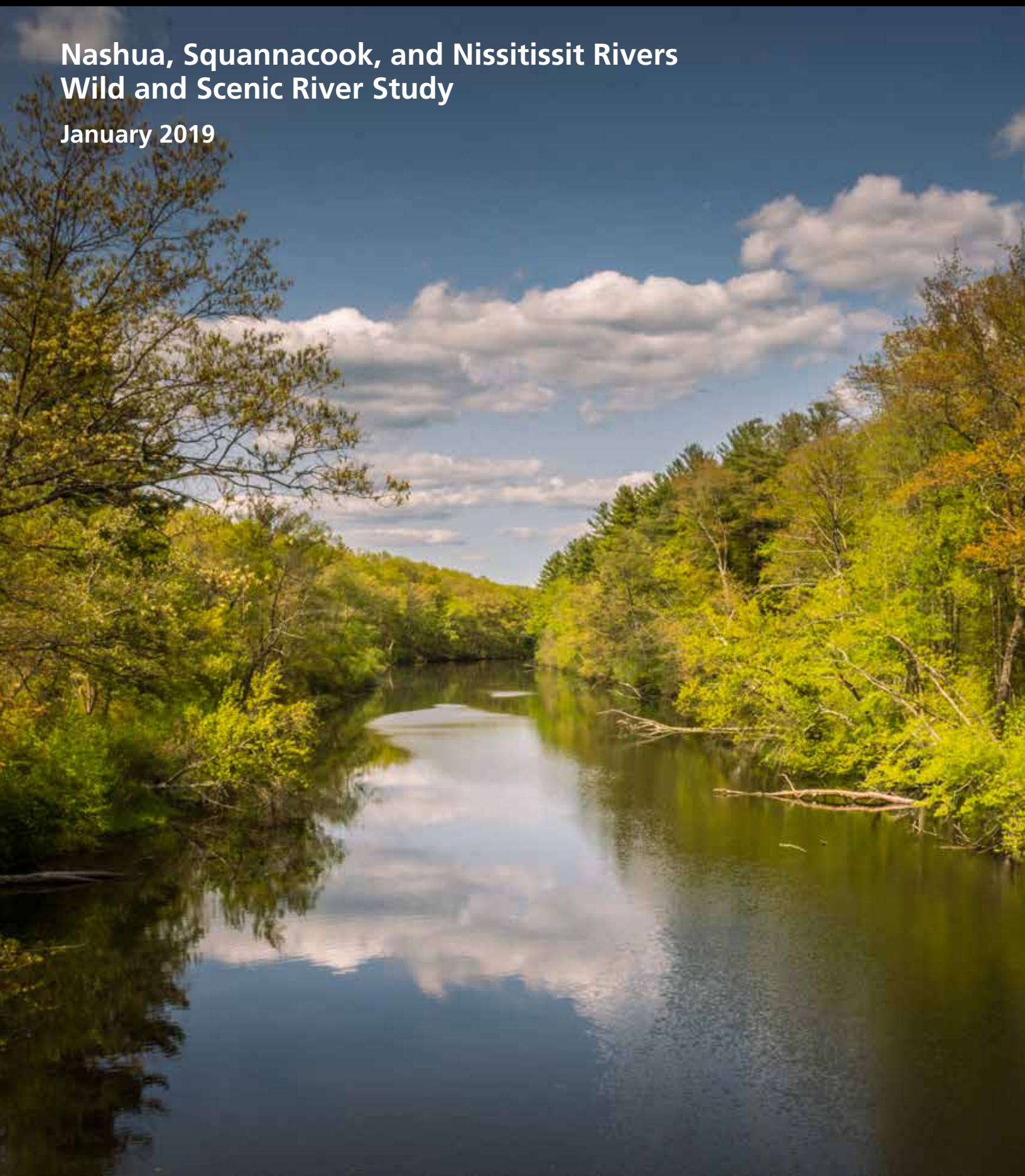




Nashua, Squannacook, and Nissitissit Rivers Wild and Scenic River Study

January 2019



Nashua, Squannacook, and Nissitissit Rivers Wild and Scenic River Study

Study Report January 2019

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For more information on the Nashua, Squannacook, and Nissitissit Rivers, or to see the companion document, *Nashua, Squannacook, and Nissitissit Rivers Stewardship Plan*, please visit www.WildandScenicNashuaRivers.org or contact:

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The National Park Service wishes to thank the commitment of many individuals and organizations (especially the Nashua River Wild and Scenic River Study Committee appointees who volunteered their time for three years). Please see the *Nashua, Squannacook, and Nissitissit Rivers Stewardship Plan* for a full list of acknowledgements and thanks to all who contributed to the Study.

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Nashua, Squannacook, and Nissitissit Rivers Wild and Scenic River Study

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Appendices

APPENDIX 1:

Nashua River Study Act – A Portion of The Carl Levin and Howard P. “Buck” McKeon National Defense Authorization Act for Fiscal Year 2015

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Record of Endorsements and Support for The Wild and Scenic Designation (State, Town, Organizations, and Individuals)

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Maps of Working Dam Areas

Consultation History



Nashua River. Photo: Cindy Knox Photography.

Summary – Principal Findings

Eligibility

The National Park Service (NPS) Wild and Scenic River Study of the Nashua, Squannacook, and Nissitissit Rivers concludes that the studied portions of these streams are eligible for designation into the National Wild and Scenic Rivers System based on their free-flowing condition and the presence of one or more Outstandingly Remarkable Values (ORVs).

The ORVs described in this report are Biological Diversity, Recreation and Scenery, and Historic and Cultural.

Classification

The Wild and Scenic Rivers Act provides for three possible classifications of eligible river segments:

wild, scenic, and recreational. The criteria distinguishing these classifications are based on the degree of human modification of the river and its adjacent shorelines including the amount and nature of access. Based upon the applicable criteria, the NPS has assigned a preliminary classification of “scenic” to the segments of the Nashua, Squannacook, and Nissitissit Rivers that have been found eligible for designation.

Water Quality

The Squannacook and Nissitissit Rivers are known for their excellent water quality and cold water fishery habitat. Both rivers are utilized as “reference reaches” by state water quality agencies, as examples of natural river systems with minimal human

alterations to water quality. The mainstem Nashua River has undergone a nationally and internationally recognized water quality restoration, and now supports a wide spectrum of recreational activities and ecological functions. Overall, water quality is supportive of identified "outstandingly remarkable" resource values, with management schemes in place to maintain and enhance these values into the future.

Suitability

The Study concludes that approximately 27 miles of the Nashua River, 16.3 miles of the Squannacook River, and 9.5 miles of the Nissitissit River are suitable for designation.

- Analysis of existing local, state, federal, and non-regulatory protections applicable to the Nashua, Squannacook, and Nissitissit Rivers are found to adequately protect the rivers consistent with the purposes of the Wild and Scenic Rivers Act. The Nashua, Squannacook, and Nissitissit Rivers Stewardship Plan developed as a part of the Study provides an appropriate and effective management framework for the long-term management and protection of the watercourses.
- Based upon the official record of endorsement from local governing bodies, citizens, local, and regional non-governmental organizations, it is concluded that there is substantial support for designation under the Wild and Scenic Rivers Act based on the Partnership Wild and Scenic Rivers model.
- Two short sections of the Nashua River surrounding the Ice House and Pepperell FERC hydroelectric projects are found unsuitable for designation, as is a short section of the Squannacook River surrounding the Hollingsworth & Vose Dam in West Groton. Appendix 4 contains a detailed discussion of these "working dam" areas.

Nashua, Squannacook, and Nissitissit Rivers Stewardship Plan

Development of the Nashua, Squannacook and Nissitissit Rivers Stewardship Plan (Stewardship Plan) has been one of the primary tasks of the Wild and Scenic Study Committee (Study Committee). The Stewardship Plan is the product of an extensive collaborative effort between the Study Committee, local citizens, land use boards and commissions, and elected officials. The Stewardship Plan contains the vision and strategy for protecting and enhancing the watercourses and the associated Outstandingly Remarkable resources.

If the candidate rivers are designated, the Stewardship Plan will serve as the comprehensive river management plan required under Section 3(d)(1) of the Wild and Scenic Rivers Act (WSRA). It functions as a companion document to this Study Report. If the rivers are not added to the National Wild and Scenic Rivers System, the Stewardship Plan could still serve to provide state and local guidance for protection of these waterways.

Support for Designation

Between March 14, 2018 and May 17, 2018 the Annual Town Meetings of all eleven communities abutting the study area voted to endorse the Nashua, Squannacook, and Nissitissit Wild and Scenic Rivers designation -and support the implementation of the Stewardship Plan. In addition, many of the land use commissions and boards from these communities voted to endorse and support the Stewardship Plan and Wild and Scenic designation as a part of the community review process leading up to official town votes. Local and regional organizations have also provided support letters. The Commonwealth of Massachusetts and State of New Hampshire have also expressed support for the Wild and Scenic designation and for participation in the implementation of the Stewardship Plan.

(Please refer to Appendix 2 for endorsement letters and votes documentation.)

Partnership Wild and Scenic River Designation

Consistent with Congressional and local government intent established prior to its authorization, the Nashua, Squannacook, and Nissitissit Rivers Wild and Scenic River Study (Study) was conducted based on the established model of the Partnership Wild and Scenic Rivers. Examples of this model include the Taunton River and Sudbury, Assabet, Concord Rivers in Massachusetts, as well as the Lamprey River in New Hampshire. The conduct and findings of this Study, including the record of public support for designation, the content and provisions of the Nashua, Squannacook and Nissitissit Rivers Stewardship Plan are all based on this premise.

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Squannacook River. Photo: Cindy Knox Photography.

Chapter 1: Background

This chapter provides an introduction to the Wild and Scenic Rivers Act and the Nashua, Squannacook, and Nissitissit Rivers Study. It includes a review of the project's history, the study strategy and process, the principal participants, and the major study products and accomplishments.

Wild and Scenic Rivers Program

The National Wild and Scenic River System was established by Congress in 1968 to protect certain outstanding rivers from the harmful effects of new federal projects such as dams and hydroelectric facilities. As of August 2, 2018, 209 rivers or river segments totaling over 12,000 miles have been

protected nationwide. To be considered “Wild and Scenic” a river must be free-flowing and have at least one river-related outstanding natural, cultural, or recreational resource value. Section 1(b) of the Act states:

It is hereby declared to be the policy of the United States that certain selected rivers of the Nation which, with their immediate environments, possess outstandingly remarkable scenic, recreational, geologic, fish and wildlife, historic, cultural, or other similar values, shall be preserved in free-flowing condition, and that they and their immediate environments shall be protected for the benefit and enjoyment of present and future generations.

There are only nine Wild and Scenic River segments located in New England: the Upper Farmington and Eightmile in Connecticut; the Allagash in Maine; the Wildcat and Lamprey in New Hampshire; the Westfield, the Sudbury, Assabet and Concord, and the Taunton in Massachusetts; and the Upper Missisquoi and Trout in Vermont.

Each river designated into the national system receives permanent protection from federally authorized or assisted dams, diversions, channelization, or other water projects that would have a direct and adverse effect on its free-flowing condition, water quality, and Outstandingly Remarkable Values, or, for projects outside the designated segments, that would invade or unreasonably diminish its fish, wildlife, scenic, or recreational resources. The Wild and Scenic Rivers Act explicitly prohibits any new hydropower dam and related facilities licensed by the Federal Energy Regulatory Commission (FERC) on or directly affecting a designated river segment. The determination of a proposed federally assisted water resource project's or FERC-licensed hydropower project's potential impacts on the river's outstandingly remarkable values, water quality, and free-flowing condition is made by the federal river administering agency, in this case the National Park Service.

Studies under the Wild and Scenic Rivers Act can bring additional local benefits such as the preparation of management and conservation strategies, research studies, and cooperation among numerous river stakeholders. River designation may bring prestige and recognition to the region and can boost the local economy through tourism, possible funding through the National Park Service, matching grants, in-kind support, and volunteer assistance.

Before a river can be added to the National Wild and Scenic Rivers System, it must be found both *eligible* and *suitable*. To be eligible, the river must be 1) free-flowing, and 2) possess at least one river-related Outstandingly Remarkable Value such as scenery, fisheries, wildlife, water quality, or cultural resources. The suitability determination is based on factors such as public support for designation versus conflicting river uses (e.g., hydropower development), evidence

of adequate existing resource protection, and lasting protection measures such as are documented in the Stewardship Plan. Local residents, leaders, and organizations must show strong support and their intent to participate in the long-term protection of the river. The *eligibility* and *suitability* analyses are presented in the chapters that follow.

Nashua, Squannacook, and Nissitissit Rivers Study History and Methods

History

Since 2009, the locally-based Nashua River Watershed Association (NRWA) including residents, town leaders, and others interested in river conservation led an exploratory effort to determine whether the Wild and Scenic River designation might be an appropriate way to recognize and protect the Nashua, Squannacook, and Nissitissit Rivers and their associated resources. The group gathered letters in support of a Study from the interested towns. Specifically, local interest was expressed in pursuing a "Partnership Wild and Scenic River Study," based on river management models such as the Sudbury, Assabet and Concord Rivers in Massachusetts and the Lamprey River in New Hampshire.

Reconnaissance Report

Prior to the Wild and Scenic Study, a reconnaissance survey of the Nashua River was conducted by the National Park Service (NPS) at the request of U.S. Representative Niki Tsongas. The reconnaissance survey (December 2013) provided a preliminary assessment of the eligibility and suitability of the Nashua, Squannacook, and Nissitissit Rivers as a candidate for a Wild and Scenic designation according to criteria established under the Wild and Scenic Rivers Act (WSRA). Included in the preliminary eligibility assessment was the identification of potentially significant natural, cultural and recreational resources to be evaluated as Outstandingly Remarkable Values (ORVs) as defined by the WSRA. Key factors of suitability were also explored including potential local support and existing protection

mechanisms. The outcome of the survey was a report that determined that Congressional authorization for a Wild and Scenic River Study was warranted, and a determination that Wild and Scenic designation could be an appropriate technique for river protection for these rivers.

Study Bill

The Nashua Wild and Scenic River Study Bill (Study Bill) was introduced in the U.S. House by Representative Niki Tsongas in January, 2013. The bill (H.R. 412) was reported out of the House Committee on Natural Resources by unanimous consent in June 2013. Subsequently, the Nashua River Study Act passed by vote as part of the Carl Levin and Howard P. “Buck” McKeon National Defense Authorization Act for Fiscal Year 2015, Public Law 113-291 (H.R. 3979), and was then signed into law by President Obama on December 19, 2014 – focusing on the mainstem of the Nashua River in Massachusetts and two of its tributaries (the Nissitissit and Squannacook) for study for potential inclusion in the National Wild and Scenic Rivers System.

Study Committee

The Wild and Scenic Rivers Act states that congressionally authorized studies “shall be pursued in as close cooperation with appropriate agencies of the affected State and its political subdivisions as possible, shall be carried on jointly with such agencies if request for such joint study is made by the State, and shall include a determination of the degree to which the State or its political subdivisions might participate in the preservation and administration of the river should it be proposed for inclusion in the national wild and scenic rivers system.” For more than 20 years, the NPS has taken advantage of this direction when conducting studies bordered by predominantly private and non-federal lands by encouraging formation of informal study committees based around state and local government representation. Such study committees become an integral part of the study approach, and the regular participation of local and state governments ensures full buy-in to

the study process and eventual products. Local and state knowledge is often critical to effective and efficient research regarding potential ORVs of the study area, and is absolutely essential to the development of local and state-based management strategies for protection of such values. Since it is a central tenet of such non-federal land river studies that land-based resource protection must be primarily accomplished through local, state, and non-governmental action, it is therefore a central task of the study committee to develop a locally-based stewardship plan to protect the important river values being researched and documented throughout the study.

As a part of the discussions that took place prior to congressional authorization of the Nashua River Study, local community support for the study was preconditioned on the understanding that such a study committee would be formed as the first step of the study process. Congress passed the Study bill in December 2014. In 2015, discussions and outreach to communities to obtain appointments to the study committee occurred, and the locally-based Nashua River Wild and Scenic Study Committee was established. The Committee began meeting on October 8, 2015. Committee members brought a wealth of knowledge and experience in governmental, ecological, and organizational processes to the study team. The appointed members included representatives from all the river towns in the study area, and the Nashua River Watershed Association. Other organizations that joined the Study Committee through regular participation included the MA Division of Ecological Restoration, Department of Fish and Wildlife, Oxbow National Wildlife Refuge, and others. Additional input from independent researchers, local supporting agencies, professional contractors, and the general public has ensured the study’s progress and comprehensiveness. The NPS provided staff support, coordination, and technical assistance on the study and development of the Stewardship Plan document. Sub-committees on Outstandingly Remarkable Resource Values and Outreach and Education helped guide and implement the study process.

Study Approach - Partnership Rivers

The Nashua River Wild and Scenic Study was carried out in “partnership” with local stakeholders. The Partnership Wild and Scenic Rivers make up a subset of rivers in the National Wild and Scenic Rivers System. The Partnership Wild and Scenic River approach was developed in response to the need for a Wild and Scenic River Study and designation program tailored to rivers characterized by extensive private land ownership along the river, and well-established traditions of local control of river management in a community-based setting. This type of study and designation model has a proven track record of effectively creating river protection strategies that bring communities together in protecting, enhancing, and managing high value river resources. Coordinated private sector, local, state, and federal government commitments are leveraged through the partnership approach to achieve efficient and effective Plan implementation.

The National Park Service recognizes 13 Partnership Wild and Scenic Rivers in eastern states that have gone through similar partnership-based study processes (coordinated through a locally-based study committee, as discussed above) and which share some common post-designation management approaches including:

- No reliance on federal acquisition of land in order to achieve the WSRA’s goals of protecting and enhancing river values.
- Land use management is regulated through existing local and state authorities, the same as before a designation.
- Administration and implementation of a locally-led Stewardship Plan is accomplished through a broadly participatory management committee, convened for each river specifically for this purpose.
- Responsibility for managing and protecting river resources is shared between the local, state, federal, and non-governmental partners on the committee.
- Reliance on volunteerism as a key to success.
- No National Park Service superintendent,

law enforcement, or similar elements of traditional federally managed units of the National Park System.

The land ownership patterns and local involvement scheme in Nashua River towns closely matches conditions that prompted development of the partnership approach. Therefore, both the study process implemented for this study, and the potential Wild and Scenic River designation model evaluated as a part of the study closely track the precedents established by the existing Partnership Wild and Scenic Rivers. For more information about the National Park Service Wild and Scenic Rivers Program, and in particular Partnership Wild and Scenic Rivers, please visit the website: <http://www.nps.gov/wsr>

Study Goals and Methods

General

The Study Committee with locally-appointed representatives from the eleven towns of the study area and representatives from other river stakeholder entities was tasked with:

1. Providing local knowledge and expertise to help guide and interpret research on the natural, cultural, and recreational resource values associated with the rivers. This information forms the basis for both Outstandingly Remarkable Value determinations and the Stewardship Plan.
2. Developing a comprehensive local advisory Stewardship Plan to serve as a blueprint for improved management and conservation of the identified natural, cultural, and recreational values, with technical assistance from the National Park Service. This Plan could serve the river, local communities, state agencies, and other stakeholders regardless of whether Wild and Scenic River status is achieved or even sought as a result of the study.
3. To serve as the focal point for local community, citizen, and stakeholder involvement throughout the study process.

To meet these goals, the Study Committee conducted extensive research, established resource

protection priorities, and worked intensively within the communities to educate and gain input for the Stewardship Plan.

Research

Early in the study process, the Study Committee formed a sub-committee to investigate and document potential outstandingly remarkable values. The subcommittee utilized the findings of the Reconnaissance Report as a starting point for its investigations. With excellent habitat and water quality the river corridor is a haven for diverse and abundant fish populations, and provides a critical dispersal and migratory route for avian, terrestrial, and aquatic wildlife in the region. The exceptional variety of river-based recreational activities and a rich cultural heritage were also determined to be clear examples of potential Outstandingly Remarkable Values (ORVs) worthy of further study and evaluation as a part of the Study.

The Study Committee identified three distinct potential ORVs which, along with free-flowing character and water quality, formed the backbone of the study's investigations. These three potential ORVs are Biological Diversity, Historic and Cultural, and Recreation and Scenery.

Research was performed by Study Committee members, the Commonwealth of Massachusetts, State of New Hampshire, and local supporting agencies and individuals. The results of the research helped to produce a clear picture of the status of the potential ORVs, as well as identify existing protections for the potential ORVs and the management outcomes resulting from these protections.

Major research undertaken during the Wild and Scenic Study to identify ORVs, develop management schemes, and determine eligibility and suitability included:

Municipal Plan and Regulation Review: This effort identified and assessed existing municipal regulations, plans and programs in order to help identify the sufficiency of such regulations, plans, and programs for protecting the Nashua River. (Conducted by NRWA)



"Nashua, Squannacook, and Nissitissit Rivers Stewardship Plan" cover.

Management Issues and Threats: This assessment identified threats to the potential Outstandingly Remarkable Values. (Conducted by Study Committee)

Existing Gaps in Protections: Based on the status of existing regulations, plans and programs, gaps between threats to potential Outstandingly Remarkable Values, and the protection goals established were identified. (Conducted by NRWA)

Geographic Information Systems (GIS) Studies: (Conducted by NRWA)

Many of these studies are available in the *Nashua, Squannacook, and Nissitissit Rivers Stewardship Plan and Appendices* and on the Wild and Scenic Study website www.wildandscenicnashuarivers.org

Outreach and Education

A major outreach and education effort was conducted throughout the study region. The Outreach and Education sub-committee led the effort to reach the leaders and residents of the communities through a series of meetings, presentations, open houses, workshops, booths at events, newsletters, posters, news articles, and mailings.

Examples of the outreach and education program conducted during the Study are included in Appendix 3 and on the Study website www.wildandscenic-nashuarivers.org

The following is an abbreviated list of outreach projects completed by the Study Committee:

- Monthly Study Committee meetings advertised and open to the public
- Information distributed at public forums
- Information pieces created and distributed at events and local venues
- Newspaper articles and PSAs presented information on the Wild and Scenic Study and sought public input
- Paddling trips held on sections of the Nashua River
- Online outreach occurred on the Study website via e-news, and Facebook
- Resource review at meetings included information garnered from experts – who are listed in the Stewardship Plan
- Leading up to Town Meetings numerous newspaper articles appeared in local papers, websites, and other venues
- A short video produced by the Study Committee was posted on the Study Committee website, social media, and viewed at several Town Meetings. It included a flyover of a portion of the area proposed for designation and interviews of Study Committee members and the NPS

Stewardship Plan

The Study Committee accomplished its major goal by preparing the Stewardship Plan that will function as a blueprint for conservation actions and management practices and serves as a companion document to this study report. It is intended to provide a guidance framework for local commissions and governments as well as for the future Wild and Scenic Stewardship Council (if the river receives the federal designation), non-profit organizations, towns, and citizens. A Stewardship Plan is intended to serve as the comprehensive plan required for all designated Wild and Scenic Rivers, as well as to stand alone regardless of whether the river gains designation status. Technical assistance and involvement of the National Park Service throughout its development made preparation of the Stewardship Plan feasible, and ensured that Wild and Scenic Rivers Act objectives would be met.

For each ORV identified during the study, the Study Committee considered the protections existing for these resources and evaluated whether the protections are sufficient. The Committee then made suggestions for voluntary stewardship recommendations, which are included in the Stewardship Plan.

The Stewardship Plan presents a series of recommendations that can be voluntarily implemented by local landowners, municipalities, and state and federal agencies working together to help protect river-related resources and maintain and enhance the quality and way of life valued by so many people. The recommendations in this locally-developed Stewardship Plan can be implemented by a post-designation, locally-appointed Stewardship Council working with communities and partners on a voluntary basis.



Nissitissit River. Photo: Ken Hartlage.

Chapter 2:

Description of the Study Area

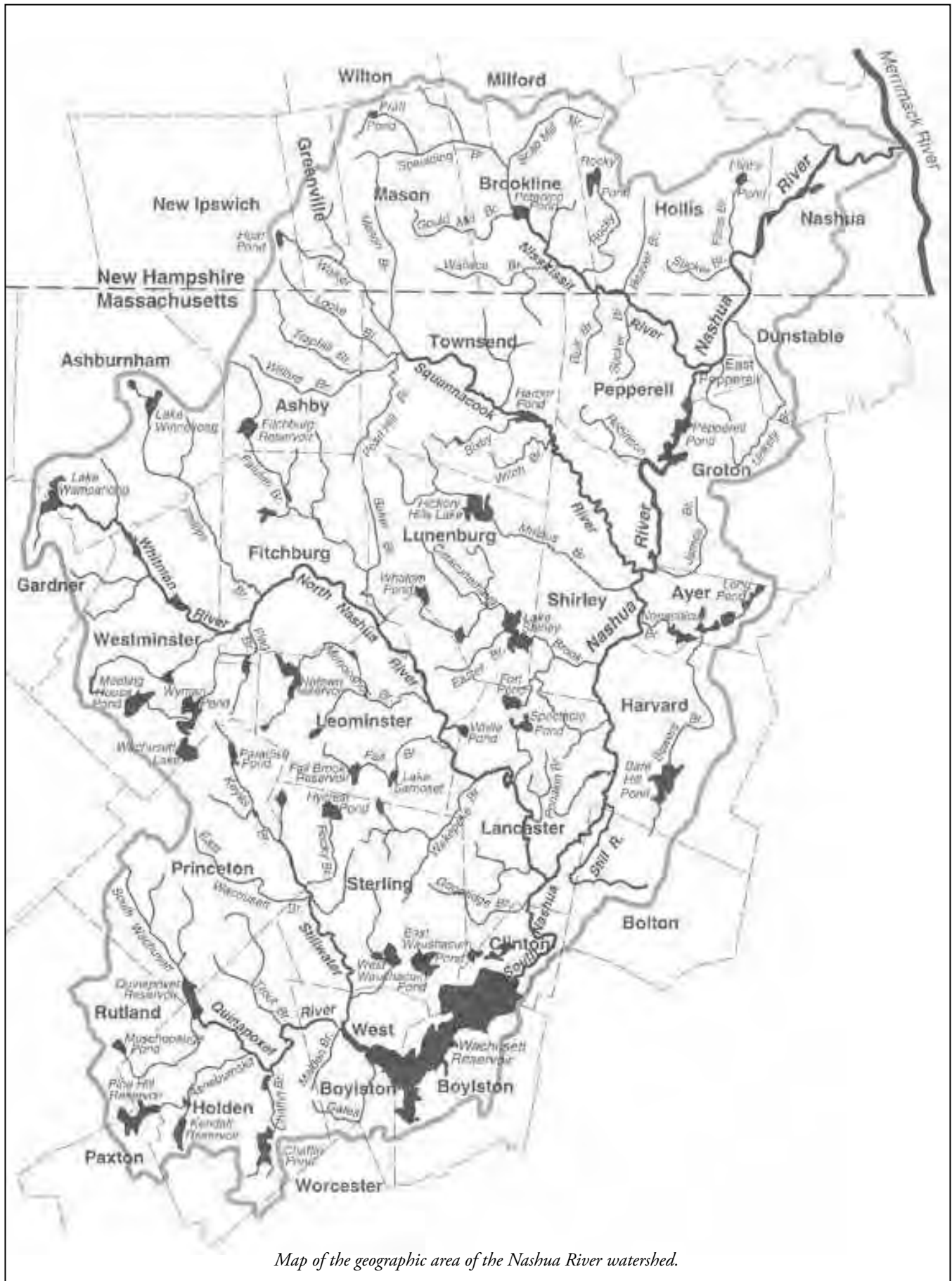
Regional Setting & Watershed Characteristics

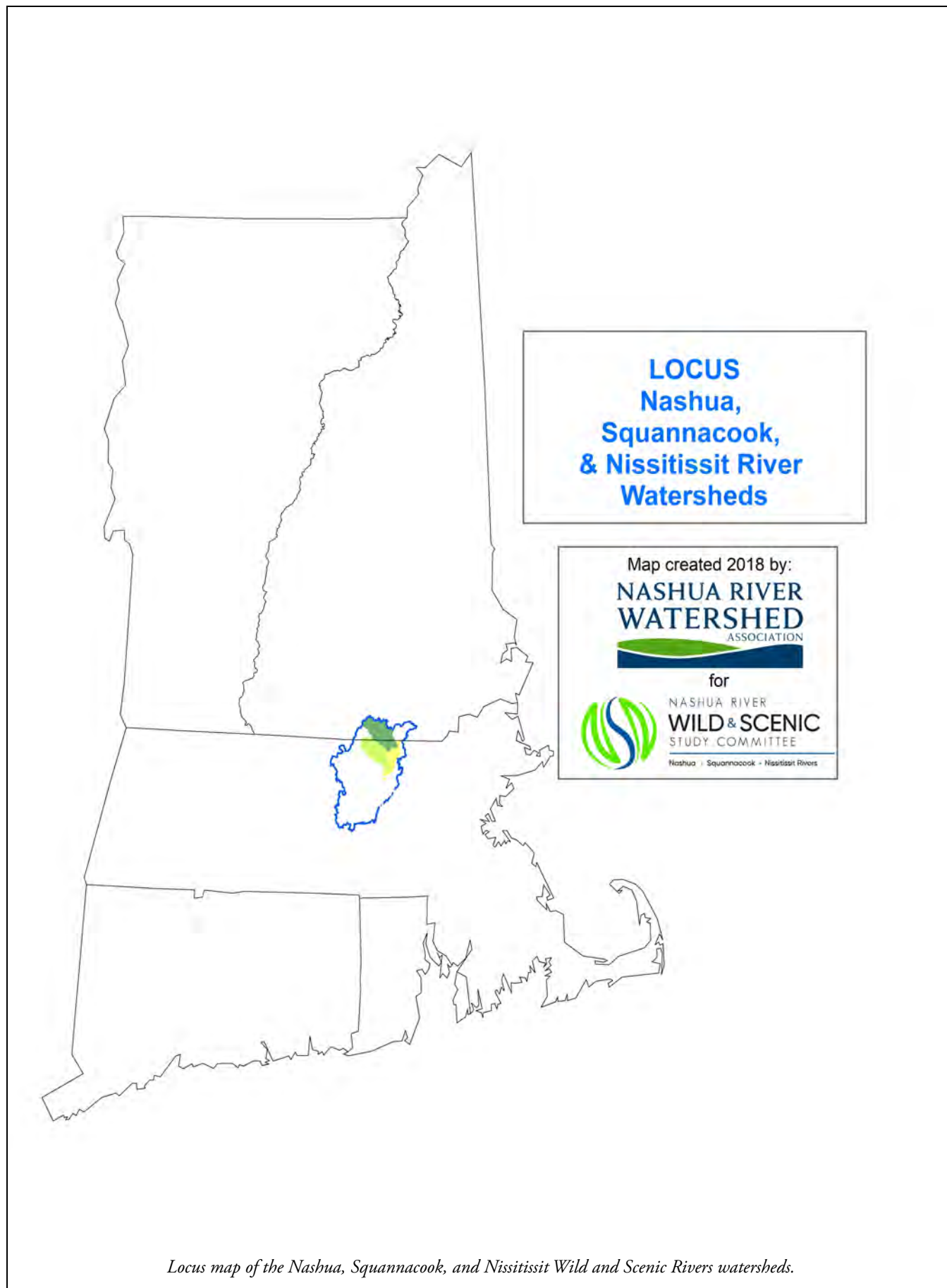
The Nashua River Watershed has a total drainage area of approximately 538 square miles, with 454 square miles of the watershed occurring in Massachusetts and 74 square miles in New Hampshire. The Nashua River and its north branch flow for approximately 56 miles, with approximately 46 of those miles flowing through Massachusetts. The Squannacook, Nissitissit, Stillwater, Quinapoxet, North Nashua, and South Nashua rivers are its major tributaries. The watershed encompasses all or part of 31 communities, seven in southern New Hampshire and 24 in central Massachusetts. The watershed's largest water body is the Wachusett Reservoir, which provides drinking water to two-thirds of Massachusetts' population. The watershed contains 13 percent residential area, 12 percent agricultural area, and is highly forested (about 70%). The watershed is abundant in water resources (6,818 acres of surface area of lakes, ponds and reservoirs) and open spaces, with thousands of acres of lands protected.

Wild and Scenic River Study Area

This study focuses on the river segments identified in the Nashua River Study Act (Public Law 113-291) as follows:

(143) NASHUA RIVER, MASSACHUSETTS.—The following segments: “(A) The approximately 19-mile segment of the mainstem of the Nashua River from the confluence with the North and South Nashua Rivers in Lancaster, Massachusetts, north to the Massachusetts-New Hampshire State line, excluding the approximately 4.8-mile segment of the mainstem of the Nashua River from the Route 119 bridge in Groton, Massachusetts, downstream to the confluence with the Nissitissit River in Pepperell, Massachusetts. “(B) The 10-mile segment of the Squannacook River from the headwaters at Ash Swamp downstream to the confluence with the Nashua River in the towns of Shirley and Ayer, Massachusetts. “(C) The 3.5-mile segment of the Nissitissit River from the Massachusetts-New Hampshire State line downstream to the confluence with the Nashua River in Pepperell, Massachusetts.





The exclusion area on the mainstem of the Nashua was specifically included in the study legislation due to the then active licensing of the Pepperell Hydroelectric Project, which could have been delayed or disrupted by enactment of the study legislation. As stated in NPS testimony on the study legislation,

H.R. 412 directs the Secretary of the Interior to study a 19-mile segment of the mainstem of the Nashua River, except for a 4.8-mile segment that is currently the subject of a Federal Energy Regulatory Commission (FERC) licensing proceeding for an existing hydroelectric facility (Pepperell Hydro Company, P-12721). It is the Department's understanding that this excepted segment would appropriately allow the FERC to complete the ongoing licensing proceeding without the delay that a Wild and Scenic River Study would otherwise impose. (Please refer to Appendix 4)

The purpose for the exclusion was concluded with the final FERC license issuance of P-12721 for the Pepperell Hydroelectric Project on September 8, 2015. Based on this fact, the Study Committee determined to treat the Pepperell facility the same as the other “working dams” within the study area, and consider eligibility and suitability in that light.

