Gorham Hydroelectric Project — LIHI Mid-Term Review

LIHI Certificate #153 | FERC No. P-2288

Androscoggin River, Gorham, Coos County, New Hampshire

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Project Information

1. Introduction

The current LIHI Certificate for the 2.15-MW Gorham Hydroelectric Project (Gorham Project or Project), LIHI #153, FERC Project Number P-2288, was issued to Central Rivers Power NH, LLC (CRP or Applicant) effective March 29, 2019, and expires on March 28, 2029. The Gorham Project was first certified by LIHI in 2019. The current LIHI certificate includes a condition requiring water quality study results and NHDES approval to be included in annual compliance submittals (satisfied in 2026). (LIHI 2019).

The Gorham Project was recently relicensed by FERC on September 8, 2025, with a new 40-year license expiring August 31, 2065 (P-2288) (FERC 2025). In accordance with Section 5.3.4 of the 2nd Edition LIHI Handbook, issuance of a new license constitutes a "material change" and triggers a mid-term LIHI Certification review. A mid-term review application package was submitted to LIHI by CRP on April 24, 2026. A new Certificate term may be granted if the Project continues to satisfy the LIHI criteria.

Note on shared context: The Gorham Project is one of six LIHI Certified® hydroelectric projects within an 11-mile reach of the Androscoggin River between Berlin and Shelburne, New Hampshire (Table 1). Two non-LIHI projects, Riverside (FERC No. P-2423) and J. Brodie Smith (FERC No. P-2287), are located between the Sawmill and Cross Power projects.

Table 1. Nearby LIHI-Certified Hydroelectric Projects in the Upper Androscoggin River between Berlin and Shelburne, New Hampshire.

Facility Name	LIHI Certification Number	FERC Project Number	Project Owner	Location (RM)
Sawmill	173	P-2422	GLHA / Brookfield	~140
Cross Power	174	P-2326	GLHA / Brookfield	~138
Cascade	188	P-2327	GLHA / Brookfield	135.6

Facility Name	LIHI Certification Number	FERC Project Number	Project Owner	Location (RM)
Upper Gorham	175	P-2311	GLHA / Brookfield	~133
Gorham	153	P-2288	Patriot Hydro / LS Power	130.4
Shelburne	176	P-2300	GLHA / Brookfield	~129

Of the six certified projects in this stretch, the Gorham Project is the only facility owned and operated by CRP, a subsidiary of LS Power/Patriot Hydro, LLC. The other five certified projects (Sawmill, Cross Power, Cascade, Upper Gorham and Shelburne) are owned by Great Lakes Hydro America, LLC (GLHA), a subsidiary of Brookfield Renewable Energy Group. The Gorham Project is located downstream from the Upper Gorham Project (LIHI #175) and upstream from the Shelburne Project (LIHI #176). All six projects received new 40-year FERC licenses in 2025. The GLHA projects submitted a combined LIHI mid-term review application separate from the Gorham Project's LIHI mid-term review application (Kleinschmidt Associates 2026).

The long-term, primary flow reference gage for this reach is USGS 01054000 (Androscoggin near Gorham), located upstream of the Gorham hydroelectric Project, which has records back to the early 1900s (Table 2).

Table 2. Nearby USGS Stream Gages in the Upper Androscoggin River between Berlin and Shelburne, New Hampshire.

USGS Gage	Gage Name	Location (River Mile)	Nearest Project
01053800	Androscoggin R. at Berlin, NH	~141	Riverside (upstream) J. Brodie Smith (downstream)
01054000	Androscoggin R. near Gorham, NH	~131	Cascade (upstream) Upper Gorham (downstream)

Background information on watershed conditions, shoreline regulations, cultural resources, and studies conducted for FERC relicensing on water quality, fish passage, threatened and endangered species, and recreation are inherently similar across all six projects. With this shared context, standard language will be used across each mid-term review report where applicable.

2. Facilities and Operations

The Gorham Project is a 2.15-MW run-of-river hydroelectric facility located on the Androscoggin River at river mile 130.4 in Gorham, New Hampshire (Figures 1 and 2). The Peabody River joins the Androscoggin immediately downstream of the powerhouse. The Project was originally constructed and completed in 1923 and acquired by CRP in 2018. The annual average generation is 10,727 MWh.

