- Review the portage around Comerford Dam downstream for potential improvements. This is long and in places steep.

Additional Observations by Riverbend local river subcommittee members:

- The portage at the McIndoes impoundment has been observed to not clean out its port-a-potty facilities during the open season.

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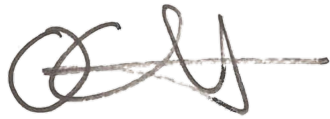
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- No known or observed signs at any of the 3 impoundment boat launches warning the public about elevated levels of mercury in fish.
- No known education at the Moore and Comerford impoundment about the proper boat maintenance to avoid the spread of aquatic invasive species. The McIndoes impoundment is known to have a few signs.

Thank you very much for your consideration of these comments. If you have any questions, please contact Olivia Uyizeye at (603) 448-1680 or ouyizeye@uvlsrpc.org.

Sincerely,



Olivia Uyizeye, Staff

On behalf of the

Riverbend Local River Subcommittee

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