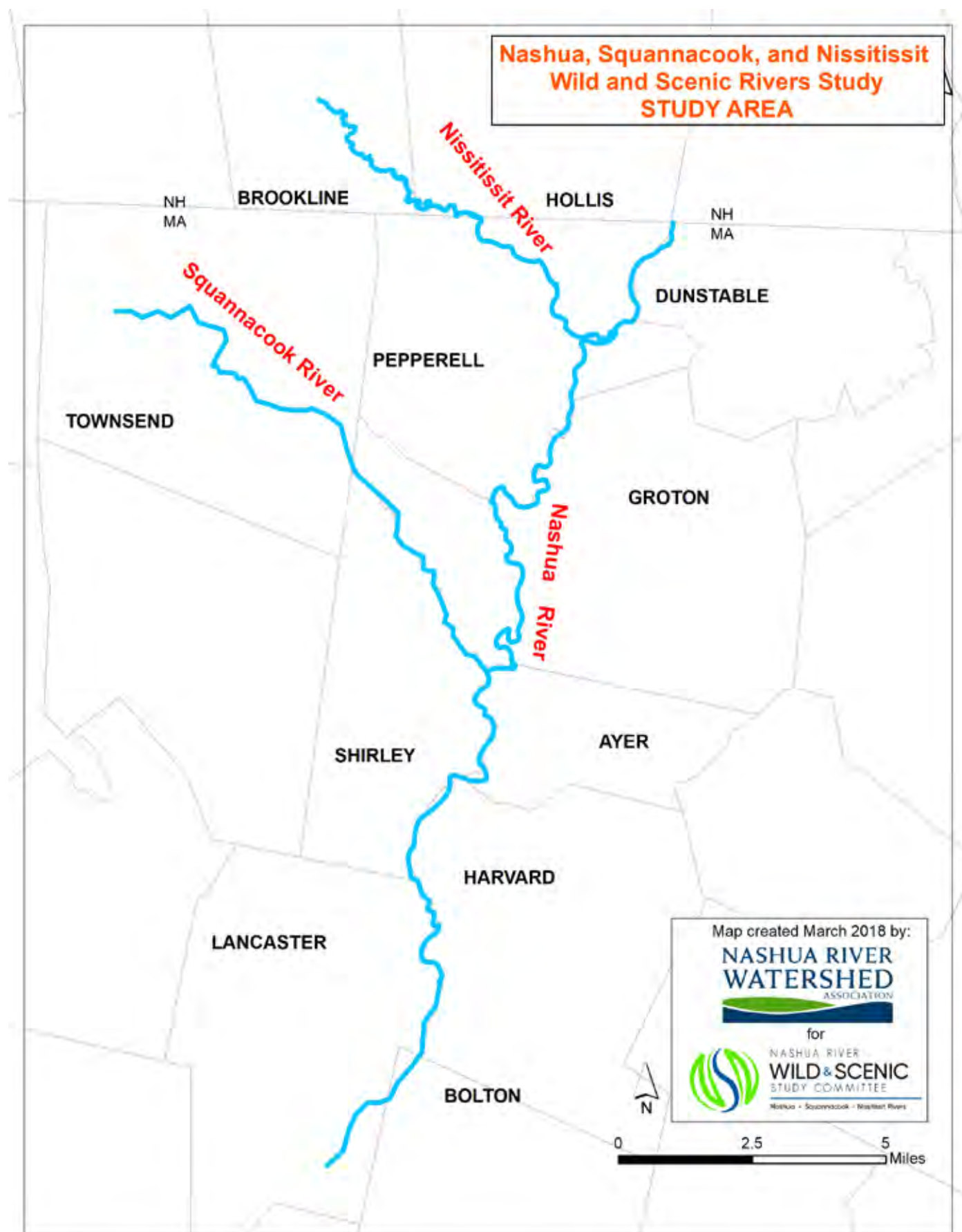
Additionally, the Study Committee expressed a strong desire from the outset to encourage the participation of the New Hampshire communities of Brookline and Hollis, which contain the upper reaches of the Nissitissit River. Initial participation by those communities was informal, at the invitation of the Study Committee. Over the course of the Study, both communities became fully engaged in the Study and voted through their Boards of Selectmen to seek formal participation. This integration was supported through informal communications with affected New Hampshire congressional offices (Representative Kuster; Senators Shaheen and Hassan), as well as the main Massachusetts study sponsor, Representative Tsongas. This request came early enough in the Study process for Brookline

and Hollis, and the upper sections of the Nissitissit, to be fully integrated into the development of the Stewardship Plan and study investigations without disrupting the study work plan or timeline.

Such expansion of the legislatively directed study area is covered in the official Interagency Guidelines for interpreting the Act, as follows:

Each report will contain a description of the area included in the study. The study area will cover as a minimum an area extending the length of the river segment authorized for study and extending in width one-quarter mile from each bank of the river. Adjacent river areas beyond one quarter mile from each river bank may be studied if their inclusion could facilitate management of the resources of the river area. For example there may be important historic, archeological or ecological resource areas which may extend beyond the boundaries of the mandated study area, but could be better managed by inclusion in the river area. Also, management of the river area may be facilitated by extension to include established or available access points not included in the study...

If areas adjacent to the study area have been studied and found eligible the report may present alternatives which incorporate such areas into the river area proposed for designation. Such expansion of the original study area either in length or in width may be desirable to preserve and facilitate management of river ecosystems, historic or archeological areas or other special areas. (1982 DOI DOA Guidelines)



Map of the Nashua, Squannacook, and Nissitissit Rivers in the Wild and Scenic Rivers Study Area.

Overview of the Study River Communities

Ayer, Massachusetts: The mainstem of the Nashua River flows through the town of Ayer that has a population of around 7,427 people (according to the 2010 Census). It is located in Middlesex County, Massachusetts. Originally part of Groton, it was incorporated February 14, 1871. Although only 9.5 square miles in area, the Town was a major junction for both east-west and north-south rail lines, and developed into an important commercial center. It is adjacent to and shares Nashua River frontage with the towns of Groton, Shirley, and Harvard. The town also contains a portion of the Oxbow National Wildlife Refuge.

Bolton, Massachusetts: The town of Bolton, located in Worcester County, Massachusetts, is host to Bolton Flats and the mainstem of the Nashua River. It covers approximately 20 square miles and has a population of 4,897 (at the 2010 Census). Bolton shares a border with other riverfront towns Harvard and Lancaster. It is known as a “country suburb” with little commercial development and much remaining open space.

Brookline, New Hampshire: The town of Brookline, New Hampshire contains the headwaters of the Nissitissit River. Originally chartered on March 30, 1769 as the town of “Raby”, Brookline has been one of the fastest growing towns in the state over the past 25 years. In 1960, Brookline’s population was 795 and recently reached 5,000. Located in eastern Hillsborough County, New Hampshire, Brookline has managed to retain many of the features of its rural past while having close proximity to the commercial centers in adjacent Milford, New Hampshire to the north and nearby Nashua, New Hampshire to the east. Brookline is about thirty minutes from Manchester, New Hampshire and one hour from Boston. It covers about 20 square miles. Brookline is also home to the Talbot-Taylor Wildlife Sanctuary, Potanipo Pond, and the Brookline Covered Bridge. Its Massachusetts bordering neighbors are Townsend and Pepperell.

Dunstable, Massachusetts: The town of Dunstable in Middlesex, County Massachusetts hosts the mainstem Nashua River and the Nissitissit River. The town has a population of 3,179 (2010 Census) and a total area of 16.7 square miles. Dunstable is bordered by Pepperell to the west, Groton to the south, Tyngsborough to the east, and Nashua and Hollis, New Hampshire, to the north. It is a rural, residential community.

Groton, Massachusetts: Groton is a 33.7 square-mile town in northwestern Middlesex County, Massachusetts. The population was 10,873 at the 2012 town census. The mainstem Nashua River as well as the Squannacook River flow within the town which is still quite rural with large tracts of protected land. Groton hosts a portion of the Nashua River Rail Trail.

Harvard, Massachusetts: Harvard is a rural town in Worcester County, Massachusetts where the mainstem Nashua River flows at its westerly border with Shirley and Lancaster and then south to Bolton. It is a farming community settled in 1658 and incorporated in 1732. It has been home to several non-traditional communities, such as Harvard Shaker Village and the utopian Transcendentalist experiment known as Fruitlands. Today, it is an affluent residential town with a population of 6,520 (2010 census) covering 27 square miles. It also contains a portion of the Oxbow National Wildlife Refuge.

Hollis, New Hampshire: The Nissitissit River flows through the town of Hollis’ southwest corner adjacent to Brookline, New Hampshire down into Pepperell and Dunstable, Massachusetts. Hollis is located in Hillsborough County, New Hampshire and has a total area of 32.3 square miles. The population was 7,684 at the 2010 census. The town maintains a rural character and has many historic features.

Lancaster, Massachusetts: Lancaster is a town in Worcester County, Massachusetts where the mainstem Nashua River flows along its northeast border with Harvard, MA. Incorporated in 1653,

Lancaster is the oldest town in Worcester County. As of the 2010 census, the town population was 8,055. It covers 28.2 square miles. Today, Lancaster retains a sense of history with old houses scattered throughout the community and a church designed by Charles Bulfinch on the town green. It is home to apple orchards, farms, historic sites, ponds, and parks – as well as a portion of the Oxbow National Wildlife Refuge.

Pepperell, Massachusetts: The town of Pepperell contains portions of the Nissitissit and Nashua Rivers. Pepperell is located in Middlesex County with a population of 11,497 and covers 23.2 square miles. It was first settled in 1720 as a part of Groton, and was officially incorporated as its own town in 1775. Pepperell hosts part of the Nashua River Rail Trail and a covered bridge still in use crossing the Nashua River.

Shirley, Massachusetts: Shirley is a town in Middlesex County, Massachusetts. The population was 7,211 at the 2010 census. It is known for its historic town center and hosts a portion of the Oxbow National Wildlife Refuge. The town has a total area of 15.9 square miles. It is bounded by the Squannacook and Nashua Rivers and contains Mulpus Brook and Catecunemaug Brook. Significant wetlands are Spruce Swamp (drained by Spruce Swamp Brook) and Tophet Swamp. Its bordering communities are Ayer, Groton, and Harvard to the east, Pepperell to the north, Lunenburg and Townsend to the west, and Lancaster to the south. Shirley also has a functioning covered bridge over the Mulpus Brook.

Townsend, Massachusetts: Townsend is located in Middlesex County, Massachusetts with a population of 8,926 in the 2010 census. It has a total area of 33.1 square miles. Townsend hosts a significant length of the Squannacook River and its feeder streams – Mason, Walker, Locke, Trapfall, Willard and Pearl Hill Brooks. Townsend is bordered by Mason, New Hampshire and Brookline, New Hampshire to the north, Pepperell to the east, Groton and Shirley to the southeast, Lunenburg to the south, and Ashby to the west.

Overview of the Study Area Rivers

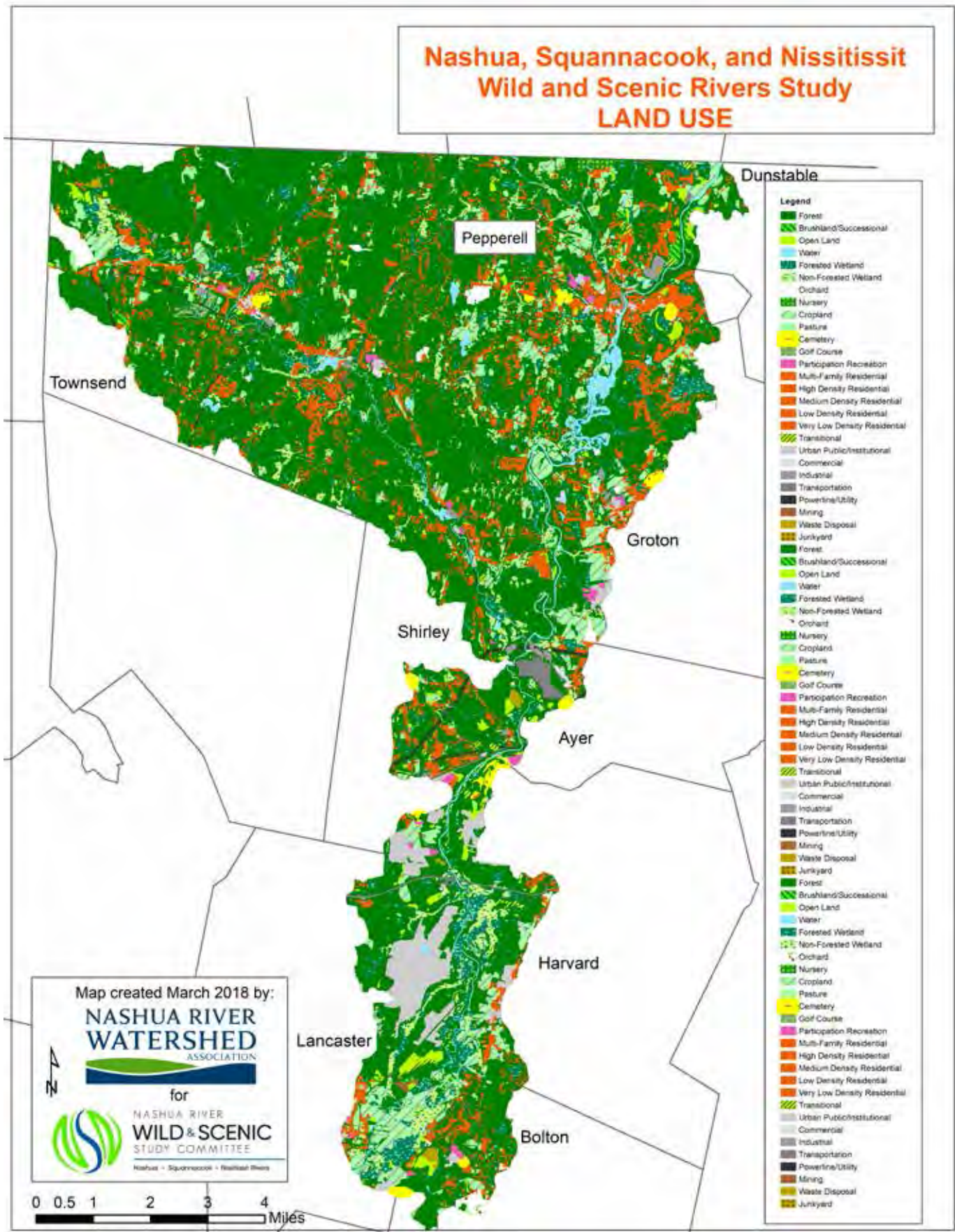
The Nashua, Squannacook, and Nissitissit Rivers and their tributaries provide many resources to the communities through which they flow including cultural, scenic, recreational, and water resource values. For example, these rivers support a diverse fishery, with a mix of cold-water streams as well as slower-flowing warm water reaches. The varied fish habitat and relative ease of access to many sections of rivers and streams create significant opportunities for recreational fishing in the Nashua River Watershed. The Nashua River and its many tributaries are also popular for boating, swimming, and wildlife viewing, and provide an important water resource for human use including in-direct drinking water and agricultural needs.

Ecology and Natural Communities

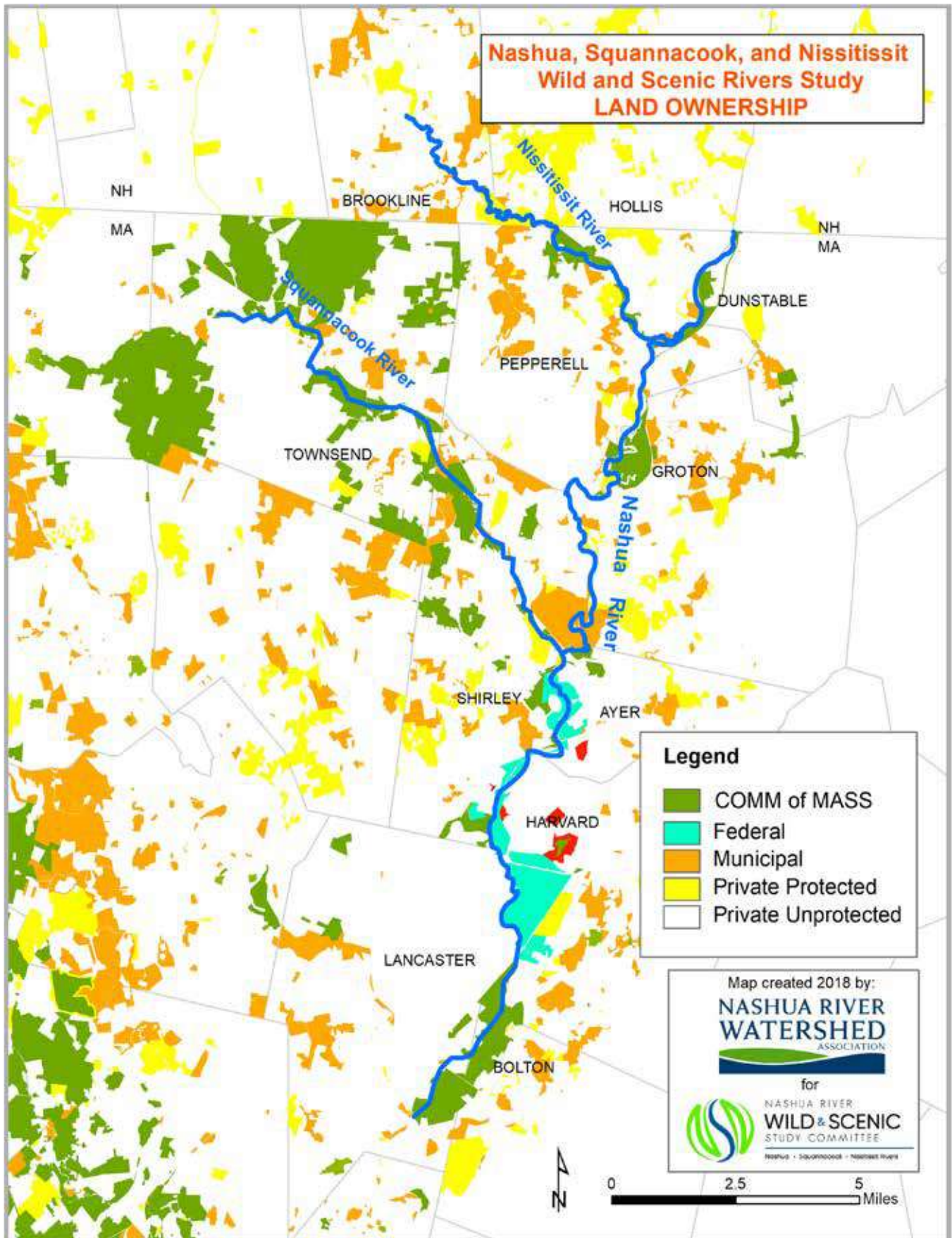
The study area streams are biologically diverse hosting three Massachusetts-designated Areas of Critical Environmental Concern, six “Priority Natural Communities” along the Nashua River, and significant areas designated as “core habitat” by Massachusetts. The study findings include more than two dozen threatened, endangered, or species of special concern, including dragonflies in the Squannacook River; freshwater mussels in the Nissitissit River; and, additionally, a notably large population of Blanding’s turtles, which are state-listed in Massachusetts and New Hampshire.

Land Use and Ownership Patterns

Along the Nashua, Squannacook, and Nissitissit River corridors, the ownership is a patchwork like many other rivers that have become Partnership Wild and Scenic Rivers. The varied ownership provides an opportunity for private landowners, towns, state and federal agencies, and non-governmental entities to work together on projects and efforts to protect or enhance the rivers.



Map of land use in the Nashua, Squannacook, and Nissitissit Rivers in the Wild and Scenic Rivers Study Area.



Map of land ownership in the Nashua, Squannacook, and Nissitissit Rivers in the Wild and Scenic Rivers Study Area.

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Canoes on the Squannacook River. Photo: Nancy Ohringer.

Chapter 3: Eligibility and Classification

The purpose of this chapter is to document National Park Service findings relative to the:

1. “Outstandingly Remarkable” natural, recreational and cultural resource values (ORVs) associated with the Nashua River Study Area;
2. “Free-flowing character” of the study segments; and
3. Preliminary “classifications” which would be appropriate if the segments are included in the National Wild and Scenic Rivers System.

Eligibility and Classification Criteria

The subsections below describe the relevant eligibility and classification criteria as set forth in the Wild and Scenic Rivers Act, in the USDA/USDI

Interagency Guidelines for Eligibility, Classification, and Management of River Areas as published in the Federal Register on September 7, 1982, in the Technical Report of the Interagency Wild and Scenic Rivers Coordinating Council (IWSRCC) on the Wild & Scenic Rivers Study Process, December 1999, and the NPS Director’s Order 46 of May 1, 2015.

Outstandingly Remarkable Values

To be considered eligible for inclusion in the National Wild and Scenic Rivers System a river segment, together with its adjacent lands, must support one or more “outstandingly remarkable” natural, cultural, or recreational resource values. Such resource values

must be directly related to, or dependent upon, the river and its adjacent lands (generally $\frac{1}{4}$ mile or another geographic area as defined by the study team). The “outstandingly remarkable” threshold within the Act is designed to be interpreted through the professional judgment of the study team during the Wild and Scenic Study.

The descriptions below provide examples to help interpret this study’s “outstandingly remarkable” eligibility requirement:

National Values

Resource values which are nationally significant clearly meet the “outstandingly remarkable” threshold. A nationally significant resource would be rare, unique, or exemplary at a national scale. For example, a recreational boating experience that draws visitors from all over the nation would qualify as a nationally significant recreational resource.

Regional Values

Based upon the desirability of protecting a regional diversity of rivers through the national system, a river segment may qualify based on regionally rare, unique, or exemplary resource values. The area, region, or scale of comparison is not fixed, and should be defined as that which serves as a basis for meaningful comparative analysis; it may vary depending on the value being considered. For example, physiographic regions are appropriate for geologic and biologic resources, while the region occupied by a particular culture is appropriate for archaeological resources.

Aggregate Values

A river may qualify for a given resource value based upon an aggregate of important values, no one of which would confer eligibility standing alone. For example, a series of unusual and distinctive river-related geologic features may together qualify a segment as exhibiting an “outstandingly remarkable geologic value” even though no one element meets the criteria alone.

Defining “River-Related” Values

The IWSRCC has characterized the determination as to whether a given resource value is river-related as based on three criteria. To be river-related a resource value should:

1. Be located in the river or in its immediate shorelands (generally within $\frac{1}{4}$ miles on either side of the river);
2. Contribute substantially to the functioning of the river ecosystem; and/or
3. Owe their location or existence to the presence of the river.

For the purposes of the Nashua River Study, the geographic area of consideration for the majority of land-based values was established as those resources located within $\frac{1}{4}$ mile of the river.

Free-Flowing

The National Wild and Scenic Rivers System is intended to protect eligible “free-flowing” rivers and sections of rivers that support outstandingly remarkable resource values from the adverse impacts of federally-assisted water resource projects, such as construction of new dams. The Act’s definition of “free-flowing” is outlined in Section 16:

(b) “Free-flowing,” as applied to any river or section of a river, means existing or flowing in natural condition without impoundment, diversion, straightening, rip-rapping, or other modification of the waterway. The existence, however, of low dams, diversion works, and other minor structures at the time any river is proposed for inclusion in the national wild and scenic rivers system shall not automatically bar its consideration for such inclusion: Provided, that this shall not be construed to authorize, intend, or encourage future construction of such structures within components of the national wild and scenic rivers system.”

Rivers that have dams above, downstream, or on a tributary to the study segment, including those that regulate flow through the segment, along with the

existence of minor dams, rip-rap, and other diversions within the segment, may still be eligible as long as the river is otherwise free-flowing and supports at least one ORV.

Classification Criteria

The Wild and Scenic Rivers Act requires that all eligible or designated river segments be classified as Wild, Scenic, or Recreational. These classifications are based solely on the amount of human impact and access and development of the waterway and shoreline present at the time of the study or designation. The Act defines them as follows:

Wild river areas: Those rivers or sections of rivers that are free of impoundments and generally inaccessible except by trail, with watersheds or shorelines essentially primitive and waters unpolluted. These represent vestiges of primitive America.

Scenic river areas: Those rivers or sections of rivers that are free of impoundments, with shorelines or watersheds still largely primitive and shorelines largely undeveloped, but accessible in places by roads.

Recreational river areas: Those rivers or sections of rivers that are readily accessible by road or railroad, that may have some development along their shorelines, and that may have undergone some impoundment or diversion in the past.

The Interagency Guidelines provide additional direction relevant to the Nashua, including:

In segmenting the river the study team should take into account the management strategies necessary to administer the entire river area and should avoid excessive segmentation.

The basis of classification is the degree of naturalness, or stated negatively, the degree of evidence of man's activity in the study area. The most natural rivers will be classified wild; those somewhat less natural, scenic; and those least natural, recreational.

The classification criteria provide uniform guidance for professional judgment, but they are not absolutes. It is not possible to formulate criteria so as to mechanically or automatically classify river areas. Therefore, there may occasionally be exceptions to some of the criteria.

Free-Flowing Determination

This subsection describes the free-flowing character of the study segments and presents an inventory of the study area's existing and historic dams.

General Streamflow Conditions

The study area consists of sections of the Nashua, Squannacook, and Nissitissit Rivers which are mostly free of impoundments and flow in a predominantly natural and unregulated condition. The Nashua mainstem and the Squannacook do have several existing small dams, some of which are remnants of historic mill developments. None of these create large impoundments, as the dams appear to have been constructed at natural falls/drops, and the general pattern of the rivers has not been appreciably altered. There are three dams that have been adapted from their historical mill uses to modern power production (two FERC licensed dams) and a modern industrial use (Hollingsworth & Vose Dam). None of the three involve major character changes to the riverine environment. There are no withdrawals of water that occur within the study area river segments with potential for negative effects on water resources.

It is unusual for a New England river so close to major metropolitan areas (Boston MA, Worcester MA, and Nashua NH) to maintain the free-flowing qualities and intact natural resources of these rivers. The surroundings are mostly low density development or undeveloped land. Decades of conservation work has been done to protect surrounding lands and to remove unnecessary obstructions to flows. The streams are flanked by large floodplain areas - some of which are protected by land conservation or local zoning.

Nashua River

The studied 27 miles of the mainstem Nashua River flow from the confluence of the North and South Branches of the Nashua River in Lancaster, Massachusetts, to the Massachusetts/New Hampshire state line. From its flow in Lancaster through Bolton, and the Bolton Flats Wildlife Management Area, and then into Harvard and Shirley through the Oxbow National Wildlife Refuge, the flows are unhindered in a natural stream channel and surrounded mainly by open marsh and agricultural lands.

When the river reaches Ayer (where the towns of Ayer, Harvard and Shirley meet), it encounters the Ice House Dam which is an active hydropower facility that is licensed by FERC and certified by the Low Impact Hydro Institute. The operation of this dam is run-of-river and does not adversely affect the free-flow of the river segment. The dam provides an eel passage.

After leaving Ayer, the mainstem flows unimpeded through wooded, open land including conservation areas, Groton Town Forest, and J. Harry Rich State Forest. The river meets the Pepperell Dam in East Pepperell operated by Eagle Creek Renewable Energy. The dam is run-of-river, where outflow from the dam equals inflow at all times and water levels in the impoundment are not drawn down for power generation. This flow requirement may be modified by the Fisheries Agencies pursuant to the implementation of upstream fish passage facilities.

The mainstem continues without obstruction from the Pepperell section through open lands, farmlands and low-density developed areas to the town of Dunstable and on to the Massachusetts/New Hampshire state line. Some of the major tributaries to the mainstem segment are the North Branch and South Branch Nashua Rivers (flowing southeasterly and northerly, respectively), and the Nissitissit and Squannacook (flowing southeasterly).

Squannacook River

The Squannacook River flows through Townsend, Shirley, and Groton, Massachusetts, directly into the Nashua River mainstem for a total of 16.3 miles.

The Squannacook River flows freely from Ash Swamp, which is fed by small streams in northwestern Townsend, past a minor run-of-river, historic dam at Mason Road/Canal Street. Built in 1792, the structure has many scenic and historic attributes - including stonework and stone arches.

The Squannacook then runs onward passing through many large tracts of undeveloped and protected lands. The river passes over the small Adams Dam - also a run-of-river dam with historic and scenic properties.

The segment next flows through mostly wooded open land, Townsend State Forest, and Squannacook Wildlife Management Area until it encounters Harbor Pond and Townsend Harbor Dam. This is a small scenic and historic run-of-river dam and impoundment which has significant habitat and scenic values.

From here the Squannacook passes through more wooded land along the town boundaries of Shirley and Groton, including conservation land and wildlife management areas, and in West Groton it encounters the Hollingsworth & Vose Company Dam - a larger run-of-river dam with many historic features.

The Squannacook then proceeds a short distance to what is known to some as the Squannacook River Reservoir and then Squannacook River Dam - also run of river - which is adjacent to the crossing for Route 225 in West Groton. It joins the Nashua River mainstem here in West Groton.

Although some minor dams and impoundments are found in this segment, the overall character and quality of the segment is free-flowing. It is a rich aquatic riverine ecosystem with diverse wildlife habitat. The existing dams and associated impoundments blend well into the character of the area and provide many scenic and historic assets. It is designated an Outstanding Resource Water (ORW) in Massachusetts which provides added protection of the free-flowing character.

Nissitissit River

The Nissitissit River flows 9.5 miles from its outlet at Lake Potanipo (also known as Potanipo Pond) in Brookline, New Hampshire across the southwest corner of Hollis, New Hampshire and to the Massachusetts border at Pepperell. It is completely free-flowing and is surrounded by wooded and open lands. The watercourse runs through an almost pristine watershed and is natural, undeveloped, and unregulated. The segment is entirely without dams or water withdrawals that would negatively affect water resources. It has a mostly intact riparian corridor with a natural stream channel and connection to its floodplains. The Nissitissit is one of the few remaining southern New Hampshire streams that is able to maintain those attributes.

The Nissitissit River then passes through Pepperell at the Massachusetts/New Hampshire border and into the mainstem Nashua. The flows are unimpeded throughout this primarily forested and protected section. The Commonwealth of Massachusetts has removed Turner Dam, the only functioning dam that was on the Nissitissit in Massachusetts, in an effort to restore the valued cold water fisheries and other habitat values.

Also, designated an ORW in Massachusetts, the Nissitissit River is a high value aquatic riverine ecosystem with high aesthetic quality and great wildlife habitat. Further, the watershed has the distinction of being the focus of the Squannacook-Nissitissit Rivers Sanctuary Act (MGL 132A:17) passed in 1975 and intended to protect the waters of these two river basins from degradation by new discharges of pollution. Streamflow, as in most of New England, has significant seasonal changes.

Conclusions

Approximately 27.0 miles of the mainstem Nashua River, 16.3 miles of the Squannacook River, and 9.5 miles of the Nissitissit River meet the free-flowing criteria for Wild and Scenic eligibility. Dams found in these reaches represent small structures with minimal impacts upon free-flowing character. Three “working dams” (Ice House and Pepperell FERC projects and Hollingsworth & Vose industrial facility) are treated further in the suitability chapter and in Appendix 4.

Description of Study Area Dams

River	Dam Name	Location	Owner	Height	Status
Nashua	Ice House Dam	Ayer, MA, at the intersection of the towns of Ayer, Harvard, and Shirley	Ice House Partners	12'	Run of River
Nashua	Pepperell Dam	Pepperell, MA – adjacent to a bridge for MA Route 113	Eagle Creek Renewable Energy	23.5'	Run of River
Squannacook	Squannacook River Dam	W. Groton – adjacent to a bridge for MA Route 225	Town of Groton Board of Selectmen	30'	Run of River
	Hollingsworth & Vose Co. Dam	W. Groton	Hollingsworth & Vose Co.	5.8'	Run of River
	Townsend Harbor Dam	Townsend	Hollingsworth & Vose Co.	13'	Run of River
	Adams Dam	Townsend	Town of Townsend Municipal	2.7'	Run of River
	Mason Road Dam	Townsend – Canal St.	Private Owner	3.6'	Run of River
Source: MA Office of Dam Safety					



Map of dams in the Nashua, Squannacook, and Nissitissit Rivers in the Wild and Scenic Rivers Study Area.

Outstandingly Remarkable Values

This subsection describes the natural, recreational and cultural resource values supported by the Nashua, Squannacook, and Nissitissit Rivers that are deemed to meet the “Outstandingly Remarkable” threshold. The study evaluated each resource’s river-relatedness or dependency and applied the rare, unique or exemplary criteria that are needed to establish that a given resource meets “outstandingly remarkable” status. More detailed information on these resource values can be found in the Nashua, Squannacook, and Nissitissit Rivers Stewardship Plan and on the Study website at www.wildandsce-nicnashuarivers.org. All of the resources cited contribute to the overall eligibility of the Nashua, Squannacook, and Nissitissit Rivers for designation. Not all river reaches in the study area support all noted outstanding values, but there is no stretch of river which does not contribute to the viability of the whole.

The Wild and Scenic Study Committee was tasked with identifying and researching potential Outstandingly Remarkable Values associated with the watercourses as required by the federal Wild and Scenic Rivers Act. Not just one, but three potential ORV categories were identified. The geographic area of consideration for the majority of land-based values was established as those resources located within ¼ mile of the watercourses. The examination of these resources (as described in detail in the Stewardship Plan and briefly below) was accomplished through substantial research that was conducted prior to and during the Study, and included evaluation of the significance of the resources within a national, statewide, and regional context. Consultations with experts and professionals (see Appendix 3) provided the background information needed to determine the eligibility of the ORVs present.