The dam is a timber crib, L-shaped structure approximately 417 feet long and 20 feet high, and the earthen power canal is approximately 415 feet long, 60 feet wide, and 20 feet deep. The Project operates in run-of-river mode, impounding a 32-acre reservoir with a total Project boundary of 75.92 acres. The impoundment fluctuation limit is 2 inches from normal pond elevation (772.53 feet NGVD29). The powerhouse contains two Francis turbines and two vertical propeller-type turbines. Flow discharges to a 350-foot-long tailrace, which converges with the Androscoggin River downstream of the 850-foot-long bypassed reach.

The Project maintains a minimum flow requirement of 200 cfs into the bypassed reach year-round, through a lowered flashboard near the middle of the dam. The flow is maintained by a monitored headpond elevation of 96.75 feet MSL.

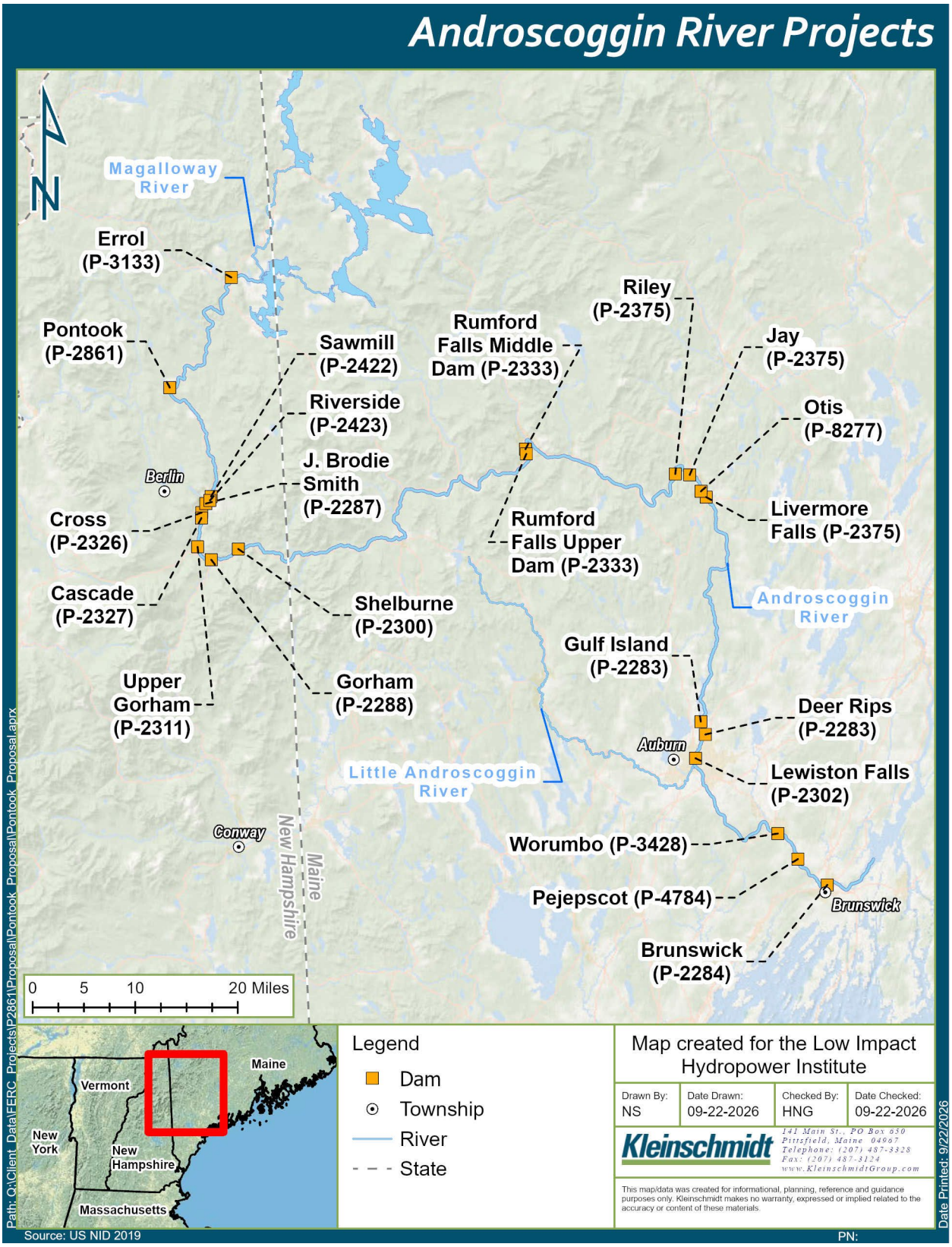

Figure 1 – Androscoggin River Watershed. Gorham Dam outlined in red (edited from original).

