

Nashua, Squannacook, and Nissitissit Rivers Wild & Scenic Stewardship Council

Activity Review and Advocacy

Approved 9/17/20

The Council may pursue the cooperative resolution of current issues affecting the Nashua, Squannacook, and Nissitissit Rivers, as well as issues that may arise in the future. However, the Council's role is advisory only and it does not have the authority to resolve any issue directly. In addition, the Council may support initiatives and opportunities that will advance the goals of the *Stewardship Plan*. The Council may provide a public forum for the discussion of issues or initiatives, help raise awareness about topics of importance, and encourage the appropriate authorities to take responsive action.

Evaluation of activities that might affect the rivers

The Council will review and evaluate activities (policies, projects, proposals, initiatives, etc.) that could affect the designated segments of the Nashua, Squannacook, and Nissitissit Rivers. As it deems necessary, the Council will make advisory comments to the appropriate authorities regarding activities and suggest mitigating measures to reduce impacts on the Nashua, Squannacook, and Nissitissit Rivers. Examples of activities that the Council might review and comment on include but are not limited to:

- Zoning changes for lands along the river or its tributaries that potentially effect ORVs.
- Development projects that potentially affect free-flow, water quality, or ORVs.
- Applications for state permits (e.g., point source discharges; water withdrawals).
- Changes to state programs or policies (e.g., statewide water quality standards).

The Council may also advise the National Park Service (NPS) about the potential impacts of federally funded or licensed projects that are subject to Section 7(a) review under the Wild and Scenic Rivers Act. The Council can comment on federally assisted projects and provide local input into the design and outcome of such projects; however, the determination regarding consistency with the Wild and Scenic Rivers Act rests solely with the NPS. Examples of projects subject to Section 7(a) include:

- Applications for federal permits (e.g., Army Corps of Engineers Section 404 permits; Federal Energy Regulatory Commission certification for pipeline crossings).
- Other federal or federally funded projects having an impact on river resources.

Monitoring activities and Council notification

Town and organizational representatives on the Council are responsible for keeping abreast of their town's/organization's activities and relaying back to the Council any information related to activities that could impact the Wild and Scenic Rivers and implementation of the *Stewardship Plan*. Town boards will be encouraged to communicate and cooperate with the Council on matters related to the rivers (including notifying the Council of specific projects), but it will be the Council's final responsibility to keep itself informed of proposals under local jurisdiction. The monitoring efforts of the Council will not affect monitoring and review functions of its member organizations. The Council may ask the states to notify the Council of certain state permit applications and other potential actions that may affect free-flow, water quality, and ORV's and give the Council the opportunity to comment. Once notified by the relevant federal agencies, the NPS will inform the Council of any proposed projects requiring federal permits or other assistance that are subject to Section 7(a) review.

Process for activity review and Council comment

Potential Council review of an activity may be initiated at the request of the public, local, state, or federal officials, or at the Council's discretion. The Council may review, discuss, and draft advisory comments on relevant activities that might affect the rivers.

Council comments on an initiative or proposal will provide objective information on anticipated impacts and advocate for protection of resources. The Council will not engage in lobbying. All formal Council comments, whether written, verbal, or otherwise, shall be approved by vote by the Council prior to submission to the appropriate party. Should any Council member entity have an interest in a project being reviewed or supported by the Council, said member entity shall reveal its interest to the Council (see Policy on Conflict of Interest).

Activity Review Criteria

Activities with the potential to impact the rivers' resource values should be evaluated under the following criteria:

- Impacts on the free-flowing character of the rivers;
- Impacts on ORVs for which the rivers were designated;
- Effect on related environmental factors and ecological systems involved, including adjacent lands, waters, scenery, fisheries, recreation, riparian vegetation, wildlife, and historic & cultural values;
- Cumulative impacts of the project;
- Alternatives available with explanations as to why some alternatives are unsuitable;
- Secondary effects likely to be caused or encouraged by the project; and
- Other relevant factors.