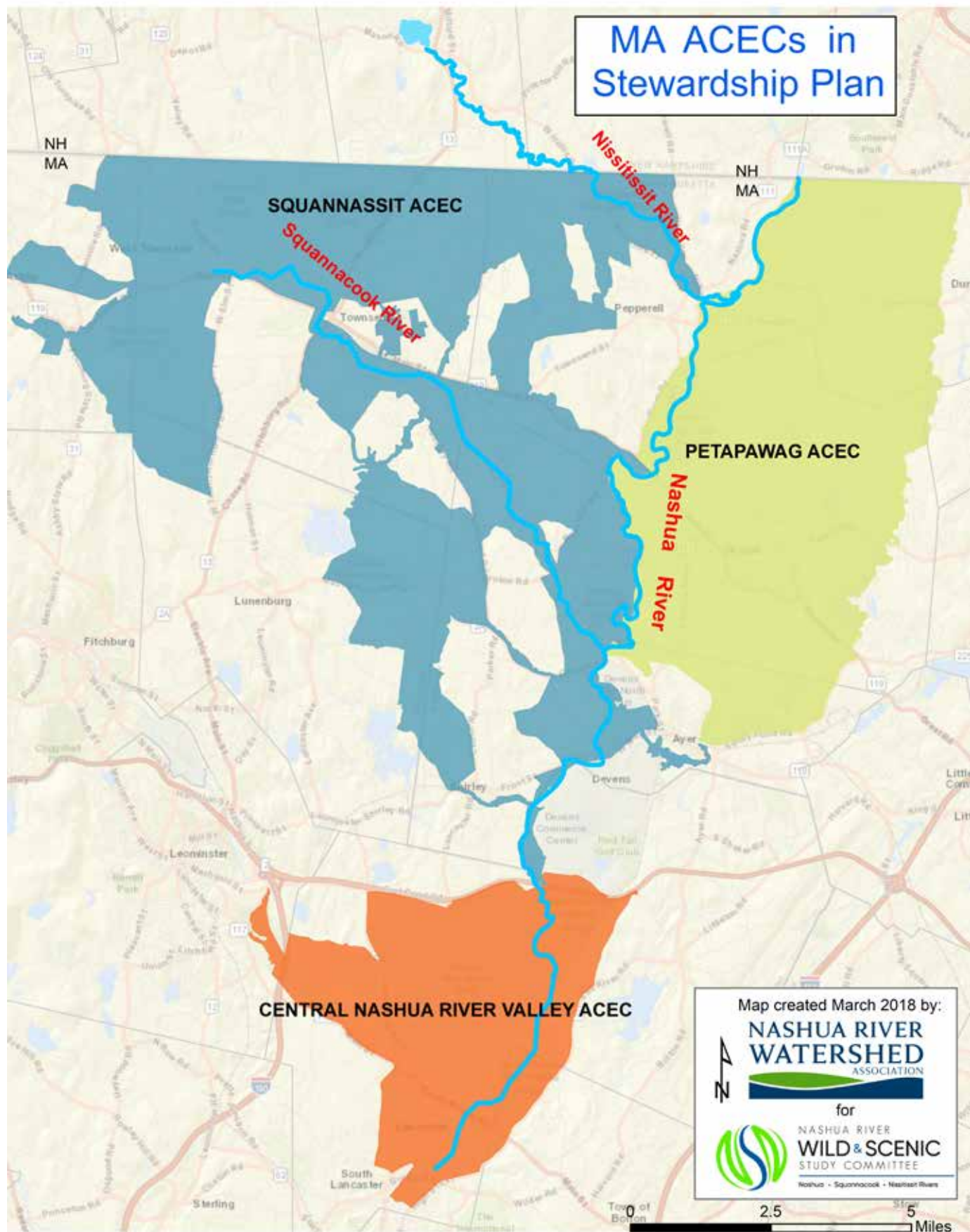
The resources of the Nashua River study area that are deemed “outstandingly remarkable values” fall within the following categories: Biological Diversity, Recreation and Scenery, and Historic and Cultural.

Biological Diversity

The Nashua, Squannacook, and Nissitissit Rivers are located in a distinct and thriving resource area supporting rich biodiversity. The important Biological Diversity of the area relies upon the strong history and culture of conservation that has improved water quality and protected surrounding lands for decades. The beauty of the area and its ability to provide recreational activities and enjoyment are also directly linked to the years of land conservation, river advocacy, and a conscious effort to protect species and their habitats.

State Recognition

This highly functional, resource rich ecosystem has been state-recognized by the designation of three unique Massachusetts Areas of Critical Environmental Concern (ACECs): the Central Nashua River Valley, Squannacook, and Petapawag ACECs. These three contiguous ACECs together comprise approximately 76,000 acres or 118 square miles - they comprise approximately 28% of the lands under ACEC designation in the Commonwealth. ACECs are a formal designation made by the MA Secretary of Energy and Environmental Affairs to protect and preserve areas of environmental significance. The designation notifies regulatory agencies and the public that most development activities under State jurisdiction within ACECs must meet high environmental quality standards. The fundamental reason for these designations was the need to protect both undeveloped land and the interconnections that are essential to maintaining the biological diversity of the entire region. There is no comparable program in New Hampshire. (<http://www.mass.gov/eea/agencies/dcr/conservation/ecology-acec/areas-of-critical-environmental-concern-acec.html>) (Also see the Stewardship Plan for other state programs and recognitions to the area.)



*Map of MA Areas of Critical Environmental Concern (ACECs) in the Wild and Scenic Rivers Study Area.
 Note: There is no equivalent program and designation in NH.*

Representative Species



Some key findings on the status of Biological Diversity in the Nashua, Squannacook, and Nissitissit Rivers - Highlights include:

- Support the most substantial concentration of coldwater fisheries (streams that support survival and natural reproduction of coldwater-adapted species such as Massachusetts' only native trout - the Eastern Brook Trout - *Salvelinus fontinalis*) - in the eastern third of Massachusetts.
- Provide for a major population center for Blanding's, Wood, and Spotted turtles.
- The population of Blanding's turtles is arguably the largest in the northeast.
- Contain state-listed rare habitats such as Floodplain forests and Pitch Pine - Scrub Oak forests.
- Support state and regionally-significant species of freshwater mussels.
- Host habitat for eight state-listed species of dragonflies.

The Nashua River corridor consists of significant portions of terrestrial habitat designated by the BioMap2 project in Massachusetts as "core habitat" representing the highest priority for biodiversity conservation and protection (www.mass.gov/eea/agencies/dfg/dfw/natural-heritage/land-protection-and-management/biomap2/).

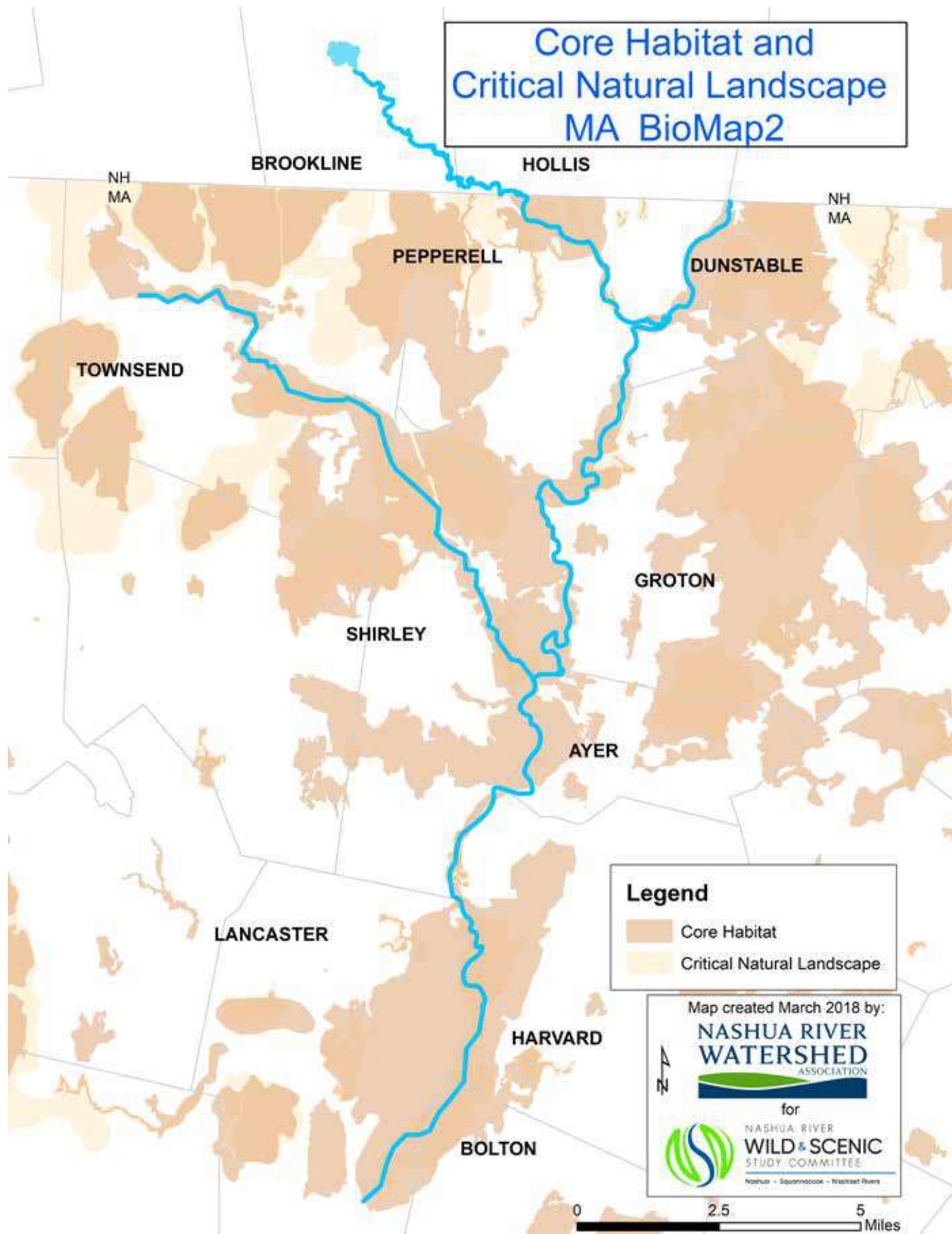
Additionally, seven exemplary or "Priority Natural Communities" occur along the Nashua River: Kettle Hole Level Bog; Pitch Pine Scrub Oak (PPSO) Community; Red Maple-Black Ash Swamp; Alluvial Red Maple Swamp; Low-energy Riverbank Community; Small-river Floodplain Forest; and High-terrace Floodplain Forest. Since few intact floodplain forests remain in New England, these are considered by The Nature Conservancy to be "arguably the rarest forest type in the region." Also, Massachusetts Division of

Fisheries and Wildlife has noted areas adjacent to the Nashua River in Lancaster where there are some of Central Massachusetts' last remaining PPSO patches.

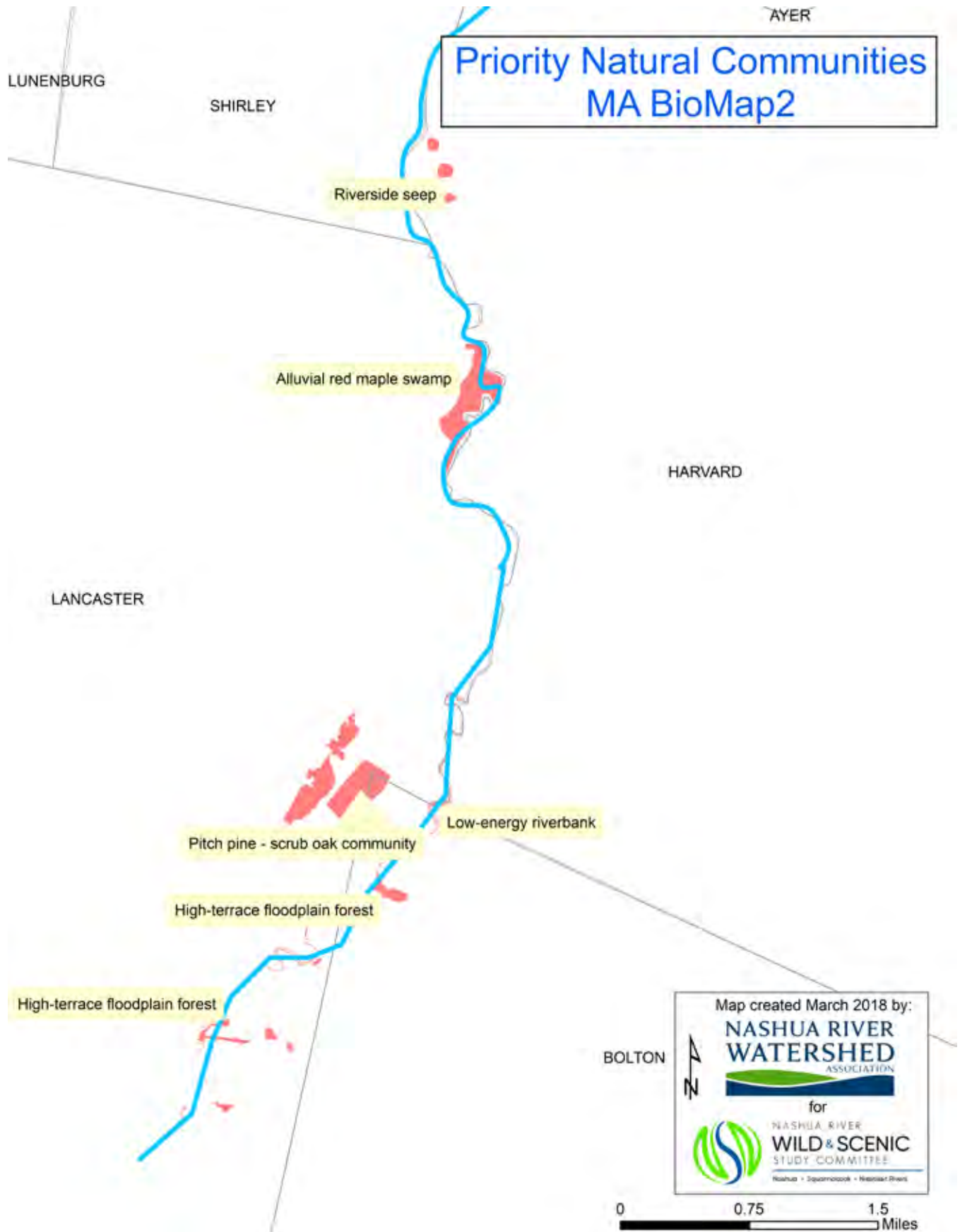
More specifically, within the Squannassit ACEC, the Nissitissit River watershed includes sightings of breeding populations of American Bittern (state-listed endangered), Brook Snaketail (dragonfly, state-listed special concern), Spine-crowned Clubtail (dragonfly, state-listed special concern), Spotted Turtle (state-listed special concern), and Wood Turtle (state-listed special concern). The Squannacook River corridor has several records of rare species including the Four-toed salamander and Marble Salamander (state-listed threatened) Blanding's Turtle (state-listed threatened), Triangle Floater and Creeper (mussels, state-listed special concern), Wood Turtles (state-listed special concern), the Bridle Shiner (minnow, state-listed special concern), and Brook Snaketail (dragonfly, state-listed special concern). The Nashua River corridor provides breeding and migration habitat for state-listed bird species such as King Rail, Pied-billed Grebes, and Common Moorhens, and provides potential habitat for American and Least Bittern.

Turtles The study area hosts a major population center of state-listed Blanding's turtle. According to Massachusetts state herpetologist Michael Jones it may be the only core Blanding's habitat in Massachusetts, and the Massachusetts Natural Heritage program calls it "...a very significant population, possibly the largest in New England." According to BioMap2, Blanding's turtles use many parts of this landscape throughout their decades-long lives, from feeding and overwintering in deep vernal pools and buttonbush shrub swamps to nesting in open, sunny, well-drained fields and abandoned gravel pits. This local population appears to be healthy and growing - it is a regional stronghold - and will continue to do so as long as their travel corridors and habitats are protected.

Though the species is not currently federally listed, the US Fish and Wildlife Service will continue to review its status closely and is dedicated to conservation work for the turtle. Two of the largest pop-



Map of MA BioMap2 Core Habitat and Critical Natural Landscape. Note: There is no equivalent datalayer in NH.



Map of MA BioMap2 Priority Natural Communities along the Nashua River. Note: There is no equivalent datalayer in NH.

ulations of Blanding's turtles in the Northeast exist at Oxbow National Wildlife Refuge (NWR) and Great Meadows NWR in Massachusetts. Biologists have partnered with researchers who have established another population at Assabet River NWR, which is located between the other two population sites.

Fish Today, the Nashua, Squannacook, and Nissitissit Rivers are all state-recognized as Cold Water Resource streams (CFRs - cold-water dependent fish use these waters to meet one or more of their life history requirements). Brook trout spawn in the tributaries and travel to the Nashua River for part of each year. These streams are also “fished” by mink, otter, mergansers, bald eagles, osprey, and great blue heron. The flourishing fish population in the mainstem Nashua River is sustained by all the surrounding open water wetlands. In addition, American Eel exist in the Nashua and Squannacook Rivers, and eel passage has been installed at Ice House and Pepperell Dams on the Nashua River. In stark contrast, in 1974, a stream survey of the Nashua River found only aquatic species most tolerant of pollution.

The Squannacook River is an important cold water fishery supporting a native trout population in its upper reaches, and its major tributaries, Willard Brook, Trapfall and Locke Brooks as well. It is likely that some of these trout find their way into the mainstem Nashua River. (USFWS Oxbow National Wildlife Refuge, Final Comprehensive Conservation Plan, Feb. 2005)

Other areas of the Nashua system that are wider and slower moving - like Pepperell Pond - support a substantial warm water fishery (including large-mouth bass, chain pickerel, fallfish, carp, brown bullhead, yellow perch and bluegill). Collectively, the fish species represented by the Nashua, Squannacook and Nissitissit rivers system are an important aspect of the biological diversity in the study area.

Mussels The Nissitissit River is home to six species of freshwater mussel which require clear, clean water. Freshwater mussels are one of the most highly endangered animal groups in North America. Two listed under the Massachusetts Endangered Species

Act (MESA) are the Creeper (Special Concern) and the Brook Floater (Endangered), notable as one of just four populations in the Commonwealth. In fact, “the Nissitissit River was ranked as a conservation priority stream based on its relatively healthy Brook Floater population” [and additionally] “...named as a conservation priority because of immediate threats to Brook Floater populations” (Confirmed Occurrences and Population Assessment of the Brook Floater in Massachusetts, Feb. 4, 2106). The 2015 removal of the Turner Dam on the Nissitissit River in Pepperell is assumed to have a beneficial impact on the mussels in the river as it will both cool the water and reconnect populations up and downstream of the former dam.

Two additional mussels in the Nissitissit River, the Triangle Floater and Eastern Pearlshell, are listed as species of conservation need in the Massachusetts State Wildlife Action Plan. Triangle Floater and Creeper mussels are also present in the Squannacook River in Townsend. And the Creeper mussel is present in the Nashua River (Freshwater Mussel Survey in the Nashua River in the Bypass Reach, Tailrace, and Impoundment of the East Pepperell Dam Pepperell, MA, Biodrawversity, May 2013).

Dragonflies Eight species of state-listed threatened dragonfly species including Brook Snaketail; Comet Darner; Forcipate Emerald; Kennedy's Emerald; Spatterdock Darner; Spine-crowned Clubtail; Ringed Boghaunter; and Umber Shadowdragon occur in the Nashua/Squannacook/Nissitissit River corridors. Such a multiplicity of dragonflies and freshwater mussels species present in this river system emphasizes the high water quality of the rivers and their importance in providing habitat for a variety of species, common and rare.

Birds During the spring and fall bird migrations, the Nashua River is the second most commonly followed flyway in Massachusetts, after Plum Island (Parker River National Wildlife Refuge). This migratory bird mecca has over 230 bird species, half of them nesting (Harold Herrill "Fall and Winter Birds of the Lancaster Area", Vol. 5, No. 6 The Bird Observer of

Eastern Massachusetts). In particular, the open field grassland habitat near the river at Bolton Flats Wildlife Management Area, Fort Devens, Moore Airfield and Shepley Landfill provides nesting sites for the state endangered Upland Sandpiper and the threatened Grasshopper Sparrow. (NHESP, An Action Plan for the Conservation of State-listed Obligate Grassland Birds in Massachusetts, 2013) Additionally, the Pine Hill area in Lancaster previously noted in regard to its exemplary Pitch Pine – Scrub Oak natural community, has documented Vesper and Grasshopper Sparrow territories on it according to Chris Buelow, Massachusetts Natural Heritage Program Restoration Ecologist.

Protected Habitats and Travel Corridors

The Nashua, Squannacook, and Nissitissit Rivers are important as biological corridors; many species described earlier use these rivers and their surroundings as habitat and to travel through. The river valleys are both wildlife habitat corridors and natural south-north migration routes for terrestrial and aquatic fauna and flora set within a context of contiguous undeveloped, and, in many cases permanently protected land. (Massachusetts Audubon Society, Focus Areas for Wildlife Habitat Protection in the Nashua River Watershed, September 2000) This study area hosts more than 1335 acres of protected lands – including riparian lands. The various conservation lands in the study area are crucial stepping stones for wildlife movement north from the anchor that is the Oxbow National Wildlife Refuge (ONWR).

In addition to the Oxbow National Wildlife Refuge, the Nashua, Squannacook, and Nissitissit River corridors provide a connection between several other sizeable public conservation lands in the study area, notably: J. Harry Rich State Forest; Groton Town Forest; Surrenden Farm; Groton Woods/Sabine Woods; Ayer State Game Area; Bolton Flats; Squannacook, and Nissitissit River Wildlife Management Areas; and Townsend State Forest.

Recreation and Scenery

The Nashua River study area contains an expansive complex of recreational and scenic resources unusual to find so close to several major population centers areas with a population upward of 3,000,000. Two factors figure prominently in the reason for these recreational and scenic resources - improved water quality and protected lands.

The improved water quality resulting from the remarkable recovery of the Nashua River since the 1960s provides a multitude of water-based recreational activities. From fishing to canoeing, kayaking and on-water environmental education, the waters of these rivers draw numerous visitors from around the region each year. The visitors include many students in classroom field trips. Since fall of 2001, a total of 51 different schools have participated in the Nashua River Watershed Association's River Classroom with 1,243 classes; 30,543 individual students; and 14,522 adult chaperones.

The study area is host to many significant local, state and federally-owned protected land resources including Oxbow National Wildlife Refuge, Bolton Flats Wildlife Management Area, Squannacook and Nissitissit River State Wildlife Management Areas, J. Harry Rich and Townsend State Forests, and others. The entire Massachusetts portion of the Nashua River study area is included in the Nashua River Greenway Forest Legacy Area (US Forest Service). These areas support numerous opportunities for recreation - including, hiking, boating, fishing, and enjoying bird migrations or open space.

Scenic Resources

Much of the study river corridors are lined with wooded lands or low density development and areas which provide for bucolic scenery. Historic villages and old mill sites throughout provide a characteristic New England mill town backdrop to the landscape. The varied topography of the river valley also gives opportunities for exemplary views for this region. Many photographers spend time in the area capturing the beauty, the flora, and the fauna. The following list and map provides a small sampling of the noted visual resources.

Nashua

- Fitch's Bridge
- View from Rail Trail at Pepperell Pond
- Petapawag launch
- MBTA RR trestle
- Overlook Prospect Hill-Fruitlands

Squannacook

- Bertozzi Rapid and swimming hole
- Harbor Pond
- Rossbach Farm

Nissitissit

- Henry Colombo Nissi WMA fly fishing spot
- Former Turners Dam site
- Lake Potanipo headwater

Recreational Resources



Many annual recreational events occur in the region due to the ample access and opportunity provided by the rivers. These include:

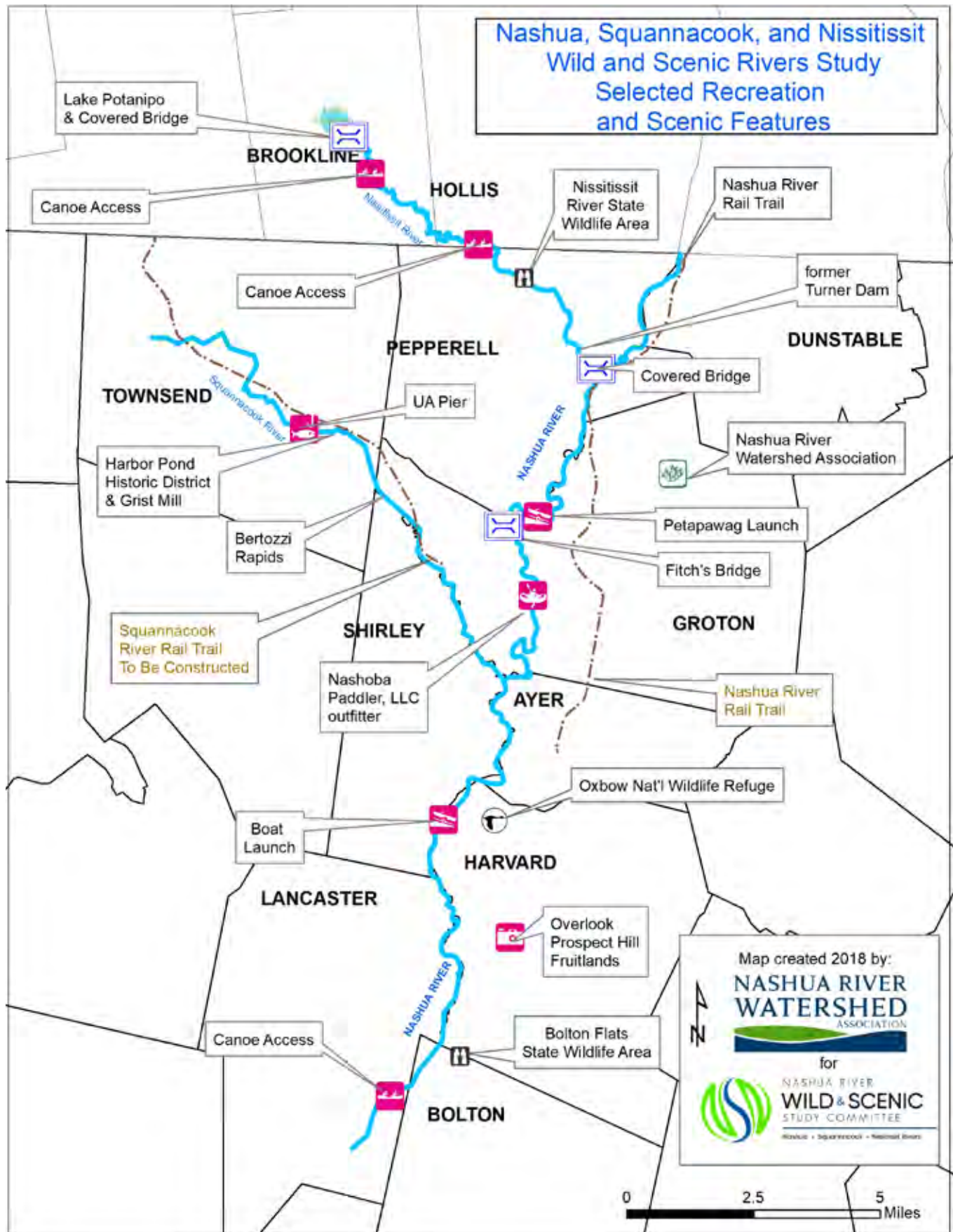
- Groton-Oxbow National Wildlife Refuge Circle's "Christmas Bird Count"
- "Big Night" first mass amphibian movement in early spring
- The Squannacook River Canoe & Kayak Race (held by the Townsend Lions Club for over 30 years)
- The Groton Greenway Committee's Greenway Festival known for its card-board boat race

Greenway and Recreational Trails Systems

The Nashua, Squannacook, and Nissitissit Rivers host many miles of recreational trails which offer the greater Boston and Worcester, MA and Nashua, NH metropolitan areas an array of recreational opportunities that are unique to the region – hiking, biking, horseback riding, birding, wildlife viewing, photography, hunting, "leaf peeping," agritourism, snowmobiling, fishing, and access to boating.

Areas that are connected by the trail systems include: Oxbow National Wildlife Refuge, Bolton Flats Management Area, Squannacook and Nissitissit River State Wildlife Management Areas, J. Harry Rich and Townsend State Forests, Groton Town Forest and the Nashua River Rail Trail.

The Nashua River Rail Trail is a former railroad right of way that travels 11 miles through the towns of Ayer, Groton, Pepperell, and Dunstable. The trail offers a 10-foot wide paved surface for the entire length and a five-foot wide gravel equestrian path for seven miles of the trail from Groton Center to the New Hampshire border in Dunstable. The entire trail is open to pedestrians, bicyclists, inline skaters, wheelchairs, and cross-country skiers. It is known to have more than 1,000 visitors on any given summer weekend day.



Map of selected recreation and scenic features in the Wild and Scenic Rivers Study Area.

Fishing Cold Water Fisheries: The Nashua River watershed is home to numerous prized cold-water streams that support native Eastern Brook Trout (*Salvelinus fontinalis*). In addition to native trout, Massachusetts Division of Fisheries and Wildlife stocks the Squannacook and Nissitissit Rivers, and other watershed streams, with brown, brook, and rainbow trout. The MA Division of Fisheries and Wildlife has been identifying coldwater fish resources (CFRs) based on fish samples collected by biologists – they include Mine Brook, Sucker Brook, and Gulf Brook. These CFRs are environmentally sensitive areas where brook, brown or rainbow trout reproduction has been identified. There is also an Alewife and Herring restoration underway in these streams. These species are stocked in various segments of the study river streams.

Warm Water Fisheries: In addition to the cold-water fisheries, bass anglers also find great fishing spots in the watershed. Pepperell Pond, the impoundment of the mainstem Nashua River above the Pepperell Dam, is a favorite. Both large and smallmouth bass abound. Many local bass fishing groups hold their tournaments on Pepperell Pond.

Historic and Cultural

River Renewal

“The restoration of the Nashua River launched the Nashua River Watershed Association into an international spotlight, a prime example of collaboration to accomplish a goal for the betterment of all society. The Association’s leadership and approach to protecting natural resources through a watershed approach, protecting both land and water throughout the region, continues to be recognized by federal, state, and local governmental leaders, as well as by leaders in the fields of environmental protection and environmental education.”

(Nashua River Watershed Association Website)

Efforts to protect key resources in the Nashua River basin go back many decades with some significant players. In the mid-1900s, William P. Wharton of Groton, and Benton MacKaye of Shirley, were

among the incorporators of the Nashua River Watershed Association (NRWA). MacKaye was a renowned activist, forester, planner, and conservationist who established the Appalachian Trail and co-founded The Wilderness Society. Wharton was a conservationist, forester, and ornithologist. He was also originator of the New England Forestry Foundation, and the president of the National Parks Association. Ecologist Ellen Swallow of Dunstable and Elizabeth Henderson of the Lowthorpe School in Groton were among those active locally in conservation interests. But it was the arrival of Marion Stoddart to the area in the 1960s that catalyzed the most profound changes.

The Marion Stoddart Story



The Nashua River played a pivotal role in the passage of landmark state and federal water pollution control legislation.

The river restoration and “greenway” vision developed and implemented around the Nashua, Squannacook, and Nissitissit is recognized as a state and national model.

The story of the recovery of the Nashua River cannot be told without telling the Marion Stoddart story. Stoddart grew up in Nevada where water was a scarce resource. She experienced its value and recognized the importance of clean water as a vital environmental element. After having read eye-opening books like *Silent Spring* by Rachel Carson, then moving to Groton, Massachusetts, seeing the Nashua River’s water ablaze in color, and smelling like a sewer, it drove her to action. Stoddart galvanized the efforts of the Nashua River watershed community and became the driving force of the recovery of the Nashua. Her story - and the results of her inspired work - makes the Nashua River’s recovery significant for the region, the state, and the nation.

Fifty years ago, when there were no environmental laws in place to protect waterways, a group of con-

cerned citizens set out to restore the Nashua River: one of the nation's ten most polluted rivers. They envisioned "sparkling blue water with a ribbon of green along its banks." They advocated for a revitalized river corridor safe for people and wildlife alike. Led by Marion Stoddart, they gained the attention of towns, government agencies, businesses, and other residents and soon a restoration and conservation ethic was born regionally - particularly in pursuing the ambitious river restoration goal.

Although Nashua is a native word for "river with a clear-bottom," by the 1960s its recovery seemed an impossible task. The river, known locally at the time as the "Nauseous River" because of its awful smell, was considered biologically dead. One could smell the river from more than a mile away, riparian real estate was nearly worthless, it notoriously ran various colors from dyes dumped into the river by the paper mills, and the only wildlife were rats and sewage worms. The river was so grossly polluted in 1969 that Fort Devens military personnel were warned to stay away from it. It had a "U" designation signifying "unacceptable" meaning its condition did not meet any of the existing water quality standards classifications.

Stoddart's pioneering actions took many forms; for example, she had children bring jars of dirty river water to the politicians and told them "we just want this river the way it was when you were kids. You could swim in it. You could fish in it." Her activism led to the passage of laws to prevent the paper mills from dumping pollutants into the river - including the Clean Water Act. In 1965, the federal Water Pollution Control Act passed and Massachusetts was the first state to pass similar legislation, with the Clean Water Protection Act in 1966. These laws provided state and federal money to build eight municipal wastewater treatment facilities to improve Nashua River system water quality at a cost of more than \$250 million.

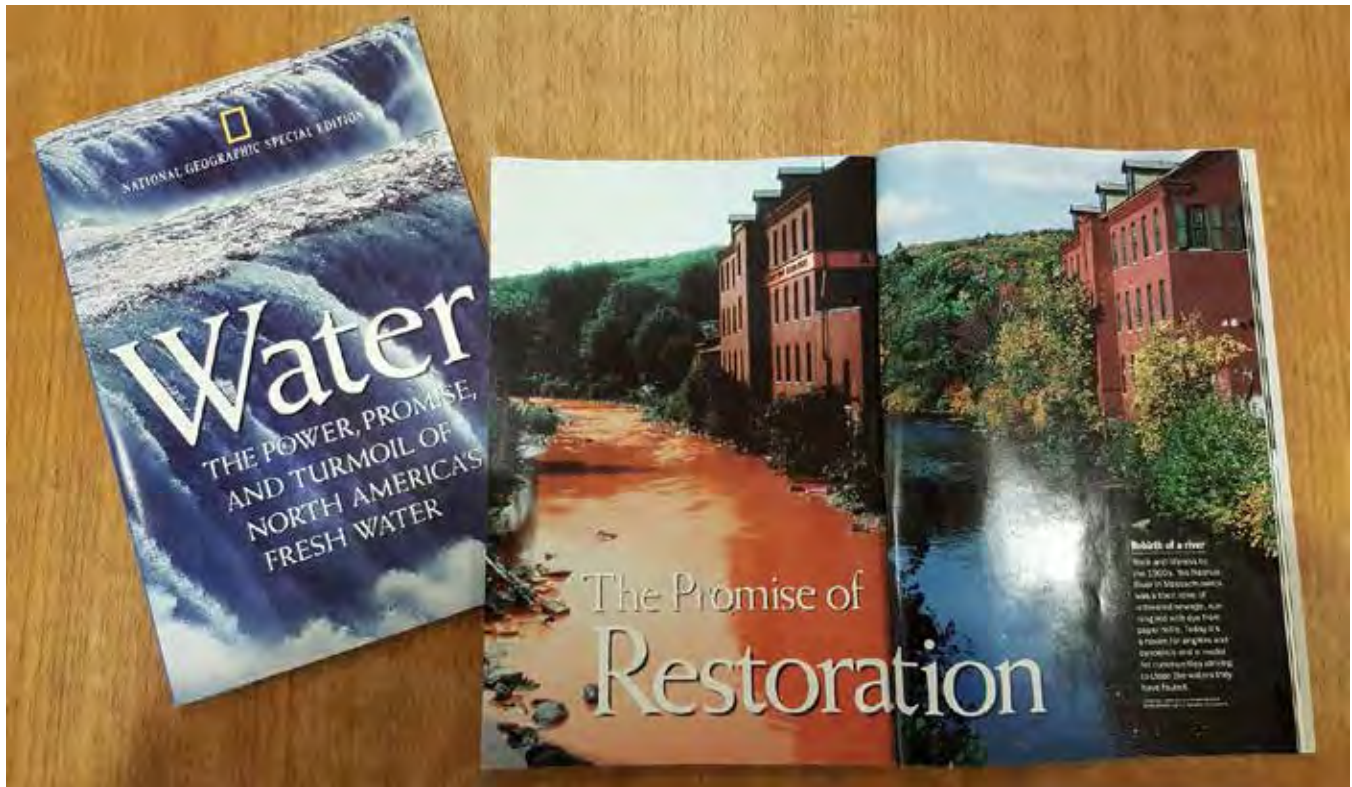
"Changing values and attitudes, diligent enforcement of environmental laws and regulations, educational programs by schools and NGOs, the

shift from manufacturing to service industries initiated the process of ecological recovery. The rate of recovery in the well-watered temperate climate of southern New England has been nothing short of remarkable." (Paul Barten, et al, *Land Conservation, Restoration, and Stormwater Management for the Squannacook and Nissitissit River Watersheds, MA & NH*, 2001) It took a quarter of a century to clean up a river that was "too thick to pour, too thin to plow." Today, a sparkling blue Nashua River runs from central Massachusetts to southern New Hampshire. It hosts some of the state's best fishing tournaments. Flora and fauna thrive in it, canoeists revel in it, and swimmers splash in some sections of it. It is now a nationally recognized example of river restoration.