Figure 2 – Gorham Project on the Androscoggin River in Gorham, Coos County, NH.

Under the new license, the Project continues to operate in substantially the same manner as before, with an additional notification and reporting requirement to FERC for planned and unplanned deviations (Article 402) and a reduction in the Project boundary of 4.27 acres (Article 206) (Table 3)(FERC 2025).

Table 3. Articles from the 2025 Gorham Project (FERC No. 2288-057) license order:

Article	Title	Summary
401	Commission Approval, Reporting, and Filing of Amendments	Plans and reports required under the water quality certification must be filed with FERC for approval; amendments require FERC application.
402	Project Operation	Licensee must operate in run-of-river mode per NH DES certification condition E-7; additional notification and reporting requirements apply for operational deviations.

Article	Title	Summary
403	Reservation of Authority (Fishways)	FERC reserves authority to require fishways as may be prescribed by the Secretary of the Interior under FPA section 18.
404	Protection of Northern Long-Eared Bat and Tricolored Bat	No tree removal of any size on project land from April 15–October 31, except for public/project safety hazards; emergency removal requires notification to NH FGD and FWS.
405	Recreation Facilities	Licensee must operate and maintain for the license term: canoe portage, informational kiosk, signage, and gravel parking area off Route 2.
406	Programmatic Agreement and Historic Properties Management Plan	Licensee must implement the January 14, 2025 PA with the NH SHPO and file a new HPMP for FERC approval within one year of license issuance.
407	Use and Occupancy	Licensee may grant permission for minor uses and occupancies of project lands without prior FERC approval, provided they are consistent with protecting scenic, recreational, and environmental values.

3. Scope of the Mid-Term Review

This review evaluates the Gorham Project's continued compliance with the current LIHI criteria and standards in consideration of the new FERC license, the 2024 New Hampshire Department of Environmental Services (NHDES) Water Quality Certificate (WQC), and other regulatory and operational requirements (FERC 2025, Appendix A). This review includes a comparison of the prior and new FERC licenses, the FERC Environmental Assessment, the NHDES WQC, annual LIHI compliance submittals, and the supporting studies prepared for FERC relicensing.

Public notice of the mid-term review was made on April 28, 2026, on the LIHI webpage, to LIHI email subscribers in New Hampshire and to agencies and stakeholders provided by CRP. The 60-day public comment period closed on June 27, 2026 and no comments were received. Due to the completeness of information in the application and recent relicensing documents, the reviewer did not need to reach out to any resource agencies or interested parties.

4. Zones of Effect

In the mid-term review application, CRP selected the exact same three Zones of Effect (ZoEs) as in their current LIHI Certificate. Zone 1 is the impoundment extending upstream from the dam to Bucks Island about 1 mile, Zone 2 is the bypassed reach extending downstream from the dam to the tailrace confluence about 2/10 of a mile, and Zone 3 is the tailrace/downstream reach to the confluence of the Peabody River just downstream of the tailrace.

CRP stated that the proposed standards remain unchanged from the 2019 LIHI review because the new license does not create significant changes in operations or other requirements that would substantially affect Project resources. However, the reviewer disagrees with the selections for some criteria and changes to the selected standards are noted in **red** in Table 4 and discussed in Section 5.