This inspiring tale has been retold in *A River Ran Wild: An Environmental History* by Lynne Cherry, first published in 1992. This children's non-fiction book is still frequently used in school curriculums throughout the nation to address human effects on the environment and to show the changes of pollution throughout history, and how people in each period affected the Nashua River.

In 1993, the *National Geographic Magazine* spotlighted the Nashua's recovery in an article titled "The Promise of Restoration: New Ideas, New Understanding, New Hope" in its Special Edition: *The Power, Promise, and Turmoil of North America's Freshwater*. The dramatic "before and after images" attract the most attention were published and still remain at the NRWA River Resource Center. In 1987, the United Nations honored Marion Stoddart, naming her to the "Global 500 Roll of Honor".

National Geographic's 2010 *Written in Water: Messages of Hope for Earth's Most Precious Resource* contains an essay on the Nashua River cleanup by Stoddart. Most recently, the story of Marion Stoddart and the Nashua River was made into an independent, critically acclaimed, call to action documentary film titled *The Work of 1000* which speaks to a model for effective leadership and advocacy, grassroots organizing and coalition building to achieve one's vision.



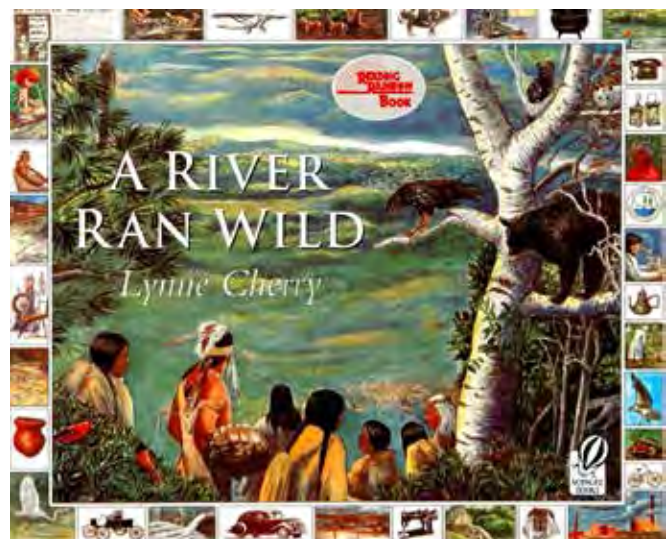
Front cover of National Geographic magazine Special Edition titled: "Water: The Power, Promise, and Turmoil of North America's Fresh Water" which had a two-page spread of the now iconic "before and after" photos of the North Nashua River in Fitchburg, MA, which was labeled "The Promise of Restoration."

The Nashua River Greenway

In 1969, Stoddart and her colleagues founded the Nashua River Watershed Association (NRWA) to protect the river by taking a watershed approach to natural resources. A key objective was to permanently protect the land adjacent to the river to help protect water quality establishing continuous "greenways" extending at least 300 feet back from the river and major tributaries. Greenways also provide wildlife habitat and corridors, protect the floodplain and wetlands, and enable people to enjoy the river. With its goal nearly half completed, and more than 175 miles of shoreline currently protected, continuing efforts are supported in part by contributions to the NRWA's Marion Stoddart Greenway Fund, which was created on her 85th birthday.

Historic Mills and Dams

The several remaining mills and dams in the Nashua River study area reflect how the river contributes to the local history. Although not exemplary or unique, these features in aggregate provide a sense

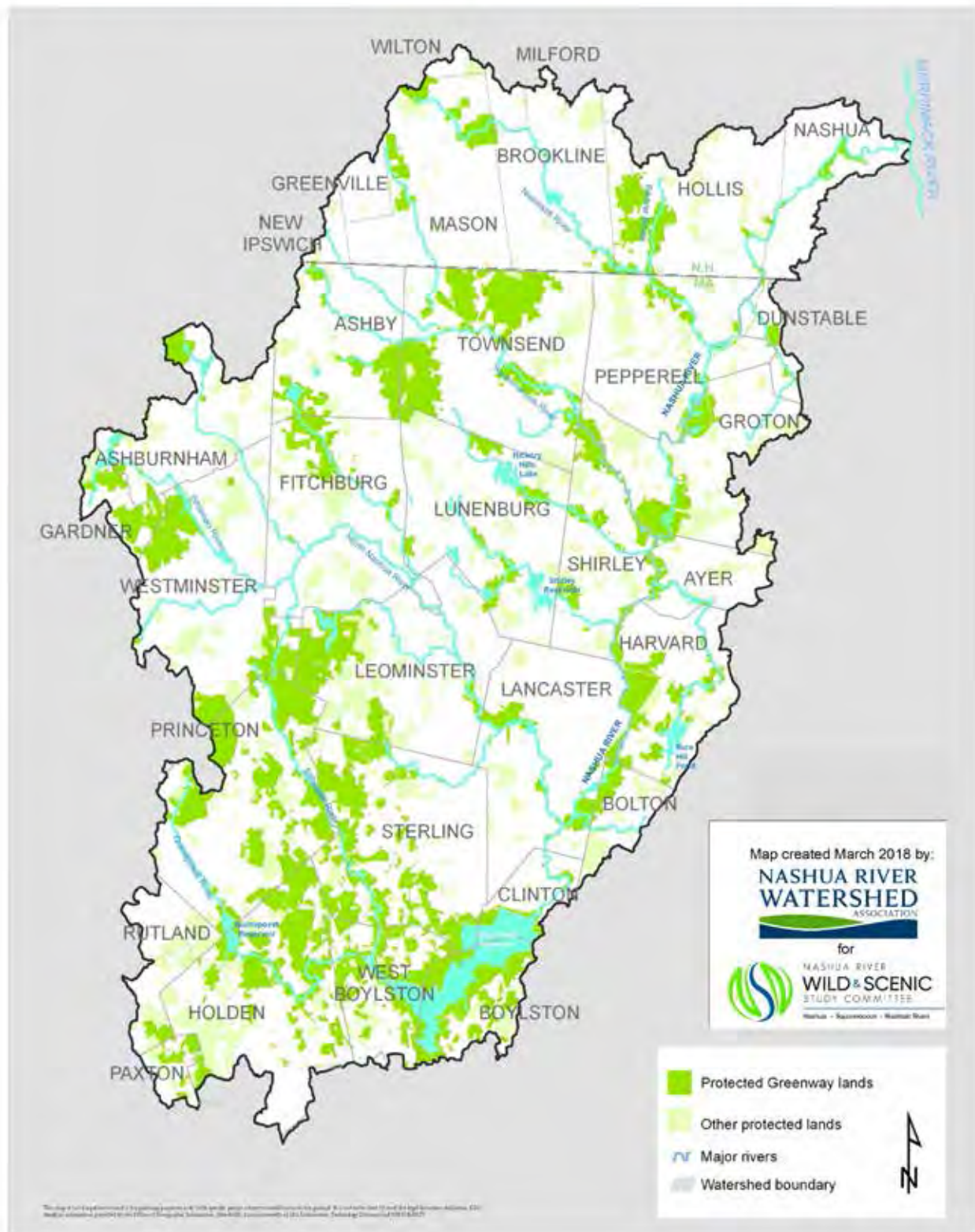


Front cover of "A River Ran Wild" by Lynne Cherry.

of the area as it once was decades and centuries ago, as well as furnish the surroundings with scenery and places of interest.

Ice House Dam, Ayer, Massachusetts - The area around this dam is quite scenic and hosts many historical buildings and other attributes. The Ice

Nashua River Watershed Greenway



Map of the Nashua River Watershed Greenway in 2013. Note that this map highlights protected lands along the rivers and tributaries throughout the entire watershed. Since that time there has been substantial progress in protecting additional greenway lands. As of 2018, nearly 50% of the lands along the Nashua River and its major tributaries are permanently protected. Work continues.

House Dam was built in the 1790s. In 1907, an electrical powerhouse was installed at the dam that operated trolley cars until the 1920s, and subsequently, ice-making machinery. During the 1970s, the powerhouse was destroyed by fire. In 2007, Ice House Partners formally proposed to the FERC to operate two turbine generating units located in the rebuilt powerhouse at the dam.

Stone Dam and Canal Townsend, Massachusetts – Located just below the Stone Bridge is the site of the second mill in Townsend, Hubbard’s Mill. The dam was built in 1768. The mill burned in 1790, and in 1798 Hezekiah Richardson built another mill on the site. Local farmers gave their labor to dig the canal for this mill in return for grist and saw-milling services. Over the years, several types of enterprises used this mill seat: wool carding, stockings, cotton yarn, leatherboard, and a machine shop. Now it’s a very popular fishing spot and canoe launch.

Adams Dam Townsend, Massachusetts — This dam was owned and operated by the Adams family starting in 1817. Throughout the 1800s, flour, meal, and lumber were produced. In 1900, the dam generated electricity for the town’s streetlights. The dam was badly washed out during the 1936 flood; the present dam was built in 1949. Now owned by the town, it is historically used as a fishing area.

Townsend Harbor Dam Townsend, Massachusetts —This is the oldest mill seat in Townsend. In 1733, John Stevens and Lott Conant built a grist mill and sawmill here – including Spaulding Cooperage. The present dam dates from 1870 and is owned by Hollingsworth & Vose Company of West Groton. The name Harbor is said to be derived from the earliest days of settlement, when four fortified garrison houses were located in the area to provide refuge during Indian attacks.

Hollingsworth & Vose Dam Factory West Groton, Massachusetts —In 1832, the Hollingsworth & Vose mill in West Groton was a starch factory briefly,

and then became a paper mill. The dam is still used as part of the manufacturing of specialty papers. It maintains an historic smokestack with the “H&V Co” name painted on its side, and is surrounded by a village with many unofficially historic homes and other notable buildings.

West Groton Dam The first mill on this site was John Tarbell’s saw and grist mill in 1760. A sawmill continued operating on this site until 1882; however, the water rights to the dam were held by a straw-board (similar to cardboard but made from straw) mill on the Shirley side in the late-1800s.

(Former) Turner Dam In 1750, Turner Dam was constructed and associated with grist and saw mills. In 1838, Blake and Ballard machine shop was established on site. In 1864, Blake Brothers produced “Improved Turbine Water Wheel,” a “belt fastener” that they invented and patented; the turbine is sold nationally and internationally. In 1942, Robert and Millie Turner purchased property and razed the industrial buildings on site (ca. 1947). Dam failure occurred in 1954 caused by upstream dam breach (Potanipo Pond) and heavy ice flows. In 1956, the dam was reconstructed by Paugus Rod and Gun Club and a group of local volunteers. The property was conveyed to David Babin by Millie Turner in 2008. In 2010, MA Department of Fish and Game purchased 17 acres from Mr. Babin for conservation purposes; the dam and underlying land (0.47 ac) was excluded. MA Division of Ecological Restoration accepted dam removal as a state Priority Project for river restoration in 2013. The dam was removed with mussel relocation, and completion of 0.47 acre property transfer to the state in 2015.

Pepperell Dam The power plant was constructed in 1918 by the Pepperell Paper Company as a means to power their nearby paper mill. It was originally constructed with three vertical Francis turbines and a 600 foot long penstock all of which have since been replaced.

Summary of Outstandingly Remarkable Values (ORVs) and Locations

ORV	Main feature	Some Key Findings	Location
Biological Diversity	Assemblages of Priority Natural Communities and Rare Species Habitats Hydrologic Reserves Coldwater and Warm water Fisheries	Coldwater fisheries (Native Eastern Brook Trout) Turtles (rare & diversity of species; Blanding's Turtles) Freshwater mussels (including Brook Floater and other rare species) Aquifers and associated habitat Outstanding Resource Waters (ORWs) Bolton Flats, Squannacook River & Nissitissit River Wildlife Management Areas & other protected riparian lands including Nashua River Greenway Forest Legacy Area lands, Oxbow NWR 3 MA designated Areas of Critical Environmental Concern (ACECs) Pepperell Pond – Warm water fish habitat	Nashua Squannacook Nissitissit
Recreation & Scenery	Aquatic Corridors Fishing Boating Extensive Trail Network	Multiple River Access Points including at Nashoba Paddler (see Stewardship Plan – Appendix I for full listing of launches) 3 MA ACECs (recognizing recreational and scenic) Coldwater Fishing Warm Water Fishing Pepperell Pond (boating, bass fishing) Various levels of riverside experience from paved rail trails, and Wildlife Management Areas maintained for wildlife habitat Protected Greenways Extensive Protected Lands (including Oxbow National Wildlife Refuge, Bolton Flats, Squannacook River & Nissitissit River Wildlife Management Areas) Nashua River Greenway Forest Legacy Area	Nashua Squannacook Nissitissit
Historic & Cultural	River Renewal Regional Conservation Ethic	Remarkably improved water quality resulting in Clean Water Act & national recognition “The Marion Stoddart Story” – Notable figures Benton MacKay, William Wharton, etc. Successful historic grassroots advocacy - multiple partners including land trusts, local, state, federal and other entities 3 MA ACECs (recognizing historic features)	Nashua Squannacook Nissitissit

Water Quality

The following is a summary of water quality levels for each of the segments in this study. Water quality in the Nashua, Squannacook, and Nissitissit Rivers has improved over the last few decades, much due to the efforts of controlling pollution sources and protection of watershed and river-corridor lands. For a more complete review of the historic water quality data, please refer to Appendix C in the Stewardship Plan.

Mainstem Nashua

According to the 2006 MA DEP Surface Water Quality Standards, the Nashua River is a Class B warm-water fishery. These waters are deemed habitat for fish, other aquatic life, and wildlife, including for their reproduction, migration, growth and other critical function, and for primary and secondary contact recreation. NPDES permits on the Nashua include wastewater treatment plants in Ayer, Pepperell and at the Groton School.

The NRWA reports that the “Nashua River is currently on the 303(d) “impaired waters” list and has had Total Daily Maximum Loads (TMDLs) developed for bacteria and phosphorus. The phosphorus TMDL noted that the primary cause of the impairment was attributed to discharges from wastewater treatment facilities. Treatment facilities along the Nashua River are correspondingly improving their infrastructure to improve water quality. Bacterial impairment is being addressed upstream of the proposed Study segment in the City of Fitchburg.”

Squannacook River

The Squannacook River is Class B. The upper Squannacook, from the confluence of Mason and Willard Brook through Harbor Pond Dam, is a cold-water fishery, and the lower segment of the Squannacook is a warm-water fishery. Hollingsworth & Vose Company, a paper manufacturer, holds the only surface water discharge permit to the Squannacook River.

Nissitissit River

The Nissitissit River is a Class B cold-water fishery. There are no NPDES permits on the Nissitissit.

Special Water Quality Designations

Outstanding Resource Waters (ORWs) are designated in the Massachusetts Surface Water Quality Standards [314 CMR 4.04(3)]. ORWs are determined by the Massachusetts Department of Environmental Protection based on their outstanding socio-economic, recreational, ecological and/or aesthetic values. These are waters whose high quality will be protected and maintained. With minor exceptions, new or increased discharges of pollutants are prohibited assuring that existing high water quality is preserved. The waterways designated in the Squannacook and Nissitissit Rivers as ORWs are also sanctuary waters. The Massachusetts General Laws Chapter 132A, Section 17 establishes the Squannacook and Nissitissit Rivers Sanctuary (SNRS). The sanctuary comprises the surface waters of both rivers and their tributaries. A short section of the Squannacook River is excluded: from the Hollingsworth & Vose Dam to the confluence with the Nashua River.

In these sanctuary waters, no new discharge of treated or untreated sewage or other wastewater is permitted. Storm water discharges and conveyances must be approved by the planning board and conservation commissions of the affected towns. The Attorney General has the authority to enforce these rules.

Classification

The Nashua, Squannacook, and Nissitissit Rivers’ preliminary classifications are based on each river segment’s accessibility, riverine characteristics, human development patterns and history of impoundments or structures within the river. Most of the sections of the rivers are free of impoundments, with shorelines or watersheds still largely primitive and shorelines largely undeveloped, but accessible in places by roads. These sections meet the Wild and Scenic Rivers Act criteria for “scenic” classification.

Classifications Chart

River Sections	Town(s)	Reach	Length (miles)*	Classification
Nashua	Ayer, Bolton, Dunstable, Groton Harvard, Lancaster, Pepperell, Shirley	From the confluence of the North and South Nashua Rivers in Lancaster, Massachusetts, north to the confluence of the Squannacook River (14.2 mi). From the Squannacook River confluence to the Pepperell Dam (9.1 mi). Pepperell Dam to the MA/NH state line (3.7 mi).	27.0	Scenic
Squannacook	Groton, Shirley Townsend	From the confluence of Mason and Willard Brooks to H&V Dam (12.6 mi). H&V Dam downstream to its confluence with the Nashua River in Shirley/Ayer, Massachusetts (3.7 mi).	16.3	Scenic
Nissitissit	Pepperell, Brookline, Hollis	From the Lake Potanipo Outlet in Brookline, New Hampshire downstream to the MA/NH state line (4.9 mi). From MA/NH state line to the confluence with the Nashua River in Pepperell, Massachusetts (4.6 mi).	9.5	Scenic
Total Miles			52.8	

* Source: MA Department of Environmental Protection

Conclusions on Eligibility and Classification

Approximately 52.8 miles of the Nashua, Squannacook, and Nissitissit Rivers are eligible for Wild and Scenic designation based on free-flowing conditions and the presence of Outstandingly Remarkable Values that include Biological Diversity; Recreation and Scenery; and Historic and Cultural. The preliminary classification for the 52.8 miles in portions of the three streams is “scenic.”

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Kayaker on the Nashua River. Photo: Jim Kay.

Chapter 4:

Suitability Findings and Management Context

This chapter presents the study findings relative to Section 4(a) of the WSR “... On the suitability or unsuitability for addition to the national wild and scenic rivers system.” The suitability of the Nashua, Squannacook, and Nissitissit Rivers for designation is directly related to existing and future river management which will also be discussed in this chapter.

Principle Factors of Suitability

In 1995, members of the Bureau of Land Management, National Park Service, U.S. Fish and Wildlife Service and U.S. Forest Service established an inter-agency council to address administration of National Wild and Scenic Rivers. The Interagency Wild and Scenic Rivers Coordinating Council (IWSRCC)

developed criteria for suitability of rivers considered for inclusion in the Wild and Scenic Rivers system. These criteria are similar to, but distinct from the eligibility requirements for inclusion in the National WSR System.

The IWSRCC developed the following criteria as a general guide to exploring the suitability or unsuitability of river segments for inclusion in the Wild and Scenic Rivers System. A suitability analysis is designed to answer the following questions:

1. Should the river’s free-flowing character, water quality, and ORVs be protected, or are one or more other uses [e.g., issuance of a hydro license] important enough to warrant doing otherwise?

2. Will the river's free-flowing character, water quality, and ORVs be protected through designation? Is it the best method for protecting the river corridor?
3. Is there a demonstrated commitment to protect the river by any non federal entities that may be partially responsible for implementing protective management?"

In answering these questions, the benefits and impacts of Wild and Scenic River designation must be evaluated and alternative protection methods considered.

Rivers such as the Nashua, Squannacook, and Nissitissit that flow through predominantly private lands are best considered following the Partnership Wild and Scenic Rivers study approach and potential designation model. For these rivers, the National Park Service has developed and refined additional factors upon which suitability findings should be made:

1. The adequacy of existing protection measures to conserve the river's outstanding resources without the need for federal land acquisition or federal land management.
2. Whether there is an existing or proposed management framework that will bring the key river interests together to work toward the ongoing protection of the river.
3. The strength of local support for river protection and national designation.
4. The effects of designation on uses of the land, water base, and resources associated with the river, the neighboring communities, etc.

Existing Protections

Protections for free-flowing character, water quality and each of the identified ORVs were assessed by the NPS in conjunction with the Study Committee and the complete findings are available in the Stewardship Plan and its appendices. The Study Committee's

website (www.wildandscenicnashuarivers.org) specifically lists the protections provided through federal, regional, state, and local mechanisms that already protect the ORVs. These protections include strong local, state, and federal programs, statutes, regulations and ordinances that directly protect the watercourses and adjacent lands. Federal legislation such as the Clean Water Act, and Federal agencies such as the Army Corps of Engineers are to provide substantial protection for water quality. The free-flowing condition of the Nashua, Squannacook, and Nissitissit Rivers is protected through local and state stringent review and permitting for projects which propose limiting the free-flowing nature of both Massachusetts and New Hampshire's waterways. In addition, there are established local watershed associations, conservation commissions, land trusts, and other non-governmental supporting organizations that have strong interests in protecting the outstanding resources identified by the local communities during the Study process. There is also strong local and regional citizen recognition, evident in town and regional plans, of the importance of these rivers and the resources they support. The Stewardship Plan demonstrates that these existing protections, along with implementation of the recommendations in the Stewardship Plan, meet the suitability criteria for the segments that are recommended for Wild and Scenic Rivers designation.

Regulatory Protections

In order to identify the regulations, policies, and plans that favor protection and enhancement of the natural and cultural resources in the Nashua, Squannacook, and Nissitissit Rivers, the Study Committee asked Nashua River Watershed Association's land use specialist to inventory and assess such regulations and policies enacted to date in the eleven river corridor towns. The study addressed each town's municipal plan and regulations as they relate to the protection and enhancement of the Outstandingly Remarkable Values in the Nashua River watershed. (Consult the Stewardship Plan Appendices Regulation Review)

Important local, state, and federal river protections were identified. These are briefly described below.

Local

Municipalities in the Study area demonstrate their support for Wild and Scenic Rivers in various ways including: town-wide master plans, regulations at times above and beyond State regulations and requirements, support for projects in the watershed that demonstrate best agricultural practices, zoning regulations that mirror WSR values, and contributions to local organizations, such as the Nashua River Watershed Association, that work for healthy rivers.

The following are some general programs and regulations found at the local level:

Local Conservation Commissions



Groton Turtle Conservation is an organization that works locally to help protect turtle habitats and the corridors in which they travel.

The organization also provides public education and raises funds to increase public awareness of the abundance of turtles in the area. An example is providing funds for turtle crossing signs along local roadways.

The Conservation Commission Act (M. G. L. Chapter 40 §8C or NH RSA 36-A) enables municipalities to establish conservation commissions through a vote of the local legislative body (town meeting or city council). Every city and town in the Commonwealth of MA has established a conservation commission. The duties and responsibilities of a conservation commission are set forth in the Conservation Commission Act. The conservation commission is the official agency specifically charged with the protection of a community's natural resources. The commission also advises other municipal officials and boards on conservation issues that relate to their areas of responsibility.

State Enabling Legislation at the Local Level

The states have comprehensive enabling legislation governing the use of land. The enabling legislation grants authority to towns to adopt regulations that effectively implement legislation at the local level. Towns therefore have the independence to choose regulatory tools to gain greater resource protection and have the flexibility to implement them.

Subdivision Regulations

A significant number of the towns allow for cluster and open space residential subdivisions that allow for greater protection of open space and/or particular natural features on a site. Modification of traditional subdivision regulations for development is an example of how the towns are using local regulations to protect outstanding resources. (Please see the Stewardship Plan for a summary of local land use regulations.)

State

Many Massachusetts and New Hampshire statutes contribute to the protection of the Outstandingly Remarkable Values. These state programs regulate non-agricultural activities within or near wetlands and watercourses. Below are some of the most important state regulations protecting the watercourses:

Massachusetts

Rivers Protection Act This act protects nearly 9,000 miles of Massachusetts riverbanks – helping keep water clean, preserving wildlife habitat, and controlling flooding. The law creates a 200-foot riverfront area that extends on both sides of rivers and streams. In certain urban areas, the riverfront area is 25 feet.

The law did not create a new permitting process, but rather built on the strength of existing procedures under the Wetlands Protection Act. The local conservation commission or the state Department of Environmental Protection (MassDEP) reviews projects to ensure that the riverfront area is protected for the eight interests in the Wetlands Act. The law also establishes the policy of the state to protect the natural integrity of rivers and to encourage

and establish open space along rivers. (source: MA Rivers Alliance)

Wetlands Protection Act The Massachusetts Wetlands Protection Act (M.G.L. Ch. 131, §40; the Act) protects important water-related lands such as wetlands, floodplains, riverfront areas, and other areas from destruction or alteration. Most work proposed to be done in those areas requires a permit (known as an Order of Conditions) from the local conservation commission.

Regulations for the Act (310 CMR 10.00), and related guidance and policy documents, are issued by the Massachusetts Department of Environmental Protection (MA DEP).

Many cities and towns have adopted local zoning or non-zoning wetland ordinances or bylaws that are stricter than the Act. Applications for work in wetland resource areas covered by state and local wetland laws are usually processed together by the conservation commission.

In addition to Bordering Vegetated Wetlands and floodplains, the Act also covers banks, dunes, beaches, vernal pools, land under lakes and ponds, and riverfront area (land under or within 200-feet of rivers and streams -- or 25 feet of some urban rivers -- that flow year round).

Many wetland resource areas are defined by an abundance of wetland plants, hydrology, or soil type. Riverfront resource areas (land within 200 feet of rivers or within 25 feet of some urban rivers) are in most cases measured from the top of the bank of the river or stream.

Water Management Act The purpose of the Water Management Act, passed in 1986, is to regulate water withdrawals so that Massachusetts has sufficient water to provide for its various needs, including the needs of the environment. All water users seeking to withdraw 100,000 new or additional gallons per day or more must apply for a permit from MA DEP. The duration of the permits is 20 years, with five-year reviews, and permits are issued on a rotating, watershed-wide basis in the state's 28 major river

basins. Water suppliers must comply with certain permit conditions, such as water use restrictions during droughts, and requirements to control "unaccounted for water use." Municipalities can't use more water than the Department of Conservation and Recreation (DCR) predicts they will need within the 20-year permit period, according to that agency's Water Needs Forecast for each town. (source: MA Rivers Alliance)

Interbasin Transfer Act The purpose of the Interbasin Transfer Act (1984) is to assure that any transfer of water or wastewater from a river basin protects the water-dependent resources of the donor basin. It is administered by the Massachusetts Water Resources Commission, and though it does not prohibit such transfers, it requires a review. (source: MA Rivers Alliance)

Public Waterfront Act (M.G. L. Ch. 91) The oldest program of its kind in the nation, Chapter 91 regulates activities on both coastal and inland waterways, including construction, dredging and filling in tidelands, great ponds and certain rivers and streams. While other agencies may play a role in preserving public rights in public trust lands, the MA DEP oversees Chapter 91 and is the primary division charged with implementing the "public trust doctrine." The MA DEP Waterways Regulation Program includes the following:

- Protects Areas of Critical Environmental Concern (ACECs), ocean sanctuaries and other ecologically sensitive areas from unnecessary encroachment by fill and structures.
- Protects the rights of waterfront property owners to approach their property from the water.
- Assures removal or repair of unsafe or hazardous structures.

New Hampshire

The **Comprehensive Shoreland Protection Act** (CSPA), RSA 483-B, is the State's regulatory approach to shoreland protection. It applies to all streams of fourth order and greater, designated rivers,

tidal waters and lakes, ponds and impoundments over 10 acres. The State maintains a directory of water bodies that are subject to the CSPA.

Rivers Management and Protection Program

Protected shorelands include all land within 250-feet of waters listed in the state's Official List of Public Waters, fourth order and higher streams, rivers designated under RSA 483, the Rivers Management and Protection Program, and tidal waters subject to the ebb and flow of the tide. In 2007, the state legislature authorized the development of a permitting program for construction, excavation, and filling within the protected shoreland.

Fill and Dredge in Wetlands Act New Hampshire regulates impacts to wetlands primarily under the Fill and Dredge in Wetlands Act (The Wetlands Act) RSA 482-A, which authorizes the state's permitting program to protect wetlands and surface waters. The state's wetland permitting program is the primary means of wetlands regulation in New Hampshire. The New Hampshire Department of Environmental Services, Water Division, Wetlands Bureau administers the state's wetland regulatory program. New Hampshire has a Section 401 certification program (under RSA 485-A:8), but the NHSPGP has a blanket 401 Water Quality Certification, so most water quality issues are handled as conditions to the State Wetlands Permit. Federal 404 permitting is mostly through the NHSPGP. Although the law was adopted in 1967 to protect tidal wetlands and waters, it was extended in 1969 to regulate activities in freshwater bodies. There is no minimum threshold of size for wetlands or wetland impacts under the Act; NHDES has jurisdiction over tidal wetlands, nontidal wetlands, and tidal buffer zones. New Hampshire Wetlands Statute, rules, and proposed rules are available at <http://des.nh.gov/organization/commissioner/legal/rules/index.htm#wetlands>.

Surface Water Quality Protection Act (SWQPA), RSA 483-B, formerly known as the Comprehensive Shoreland Protection Act, regulates impacts to

uplands adjacent to fourth order streams and higher and public waters. Under the SWQPA, also administered by NHDES, projects and activities located within the regulated shoreland are subject to Minimum Shoreland Protection Standards.

Alteration of Terrain This law, RSA 485-A:17, requires a permit for any project that disturbs 100,000 or more square feet of land or 50,000 square feet of land within the protected shoreland. The permit is intended to limit the negative impacts associated with increased stormwater runoff at developed sites. To the extent that projects requiring these permits are adjacent to wetlands, this law protects wetlands from indirect impacts caused by stormwater. For rivers that have been designated by the Legislature for protection under the state's Rivers Management and Protection Program, local advisory committees routinely comment on permit applications for development projects. Because of co-occurrence of rivers and wetlands, this also serves to protect wetlands, although not through any specific regulatory or permitting authority.

Large Groundwater Withdrawal Permitting Program

This program is administered by DES and serves to prevent impacts to wetlands and other water resources from large withdrawals of groundwater from wells sited after July 1998. Additionally, municipalities may designate wetlands as "prime wetlands," which receive higher level protection under the Act. NHDES also has jurisdiction over areas within 100 feet of prime wetlands, although only seven wetlands still retain this designation at this time. In Wetlands are evaluated for designation using the "New Hampshire Method" as detailed in two manuals, one for nontidal wetlands and the other for tidal wetlands.

Finally, the New Hampshire Fish and Game Department (NHFGD) participates in the regulatory review process and implements the *State Wildlife Action Plan*, which includes measures to conserve and protect wetland habitat. (source: www.aswm.org)

Federal Regulatory Programs:

There are multiple federal regulations that offer protection for the Nashua, Squannacook, and Nissitissit Rivers.

The **Clean Water Act** (CWA) provides substantial protection for the Nashua River water quality by restricting all discharges into the river. The CWA was created to restore and maintain the chemical, physical, and biological integrity of the nation's surface water. It requires states to adopt surface Water Quality Standards and an Anti-degradation Policy and establishes the National Pollution Discharge Elimination System, which requires all entities to obtain a discharge permit from the appropriate authority. In addition, the Section 404 Permit requires approval from the U.S. Army Corps of Engineers for any project that would discharge dredged or fill material into waters of the U.S.

The **National Flood Insurance Act** established the National Flood Insurance Program (NFIP) to protect against flood losses. States can require more stringent measures. The MA DEP is the designated coordinating agency that recently adopted new requirements that establish a higher regulatory standard that is more protective of floodplains. In addition NFIP encourages communities to engage in better floodplain management and also allow municipalities to adopt more restrictive ordinances than the Federal government. All eleven towns of the Wild and Scenic Study Area engage in some form of flood plain management through their town regulations and policies.

The **Safe Drinking Water Act (SDWA)** is the federal law that protects public drinking water supplies throughout the nation. Under the SDWA, EPA sets standards for drinking water quality and with its partners implements various technical and financial programs to ensure drinking water safety.

Additionally, the **National Environmental Policy Act** (NEPA) and the **Rivers and Harbors Act** provide some protection to the streams.

The **Wild and Scenic Rivers Act** provides the

strongest protection available for the watercourses by protecting designated rivers from any federally assisted or licensed water resource development project that would have a direct and adverse effect on the outstanding resources for which the river was designated.

Further description of these programs is available in the Stewardship Plan.

In summary, there is a substantial set of local, state, and federal regulations that are protective of the Nashua, Squannacook, and Nissitissit Rivers and make the watercourses suitable for Wild and Scenic designation within the Partnership system of management.

Federal Non-Regulatory Programs:

There are many federal programs that promote watershed and river protection – as well as protection of cultural, historic, scenic, and recreational features. The following are just a few examples:

USDA Forest Legacy Program (FLP) The Nashua River Watershed Association and its partners have utilized the USDA Forest Service's Forest Legacy program to protect thousands of acres of forested land in the watershed. The FLP is a conservation program administered by the U.S. Forest Service in partnership with State agencies to encourage the protection of privately owned forest lands through conservation easements or land purchases. Protection of private forests through FLP maintains a multitude of public benefits including: Opportunities to hunt, fish, and camp; Clean and abundant drinking water; Habitat for fish and wildlife; and Timber, fuel wood, and other forest products.

USDA Natural Resources Conservation Service (NRCS) NRCS offers voluntary programs to eligible landowners and agricultural producers to provide financial and technical assistance to help manage natural resources in a sustainable manner. Through these programs the agency approves contracts to provide financial assistance to help plan and implement conservation practices that address natural resource concerns or opportunities to help save energy,

improve soil, water, plant, air, animal and related resources on agricultural lands and non-industrial private forest land.

Open Space and Land Conservation

There are ongoing significant efforts to protect open



The eleven riverfront towns, land trusts, and state and federal agencies have protected about 61% of the lands within one quarter mile of the 52.8 miles of river frontage along the Nashua, Squannacook, and Nissitissit Rivers.

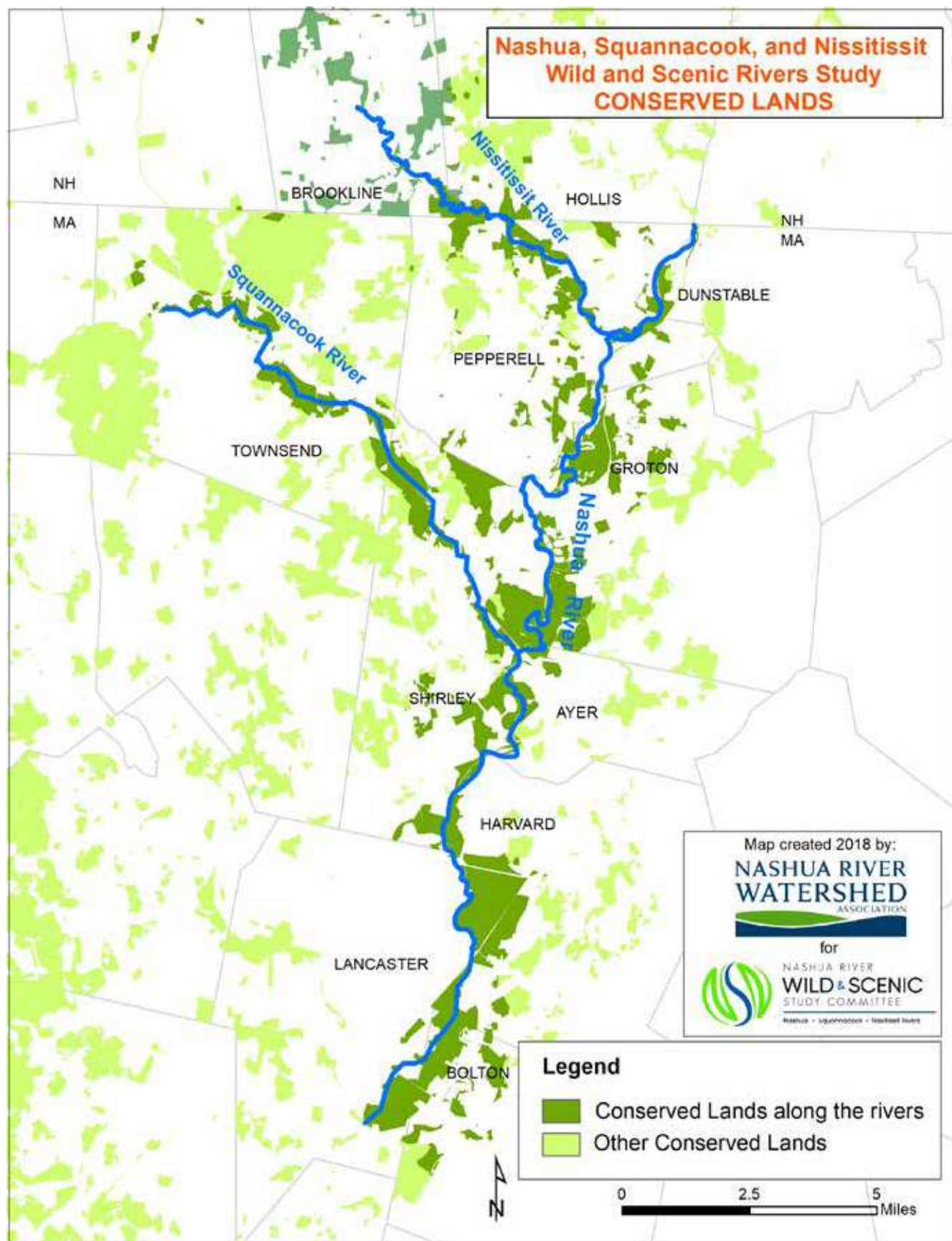
space along the watercourses to protect water quality, biodiversity, and corridors for recreational use. Based on the results of a review by the Study Committee, approximately 6% of the open space lands in the corridor are held by the local land trusts. There are noteworthy examples of land preservation efforts by area land trusts even during this time of scarce funding for conservation purposes. Both the towns and land trusts have demonstrated their commitment to protecting land along the watercourses. The Study Towns are actively pursuing updated regulations and establishing policies that maintain open space and establish corridors for recreation along the rivers.

Open Space and Land Conservation – Protected Areas

River Segment	Protected Area	Acreage	Features
Nashua Mainstem	Bolton Flats WMA	~1,320	“...extends along the Nashua River in Harvard, Lancaster, and Bolton. The river here is slow and meandering, with adjacent High-Terrace Floodplain Forest and Low-Energy Riverbank. The combination of a slow river, floodplain forest, and dry sand makes for excellent turtle habitat. In fact, 3 state-listed rare turtle species have all been documented from this stretch of river.” www.mass.gov/eea/agencies/dfg/.../bolton-flats-wildlife-management-area.html
	Oxbow National Wildlife Refuge	~1,667	“...particular value in carrying out the national migratory bird management program...” along nearly 8 miles of the Nashua River, the Refuge's interspersed wetland, forested upland and old field habitats is ideally suited for this purpose. www.fws.gov/northeast/facts/Oxbow06.pdf
	Portion of Mulpus Brook WMA	124-acres portion of 517-acre total	Mulpus Brook is an important cold-water tributary to the Nashua. The majority of Mulpus Brook WMA is outside the ¼ mile of the Nashua
	J. Harry Rich State Forest	~679	“...along the Nashua River is a wooded with broad level trails for easy walking. It offers excellent views of the river and surrounding area as it winds along the banks” through a portion of which linear Nashua River Rail Trail passes. One of the few state-owned tree farms in the nation and one of the first such in MA...and described as “...the most intensively managed forest acreage in New England”. www.nashuariverwatershed.org/recreation/hiking-walking.html

River Segment	Protected Area	Acreage	Features
Nashua Mainstem	Groton Town Forest	~513	“...provides protection for the watershed, educational activities, recreation, and wildlife habitat...created by vote of the Town Meeting in 1922, was among the first dozen such town forests in the Commonwealth”. As part of the Surrenden Farm protection effort, the town of Groton granted the MA Dept of Fish & Game a conservation restriction on the Town Forest, thereby opening it up to hunting and permanently protecting it as open space.
	Sabine Woods and Groton Place (abutting properties)	~146 and ~54, respectively	“...owned and managed by the New England Forestry Foundation (NEFF), is a former estate featuring open fields and river vistas, broad trail... with ~1,800 feet of frontage on the east side of the Nashua River... proclaimed "Wild Life Sanctuary for The Benefit and Pleasure of the People of Groton". http://www.nashuariverwatershed.org/recreation/hiking-walking.html
	Ayer Game Farm & MDF&W NE Headquarters	~116	Previously used to raise pheasants for stocking, this property is now used as offices for the Office of Fishing & Boating Access. This property directly abuts the Groton Town Forest and Surrenden Farm.
	Surrenden Farm/ General Field	~325	Sitting prominently in a 1,500-acre block of contiguous protected open space, 360-acre Surrenden Farm was Groton's highest conservation priority until it was purchased by the town and several conservation organizations in 2006. With 3/4 mile of Nashua River frontage, forest and scenic rolling hayfields, Surrenden Farm had been one of the largest remaining unprotected landscapes in town. The General Field is 143 acres of agricultural land that has survived since early colonial times. www.tpl.org/our-work/surrenden-farm
	Unkety Brook WMA	Portion = 185 acres of a total of 527 acres	In Dunstable and Pepperell a 185-acre portion of the Unkety Brook WMA is located along the eastern bank Nashua River. These parcels lie between the river and DCR's rail trail, providing important wildlife habitat south of the confluence of Unkety Brook with the Nashua.
Nissitissit	Nissitissit River WMA	~625	Very popular for catch and release, hunting, bird watching, and hiking on abandoned rail bed which runs along the river. The section of the river from the NH border to the Prescott bridge in Pepperell is one of only 9 designated catch & release areas in the state. In addition, in this section anglers must use a conventional fly rod and fly line. The former Turner dam was removed in 2015, benefitting fish passage and restoring coldwater habitat.

River Segment	Protected Area	Acreage	Features
Squannacook	Squannacook River WMA, WCR and WCE	~2,008	This non-contiguous WMA extends from Shirley through Groton & Townsend to Ashby, consisting of almost 50 different fee-owned parcels. The Squannacook WCR is a 68-acre donated restriction on development of the South Fitchburg Hunting & Fishing Club that does not allow public access. The Squannacook WCE consists of 4 conservation-restricted parcels totaling 299 acres which are open to the public, 2 in Shirley at the confluence with the Nashua and 2 in Townsend, 1 of which is located in the headwaters. (2,008 total)
	Townsend State Forest	~3,082	Non-contiguous parcels owned by the MA Dept. of Conservation & Recreation. Portions are located across the river from & adjacent to portions of the Squannacook River WMA, while other large blocks extend away from the river to the NH border & include many small tributaries to the river & hiking trails.
	Willard Brook State Forest	~2,930	
	Bertozzi Conservation Area	~56 (42 acres in Groton and 14 acres are across the river in Shirley)	Municipal land adjacent to state Squannacook River WMA; popular swimming hole.



Map of permanently protected conservation lands with emphasis on those abutting the Nashua, Squannacook, and Nissitissit Rivers.

Other Supporting Programs

Conservation Organizations and Land Trusts

Many of the conservation groups in and around the eleven study towns have been supporters of the Wild and Scenic Study effort through participation of their members on the Study Committee as representatives or experts adding valuable information to the study. In addition to actively seeking out and protecting important land or resources in the towns, these organizations play a significant role in community outreach, education and land stewardship activities.

The following groups play a vital role in resource protection in the study area: Beaver Brook Association of Hollis, New Hampshire; the Massachusetts Department of Natural Resources; the Fish and Game Departments of New Hampshire and Massachusetts; the Society for Protection of New Hampshire Forests; the Nashoba Conservation Trust; the Nashua River Watershed Association; Mass Audubon; New England Forestry Foundation; The Nature Conservancy; Trust for Public Land; Groton Conservation Trust; The Trustees of Reservations; North County Land Trust; Townsend Land Conservation Trust; Harvard Conservation Trust; Sudbury Valley Trustees; Lancaster Land Trust; and Bolton Conservation Trust.

Non-regulatory State Programs:

Massachusetts

Chapter 61 Tax Abatement Programs (MA General Laws Ch. 61)

Chapter 61 Forestry (Ch. 61) applies to land growing forest products, including wood, timber, Christmas trees, and other products produced by forest vegetation. Landowners receive a property tax reduction in exchange for a commitment to keep their land undeveloped and to manage it for forest products. Ch. 61 is a good fit for landowners interested in actively managing their forestland.

Chapter 61A Agriculture (Ch. 61A) is for land growing agricultural or horticultural products, in-

cluding fruits, vegetables, ornamental shrubs, timber, animals, and maple syrup. Ch. 61A is a good fit for landowners engaged in agriculture on their land.

Chapter 61B Open Space and Recreation

(Ch. 61B) is for land in open space and/or recreation. Because there is no requirement for land enrolled in Ch. 61B to be managed or have a 10-year forest management plan, the Ch. 61B program is a good fit for landowners who take a passive approach to their land.

Conservation Restrictions A conservation restriction, formerly known as a conservation easement, is a means authorized by Sections 31-33 of Chapter 184 of the General Laws of the Commonwealth of Massachusetts to limit the use of land in order to protect specified conservation values including the natural, scenic or open condition of the land. As it is statutorily defined, a conservation restriction does not require re-recording as is the case with the conventional restrictions under Chapter 184, §26.

Agricultural Preservation Restrictions The Massachusetts APR program preserves and protects agricultural land, including designated farmland soils, which are a finite natural resource, from being built upon for non-agricultural purposes or used for any activity detrimental to agriculture. It is a voluntary program which offers a non-development alternative to farmers and other owners of "prime" and "state important" agricultural land who are faced with a decision regarding future use and disposition of their farms.

New Hampshire

Current Use Programs (NH RSA Ch. 79-A)

Reduce the property tax on undeveloped land by having the land assessed at its income producing rather than fair market value. It is a voluntary program. Landowners may enroll undeveloped land of 10 or more acres. Smaller parcels of wetlands or devoted to agriculture may also qualify for this program.

Conservation Easement or Restriction (NH RSA Ch. 79 – B) A legally binding agreement between

a landowner and the easement holder that restricts use of the land subject to the terms of the easement in order to protect its significant natural features including the preservation of open space. Another voluntary program.

Management Framework

The Nashua, Squannacook, and Nissitissit Rivers Stewardship Plan (February 2018), together with the Nashua, Squannacook, and Nissitissit Rivers Wild and Scenic Stewardship Council (Stewardship Council) that would be charged with its implementation, has been specifically developed to ensure that an adequate and successful management framework exists to meet the purposes of the Wild and Scenic River designation. This type of management framework has proven to be a successful approach in providing management coordination and implementation on the 12 other Partnership Wild and Scenic Rivers.

Stewardship Plan

Development of the Nashua, Squannacook, and Nissitissit Rivers Stewardship Plan (Stewardship Plan) was of central importance to the Study Committee, and the final, completed Stewardship Plan is available as a companion document to this Study Report. The Stewardship Plan is a guidance document for protection and enhancement of the Nashua River study area. It details the management framework and protection strategies and standards for identified Outstandingly Remarkable Values, free-flowing conditions, and water quality. Each of the eleven towns included in the Study Area formally endorsed the Stewardship Plan in 2018 through votes of their Town Meetings. Selectboards, land use commissions, and local organizations have endorsed the Plan as well. The Commonwealth of Massachusetts and State of New Hampshire support designation and the relevant state agencies intend to participate in the implementation of the Stewardship Plan. Endorsement of the Stewardship Plan by the partners substantiates suitability for designation by demonstrating local commitment to river conservation if the designation occurs.

Though existing protections are deemed adequate, it is important to ensure optimal protection of Outstandingly Remarkable Values (ORVs), water quality, and free-flowing character over time due to threats and a changing environment. To do so, the Study Committee identified a protection goal for each ORV, identified threats and management issues that could degrade ORV quality, noted potential gaps between these threats and *existing* protections, and recommended tools or techniques for improving protection and enhancement of the ORVs at the local level. This analysis and the protection strategies developed for the Stewardship Plan could potentially serve as a tool to protect and enhance the values of the Nashua, Squannacook, and Nissitissit Rivers whether or not Wild and Scenic designation is achieved.

The Stewardship Plan calls for the creation of the Stewardship Council charged with coordinating and overseeing its implementation. As with the Sudbury-Assabet-Concord Rivers, the Lamprey River, and the other designated Partnership Wild and Scenic Rivers, it is envisioned that the Stewardship Council would lead the Stewardship Plan implementation process in the event of a Wild and Scenic designation. Each of the key entities that would be the core membership of the Stewardship Council has endorsed its creation through the Stewardship Plan. These entities include: the eleven towns bordering the river segments, the Nashua River Watershed Association, and the National Park Service. The state agencies will also participate. It will be vital for the Stewardship Council to develop and maintain local and regional partnerships with towns and with other conservation organizations to achieve short and long-range Stewardship Plan goals. It will also be the Stewardship Council's responsibility to monitor the Outstandingly Remarkable Values, free-flowing character and water quality with respect to the degree they are protected, degraded or enhanced during implementation of the Stewardship Plan.

The purpose of the Stewardship Council is to lead and coordinate implementation of the Stewardship Plan by:

- Bringing together on a regular basis various parties responsible for river management.
- Facilitating agreements, cooperation, and coordination among parties.
- Providing a focus and a forum for all river interests to discuss and make recommendations regarding issues of concern.
- Assisting the National Park Service in implementation of the Wild and Scenic River designation and expenditure of potential federal funding for Stewardship Plan implementation (subject to Wild and Scenic River Designation).
- Assisting the National Park Service in the review of potentially adverse federal water resource development projects (subject to Wild and Scenic River Designation).

It would also be the responsibility of the Stewardship Council to:

- Address river-related issues through cooperative resolution.
- Review and update the Stewardship Plan.
- Promote public involvement and education.
- Promote river enhancement initiatives.
- Report to the member towns and organizations on the activities of the Committee.
- Prepare periodic status reports for the river communities.

Support for River Protection and National Wild and Scenic Designation

There was a high level of interest in the Wild and Scenic Study from the Study Committee, the study area towns, and the public throughout the study process. This interest developed into widespread support for the designation of Nashua, Squannacook, and Nissitissit Rivers as the Study progressed. The broad range of support from governing bodies, land use commissions, non-profit organizations, and local citizens is described below and in Appendix 2.

Evidence of Support

Study Committee

The Wild and Scenic Study Committee began meeting in October 2015 to fulfill its mission of supporting the Study process through facilitating public involvement, guiding research on potential ORVs, development of the Stewardship Plan, and assessing local support for the designation. The high level of volunteer commitment displayed throughout the course of the study is commendable. The Study Committee has stated its intention to continue meeting until the rivers gain designation and then begin the transition to the Wild and Scenic Stewardship Council in preparation for the potential designation.

The Nashua River Wild and Scenic Study Committee voted to endorse the Nashua, Squannacook, and Nissitissit Rivers Stewardship Plan and to recommend Wild and Scenic designation at its February 15, 2018 meeting.

Local Support

Town Support - Local communities were integrally involved in the Study process and Stewardship Plan development as noted in Appendices 2 and 3. The study towns' Planning Boards and Conservation Commissions gave support at their meetings prior to official town meeting votes and have provided letters of endorsement as shown in Appendix 2.

Each of the eleven riverfront towns overwhelmingly endorsed the Stewardship Plan and Wild and Scenic designation for the Nashua, Squannacook, and Nissitissit Rivers at their annual town meetings.

The following warrant article was approved at each Massachusetts town meeting:

To see if the Town of _____ will accept the Nashua, Squannacook, and Nissitissit Rivers Stewardship Plan developed by the Nashua River Wild and Scenic River Study Committee, together with its recommendation to seek Wild and Scenic River designation, or to take any other action relative thereto.

The following warrant article was approved at each New Hampshire town meeting:

To see if the town will accept the locally developed River Stewardship Plan drafted by the Nashua River Wild and Scenic Study Committee and its recommendation that the portion of the Nissitissit River flowing through {Brookline}{Hollis} be designated a Wild and Scenic River with the understanding it would not involve Federal acquisition or management of lands.

States Support

Several representatives of Massachusetts and New Hampshire state agencies were involved in the Study process and development of the Stewardship Plan. Each of these individuals provided vital information and support as the study progressed. There was a strong sense of commitment to follow through on the study and to implement the Stewardship Plan in the future (see List of Contributors). States support is also evidenced by the endorsement letters found in Appendix 2.

List of Key Endorsement Letters

The following is a list of many of the key endorsement letters received as of the publishing of this study report.

Federal Agencies

US Fish & Wildlife Service, Eastern MA National Wildlife Refuge Complex, Tom Eagle,
Acting Refuge Manager
US Geological Survey, New England Water Science Center, Keith Robinson, Director

MA and NH Governors

Governor Charles Baker
Governor Christopher Sununu

State Agencies

MA Executive Office of Energy & Environmental Affairs, Matthew Beaton, Secretary
MA Department of Conservation and Recreation, Leo Roy, Commissioner
MA Department of Environmental Protection, Martin Suuberg, Commissioner
MA Department of Fish and Game,

Ronald Amidon, Commissioner
MA Division of Ecological Restoration,
Beth Lambert, Director
NH Department of Environmental Services,
Robert Scott, Commissioner
NH Fish & Game Department,
Glenn Normandeau, Executive Director

MA Legislators

James Eldridge, MA State Senator
Dean Tran, MA State Senator
Jennifer Benson, MA State Representative
Sheila Harrington, MA State Representative
Kate Hogan, MA State Representative
Harold Naughton, MA State Representative

NH Legislators

Jim Belanger, NH State Representative
John Carr, NH State Representative
Carolyn Gargas, NH State Representative

National Heritage Area

Freedom's Way Heritage Association

Regional Planning Commissions

Metropolitan Area Planning Council
Montachusett Regional Planning Commission
Nashua Regional Planning Commission
Northern Middlesex Council of Governments

Local Land Trusts

Bolton Conservation Trust
Dunstable Rural Land Trust
Groton Conservation Trust
Harvard Conservation Trust
Lancaster Land Trust
Nashoba Conservation Trust
Nissitissit River Land Trust
North County Land Trust
Piscataquog Land Conservancy
Townsend Conservation Land Trust

Regional Land Trusts and Conservation Organizations

Beaver Brook Association
Groton Turtle Conservation
Lancaster Friends of the Nashua River
Mass Audubon
Massachusetts Rivers Alliance

Massachusetts Watershed Council
 Middlesex Conservation District
 Nashua River Watershed Association
 New England Forestry Foundation
 New Hampshire Audubon
 Society for the Protection of New Hampshire Forests
 The Merrimack Conservation Partnership
 The Nature Conservancy, Massachusetts Chapter
 The Nature Conservancy, New Hampshire Chapter
 The Trust for Public Land
 The Trustees of Reservations
 Worcester County Conservation District

Recreation Organizations

Ayer Parks Commission
 Ducks Unlimited, Nashua River Chapter
 Friends of Nashua River Rail Trail
 Groton Trails Committee
 Groton Greenway Committee
 Pepperell Horse Owners Association
 Squannacook Greenways, Inc.
 Townsend Rod and Gun Club
 Trout Unlimited, Squann-a-tissit Chapter
 Worcester County League of Sportsmen's Clubs

Historical and Cultural Organizations

Groton History Center
 Townsend Historical Society

Schools and Teachers

Carrie Boyden, Memorial Middle School Teacher
 Francis W. Parker Charter Essential School
 Groton School, Andy Anderson
 Lawrence Academy
 University of New Hampshire Cooperative Extension

Businesses, Chambers of Commerce, Rotaries, and Town Office of Community & Economic Development

Town of Ayer, Office of Community & Economic Development
 Evening Sun Fly Shop
 Hollingsworth & Vose Company
 Ice House Partners, Inc.
 Nashoba Paddler, LLC
 Nashoba Valley Chamber of Commerce
 North Central Massachusetts Chamber of Commerce
 Rotary Club of Ayer-Harvard-Shirley
 Rotary Club of Hollis-Brookline

Individuals

Bill Biswanger, Townsend MA, avid fisherman and columnist
 Eileen Donoghue, City Manager of Lowell, MA and former MA State Senator
 Bob Durand, President of Durand & Anastas Environmental Strategies, and former MA Secretary of Environmental Affairs
 Judd Gregg, former NH Senator and former NH Governor
 Libby Herland, former Refuge Manager, Eastern MA National Wildlife Refuge Complex, US Fish & Wildlife Service
 Leslie Luchonok, former Director of Area of Critical Environmental Concern Program at MA Department of Conservation and Recreation
 Marion Stoddart, NRWA Founder, Ayer, MA
 Dr. Michael Volmar, Archaeologist and former Chief Curator at Fruitlands Museum

Partnership Wild and Scenic River Model

NPS encouraged broad participation of local stakeholders in the study process and spent substantial time and effort considering and explaining the effects of the designation. Other Massachusetts rivers such as the Taunton as well as the Sudbury, Assabet, Concord, and the other Partnership Wild and Scenic Rivers, have established a model for designation and management which constitute a substantial track record for the practical and expected effects of a Wild and Scenic River designations in settings very similar to the Nashua Study area. These case studies and examples were explored with the affected communities and other stakeholders as a part of the study process. Common features of all of the existing Partnership Wild and Scenic Rivers (as noted in Chapter 1) include the following:

- No reliance on federal ownership of land in order to achieve the WSRA's goals of protecting and enhancing river values.
- Land use management is regulated through existing local and state authorities, the same as before a designation.
- Administration and implementation of a locally led Stewardship Plan is accomplished through a broadly participatory management committee, convened for each river specifically for this purpose.
- Responsibility for managing and protecting river resources is shared between the local, state, federal, and non-governmental partners on the committee.
- Reliance on volunteerism as a key to success.
- No National Park Service Superintendent, law enforcement, or similar elements of traditional federally managed units of the National Park System.

As a factor of suitability for Wild and Scenic River designation, the Partnership Wild and Scenic River model was used as the baseline for consideration of the likely impacts of designation. These are further refined in the Stewardship Plan, and discussed in Chapter 5 of this Report.

“Working Dams” Within the Study Area

As noted in Chapter 3, three “working dams” were identified within the Study Area: The Ice House Dam and Pepperell Dam on the mainstem Nashua River are both FERC licensed run-of-river hydroelectric facilities (Ice House Partners, FERC Project # P-12769; Pepperell Project, FERC Project # P-12721). The third “working dam” is the Hollingsworth & Vose dam on the Squannacook River (utilized for industrial manufacture processes by the Hollingsworth & Vose Corporation). The current management and operation of these facilities was researched in conjunction with the Study Committee as a part of the Study process. It was concluded that the current management of these

facilities is compatible with the Wild and Scenic River designation of the study rivers, and each facility has a long track record of cooperative management and protection efforts on the rivers with local communities and partner organizations such as the Nashua River Watershed Association. However, as a suitability consideration, to clarify future management and emphasize the “grandfathered” nature of the facilities, the NPS believes that short exclusion areas within the Wild and Scenic Designation areas are warranted. This approach, as further discussed in the Stewardship Plan and Appendix 4, has been endorsed by the Study Committee. For each facility, a short exclusion area that encompasses the principal project works/project facilities and all lands owned by the projects is being recommended.

Summary of General Findings of Suitability

The Suitability analysis of the Nashua River concludes the following:

- Analysis of existing local, state, federal, and non-regulatory protections applicable to the Nashua, Squannacook, and Nissitissit Rivers are found to adequately protect the rivers consistent with the purposes of the Wild and Scenic Rivers Act. These protections, combined with local support through town policies for river protection provide substantial protection to the river and its adjacent lands. When combined with the statutory protections that would be provided through the Wild and Scenic River designation, the Nashua, Squannacook, and Nissitissit Rivers' Outstandingly Remarkable Values, free-flowing character, and water quality would be adequately protected without the need for federal land acquisition or federal land ownership and management. This finding is consistent with similar findings that have been made for each of the existing Partnership Wild and Scenic Rivers, whereby the designating legislation for each of those rivers has prohibited the federal condemnation of lands, as provided for by Section 6(c) of the Wild and Scenic Rivers Act. It is anticipated that any designating legislation for the Nashua, Squannacook, and Nissitissit Rivers will likewise include such a provision. The Stewardship Plan has been developed with input from and to meet the needs of local, state, and federal stakeholders and programs. It has been endorsed as the Stewardship Plan for the Nashua, Squannacook, and Nissitissit Rivers by the riverfront towns. It would be utilized as the "Comprehensive Management Plan" called for by Section 3(d) of the Wild and Scenic Rivers Act, if the Nashua, Squannacook and Nissitissit Rivers are designated as components of the national system.
- The Nashua, Squannacook, and Nissitissit Rivers Stewardship Plan as implemented by the future Nashua, Squannacook, and Nissitissit Rivers Wild and Scenic Stewardship Council provides an appropriate and effective management framework for the long-term management and protection of the watercourses.
- Based upon the official record of endorsement from local governing bodies, citizens, local and regional non-governmental organizations as well as an endorsement from the Massachusetts and New Hampshire Legislatures and Offices of the Governor, it is concluded that there is sufficient support to make the river suitable for designation under the Wild and Scenic Rivers Act based on the Partnership Wild and Scenic Rivers model.

Summary

In summary, 52.8 miles of the Nashua, Squannacook and Nissitissit Rivers, are found to be eligible and suitable for Wild and Scenic River designation. The Nashua, Squannacook and Nissitissit Rivers are assigned a preliminary classification of 'scenic.'



Nashua River. Photo: Bill Nickerson.

Chapter 5: Consideration of Alternatives and Impacts

This chapter discusses alternatives considered as a part of the study process, as well as the reasonably foreseeable impacts associated with designation, as required by the Wild and Scenic Rivers Act and National Environmental Policy Act. For NEPA purposes, the NPS has concluded that such foreseeable impacts of designation are consistent with utilization of Categorical Exclusion 3.2R. The pertinent impacts of designation are fully discussed in this Report and its companion document the Stewardship Plan. Substantial public engagement and involvement has also occurred throughout the study process, and an additional 90 day public and agency review period is also a part of the WSRA specified process.

Alternatives

The purpose of this document is to report on the conduct and findings of the Wild and Scenic River Study of the Nashua, Squannacook, and Nissitissit Rivers, and determine the eligibility and suitability of the rivers under the relevant criteria of the Wild and Scenic Rivers Act. The scope of alternatives considered was further limited by coordination between the NPS and local and congressional study sponsors that occurred prior to study authorization, as reflected in the “Reconnaissance Report” (see Chapter 1, Study Background) which clearly established that only consideration of designation based

on the “Partnership Wild and Scenic River model” would be evaluated. Alternatives such as creation of a federally managed park area were therefore not investigated. This understanding was confirmed at the outset of the study through consideration by the Study Committee.

The review of eligibility and suitability, as described in previous chapters, did not produce any findings or results that would warrant consideration of any other alternative than designation or non-designation of the entire nominated river area under the principles of the Partnership WSR model. There was no impetus to consider partial designation scenarios or alternatives, as favorable suitability findings exist for all eligible segments. As such, no other alternatives are evaluated.

Designation of the Nashua, Squannacook, and Nissitissit Rivers as a component of the National Wild and Scenic River System would have modest impacts to the administration and management of the designated river segment.

Impacts of Designation

Overview

The designation as proposed would be based on 25 years of experience with the “Partnership Wild and Scenic Rivers” management model. The general principles of which include:

- No reliance on federal ownership of land in order to achieve the WSRA’s goals of protecting and enhancing river values.
- Land use management is regulated through existing local and state authorities, the same as before a designation.
- Administration and implementation of a locally led Management Plan is accomplished through a broadly participatory management committee, convened for each river specifically for this purpose.
- Responsibility for managing and protecting river resources is shared between the local, state, federal, and non-governmental partners on the committee.

- Reliance on volunteerism as a key to success.
- No National Park Service superintendent, law enforcement, or similar elements of traditional federally-managed units of the National Park System.

This administrative and management model effectively limits federal involvement to a role centered around: technical and financial assistance to the locally-based Management Council; implementation of Section 7 of the WSRA; coordination and communication functions.

Administrative Impacts

Administration of the rivers under the Wild and Scenic Rivers Act is detailed in the Stewardship Plan and summarized in Chapter 4. The centerpiece of administration would be creation of the Nashua Squannacook, and Nissitissit Wild and Scenic River Stewardship Council to partner with the NPS and oversee Stewardship Plan implementation. The Council would be strictly non-regulatory. It would serve as a vital communication and coordination body charged with overall implementation of the Plan through voluntary actions, public education, and technical and financial support to local communities and partners. Its operations would be funded, subject to congressional appropriations, through cooperative agreements authorized under the Wild and Scenic Rivers Act. This new entity would serve to increase attention and focus of all partners on the preservation of natural, cultural, and recreational values as described in the Plan.

Impacts on Federally Assisted Water Resource Development Projects

New protection for the designated segment would be provided through application of Section 7a of the Wild and Scenic Rivers Act against new federally-licensed hydroelectric development projects or potentially adverse impacts of “federally assisted water resource development projects.”

The Federal Power Commission [FERC] shall not license the construction of any dam, water conduit, reservoir, powerhouse, transmission line, or other project works under the Federal Power Act, as amended, on or directly affecting any river which is designated in section 3 of this Act as a component of the national wild and scenic rivers system or which is hereafter designated for inclusion in that system, and no department or agency of the United States shall assist by loan, grant, license, or otherwise in the construction of any water resources project that would have a direct and adverse effect on the values for which such river was established, as determined by the Secretary charged with its administration. Nothing contained in the foregoing sentence, however, shall preclude licensing of, or assistance to, developments below or above a wild, scenic or recreational river area or on any stream tributary thereto which will not invade the area or unreasonably diminish the scenic, recreational, and fish and wildlife values present in the area on the date of designation of a river as a component of the national wild and scenic rivers system.

Based upon application of Section 7a, no new hydroelectric developments could be licensed by FERC on the designated river segment. The two existing FERC licensed, run-of-river facilities (see Working Dams, Chapter 4) would be expected to continue to operate, and could be licensed/re-licensed in the future. As such, the existing baseline relating to hydroelectric developments would be effectively “grandfathered” as a part of the wild and scenic designation. New projects would not be allowed. Changes to the operation of the two existing FERC licensed facilities would need to be reviewed by the National Park Service for compatibility with the wild and scenic river designation. In particular, any changes that either inundated additional free-flowing river areas (raising of dam height) or changed downstream flow patterns (away from instantaneous run-of-river operation) would likely not pass wild and scenic review, and therefore not be allowed. Other sorts of project changes (modernization of turbines, changes to FERC license conditions or requirements, etc.) would be reviewed by NPS under

FERC agency consultation procedures to determine compatibility with the designation. To emphasize the “grandfathered” status of these projects, and clarify FERC jurisdiction to continue to manage the projects without the need for unnecessary NPS coordination, NPS is proposing short exclusion areas around both FERC projects (see discussions in Chapters 3 and 4, as well as in the Stewardship Plan). Proposed exclusion areas include the lands and working facilities of the projects (dams, tailraces, power houses, diversion structures, recreational facilities, etc.). These proposed exclusion areas were reviewed and developed in consultation with the Study Committee, and in consultation with the facility owners (see Appendix 4). The proposed exclusion area for the Pepperell Project has a range of options. The smaller exclusion area (1000 feet above and below the crest of the dam) is the most consistent with NPS’ stated desire to exclude small areas that encompass the lands and working facilities associated with all three projects. The larger exclusion areas would have no greater “grandfathering” effect on the Pepperell Project, while excluding important natural and recreational features from the designation unnecessarily. Assuming exclusion areas are implemented as a part of the designation, then future project changes that may be proposed would be reviewed under the “invade or unreasonably diminish” standards of Section 7a (applied to projects upstream, downstream, or on tributaries to designated Wild and Scenic River segments).