Table 4. Selected LIHI Standards

Zone of Effect:		**Zone 1 Impoundment**	**Zone 2 Bypassed Reach**	**Zone 3 Headrace, Tailrace, and Downstream Reach**
River mile at upper and lower extent of Zone:		131.4 – 130.4	130.4 – 130.2	130.4-130.2
Criterion		**Standard Selected**		
A	Flow Regimes	2	2	2
B	Water Quality	2	2	2
C	Upstream Fish Passage	1	1	1
D	Downstream Fish Passage	~~2,~~ **1**	~~2,~~ **1**	1
E	Shorelines and Watershed	~~2,~~ **3**	~~2,~~ **3**	~~2,~~ **3**
F	Threatened and Endangered Species	~~1,~~ **2**	~~1,~~ **2**	~~1,~~ **2**
G	Cultural and Historic Resources	2	2	2
H	Recreational, Public, and Traditional Cultural Access	2	2	2

5. Detailed Criteria Review

A. Flow Regimes

Goal: *The flow regimes in riverine reaches affected by the facility support habitat and other conditions suitable for healthy fish and wildlife resources.*

Assessment of Criterion: Standard A-2, Resource Agency Recommendations for all zones, remains appropriate for all zones. The minimum flow regime was developed based on results of an Instream Flow Study conducted during the prior FERC licensing, and in consultation with US Geological Survey (USGS), US Fish and Wildlife Service (USFWS), and the NH Fish and Game Department (NHFG) (FERC 1993). Minimum flow requirements were determined to provide suitable protection for resident aquatic species, including trout, and their habitat. A Bypass Reach Aquatic Habitat Study conducted by CRP in 2020 for relicensing observed a fully wetted river channel with habitat features including a spillway pool, boulder riffle, and riverine pool at existing minimum flows (GLHA 2021).

Under the new license, the Project continues to operate in a run-of-river mode, always maintaining a stable impoundment level and a minimum flow of 200 cfs into the bypassed reach (FERC 2025). An Operations Compliance Monitoring Plan (OCMP) requires a drawdown rate of 6 inches per day under Article 402 and Condition E-9 of the Water Quality Certificate (NHDES 2024, FERC 2025, Appendix A). CRP proposed to modify the drawdown rate to 24 inches per day in the OCMP, but the NHDES required a maximum of 6 inches of drawdown per day, subject to agreed-upon modifications if needed. The Project is now also subject to notification and reporting in the event of flow or impoundment level deviations (Article 402, Condition E-8 of the WQC) and CRP is required to protect aquatic resources downstream under Condition E-7 for emergency or maintenance “Impoundment Refill Procedures” to discharge 90 percent of inflow using 10% of inflow for refill (FERC 2025, Appendix A).

There were no reported flow or impoundment-level deviations identified in the FERC eLibrary. The flow regime has not changed under the new license, and the Project continues to provide a stable hydraulic environment consistent with prior operations. Therefore, the Project continues to satisfy the flow regimes criterion with the condition recommended in Section 7 to implement the OCMP.

B. Water Quality

Goal: Water quality is protected in waterbodies directly affected by the facility, including downstream reaches, bypassed reaches, and impoundments above dams and diversions.

Assessment of Criterion: Standard B-2, Resource Agency and Tribal Government Recommendations for all zones is appropriate, given the recent Water Quality Certification (WQC) although Standard B-3, Site Specific Studies could also be appropriate because the Project completed a water quality study during relicensing (CRP 2025) which confirmed that it

does not contribute to existing water quality impairments. The Project reach is designated Class B by NHDES and is impaired for mercury, low dissolved oxygen, and pH.

The Project continues to meet surface water quality standards consistent with the Androscoggin Rivers Class B designation and the Water Quality Certificate issued by NHDES on September 18, 2024 (NHDES 2024, FERC 2025, Appendix A). The Project does not adversely affect water quality under Condition E-1 of the WQC and the new license does not impose a fundamentally different water quality regime. A 10-week water quality study conducted by CRP between June and September of 2020, observed pH and dissolved oxygen (concentration and percent saturation) exceeded or were within the range of attainment for Class B standards during the monitoring period (FERC 2024). Similar to the other projects on the river pH occasionally fell below 6.5 during times of cooler water temperatures and higher flows following rain events. Chlorophyll-a and total phosphorus values indicated overall low productivity, consistent with oligotrophic conditions, and no presence of nuisance algal blooms (FERC 2024).

The new license preserves compliance obligations addressed during relicensing under Conditions E-10 and E-11 of the WQC, which requires CRP to provide a Water Quality Improvement Plan to NHDES within 120 days of notice if the Project is determined to be contributing to a violation. Although there remain legacy impairments in this reach of the Androscoggin River unrelated to Project operations, the Project continues to satisfy the water quality criterion.