The prohibition against new hydroelectric project licensing is not likely to have any significant impact over the status quo, as there are no known, pending or likely proposals within the subject segment of the Nashua, Squannacook, and Nissitissit Rivers. Similarly, wild and scenic river review of future project changes to the two existing facilities is not likely to have a major impact on these projects since all of the lands and operating project works are anticipated to be excluded. Implementation of existing license provisions contained in the recreation management plan, fish passage provisions, and similar document will continue to be implemented by the FERC with NPS as a party. All indications are that these



Nashua River. Photo: Sarah Connell Campbell.

facilities will continue to operate as run-of-river facilities at their current crest heights for the foreseeable future with or without a wild and scenic river designation.

While it is impossible to know what, if any, changes to these facilities could be proposed in the future, existing constraints of the physical plants and the existing local, state and federal regulatory environment probably would limit these facilities to operations similar to the existing conditions with or without a wild and scenic river designation. It is possible that the designation could have a minor impact on the potential future licensing/relicensing of these facilities by the FERC due to an emphasis on the protection of wild and scenic river values as a part of the review process.

Similarly, the existing Hollingsworth & Vose Dam and associated facilities would be excluded from the designation, and would be considered a “grandfathered” industrial use. As such, no impact to the baseline operations of this facility would be anticipated or required. Significant changes to the current operation could trigger Wild and Scenic Rivers Act review (if federal assistance were involved). As with the “excluded” FERC projects, the standard of review for future proposed changes would be the “invade or unreasonably diminish” standard of Section 7a.

Other potential projects that could trigger review under Section 7 of the Act would include stream-bank stabilization projects or similar in-stream work requiring permits under Section 404 of the Clean Water Act (US Army Corps of Engineers). Such projects/permits would be reviewed for consistency with the designation, and NPS would generally promote natural stream channel design principles and techniques in their review/consideration (soil bioengineering techniques, incorporation of vegetation, etc.).

Bridge replacement projects often require Section 404 permits and may have federal funding associated with them, thereby triggering Wild and Scenic River review. Such replacements have been a frequent and routine occurrence on the Partnership Wild and Scenic Rivers throughout New England and the Northeast. Often there may be opportunities to improve free-flowing condition through removal on instream piers or other design changes. Opportunities also sometimes exist to improve recreational access associated with bridges. Scenic and historic qualities may also be involved in reviews. NPS and the Stewardship Council can be expected to advocate for the protection and enhancement of wild and scenic river values (free-flow, natural,

cultural and recreational values) in association with bridge replacement projects. This has the potential to impact how such projects get completed.

Impacts on other Federally Funded or Assisted Projects

The overall context and purpose of a wild and scenic river designation is to establish a federal policy to “protect and enhance” wild and scenic river values for the enjoyment of present and future generations, as articulated in Sections 1 and 10 of the Wild and Scenic Rivers Act:

Section 1:

(b) It is hereby declared to be the policy of the United States that certain selected rivers of the Nation which, with their immediate environments, possess outstandingly remarkable scenic, recreational, geologic, fish and wildlife, historic, cultural, or other similar values, shall be preserved in free-flowing condition, and that they and their immediate environments shall be protected for the benefit and enjoyment of present and future generations. The Congress declares that the established national policy of dam and other construction at appropriate sections of the rivers of the United States needs to be complemented by a policy that would preserve other selected rivers or sections thereof in their free-flowing condition to protect the water quality of such rivers and to fulfill other vital national conservation purposes.

Section 10:

(a) Each component of the national wild and scenic rivers system shall be administered in such manner as to protect and enhance the values which caused it to be included in said system without, insofar as is consistent therewith, limiting other uses that do not substantially interfere with public use and enjoyment of these values.

In this context, any federal agency undertaking projects that could impact the designated segment of the Nashua, Squannacook, and Nissitissit would consult with the National Park Service as an aspect of their normal project review procedures under the Na-

tional Environmental Policy Act (NEPA). The NPS would have the opportunity to comment on those projects to ensure that wild and scenic river values are recognized and protected. Such consultations would not carry the definitive weight of Section 7 of the Act (which only applies to federally assisted water resource development projects), but nonetheless could impact the implementation of other sorts of federally funded or assisted projects. The effect of such consultations would be to provide greater weight to the recognition and protection of values such as scenery, recreation, historic and cultural values associated with the designated river segment.

Other Potential Indirect Impacts of Designation

Wild and Scenic River designation can be anticipated to raise the overall awareness and visibility of the Nashua, Squannacook, and Nissitissit Rivers as a resource of national recognition and significance. This may improve the ability of local partners to raise grant funds and otherwise compete for resources directed toward conservation and recreation efforts. Similarly, the added recognition and awareness could impact decision makers at all levels (individuals, local boards, state, federal, non-governmental) to consider stewardship of river values in their decision making.

Recreational visitation could also increase, although the area already exists as a destination, and any future increase will likely be based on local marketing of the area as such, which is not likely to be driven by the designation. There is no data from the existing Partnership Wild and Scenic Rivers in New England that designation itself has led to significant recreational visitation.

Effects of Designation: Addressing Legislative Report Requirements

PL113-291 contained several special reporting requirements whereby Congress has directed the NPS to report on certain particular matters in the Nashua, Squannacook, Nissitissit Wild and Scenic River Study Report. Language from PL113-291 states:

Determine the Effect of Designation on:

- I. Existing commercial and recreational activities (such as hunting, fishing, trapping, recreational shooting, motor boat use, and bridge construction).
- II. Energy Related Infrastructure (authorization, construction, operation, maintenance, or improvement)
- III. State and Local authorities related to I and II

Discussion: Existing commercial and recreational activities were explored as a part of the study process. Detailed information regarding the wide variety of recreational uses is found in the eligibility chapter of this report and in the Stewardship Plan. The wide variety of recreational uses, including motorized boating and hunting, have been embraced within the Recreational “Outstandingly Remarkable” value. Partnership Wild and Scenic River designation would create no authority for the National Park Service to manage or regulate recreational activities. NPS does not issue recreational use permits or otherwise manage recreational usage in the Partnership Wild and Scenic Rivers.

Bridge construction or other construction activities which trigger federal permits subject to Section 7 of the Wild and Scenic Rivers Act (construction of federally assisted water resource development projects) would be subject to NPS review. These impacts are discussed in other sections of Chapters 4 and 5 of this Report. Numerous bridges have been replaced on New England Partnership Wild and Scenic Rivers over the last 25 years. No outstanding issues were identified regarding bridges or planned bridge construction projects during the course of the study.

Three commercial, “working dams” were identified and researched during the Study. These have been extensively treated in both this Report and the Stewardship Plan. No impacts to these facilities is anticipated. Small “exclusion areas” around each facility are recommended to clarify and strengthen the “grandfathered” nature of these facilities, and to clarify ongoing and future management responsibilities.

The two identified FERC hydroelectric facilities are the only known energy –related infrastructure projects potentially impacted by designation. At the outset of the Study, Tennessee Gas Pipeline Company had filed a Notice of Intent to prepare an EIS for the Northeast Energy Direct Project (FERC Docket PF14-22-000). This project as initially scoped could have crossed several Nashua River tributaries. However, the company abandoned the proposal prior to any coordination or comments being filed. In the event that this or a similar project were to be proposed, the review procedures of the Wild and Scenic Rivers Act discussion in this Report would apply.

Identify Any WSR-Related Authorities by which DOI could or would:

- I. Influence Local Land Use Decisions (zoning, etc.)
- II. Restrict use of non-federal lands
- III. Condemn Property

Discussion: The potential authority of the NPS to influence or compel disposition of private or non-federal lands relates back to the potential condemnation authority of the Wild and Scenic Rivers Act. Without such authority, no direct or indirect means to compel or regulate non-federal lands exists in the Act. It is an essential provision of the Partnership Wild and Scenic Rivers model that designating legislation include a prohibition against such use of condemnation authority. All of the existing Partnership WSRs contain such a legislative prohibition, and it is essential to the model as discussed in this Report and as incorporated into the provisions of the Stewardship Plan.

The potential of the Nashua, Squannacook, and Nissitissit Wild and Scenic Rivers designation, as discussed in this Report and in the Stewardship Plan, to influence local land use decisions or local land use regulation relates solely to the voluntary measures that communities may undertake in response to the Stewardship Plan. The Plan contains many strategies and opportunities for communities to pursue through their normal local procedures to

work together to continue the very strong progress that has been made to manage and protect the three rivers. It is entirely possible that communities will utilize the impetus of joining into the Wild and Scenic River designation, through Town Meeting support for the Stewardship Plan and Wild and Scenic designation, as an opportunity to strengthen local river protections through zoning, subdivision regulations, and similar related means. It is important to note, however that neither the Stewardship Plan nor designation require any changes - all of the communities have existing, robust schemes in place that form an adequate basis for the designation (see Appendix B of the Stewardship Plan).

Identify Private Lands Associated with the WSR Study Areas

Discussion: Private lands within the study area have been identified and are portrayed on the Land Ownership map in Chapter 2. No direct impacts to the management or regulation of these lands would accompany designation. Indirect impacts through local community initiatives to implement the Stewardship Plan would need to be proposed, developed, reviewed and adopted through standard community procedures. The Stewardship Plan contains a full discussion of land management and the local community regulations associated with the preservation of outstanding resources.

Anticipated Costs of Designation

The anticipated direct annual cost of designation is expected to be similar to the established Partnership Wild and Scenic Rivers funded through congressional appropriations. In FY17 and 18, the total costs of administration funded through federal appropriations averaged approximately \$170,000 per river. The NPS considers this level of funding adequate to implement the designations consistent with approved Plans, and has become an established “baseline” funding level for the Partnership Rivers.

History with the established Partnership Rivers indicates that this level of federal investment is leveraged many times over through local, state, federal, and non-governmental partners working voluntarily to implement the management plans. In 2017, the NPS published a “20 Years of Success” report for the Partnership Rivers, documenting many highlights of leveraged successes associated with the designation model. These leveraged contributions from partner organizations could be considered indirect costs associated with the designation, as could the time that volunteers serving on the Stewardship Council will commit. For estimation purposes, the indirect costs associated with voluntary partners contributions associated with the Stewardship Council and Wild and Scenic River protection and enhancement initiatives under the Stewardship Plan will likely equal or exceed the direct federal costs.

Summary of Expected Impacts

Under the Wild and Scenic River designation, the National Park Service would become a federal partner and advocate for the preservation of identified wild and scenic river values in the context of federally funded or assisted projects that could impact river values. The Stewardship Council would be created as a non-regulatory communication and coordination body focused on spurring implementation of the Stewardship Plan. Existing industrial uses, including two FERC projects and the H&V facility would be grandfathered, with existing operations unaffected. New hydroelectric developments would be prohibited. Designation would elevate the status and perception of the river and its values at the local, state, and federal levels. Consistent with past experience on 13 similar “Partnership Wild and Scenic Rivers,” it is anticipated that these impacts will have a steady, modest, long-term effect of helping ensure that identified river values are protected and enhanced.

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The Study Report Draft will be made available for public comment through the NPS Planning, Environment & Public Comment website. In addition, hard copies will be sent to the following list of state and federal agencies:

Federal Agency Head

Secretary of the Interior – Ryan Zinke

Secretary of Agriculture – Sonny Perdue

Chief of Army Corps of Engineers – Todd Semonite

Administrator Environmental Protection Agency – Andrew Wheeler

Chairman of Federal Energy Regulatory Commission (FERC) – Kevin McIntyre
Administrator of Federal Emergency Management Agency – Brock Long

Administrator of Department of Transportation and Federal Highways Department – Elaine Chao

Head of any other affected federal department or agency

Regional and State Federal Agency Heads

Regional Forester of Eastern Region of USDA Forest Service -

State Conservationist of USDA Natural Resource Conservation Service

Commander and District Engineer of New England District of Army Corp of Engineers

Northeast Regional Director of US Fish & Wildlife Service

Regional Administrator Region 1 of Federal Emergency Management Agency

Regional Administrator Region 1 of Environmental Protection Agency

Massachusetts Division Administrator of US Department of Transportation Federal Highways Department

Head of any other affected federal department or agency

Commonwealth of Massachusetts

Governor Charles D. Baker

State of New Hampshire

Governor Chris Sununu

Heads of any other state departments

Nashua River Study documents will be posted on the following websites for public view and formal comment:

<http://parkplanning.nps.gov/>

<https://www.wildandscenicnashuarivers.org/>

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Appendices

Appendix 1: Nashua River Study Act

A Portion of The Carl Levin And Howard P. “Buck” McKeon National Defense Authorization Act For Fiscal Year 2015 (Only Pertinent Section Copied Here)

128 Stat. 3848 Public Law 113–291—Dec. 19, 2014

PL 113—291 (Excerpt)

SEC. 3074. STUDIES OF WILD AND SCENIC RIVERS.(a) DESIGNATION FOR STUDY.—Section 5(a) of the Wild and Scenic Rivers Act (16 U.S.C. 1276(a)) is amended by inserting after paragraph (141), as added by section 3041(e), the following: “(142) BEAVER, CHIPUXET, QUEEN, WOOD, AND PAWCATUCK RIVERS, RHODE ISLAND AND CONNECTICUT.—The following segments: “(A) The approximately 10-mile segment of the Beaver River from the headwaters in Exeter, Rhode Island, to the confluence with the Pawcatuck River. “(B) The approximately 5-mile segment of the Chipuxet River from Hundred Acre Pond to the outlet into Worden Pond. “(C) The approximately 10-mile segment of the upper Queen River from the headwaters to the Usquepaugh Dam in South Kingstown, Rhode Island, including all tributaries of the upper Queen River. “(D) The approximately 5-mile segment of the lower Queen (Usquepaugh) River from the Usquepaugh Dam to the confluence with the Pawcatuck River. “(E) The approximately 11-mile segment of the upper Wood River from the headwaters to Skunk Hill Road in Richmond and Hopkinton, Rhode Island, including all tributaries of the upper Wood River. “(F) The approximately 10-mile segment of the lower Wood River from Skunk Hill Road to the confluence with the Pawcatuck River. “(G) The approximately 28-mile segment of the Pawcatuck River from Worden Pond to Nooseneck Hill Road (Rhode Island Rte 3) in Hopkinton and Westerly, Rhode Island. “(H) The approximately 7-mile segment of the lower Pawcatuck River from Nooseneck Hill Road to Pawcatuck Rock, Stonington, Connecticut, and Westerly, Rhode Island. “(143) NASHUA RIVER, MASSACHUSETTS.—The following segments: “(A) The approximately 19-mile segment of the mainstem of the Nashua River from the confluence with the North and South Nashua Rivers in Lancaster, Massachusetts, north to the Massachusetts-New Hampshire State line, excluding the approximately 4.8-mile segment of the mainstem of the Nashua River from the Route 119 bridge in Groton, Massachusetts, downstream to the confluence with the Nissitissit River in Pepperell, Massachusetts. “(B) The 10-mile segment of the Squannacook River from the headwaters at Ash Swamp downstream to the confluence with the Nashua River in the towns of Shirley and Ayer, Massachusetts. “(C) The 3.5-mile segment of the Nissitissit River from the Massachusetts-New Hampshire State line downstream to the confluence with the Nashua River in Pepperell, Massachusetts. “(144) YORK RIVER, MAINE.—The segment of the York River that flows 11.25 miles from the headwaters of the York River at York Pond to the mouth of the river at York Harbor, and any associated tributaries.”. (b) STUDY AND REPORT.—Section 5(b) of the Wild and Scenic Rivers Act (16 U.S.C. 1276(b)) is amended by inserting after paragraph (20), as added by section 3041(e), the following: “(21) BEAVER, CHIPUXET, QUEEN, WOOD, AND PAWCATUCK RIVERS, RHODE ISLAND AND CONNECTICUT; NASHUA RIVER, MASSACHUSETTS; YORK RIVER, MAINE.— “(A) IN GENERAL.—Not later than 3 years after the date on which funds are made available to carry out this paragraph, the Secretary of the Interior shall— “(i) complete each of the studies described in paragraphs (142),

(143), and (144) of subsection (a); and “(ii) submit to the Committee on Natural Resources of the House of Representatives and the Committee on Energy and Natural Resources of the Senate a report that describes the results of each of the studies. “(B) REPORT REQUIREMENTS.—In assessing the potential additions to the wild and scenic river system, the report submitted under subparagraph (A)(ii) shall— “(i) determine the effect of the designation on— “(I) existing commercial and recreational activities, such as hunting, fishing, trapping, recreational shooting, motor boat use, and bridge construction; “(II) the authorization, construction, operation, maintenance, or improvement of energy production, transmission, or other infrastructure; and “(III) the authority of State and local governments to manage the activities described in sub clauses (I) and (II); “(ii) identify any authorities that, in a case in which an area studied under paragraph (142), (143), or (144) of subsection (a) is designated under this Act— “(I) would authorize or require the Secretary of the Interior— “(aa) to influence local land use decisions, such as zoning; or “(bb) to place restrictions on non-Federal land if designated under this Act; and “(II) the Secretary of the Interior may use to condemn property; and “(iii) identify any private property located in an area studied under paragraph (142), (143), or (144) of subsection (a).”.

Appendix 2: Record of Endorsements, Certifications, and Support for the Wild and Scenic Designation

Town Board and Commission Votes Prior to the Annual Town Meetings

Ayer Board of Selectmen
Ayer Conservation Commission
Ayer Planning Board
Bolton Board of Selectmen
Bolton Conservation Commission
Bolton Planning Board
Dunstable Board of Selectmen
Dunstable Conservation Commission
Dunstable Planning Board
Groton Board of Selectmen
Groton Conservation Commission
Groton Planning Board
Harvard Board of Selectmen
Harvard Conservation Commission
Harvard Planning Board
Lancaster Board of Selectmen
Lancaster Conservation Commission
Lancaster Planning Board
Pepperell Board of Selectmen
Pepperell Conservation Commission
Pepperell Planning Board
Shirley Board of Selectmen
Shirley Conservation Commission
Shirley Planning Board
Townsend Board of Selectmen
Townsend Conservation Commission
Townsend Planning Board
Devens Enterprise Commission

Town Certifications of Affirmative Votes at the Annual Town Meetings

Brookline, NH - March 14, 2018
Hollis, NH - March 17, 2018
Townsend, MA - May 1, 2018
Harvard, MA - May 5, 2018
Bolton, MA - May 7, 2018
Groton, MA - May 7, 2018
Lancaster, MA - May 7, 2018

Pepperell, MA - May 7, 2018
Ayer, MA - May 14, 2018
Shirley, MA - May 14, 2018
Dunstable, MA - May 17, 2018

Additional Letters of Support

Federal Agencies

US Fish & Wildlife Service, Eastern MA National
Wildlife Refuge Complex, Tom Eagle,
Acting Refuge Manager
US Geological Survey, New England Water
Science Center, Keith Robinson, Director

MA and NH Governors

Governor Charles Baker
Governor Christopher Sununu

State Agencies

MA Executive Office of Energy & Environmental
Affairs, Matthew Beaton, Secretary
MA Department of Conservation and Recreation,
Leo Roy, Commissioner
MA Department of Environmental Protection,
Martin Suuberg, Commissioner
MA Department of Fish and Game,
Ronald Amidon, Commissioner
MA Division of Ecological Restoration,
Beth Lambert, Director
NH Department of Environmental Services,
Robert Scott, Commissioner
NH Fish & Game Department,
Glenn Normandeau, Executive Director

MA Legislators

James Eldridge, MA State Senator
Dean Tran, MA State Senator
Jennifer Benson, MA State Representative
Sheila Harrington, MA State Representative
Kate Hogan, MA State Representative
Harold Naughton, MA State Representative

NH Legislators

Jim Belanger, NH State Representative
John Carr, NH State Representative
Carolyn Gargas, NH State Representative

National Heritage Area

Freedom's Way Heritage Association

Regional Planning Commissions

Metropolitan Area Planning Council
Montachusett Regional Planning Commission
Nashua Regional Planning Commission
Northern Middlesex Council of Governments

Local Land Trusts

Bolton Conservation Trust
Dunstable Rural Land Trust
Groton Conservation Trust
Harvard Conservation Trust
Lancaster Land Trust
Nashoba Conservation Trust
Nissitissit River Land Trust
North County Land Trust
Piscataquog Land Conservancy
Townsend Conservation Land Trust

Regional Land Trusts and Conservation Organizations

Beaver Brook Association
Groton Turtle Conservation
Lancaster Friends of the Nashua River
Mass Audubon
Massachusetts Rivers Alliance
Massachusetts Watershed Council
Middlesex Conservation District
Nashua River Watershed Association
New England Forestry Foundation
New Hampshire Audubon
Society for the Protection of New Hampshire Forests
The Merrimack Conservation Partnership
The Nature Conservancy, Massachusetts Chapter
The Nature Conservancy, New Hampshire Chapter
The Trust for Public Land
The Trustees of Reservations
Worcester County Conservation District

Recreation Organizations

Ayer Parks Commission
Ducks Unlimited, Nashua River Chapter
Friends of Nashua River Rail Trail

Groton Trails Committee
Groton Greenway Committee
Pepperell Horse Owners Association
Squannacook Greenways, Inc.
Townsend Rod and Gun Club
Trout Unlimited, Squann-a-tissit Chapter
Worcester County League of Sportsmen's Clubs

Historical and Cultural Organizations

Groton History Center
Townsend Historical Society

Schools and Teachers

Carrie Boyden, Memorial Middle School Teacher
Francis W. Parker Charter Essential School
Groton School, Andy Anderson
Lawrence Academy
University of New Hampshire Cooperative Extension

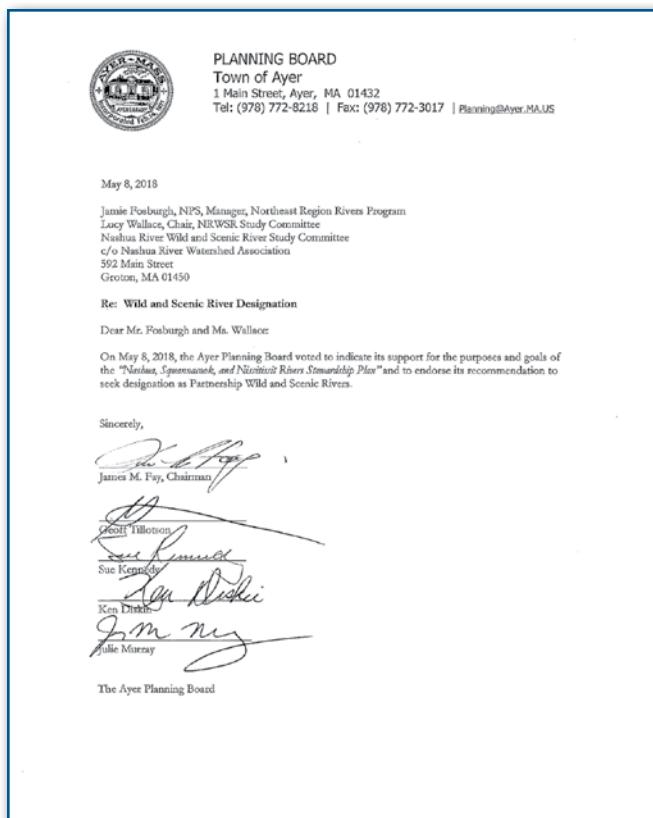
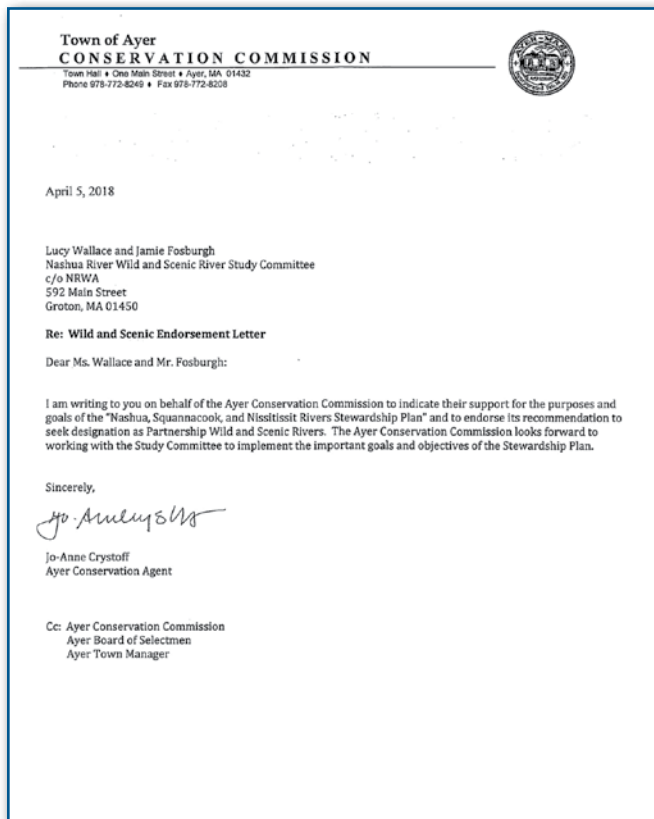
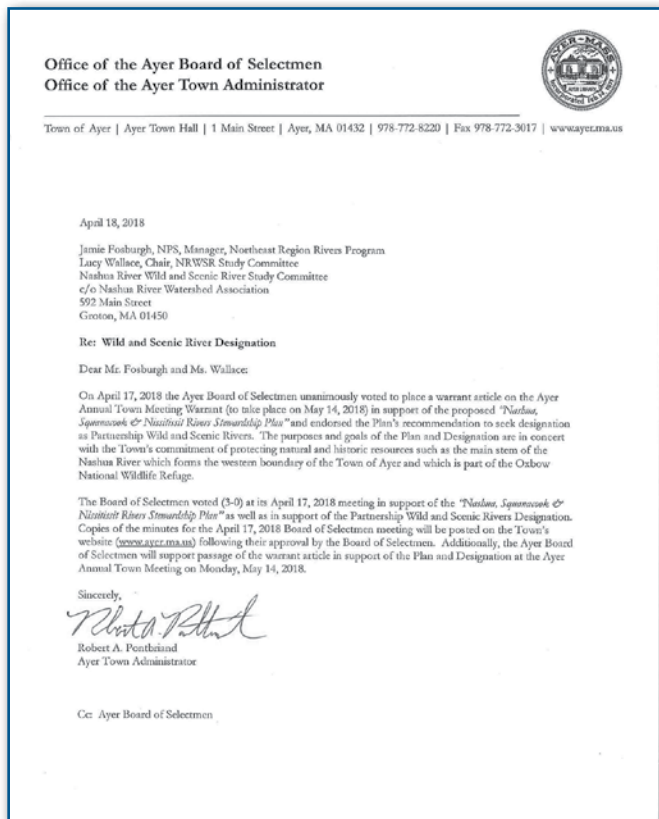
Businesses, Chambers of Commerce, Rotaries, and Town Office of Community & Economic Development

Town of Ayer, Office of Community &
Economic Development
Evening Sun Fly Shop
Hollingsworth & Vose Company
Ice House Partners, Inc.
Nashoba Paddler, LLC
Nashoba Valley Chamber of Commerce
North Central Massachusetts Chamber of Commerce
Rotary Club of Ayer-Harvard-Shirley
Rotary Club of Hollis-Brookline

Individuals

Bill Biswanger, Townsend MA, avid fisherman
and columnist
Eileen Donoghue, City Manager of Lowell, MA
and former MA State Senator
Bob Durand, President of Durand & Anastas
Environmental Strategies, and former
MA Secretary of Environmental Affairs
Judd Gregg, former NH Senator and
former NH Governor
Libby Herland, former Refuge Manager,
Eastern MA National Wildlife Refuge Complex,
US Fish & Wildlife Service
Leslie Luchonok, former Director of Area of
Critical Environmental Concern Program at MA
Department of Conservation and Recreation
Dr. Michael Volmar, Archaeologist and former
Chief Curator at Fruitlands Museum
Marion Stoddart, NRWA Founder, Ayer, MA

Town Board and Commission Votes Prior to the Annual Town Meetings





Board of Selectmen Bolton, Massachusetts

Town Hall, 663 Main Street, Bolton, MA 01740
Phone 978-779-2297 Fax 978-779-5461

April 12, 2018

Jamie Fosburgh, NPS, Manager, Northeast Region Rivers Program
Lucy Wallace, Chair, NRWSR Study Committee
Nashua River Wild and Scenic River Study Committee
c/o Nashua River Watershed Association
592 Main Street
Groton, MA 01450

RE: Wild and Scenic River Designation

Dear Mr. Fosburgh and Ms. Wallace:

I am writing on behalf of the Conservation Commission to indicate its support for the purposes and goals of the "Nashua, Squannacook, and Nissitissit Rivers Stewardship Plan" and to endorse its recommendation to seek designation as Partnership Wild and Scenic Rivers. This position was taken by formal vote of the Board at their meeting on Thursday, April 12, 2018. For copies of the minutes for this meeting please visit our website www.townofbolton.com.

Sincerely,


Stanley Wysocki
Chairman



Bolton, Massachusetts 01740

4/24/2018

Jamie Fosburgh, NPS, Manager, Northeast Region Rivers Program
Lucy Wallace, Chair, NRWSR Study Committee
Nashua River Wild and Scenic River Study Committee
c/o Nashua River Watershed Association
592 Main Street
Groton, MA 01450

RE: Wild and Scenic River Designation

Dear Mr. Fosburgh and Ms. Wallace:

I am writing on behalf of the Conservation Commission to indicate its support for the purposes and goals of the "Nashua, Squannacook, and Nissitissit Rivers Stewardship Plan" and to endorse its recommendation to seek designation as Partnership Wild and Scenic Rivers. This position was taken by formal vote of the Board at their meeting on April 24, 2018. For copies of the minutes for the April 24, 2018 Conservation Commission meeting please visit our website <https://www.townofbolton.com/conservation-commission>.

Sincerely,



Chair, Brian Berube
Town of Bolton
Conservation Commission
978-779-3304
concom@townofbolton.com



Town of Bolton

Town Hall, 663 Main Street, Bolton, MA 01740
Phone 978-779-3308 Fax 978-779-5461
townplanner@townofbolton.com

4/11/2018

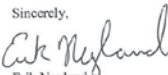
Jamie Fosburgh, NPS, Manager, Northeast Region Rivers Program
Lucy Wallace, Chair, NRWSR Study Committee
Nashua River Wild and Scenic River Study Committee
c/o Nashua River Watershed Association
592 Main Street
Groton, MA 01450

RE: Wild and Scenic River Designation

Dear Mr. Fosburgh and Ms. Wallace:

I am writing on behalf of the Bolton Planning Board to indicate its support for the purposes and goals of the "Nashua, Squannacook, and Nissitissit Rivers Stewardship Plan" and to endorse its recommendation to seek designation as Partnership Wild and Scenic Rivers. This position was taken by formal vote of the Board at their meeting on April 11, 2018. For copies of the minutes or video recording of the April 11, 2018 Planning Board meeting please visit our website at www.townofbolton.com.

Sincerely,


Erik Neyland
Planning Board Chairman



BOARD OF SELECTMEN
TOWN OF DUNSTABLE
511 MAIN STREET
DUNSTABLE, MA 01827-1313
(978) 649-4514 FAX (978) 649-4371

April 18, 2018

Lucy Wallace and Jamie Fosburgh
Nashua River Wild and Scenic
River Study Committee
c/o NRWA
592 Main Street
Groton, MA 01450

RE: Wild and Scenic Endorsement Letter

Dear Ms. Wallace and Mr. Fosburgh:

I am writing on behalf of the Dunstable Board of Selectmen to indicate our support for the purposes and goals of the "Nashua, Squannacook, and Nissitissit Rivers Stewardship Plan" and to endorse its recommendation to seek designation as Partnership Wild and Scenic Rivers. This position was taken by formal vote of the Board at their meeting on April 18, 2018. For copies of the minutes for the April 18, 2018 Board of Selectmen meeting please visit our website (www.dunstable-ma.gov).