C. Upstream Fish Passage

Goal: The facility allows for the safe, timely, and effective upstream passage of migratory fish.

Assessment of Criterion: Standard C-1, Not Applicable/De Minimis Effect, remains appropriate for all zones. The upper Androscoggin River is not accessible to diadromous species in the Project area (Wippelhauser et al. 2017, Yoder 2006) due to natural and human made barriers downstream in the Maine section of the river. As such, there is no upstream migratory fish passage at the Project, and the new license does not impose a current operational requirement for fish passage (Article 403, FERC 2025). No fish passage studies were requested or conducted during FERC relicensing, and no upstream fish passage structures are currently required per the new FERC license.

Although there are no anadromous fish present in the Project area, the new license preserves FERC's authority to require fishways that may be prescribed by the Secretary of the Interior pursuant to section 18 of the Federal Power Act. Based on the absence of migratory fish in the reach and the lack of any passage structures required by the new license, the Project continues to satisfy the upstream fish passage criterion.

D. Downstream Fish Passage

Goal: The facility allows for the safe, timely, and effective downstream passage of migratory fish and minimizes loss of resident fish from impoundments.

Assessment of Criterion: Standard D-1, Not Applicable/De Minimis Effect, remains appropriate for the tailrace/downstream reach since once a fish has passed below the dam and bypass reach there is no further Project-related barrier to continued downstream passage. Standard D-1 is also appropriate in the impoundment and bypassed reach zones under the new FERC license. There are no catadromous or other migratory fish requiring downstream passage at the Project (FERC 2025). Resident fish species include stocked trout, fallfish, smallmouth bass, white sucker, and longnose dace (FERC 2024).

Article 406 of the prior FERC license required the licensee to provide functional designs of downstream fish bypass facilities, including plans for operations and maintenance. However, FERC terminated this order upon appeal, by an order issued January 9, 2003.[1] The original requirement was premised on the proposed construction of a new development, Pulsifer Rips, associated with the upstream Cascade Project which would have created a significantly enhanced salmonid habitat in the new development's 1.5-mile-long bypassed reach. A proposed increase in hydraulic capacity at the upstream Upper Gorham Project would have increased flows to the powerhouse there. Both of these proposals were seen by FERC staff as increasing the entrainment risk to stocked land locked salmon and trout in the Gorham Project reach. Neither of these proposals were implemented and therefore, FERC determined in 2003 that with the bypass reach minimum flows at these projects, there was no additional need for further downstream passage protection measures.

Downstream passage for resident fish occurs through spillage, low-level gate releases, and turbine flow through the trashracks. Resident fish species include stocked trout, fallfish, smallmouth bass, white sucker, and longnose dace (FERC 2025). During relicensing, CRP conducted a desktop entrainment/impingement study and created estimates of turbine passage survival for juvenile and adult life stages of resident fish species using the USFWS Turbine Blade Strike Analysis model (Towler and Pica 2020). Results indicated low entrainment and impingement risk in addition to a baseline lack of quality aquatic habitat due to legacy impairments in this riverine reach and the absence of migratory fish species.

The Project's operational and structural characteristics were also determined by FERC's EA to create little downstream passage concern for the resident species present (FERC 2024). Resource agencies did not identify downstream passage measures that were required as part of the new license. Therefore, the Project has little to no impact on downstream passing fish and continues to satisfy the downstream passage criterion.

[1] https://elibrary.ferc.gov/eLibrary/filelist?accession_number=20030109-3025&optimized=false&sid=75347f00-12e7-46f1-98d9-b609e783622d

E. Shorelines and Watershed Protection

Goal: The facility has demonstrated that sufficient action has been taken to protect, mitigate, or enhance the condition of soils, vegetation, and ecosystem functions on shoreline and watershed lands associated with the facility.

Assessment of Criterion: Standard E-3, Enforceable Protection, is appropriate for all zones under the new FERC license. Article 408 of the prior license required a Shoreline Management Plan but that was not carried forward in the new license.

All projects on the river are subject to the New Hampshire Shoreland Water Quality Protection Act (SWQPA), which governs shoreland uses within a 250-foot buffer of the high-water mark. The SWQPA establishes minimum standards for the subdivision, use and development of shorelands adjacent to the state's public water bodies. It includes limits on impervious surfaces, a provision for waterfront and natural woodland buffers in which vegetation removal is limited, shoreland protection, and the establishment of a permit requirement for many new construction, excavation and filling activities within the Protected Shoreland.

Project lands consist of about 76 acres with no lands of ecological significance. Shoreline protection is maintained through compliance with the SWQPA. The Project continues to operate in a run-of-river mode that minimizes shoreline erosion and negative impacts of reservoir fluctuation. Therefore, the Project continues to satisfy the shorelines and watershed criterion.

F. Threatened and Endangered Species

Goal: The facility does not negatively impact federal or state listed species or tribal trust species.

Assessment of Criterion: Standard F-2, Finding of No Negative Effect is appropriate for all zones under the new FERC license. Based on the USFWS IPaC online tool, the federally endangered northern long-eared bat, the federally threatened Canada lynx, the federally proposed endangered tricolored bat, and the federally proposed threatened monarch butterfly have the potential to occur within the Project boundary (FERC 2024). No critical habitat for either bat species, Canada lynx, or monarch butterfly is proposed or designated within the Project area. In addition, a freshwater mussel survey conducted in the summer of 2021 found no state-listed mussel species. A botanical survey conducted in September 2020 documented no federal or state threatened or endangered plant species. In a September 27, 2024, letter to FERC, the USFWS indicated that the Project would have no effect on Canada lynx and any effect on bats would be “insignificant and/or discountable”. [2]

Article 404 of the new FERC license implements protection for the northern long-eared bat and tricolored bat on Project land by imposing a seasonal tree-cutting restriction from April 15

[2] https://elibrary.ferc.gov/eLibrary/filelist?accession_number=20241001-5091&optimized=false&sid=279f99c6-6e21-49a5-b805-eb79da6aaf52

through October 31 (FERC 2024, 2025). Operation under the new license is not expected to create significant impacts. Therefore, the Project continues to satisfy the threatened and endangered species criterion.

G. Cultural and Historic Resources

Goal: The facility does not adversely impact cultural or historic resources associated with the facility's lands and waters, including archaeological sites, historic era sites, traditional cultural landscapes, traditional cultural properties, and other tribal trust resources.

Assessment of Criterion: Standard G-2, Approved Plan, remains appropriate for all zones. Article 406 of the new license requires implementation of a Programmatic Agreement between FERC and the New Hampshire State Historic Preservation Office for managing cultural and historic resources pursuant to which CRP must develop a Historic Properties Management Plan (HPMP) within one year of license issuance (FERC 2025). The prior license had required a Cultural Resources Management Plan which no longer meets FERC standards.

FERC designated CRP NH Gorham, LLC as its non-federal representative for Section 106 consultation in 2019. A historic architectural survey of the Gorham Dam and related Project structures was completed for relicensing and concluded that the Project is not recommended for eligibility for the National Register of Historic Places (NRHP) due to significant structural alterations over time. However, the Project inundates the Eddy Bridge and Logging Boom sites which are eligible for listing. No Native American lands, known as traditional cultural properties, or NRHP-eligible tribal resources are present within the Project boundary. There are no state or federal recognized tribes in New Hampshire, but three local tribes[3] were notified of the LIHI mid-term review application. No comments were received from any tribal interests. Given the lack of cultural or historic resources and development of a new HPMP, the Project continues to satisfy the cultural and historic resources criterion with the condition recommended in Section 7 to implement the HPMP.

H. Recreational, Public, and Traditional Cultural Access

Goal: The facility accommodates recreational activities and provides recreational, public, and traditional cultural access to associated lands and waters without fee or charge.

Assessment of Criterion: Standard H-2, Resource Agency and Tribal Government Recommendations, remains appropriate for all zones. The upper Androscoggin corridor supports fishing, paddling, and trail access. The previous licensee filed recreation use reports with FERC while those were required and maintained a self-registration survey system. Recreation opportunities at the Project include canoeing, kayaking, bank fishing, boat fishing, biking, scenic and nature viewing, picnicking, and walking.