Sincerely,


Walter Alterisio
Chairman



OFFICE OF THE
CONSERVATION COMMISSION
TOWN HALL, 511 MAIN STREET
DUNSTABLE, MA 01827-1313
(978) 649-4514 FAX (978) 649-8893
mailto:concom@dunstable-ma.gov

April 9, 2018

**Nashua River Wild and Scenic
River Study Committee**
c/o Nashua River Watershed Association
592 Main Street
Groton, MA 01450

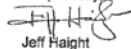
Attn: Lucy Wallace and Jamie Fosburgh

RE: Wild and Scenic Endorsement Letter

Dear Ms. Wallace and Mr. Fosburgh:

I am writing on behalf of the Dunstable Conservation Commission to indicate their support for the purposes and goals of the "Nashua, Squannacook, and Nissitissit Rivers Stewardship Plan" and to endorse its recommendation to seek designation as Partnership Wild and Scenic Rivers. This position was taken by formal vote of the Commission at their meeting on April 9, 2018. For copies of the minutes for the April 9, 2018 Conservation Commission meeting please visit our website at www.dunstable-ma.gov

Respectfully,


Jeff Haight
Chair
Dunstable Conservation Commission



OFFICE OF THE
PLANNING BOARD
TOWN HALL, 511 MAIN STREET
DUNSTABLE, MA 01827-1313

April 17, 2018

**Nashua River Wild and Scenic
River Study Committee**
c/o Nashua River Watershed Association
592 Main Street
Groton, MA 01450

Attn: Lucy Wallace and Jamie Fosburgh

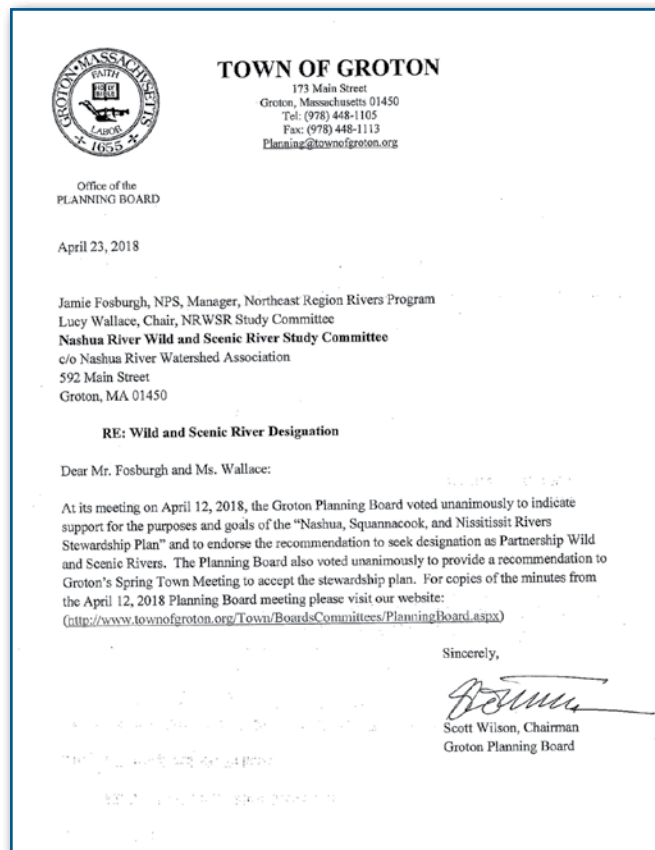
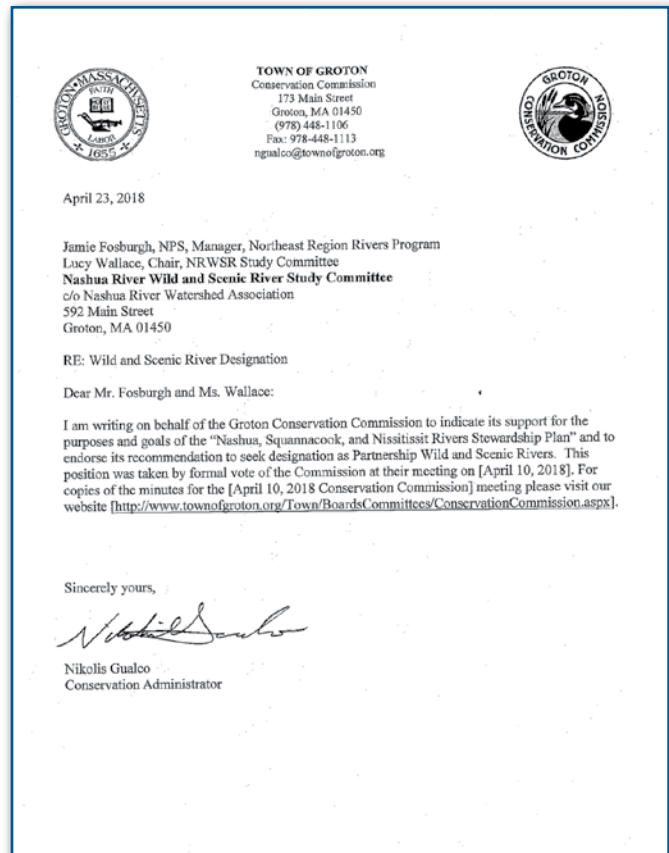
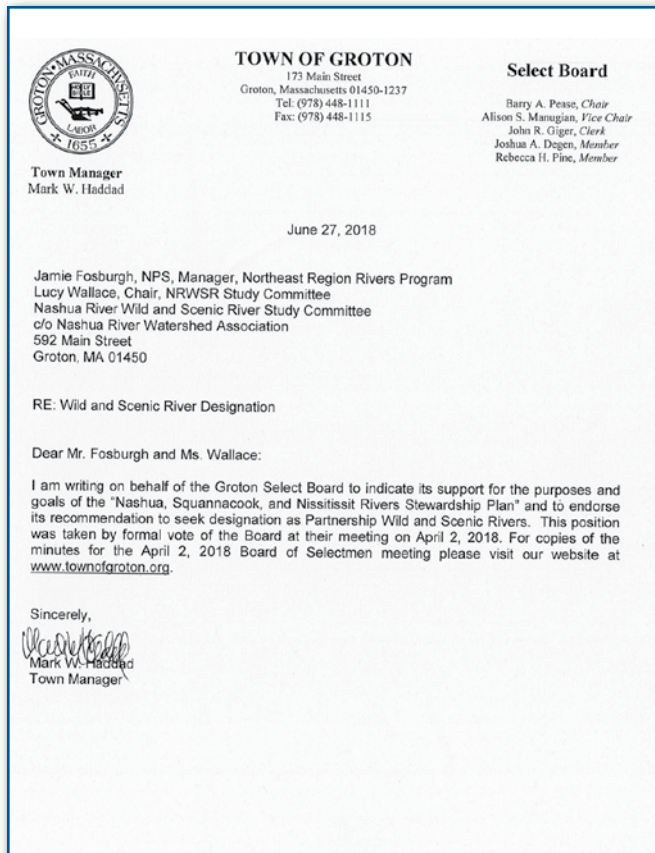
RE: Wild and Scenic Endorsement Letter

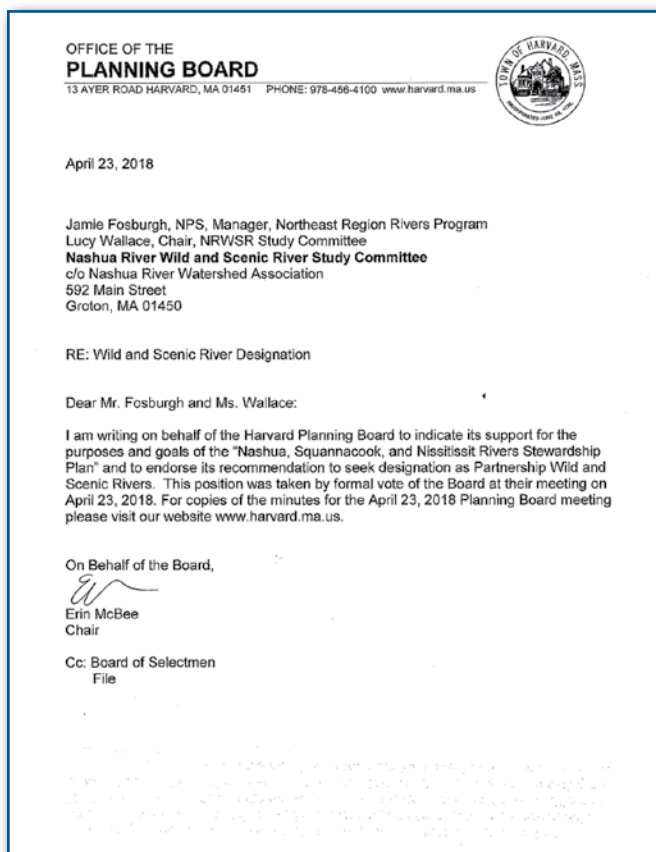
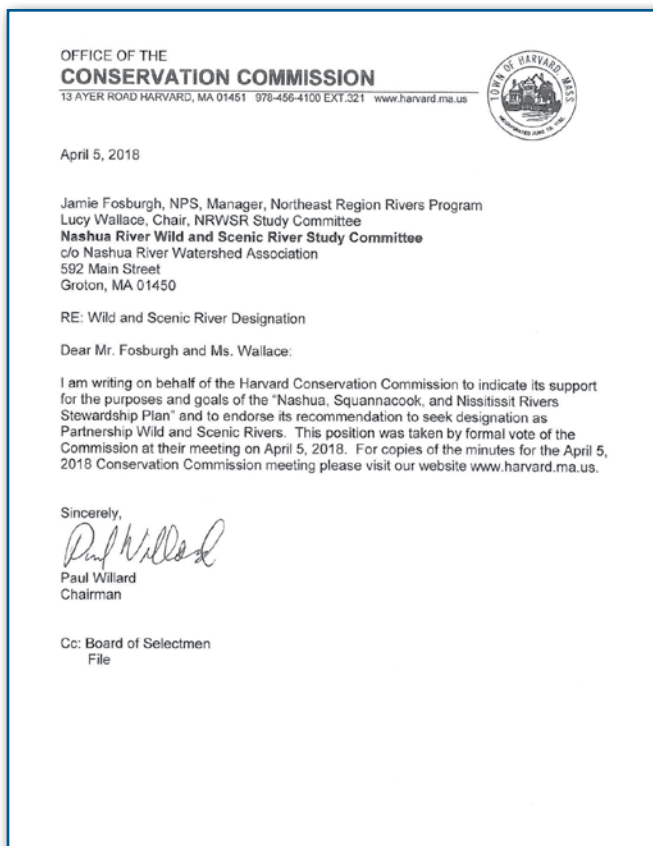
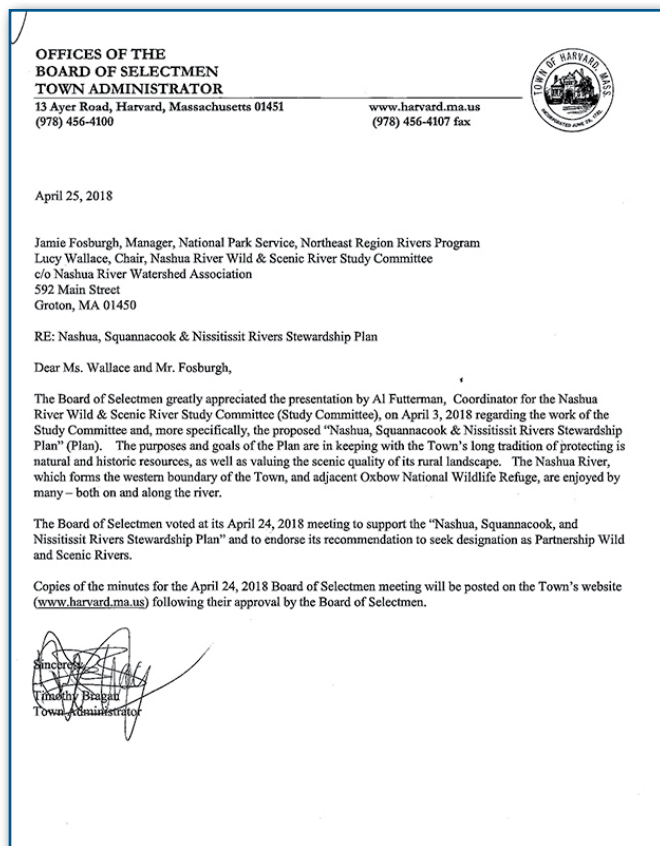
Dear Ms. Wallace and Mr. Fosburgh:

I am writing on behalf of the Dunstable Planning Board to indicate their support for the purposes and goals of the "Nashua, Squannacook, and Nissitissit Rivers Stewardship Plan" and to endorse its recommendation to seek designation as Partnership Wild and Scenic Rivers. This position was taken by formal vote of the Board at their meeting on April 17, 2018. For copies of the minutes for the April 17, 2018 Planning Board meeting please visit our website at www.dunstable-ma.gov

Respectfully,


Joshua Kelly
Chairman
Dunstable Planning Board







Town of Lancaster
Office of the Board of Selectmen
701 Main Street, Suite 1
Lancaster, MA 01523

Stanley B. Starr, Jr., Chairman
Walter F. Siodrowski, Clerk
Mark A. Gouss, Jr., Member

Orlando Pacheco, Town Administrator
Kathleen A. Bacon, Executive Assistant

April 3, 2018

Mr. Jamie Fosburgh, NPS Northeast Regional Rivers Program Manager
Ms. Lucy Wallace, Chair, NRWSR Study Committee Chair
c/o Nashua River Watershed Association
592 Main Street
Groton, MA 01450

Re: Wild and Scenic River Designation

Dear Mr. Fosburgh and Ms. Wallace,

The Lancaster Board of Selectmen supports the purposes and goals of the "Nashua, Squannacook and Nissitissit Rivers Stewardship Plan" and endorses its recommendation to seek designation as Partnership Wild and Scenic Rivers. This action was voted by the Board of Selectmen at their meeting on April 2, 2018.

Sincerely,

Stanley B. Starr, Jr., Chair



Town of Lancaster
701 Main Street, Suite 4
Lancaster, MA 01523
Telephone: 978-365-3326 ext.1054
Fax: 978-368-4009
E-mail: dkoonce@lancasterma.net

Office of the
Conservation Commission

March 27, 2018

Mr. Jamie Fosburgh, NPS Northeast Regional Rivers Program Manager
Ms. Lucy Wallace, Chair, NRWSR Study Committee Chair
c/o Nashua River Watershed Association
592 Main Street
Groton, MA 01450

Re: Wild and Scenic River Designation

Dear Mr. Fosburgh and Ms. Wallace,

The Lancaster Conservation Commission supports the purposes and goals of the "Nashua, Squannacook and Nissitissit Rivers Stewardship Plan", and endorses its recommendation to seek designation as Partnership Wild and Scenic Rivers. This action was voted by the Commission at the meeting on March 27, 2018.

Sincerely,

Kenneth Rapoza
Chairman



TOWN OF LANCASTER
Community Development & Planning

Tel: (978) 365-3326
Fax: (978) 368-4009

701 Main Street, Suite 4
Lancaster, MA 01523

April 10, 2018

Mr. Jamie Fosburgh, NPS Northeast Regional Rivers Program Manager
Ms. Lucy Wallace, NRWSR Study Committee Chair
c/o Nashua River Watershed Association
592 Main Street
Groton, MA 01450

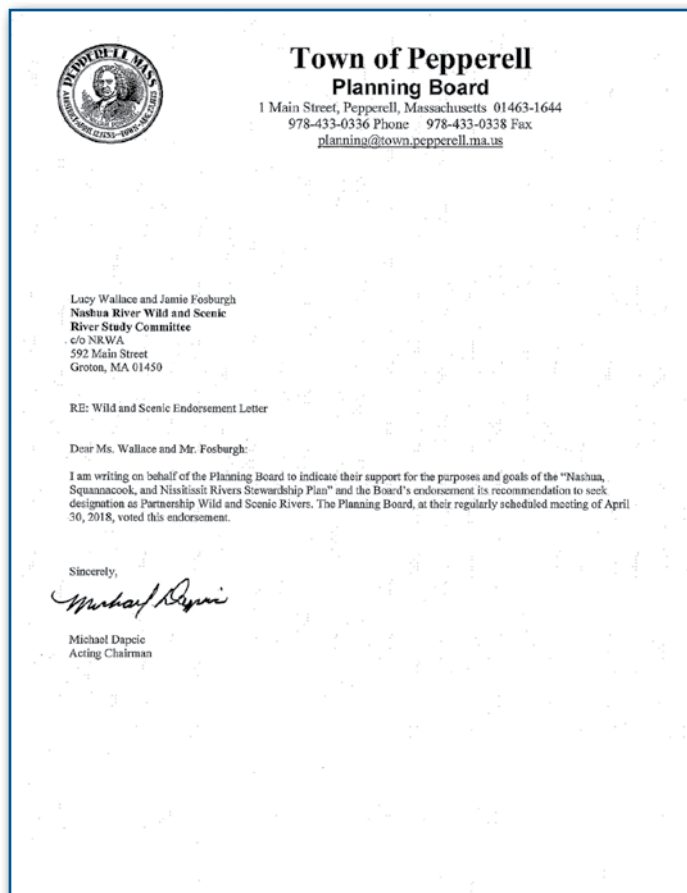
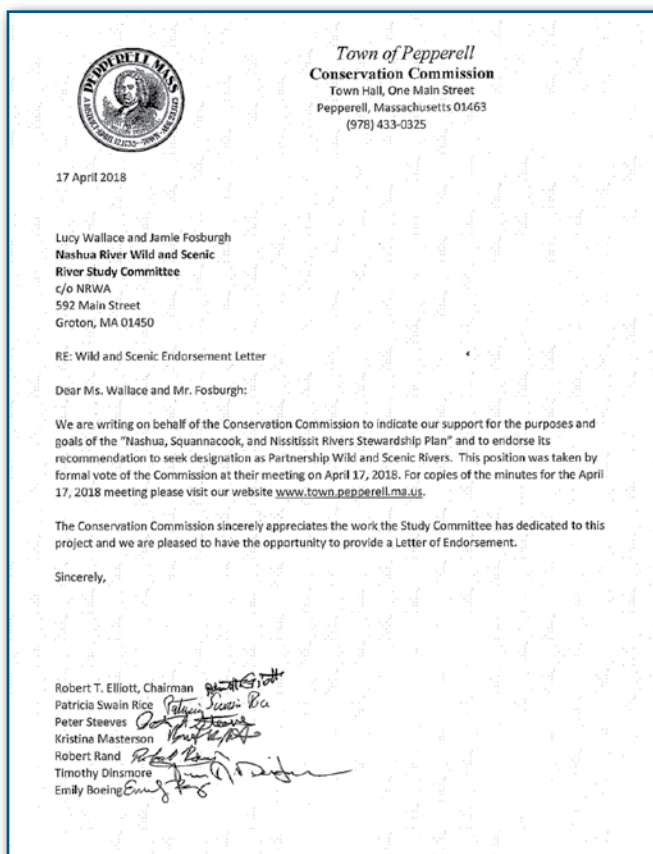
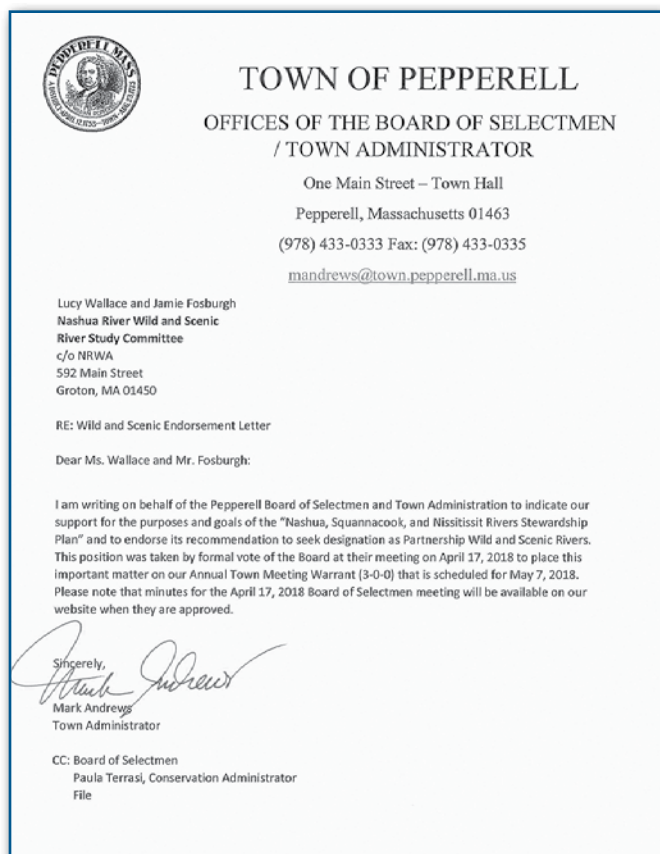
Re: Wild and Scenic River Designation

Dear Mr. Fosburgh and Ms. Wallace,

The Lancaster Planning Board supports the purposes and goals of the *Nashua, Squannacook and Nissitissit Rivers Stewardship Plan* and endorses its recommendation to seek designation as *Partnership Wild and Scenic Rivers*. This action was voted by the Lancaster Planning Board at their regular meeting held on April 9, 2018.

Sincerely,

Philip Lawler, Chair
Lancaster Planning Board



**Town of Shirley
BOARD OF SELECTMEN**



7 KEADY WAY - SHIRLEY, MASSACHUSETTS - 01464-2812

TEL: (978) 425-2600 x121
Fax: (978) 425-2602

April 30, 2018

Jamie Fosburgh, NPS, Manager, Northeast Region Rivers Program
Lucy Wallace, Chair, NRWSR Study Committee
Nashua River Wild and Scenic River Study Committee
c/o Nashua River Watershed Association
592 Main Street
Groton, MA 01450

RE: Wild and Scenic River Designation

Dear Mr. Fosburgh and Ms. Wallace:

I am writing on behalf of the Board of Selectmen to indicate its support for the purposes and goals of the "Nashua, Squannacook, and Nissitissit Rivers Stewardship Plan" and to endorse its recommendation to seek designation as Partnership Wild and Scenic Rivers. This position was taken by formal vote of the Board at their meeting on April 9, 2018. The minutes for the April 9, 2018 meeting will be available for review on the town website www.shirley-ma.gov.

Sincerely,

Enrico Caputo, Chairman
Board of Selectmen

**TOWN OF SHIRLEY
CONSERVATION COMMISSION**



7 KEADY WAY, SHIRLEY, MASSACHUSETTS 01464
PHONE: (978) 425-2600 Ext. 246 FAX (978) 425-2627

April 24, 2018

Jamie Fosburgh, NPS, Manager, Northeast Region Rivers Program
Lucy Wallace, Chair, NRWSR Study Committee
Nashua River Wild and Scenic River Study Committee
c/o Nashua River Watershed Association
592 Main Street
Groton, MA 01450

RE: Wild and Scenic River Designation

Dear Mr. Fosburgh and Ms. Wallace:

I am writing on behalf of the Shirley Conservation Commission to indicate its support for the purposes and goals of the "Nashua, Squannacook, and Nissitissit Rivers Stewardship Plan" and to endorse its recommendation to seek designation as Partnership Wild and Scenic Rivers. This position was taken by formal vote of the Shirley Conservation Commission at their meeting on April 24, 2018. For a copy of the April 24, 2018 Shirley Conservation Commission meeting minutes, please visit our website at: <https://www.shirley-ma.gov/conservation-commission>.

Sincerely,

Jennifer McGuinness
Chair

cc: Board of Selectmen

**TOWN OF SHIRLEY
Planning Board**



7 KEADY WAY, SHIRLEY, MASSACHUSETTS 01464
PHONE: (978) 425-2600 Ext. 240 FAX (978) 425-2627

May 9, 2018

Jamie Fosburgh, NPS, Manager, Northeast Region Rivers Program
Lucy Wallace, Chair, NRWSR Study Committee
Nashua River Wild and Scenic River Study Committee
c/o Nashua River Watershed Association
592 Main Street
Groton, MA 01450

RE: Wild and Scenic River Designation

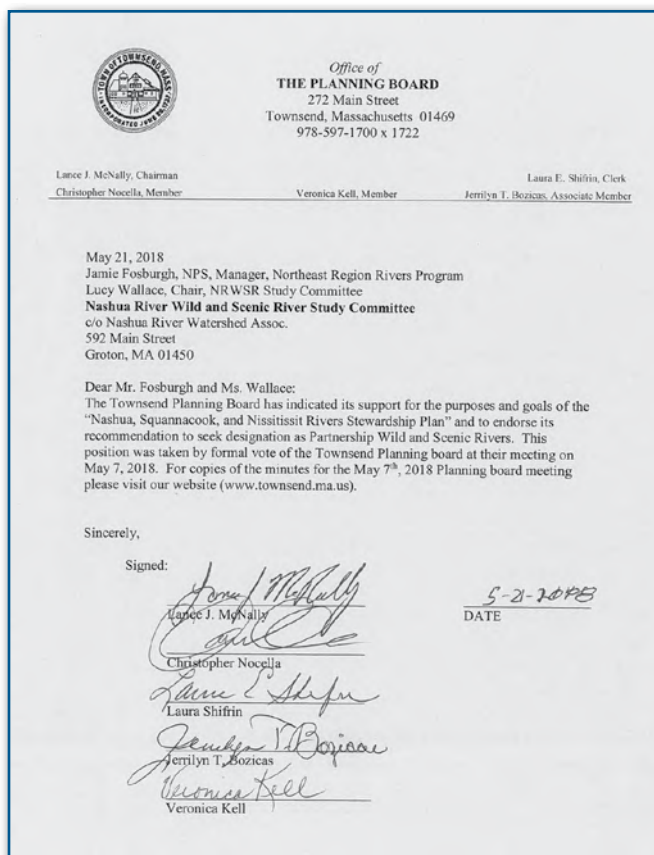
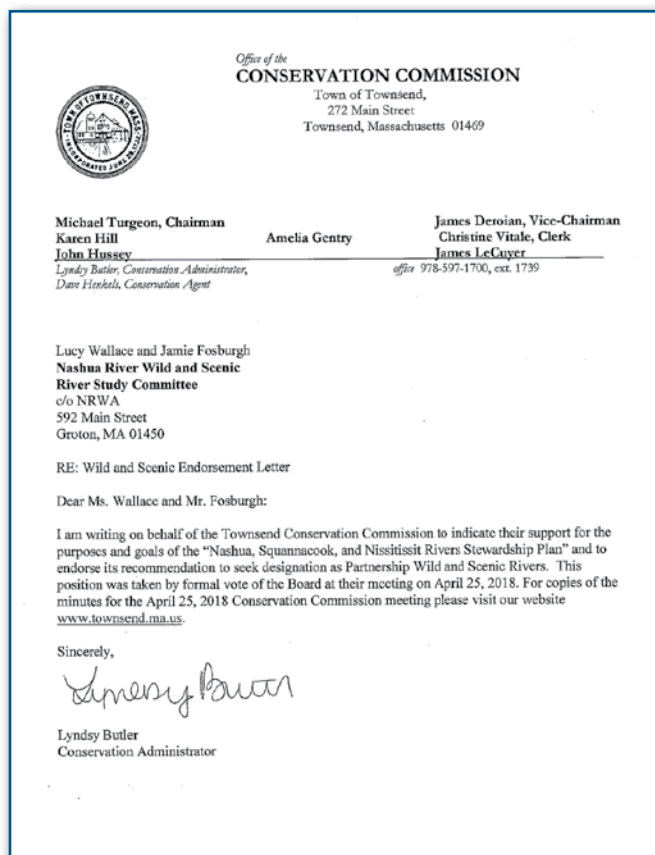
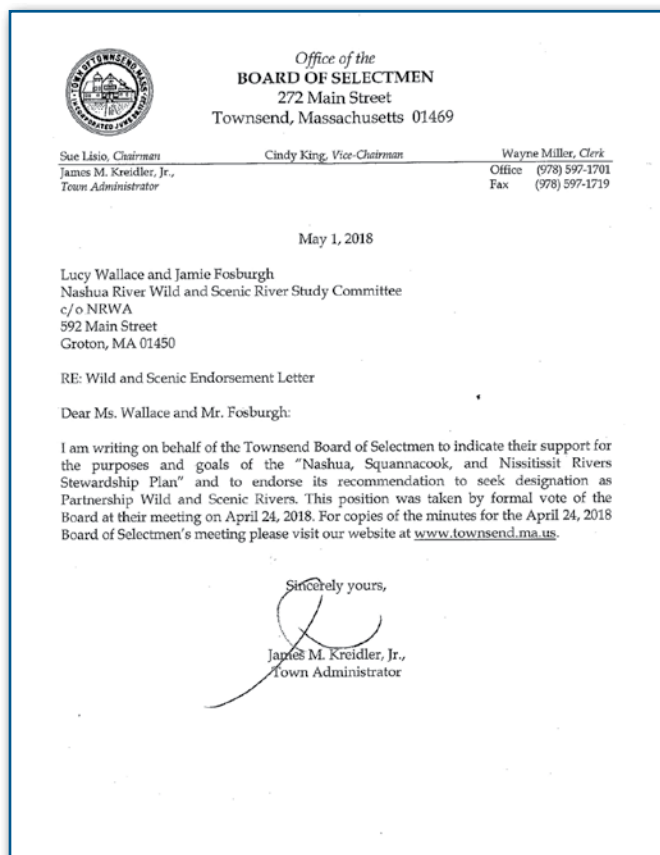
Dear Mr. Fosburgh and Ms. Wallace:

I am writing on behalf of the Shirley Planning Board to indicate its support for the purposes and goals of the "Nashua, Squannacook, and Nissitissit Rivers Stewardship Plan" and to endorse its recommendation to seek designation as Partnership Wild and Scenic Rivers. This position was taken by formal vote of the Shirley Planning Board at their meeting on May 9, 2018. For a copy of the May 9, 2018 Shirley Planning Board meeting minutes, please visit our website at: <https://www.shirley-ma.gov/planning-board>.

Sincerely,

Sarah Widing
Chair

cc: Board of Selectmen



May 3, 2018

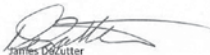
Lucy Wallace and Jamie Fosburgh
Nashua River Wild and Scenic
River Study Committee
c/o NRWA
592 Main Street
Groton, MA 01450

RE: Wild and Scenic Endorsement Letter

Dear Ms. Wallace and Mr. Fosburgh:

At their regular meeting on May 3, 2018, the Devens Enterprise Commission voted to support the purposes and goals of the "Nashua, Squannacook, and Nissitissit Rivers Stewardship Plan" and to endorse its recommendation to seek designation as Partnership Wild and Scenic Rivers. This position was approved unanimously by roll call vote of the Commission. For copies of the minutes for the [May 3, 2018 Devens Enterprise Commission] meeting please visit our website (<http://www.devensec.com>).

Sincerely,



James McCutcher
Vice Chairman



DEVENS ENTERPRISE COMMISSION

33 Andrews Parkway • Devens, MA 01434 • Phone: (978) 772-8831 • Fax: (978) 772-1529

Town Certifications of Affirmative Votes at the Annual Town Meetings



Telephone (603) 673-8855, ext. 213
Fax (603) 673-8136

**TOWN OF
BROOKLINE, NEW HAMPSHIRE**

P.O. BOX 360 – 1 Main Street
BROOKLINE, NH 03033-0360

<http://www.brookline.nh.us>

May 23, 2018

Jamie Fosburgh, NPS, Manager, Northeast Region Rivers Program
Lucy Wallace, Chair, NRWSR Study Committee
Nashua River Wild and Scenic River Study Committee
c/o Nashua River Watershed Association
592 Main Street
Groton, MA 01450

Dear Mr. Fosburgh and Ms. Wallace:

This is to certify that the following was voted at the Annual Town meeting held March 14, 2018:

Article #19: Voted in the majority to accept the locally-developed River Stewardship Plan drafted by the Nashua River Wild and Scenic River Study Committee and its recommendation that the portion of the Nissitissit River flowing through Brookline be designated a Wild and Scenic River with the understanding it would not involve Federal acquisition or management of lands.

A true copy of record,
ATTEST:


Patti Howard- Barnett
Town Clerk

**TOWN OF
HOLLIS
NEW HAMPSHIRE**

05/30/2018

Jamie Fosburgh, NPS, Manager, Northeast Region Rivers Program
Lucy Wallace, Chair, NRWSR Study Committee
Nashua River Wild and Scenic River Study Committee
c/o Nashua River Watershed Association
592 Main Street
Groton, MA 01450

Dear Mr. Fosburgh and Ms. Wallace:

This is to certify that the following article was voted at the Annual Town meeting held March 17, 2018:

Article # 12: Voted by a majority vote to accept the locally-developed River Stewardship Plan drafted by the Nashua River Wild and Scenic River Study Committee and its recommendation that the portion of the Nissitissit River flowing through Hollis be designated a Wild and Scenic River with the understanding it would not involve Federal acquisition or management of lands.

A true copy of records,

ATTEST:


Lisa Claire
Hollis Town Clerk





Office of the Town Clerk,
Town of Townsend
272 Main Street
Townsend, MA 01469

Kathleen M. Spofford, CMMC
Town Clerk
Carolyn Smart
Assistant Town Clerk

Office: (978) 597-1704
Fax: (978) 597-8135

May 29, 2018

Jamie Fosburgh, NPS, Manager, Northeast Region Rivers Program
Lucy Wallace, Chair, NRWSR Study Committee
c/o Nashua River Watershed Association
592 Main Street
Groton, MA 01450

Dear Mr. Fosburgh and Ms. Wallace:

This is to certify that the following article was voted at the Annual Town Meeting on May 1, 2018.

Article 20

I move that the Town vote to accept the Nashua, Squannacook and Nissitissit Rivers Stewardship Plan developed by the Nashua River Wild and Scenic River Study Committee, together with its recommendation to seek Wild and Scenic River designation.

SUBMITTED BY: Nashua River Wild and Scenic River Study Committee

READ BY: Wayne Miller

VOTE: Passed by Majority

A true copy attest:

Kathleen M. Spofford, CMMC
Town Clerk

ANNUAL TOWN MEETING, MAY 1, 2018

ARTICLE 20

I move that the Town vote to accept the Nashua, Squannacook, and Nissitissit Rivers Stewardship Plan developed by the Nashua River Wild and Scenic River Study Committee, together with its recommendation to seek Wild and Scenic River designation.

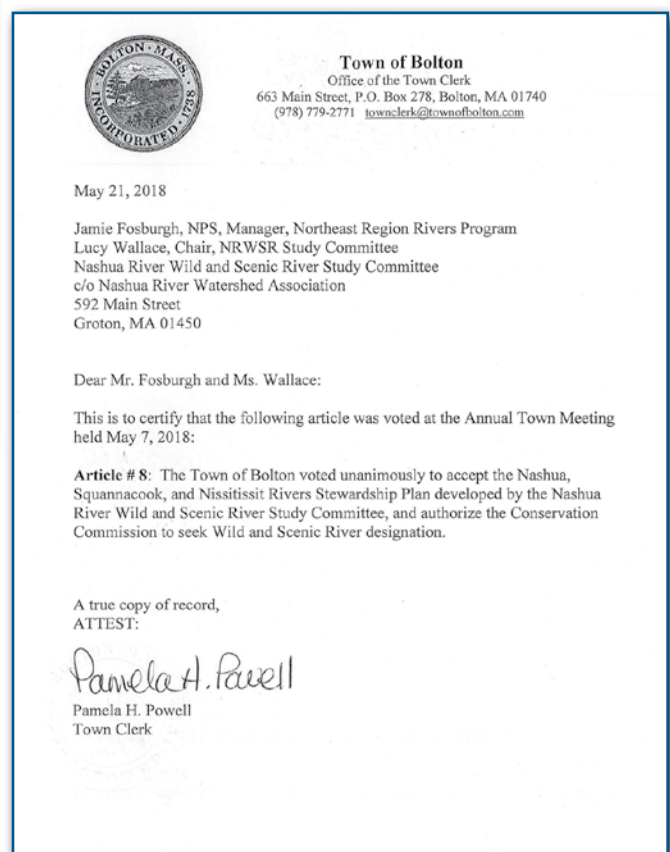
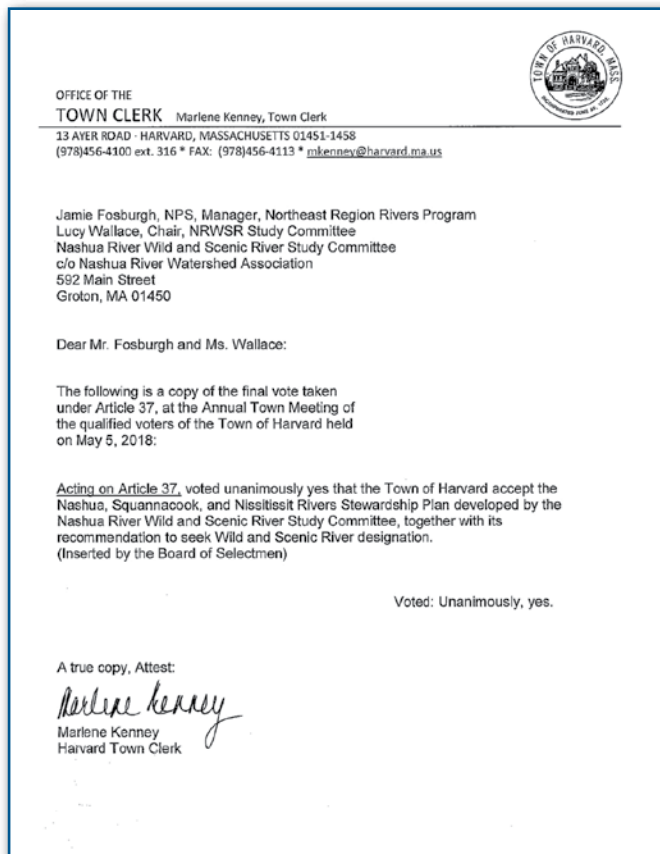
SUBMITTED BY: Nashua River Wild and Scenic River Study Committee

READ BY: Wayne Miller

VOTED: Passed by Majority

A True Copy Attest:

Town Clerk
Townsend, MA





Town of Groton
173 Main Street
Groton, MA 01450

Phone: 978-448-1100
FAX: 978-448-2030
mbouchard@townofgroton.org

Office of the Town Clerk – Notary Public

Michael F. Bouchard, Town Clerk

CERTIFICATE OF VOTE

Town Meeting
April 30, 2018 Article 19

I, Michael F. Bouchard, Town Clerk of Groton, Massachusetts do hereby certify the following vote from a Town Meeting of the Town of Groton held beginning on April 30, 2018:

ARTICLE 19: ACCEPT NRWSRSC STEWARDSHIP PLAN

To see if the Town of Groton will accept the Nashua, Squannacook, and Nissitissit Rivers Stewardship Plan developed by the Nashua River Wild and Scenic River Study Committee, together with its recommendation to seek Wild and Scenic River designation, or to take any other action relative thereto.