[3] Abenaki Nation of New Hampshire, Koasek Abenaki Nation, and Pennacook New Hampshire Tribe

Article 405 requires CRP to continue operating and maintaining the existing canoe portage, the informational kiosk, directional and informational signage, walking path to the impoundment, and the gravel parking area off Route 2 (river right looking downstream). CRP conducted recreation user intercept surveys during the 2022 recreation season. Respondents reported light crowding, satisfactory conditions, and adequate facilities. The Town of Gorham obtained a grant for access improvements in 2022, a part of the Northern Forest Canoe Trail[4] and the town maintains the new parking and access area on Howland Avenue including the portage take out and a seasonal dock. CRP will continue to maintain Project facilities and coordinate maintenance of the improved portage take-out and new parking area with the Town of Gorham.

The Project continues to provide free public access where it is safe to do so, and therefore, continues to satisfy the recreation, public and traditional cultural access criterion with the condition recommended in Section 7 to inspect and maintain recreational facilities.

6. Current Certificate Conditions

The current LIHI condition requires CRP to submit water quality study results to LIHI in annual compliance submittals along with NHDES approval of results. This condition was partially satisfied in 2021, and the referenced water quality study has now been completed as part of relicensing fully satisfying the condition. Per the Water Quality Certification issued by NHDES on September 18, 2024, the Project does not adversely affect water quality standards (FERC 2025, Appendix A).

7. Conclusion and Recommendation

This review determined that the Project continues to satisfy the LIHI criteria and that a new 10-year Certificate term can be granted. All requirements of Condition 1 of the current certification have been satisfied. The Project's new FERC license formalizes existing operational practices, establishes compliance reporting structures, and monitoring requirements for continued resource protection. However, the following conditions are recommended to ensure completion of post-license requirements related to the LIHI criteria:

Condition 1: The Facility Owner shall submit the final Operational Compliance Monitoring Plan (OCMP) to LIHI once it has been approved by resource agencies and FERC. In annual compliance submittals to LIHI the Facility Owner shall submit a summary of all planned and unplanned operational deviations that occurred during the year along with evidence of resource agency consultation and any comments received.

Condition 2: The Facility owner shall submit the final Historic Properties Management Plan (HPMP) to LIHI once it has been approved by the SHPO and FERC. In annual compliance submittals to LIHI, the Facility Owner shall report on any consultation that occurred during the year related to ground-disturbing or other activities subject to the HPMP.

[4] https://www.northernforestcanoetrail.org/projects-enhance-access-to-androscoggin-river/

Condition 3: The Facility Owner shall confirm with LIHI in annual compliance submittals that recreational facilities have been inspected at least annually and any required maintenance has been completed. If additional maintenance is required, a plan and schedule shall be submitted.

Appendix A — License Crosswalk

Resource Area	Previous License Requirement	Change from Existing License
Flow Regimes	Articles 401, 402, and 403 included restrictions on impoundment fluctuation, run-of-river operations, minimum bypass flows, and an operational compliance monitoring plan.	Articles 401, 402 and WQC Conditions E-7 - E-9 require an updated operational compliance monitoring plan including deviation reporting and drawdown/refill operations.
Water Quality	Article 405 and WQC Condition 1 required a 3-year water quality monitoring program which was completed in 1997.	Article 401 and WQC Conditions E-10 and E-11 require a water quality improvement plan and monitoring, if NHDES determines that the project is contributing to non-compliance with state water quality standards. Article 401 requires submittal of that plan if developed.
Fish Passage	Article 404 retained FERC's Section 18 reservation of authority to prescribe fishways Article 406 required design and implementation of trash rack and downstream fish bypass facilities (later removed upon appeal).	Article 403 preserves FERC's Section 10 reservation of authority to prescribe fishways.
Shorelines and Watershed	Article 408 required development and implementation of a Shoreline Management Plan.	The new license does not require a shoreline management plan. The project is subject to restrictions under the state Shoreline Water Quality Protection Act
Threatened and Endangered Species	No species-specific protection measures.	Article 404 requires avoidance of tree removal, trimming on from April 15 through October 31.
Cultural and Historic Resources	Article 407 required implementation of a cultural resources management plan.	Article 406 requires implementation of the Programmatic Agreement and development of an updated historic properties management plan.
Recreation	Article 409 required development and implementation of a recreation management plan.	Article 405 continues recreation facility maintenance but does not require a recreation management plan.

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