BOARD OF SELECTMEN

Board of Selectmen: *Recommended Unanimously*
Finance Committee: *No Position*

Summary: *The Wild and Scenic Rivers program is dedicated to protecting nationally significant rivers and their unique biological, recreational, scenic, historical and/or cultural resources. This present effort has been joined by 11 towns (9 in MA, 2 in NH) that have frontage on the Nashua, Squannacook, or Nissitissit Rivers. A locally-drafted, voluntary Stewardship Plan has been developed which will help assure the protection of one unique river resources for generations to come. There is no cost to the town. For more information and to read the Stewardship Plan, visit: www.WildandScenicNashuaRivers.org*

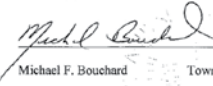
Mover: Rebecca Pine

MOTION: I move that the Town vote to accept the Nashua, Squannacook, and Nissitissit Rivers Stewardship Plan developed by the Nashua River Wild and Scenic River Study Committee, together with its recommendation to seek Wild and Scenic River designation.

Moved and Seconded
Quantities of Town Meeting Vote: Majority

Unanimously supported by the Select Board, Greenway Committee and the Planning Board

VOTE on Article 19 – Main Motion: Passed by Unanimous Vote


 Michael F. Bouchard Town Clerk



Town of Lancaster
Office of the Town Clerk
701 Main Street, Suite 2
Lancaster, Massachusetts 01523
Tel (978) 365-3526 ext. 1013 • Fax (978) 368-4011

May 21, 2018

Jamie Fosburgh, NPS, Manager
Northeast Region Rivers Program
Lucy Wallace, Chair
NRWST Study Committee
Nashua River Wild and Scenic River Study Committee
c/o Nashua River Watershed Association
592 Main Street
Groton, MA 01450

Dear Mr. Fosburgh and Ms. Wallace:

This is to certify that the following article was voted at Lancaster's Annual Town Meeting held on May 7, 2018.

A true copy of attestation is enclosed

Sincerely,


 Mary de Alderete
 Town Clerk

Enc:



Town of Lancaster
Office of the Town Clerk
695 Main Street, Suite 2
Lancaster, Massachusetts 01523
Tel (978) 365-3326 ext. 1015 • Fax (978) 368-4011

EXCERPT OF THE ANNUAL TOWN MEETING HELD
MONDAY, MAY 7, 2018, 7:00 P.M.
MARY ROWLANDSON ELEMENTARY SCHOOL AUDITORIUM
MAY 7, 2018 – TOWN MEETING VOTER ATTENDANCE: 153, 11 NON-VOTERS

ARTICLE 10 – ACCEPT RIVERS STERWARDSHIP PLAN
(Majority vote)

To see if the Town of Lancaster will accept the Nashua, Squannacook, and Nissitissit Rivers Stewardship Plan developed by the Nashua River Wild and Scenic River Study Committee, together with its recommendation to seek Wild and Scenic River designation.

Mr. Sendrowski (Starr seconded) to accept the Nashua, Squannacook, and Nissitissit Rivers Stewardship Plan as printed in the Warrant.

MOTION CARRIES UNANIMOUSLY

A TRUE COPY ATTEST:

TOWN CLERK



Town of Pepperell
OFFICE OF THE TOWN CLERK
One Main Street - Town Hall
Pepperell, Massachusetts 01463
(978) 433-0339 fax: (978) 433-0338
www.town.pepperell.ma.us/clerk

This is to certify that at the Pepperell Annual Town Meeting on May 7, 2018 the following article was voted on and passed according to the Moderator.

Article 17 - NASHUA RIVER WILD AND SCENIC DESIGNATION
To see if the Town of Pepperell will accept the Nashua, Squannacook, and Nissitissit Rivers Stewardship Plan developed by the Nashua River Wild and Scenic River Study Committee, together with its recommendation to seek Wild and Scenic River designations.

Summary: *The Wild and Scenic Rivers program is dedicated to protecting national significant rivers and their unique biological, recreational, scenic, historical and/or cultural resources. This present effort has been joined by 11 towns (9 in MA, 2 in NH) that have frontage on the Nashua, Squannacook, or Nissitissit Rivers. A locally-drafted, voluntary Stewardship Plan has been developed which will help assure the protection of our unique river resources for generations to come. There is no cost to the town. For more information and to read the Stewardship Plan, visit: www.WildandScenicNashuaRivers.org*

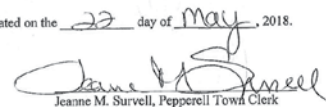
Recommendation: The Finance Committee voted to take no action.
Recommendation: The Board of Selectmen recommends the passage of this article by a vote of 3-0-0

Majority vote required for passage.

MOTION MADE: Paula Terrasi, Appointee to Wild and Scenic Study Committee
I move that the Town vote to accept the Nashua, Squannacook, and Nissitissit Rivers Stewardship Plan as developed by the Nashua River Wild and Scenic River Study Committee together with its recommendation to seek Wild and Scenic River designation.

MOTION PASSED BY MAJORITY VOTE AS DECLARED BY THE MODERATOR

Certified as a True, Attest, Copy dated on the 22 day of May, 2018.


Jeanne M. Survell, Pepperell Town Clerk



Town of Ayer
1 Main Street, Ayer, MA 01432

Annual Town Meeting
May 14, 2018 @ 7:00 p.m.
Ayer Shirley Regional High School Auditorium
141 Washington Street
Ayer, MA 01432

May 17, 2018

Jamie Fosburgh, NPS, Manager, Northeast Region Rivers Program
Lucy Wallace, Chair, NRWSR Study Committee
Nashua River Wild and Scenic River Study Committee
c/o Nashua River Watershed Association
592 Main Street
Groton, MA 01450

Dear Mr. Fosburgh and Ms. Wallace:

This is to certify that the following article was voted at the Annual Town meeting held May 14th, 2018:

Article # 31 Nashua River Wild and Scenic Designation: Voted unanimously to accept the Nashua, Squannacook, and Nissitissit Rivers Stewardship Plan developed by the Nashua River Wild and Scenic River Study Committee, together with its recommendation to seek Wild and Scenic River designation.

A true copy of record,
ATTEST:


Susan E. Copeland
Ayer Town Clerk

May 2018 Annual Town Meeting
Ayer, Massachusetts
Page 1 of 1



Town of Shirley
TOWN CLERK

7 KEADY WAY - SHIRLEY, MASSACHUSETTS - 01464-2812
William Oeffke, Town Clerk

TEL: (978) 425-2600, 4205
Fax: (978) 234-9112

May 17, 2018

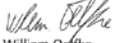
Jamie Fosburgh, NPS, Manager, Northeast Region Rivers Program
Lucy Wallace, Chair, NRWSR Study Committee
Nashua River Wild and Scenic River Study Committee
c/o Nashua River Watershed Association
592 Main Street
Groton, MA 01450

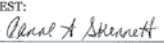
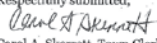
Dear Mr. Fosburgh and Ms. Wallace:

This is to certify that the following article was voted at the Annual Town meeting held May 14, 2018:

Article # 16: Voted by a majority vote to accept the Nashua, Squannacook, and Nissitissit Rivers Stewardship Plan developed by the Nashua River Wild and Scenic River Study Committee, together with its recommendation to seek Wild and Scenic River designation.

A true copy of record,
ATTEST:


William Oeffke
Town Clerk

	OFFICE OF THE TOWN CLERK TOWN HALL 511 MAIN STREET DUNSTABLE, MA 01827-1313 (978) 649-4514 x222 FAX (978) 649-4371 CSkerrett@dunstable-ma.gov
May 22, 2018	
Jamie Fosburgh, NPS, Manager, Northeast Region Rivers Program Lucy Wallace, Chair, NRWSR Study Committee Nashua River Wild and Scenic River Study Committee c/o Nashua River Watershed Association 592 Main Street Groton, MA 01450	
Dear Mr. Fosburgh and Ms. Wallace:	
This is to certify that the following article was voted at the Annual Town meeting held on May 14 2018 and duly continued on May 17, 2018:	
Article 31: Voted by a majority vote unanimously to accept the Nashua, Squannacook, and Nissitissit Rivers Stewardship Plan developed by the Nashua River Wild and Scenic River Study Committee, together with its recommendation to seek Wild and Scenic River designation.	
A true copy of record, ATTEST:  Carol A. Skerrett, Town Clerk CMMC	
Quorum Certificate	
In accordance with The Town of Dunstable's Town Meetings, Town Elections & Records Bylaw, I hereby certify that the quorum for an Annual or Special Town Meeting is 50 registered voters of the Town of Dunstable.	
Total number of voters checked in at the Town Meeting of May 17, 2018: 150	
	Respectfully submitted,  Carol A. Skerrett, Town Clerk CMMC

Additional Letters of Support

Federal Agencies



United States Department of the Interior

FISH AND WILDLIFE SERVICE

Eastern Massachusetts National Wildlife Refuge Complex
73 Weir Hill Road
Sudbury, MA 01776-1420



June 18, 2018

Jamie Fosburgh, NPS, Manager, Northeast Region Rivers Program
Lucy Wallace, Chair, NRWSR Study Committee
Nashua River Wild and Scenic River Study Committee
c/o Nashua River Watershed Association
592 Main Street
Groton, MA 01450

Dear Mr. Fosburgh and Ms. Wallace:

I serve as the Acting Refuge Manager for the U.S. Fish & Wildlife Service's Eastern Massachusetts National Wildlife Refuge Complex. Before I took this position my predecessor Libby Herland served on the Nashua River Wild and Scenic River Study Committee, so I am familiar with the Study Committee's activities and I have reviewed the commendable Stewardship Plan as well.

The Oxbow National Wildlife Refuge (NWR) is featured prominently in the Plan as well it ought to. The Nashua River flows through eight miles of our refuge; it's 1,667 acres could be considered the core of the Nashua, Squannacook, and Nissitissit Rivers Study Area. It is worth noting that the ONWR has features of all three of the Outstandingly Remarkable Resource Values (ORRV) that comprise the eligibility aspect of the designation. We have rare species (biological diversity ORRV), riparian trails and canoe access (recreational ORRV), and several noteworthy historical and cultural ORRVs as well.

Indeed, for many years the Oxbow NWR has partnered on a variety of projects with the nonprofits and agencies involved in the Nashua River Wild and Scenic River Study, and I foresee this continuing in the years to come. A collaborative approach is what will allow for maximum implementation of the voluntary recommendations in the Stewardship Plan. We look forward to continuing our involvement in the project while designation is pursued and thereafter.

Sincerely,

Tom Eagle

Federal Agencies



United States Department of the Interior

U.S. GEOLOGICAL SURVEY
New England Water Science Center
331 Commerce Way, Suite 2
Pembroke, NH 03275

June 12, 2018

Jamie Fosburgh, NPS, Manager, Northeast Region Rivers Program
Lucy Wallace, Chair, NRWSR Study Committee
Nashua River Wild and Scenic River Study Committee
c/o Nashua River Watershed Association
592 Main Street
Groton, MA 01450

RE: National Park Service Wild and Scenic River Designation for the Nashua,
Squannacook, and Nissitissit Rivers

Dear Mr. Fosburgh and Ms. Wallace:

As the Director of the U.S. Geological Survey (USGS) New England Water Science Center, I am writing to indicate USGS support for the goals defined in the "Nashua, Squannacook, and Nissitissit Rivers Stewardship Plan", including support for the recommendation of the Stewardship Plan to seek designation as Partnership Wild and Scenic Rivers.

The Nashua, Squannacook, and Nissitissit Rivers represent important water resources for the northeastern Massachusetts and southern New Hampshire region because of its headwaters status, and many unique ecological, cultural and recreational resources. USGS remains willing to assist as possible in future work that would further characterize and enhance our understanding of these valuable water resources. USGS will continue to participate in the Nashua River Wild and Scenic River Study Committee, as Jeff Barbaro has done for the past few years.

We look forward to continue our participation after designation is achieved and implementation of the Plan begins. Much success in moving the designation forward.

Yours truly,

A handwritten signature in blue ink, which appears to read "Keith Robinson", is written over a horizontal line.

Keith Robinson
Director, New England Water Science Center

MA and NH Governors



CHARLES D. BAKER
GOVERNOR

OFFICE OF THE GOVERNOR
COMMONWEALTH OF MASSACHUSETTS
STATE HOUSE • BOSTON, MA 02133
(617) 725-4000

KARYN E. POLITO
LIEUTENANT GOVERNOR

November 2, 2018

Jamie Fosburgh, NPS, Manager, Northeast Region Rivers Program
Lucy Wallace, Chair, NRWSR Study Committee
Nashua River Wild and Scenic River Study Committee
c/o Nashua River Watershed Association
592 Main Street
Groton, MA 01450

Dear Mr. Fosburgh and Ms. Wallace:

As Governor of Massachusetts, I support the recommendation of the "Nashua, Squannacook and Nissitissit Rivers Stewardship Plan" to seek designation as Partnership Wild and Scenic Rivers.

Nine communities in Massachusetts and two in neighboring New Hampshire voted at their annual town meetings to support designation of the Nashua, Squannacook, and Nissitissit Rivers as Partnership Wild and Scenic Rivers. For over 20 years the Partnership Wild and Scenic Rivers model has provided a collaborative approach to protecting rivers and river related resources, allowing citizens to work together across town and state borders to voluntarily protect the natural resources that extend beyond their communities. Following Congressional approval of the designation the communities will continue to work together implementing the locally-developed Stewardship Plan.

There are only seven Partnership Wild and Scenic Rivers currently designated in New England, and it is my hope that during the 50th Anniversary year of the program that these rivers will be the eighth awarded designation in the region.

Sincerely,

A handwritten signature in cursive script, reading "Charles D. Baker".

Charles D. Baker
Governor

MA and NH Governors



STATE OF NEW HAMPSHIRE
OFFICE OF THE GOVERNOR

CHRISTOPHER T. SUNUNU
Governor

June 18, 2018

Jamie Fosburgh, NPS, Manager, Northeast Region Rivers Program
Lucy Wallace, Chair, NRWSR Study Committee
Nashua River Wild and Scenic River Study Committee
c/o Nashua River Watershed Association
592 Main Street
Groton, MA 01450

Dear Mr. Fosburgh and Ms. Wallace:

As Governor of New Hampshire, I am energized by the efforts individuals and conservation groups have made in maintaining the NH quality of life by preserving its natural resources. Today, I offer my support for the proposed designation of the Nissitissit River, as a locally managed Partnership Wild and Scenic River under the National Wild and Scenic Rivers System. The "Nashua, Squannacook, and Nissitissit Rivers Stewardship Plan" will join the section of the Nissitissit flowing through NH with the Squannacook River, and parts of the Nashua River, both in Massachusetts. These rivers are an essential part of our region's culture, character, and history. All eleven towns participating in the Wild and Rivers designation study have voted at Town Meetings to accept the Stewardship Plan and its recommendation to seek designation.

The Nissitissit River was identified in 1967 by the NH Office of Planning and Research, as deserving of protection and was ranked 4th as a priority area by the State Planning Project Director. The agency report goes on to recommend, *"An attempt should be made to protect this river in a joint project with Massachusetts. On a small scale this would be comparable to some of the "Wild River" projects of the National Government....It is essential only that the stream be kept unpolluted and the shores undeveloped"*.

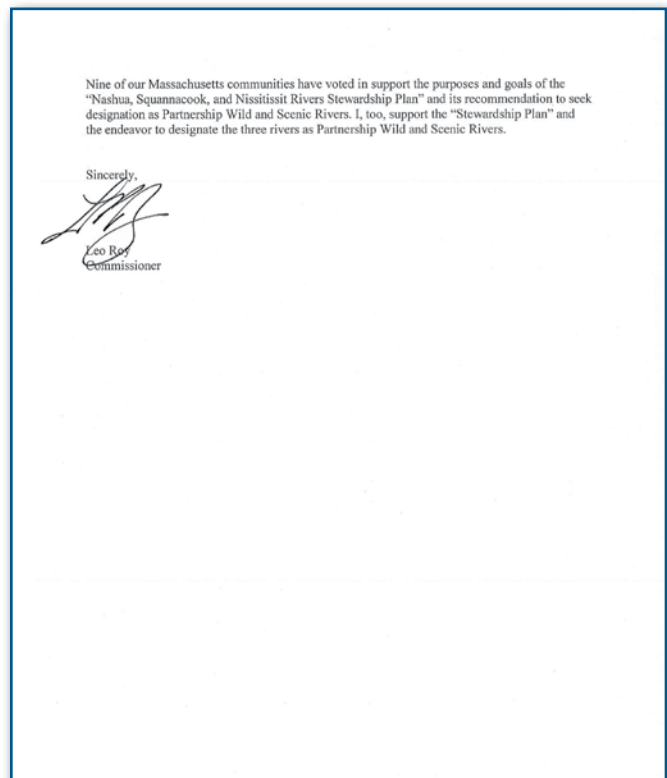
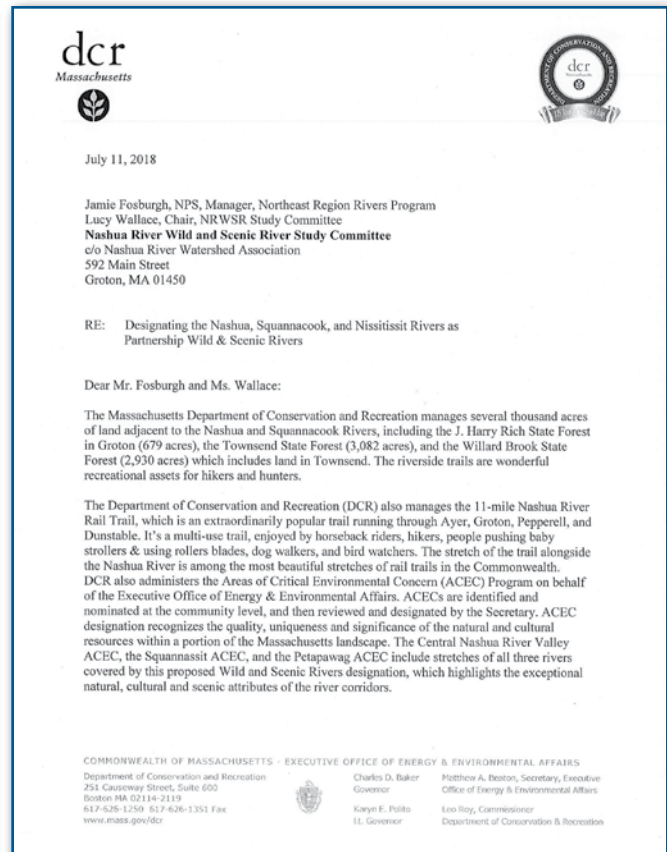
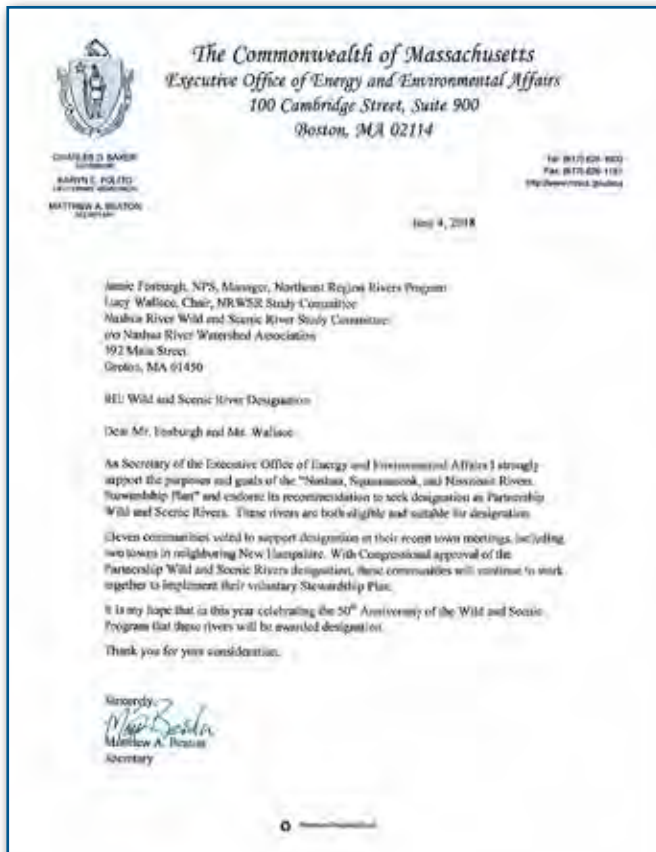
The Partnership Wild and Scenic Rivers model is well structured for New Hampshire, as it maintains our local governance while providing a common framework to work with other communities in protecting our shared natural resources. In New Hampshire, the Lamprey River has had 20 years of success after it was designated a Partnership Wild and Scenic River with legislation sponsored by US Rep. Bill Zeliff, Sen. Bob Smith and Sen. Judd Gregg. A few years later my brother, then a US Representative John Sununu, introduced legislation to add an additional 12 miles of the river in the town of Epping. Today, I'm pleased to add my name to the list of communities, organizations, and individuals and offer my support for this important endeavor.

Sincerely,

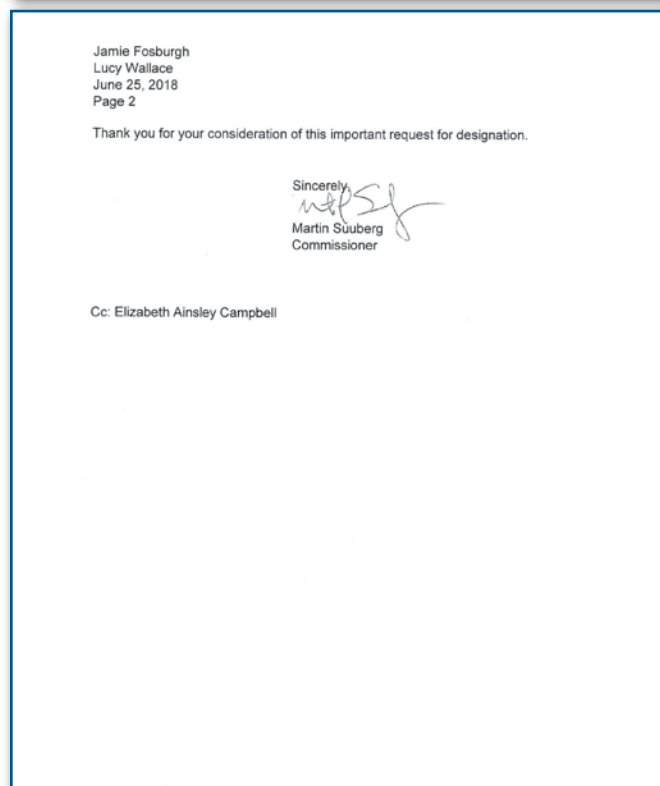
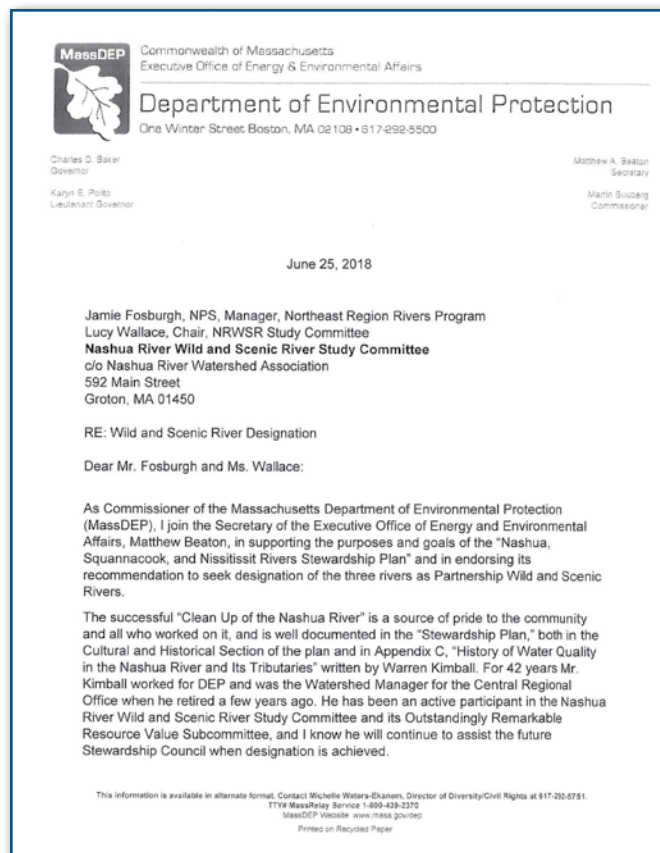
Christopher T. Sununu
Governor

107 North Main Street, State House - Rm 208, Concord, New Hampshire 03301
Telephone (603) 271-2121 • FAX (603) 271-7840
Website: <http://www.governor.nh.gov/> • Email: governorsununu@nh.gov
TDD Access: Relay NH 1-800-735-2964

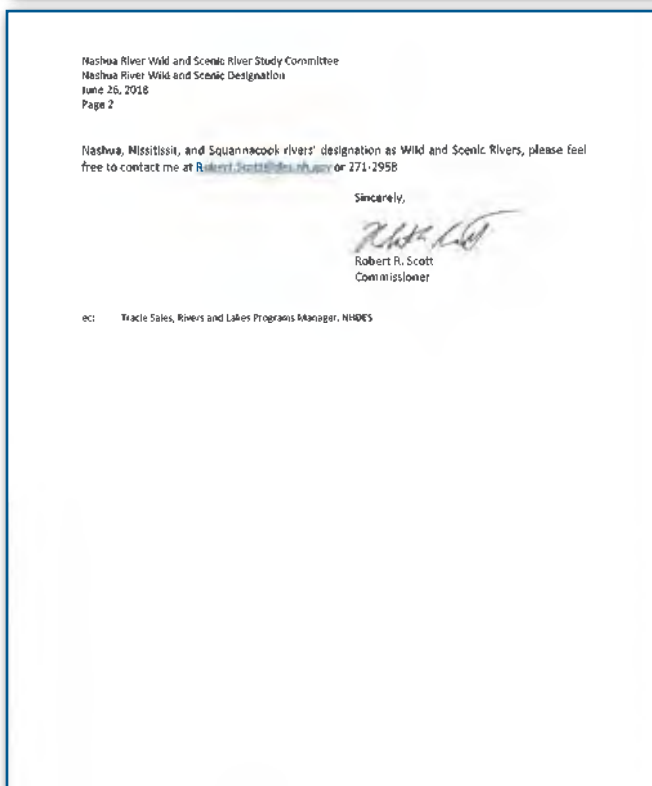
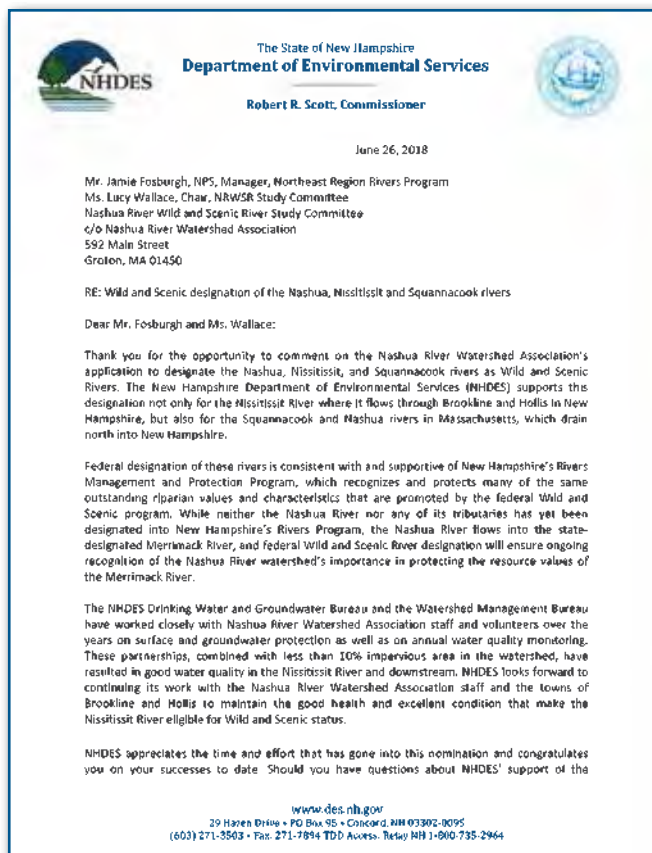
State Agencies



State Agencies



State Agencies



State Agencies



**New Hampshire
Fish and Game Department**

HEADQUARTERS: 11 Hazen Drive, Concord, NH 03304-6500
(603) 271-3421
FAX: (603) 271-1438

www.NH.gov
info@wildlife.nh.gov
TDD Access: Relay NH 1-800-735-2564

June 11, 2018

Jamie Fosburgh, NPS, Manager, Northeast Region Rivers Program
Lucy Wallace, Chair, NRWSR Study Committee
Nashua River Wild and Scenic River Study Committee
c/o Nashua River Watershed Association
592 Main Street
Groton, MA 01450

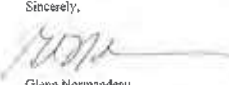
RE: Wild and Scenic River Designation

Dear Mr. Fosburgh and Ms. Wallace:

As Executive Director of the NH Fish & Game Department I write to offer my support for the "Nashua, Squannacook, and Nissitissit Rivers Stewardship Plan" and to endorse its recommendation to seek designation as Partnership Wild and Scenic Rivers. The towns of Brookline and Hollis are involved in the Study Committee working on this Partnership Wild and Scenic designation, as they both abut the Nissitissit River. Both towns voted overwhelmingly in the affirmative at their Spring 2018 Annual Town Meetings to support this Plan and seek designation for their river.

Designation would aid in the protection of the Outstandingly Remarkable Resource Values (ORRVs) identified by the Study Committee. The Study Committee, which utilized key input from our agency staff, wrote the Stewardship Plan. These ORRVs are comprised of ecological, recreational & scenic, and historical & cultural values. The ORRVs include rare species, riverside greenways, river-related historic features, boating access sites, and many other values that are appreciated by both sportsmen and nature enthusiasts. From the vantage point of my role with the NH Fish & Game Department, I see extraordinarily positive benefits to New Hampshire and our neighboring Commonwealth of Massachusetts if designation is achieved.

Sincerely,



Glenn Normandes
Executive Director
NH Fish and Game Department

REGION 1
6228 Main Street
Lancaster, NH 03584-3812
(603) 788-3194
FAX: (603) 788-4825
email: reg1@wildlife.nh.gov

REGION 2
PO Box 417
New Hampton, NH 03256
(603) 744-5470
FAX: (603) 744-6302
email: reg2@wildlife.nh.gov

REGION 3
225 Main Street
Dunsmuir, NH 03524-4732
(603) 888-0535
FAX: (603) 868-3305
email: reg3@wildlife.nh.gov

REGION 4
15 Ash Brook Court
Rayne, NH 03431
(603) 855-9660
FAX: (603) 352-8789
email: reg4@wildlife.nh.gov

MA Legislators



**Commonwealth of Massachusetts
MASSACHUSETTS SENATE**

SENATOR JAMES B. ELDRIDGE
Middlesex and Worcester Districts
Office: 1000 State House
Boston, MA 02133-0001
Tel: (617) 725-1000
Fax: (617) 725-1000
James.B.Eldridge@leg.state.ma.gov
www.jbeldridge.com

June 21, 2018

Jamie Fosburgh, NPS, Manager, Northeast Region Rivers Program
Lucy Wallace, Chair, NRWSR Study Committee
Nashua River Wild and Scenic River Study Committee
c/o Nashua River Watershed Association
592 Main Street
Groton, MA 01450

Dear Mr. Fosburgh and Ms. Wallace,

During my sixteen years in the Massachusetts Legislature, first as a State Representative elected in 2002 and then as a State Senator beginning in 2009, I have familiarized myself with the extraordinary river related resources in the communities I serve and across the Commonwealth. I began following the work to explore possible Wild and Scenic designation of the Nashua, Squannacook, and Nissitissit when the Nashua River Watershed Association first asked the Senate in 2009 if they would be interested in requesting Congress to authorize a Study. Since then I have stayed in contact with the resultant Nashua River Wild and Scenic River Study Committee and attended and/or spoken at many of the Committee's public events. It was no surprise to me that the constituents in my communities of Ayer, Harvard, and Shirley voted unanimously at their Town Meetings to accept the "Nashua, Squannacook, and Nissitissit Rivers Stewardship Plan" and its recommendation to seek Wild and Scenic designation.

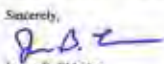
One of the "Cultural & Historical" values highlighted in the Stewardship Plan is the story of the Nashua River clean-up. The Nashua, once one of the top ten most polluted rivers in the

country, was revitalized due to the efforts of internationally recognized Marion Stoddard working in concert with others in the 1950s. And she has continued her work to this day. Marion just celebrated her 90th birthday. I note that the National Park Service is celebrating the 50th Anniversary of the Wild and Scenic Program this year.

Congress has a stunning, once-in-a-lifetime opportunity to designate these three deserving rivers as Wild and Scenic during the 50th Anniversary of the Wild and Scenic Program and the 90th year of Marion Stoddard's impactful life. I urge Congress to move ahead quickly with the designation.

I am happy to answer any questions that Congressional staff may have as they review this project. I am completely in support of the designation and appreciate your consideration.

Sincerely,



James B. Eldridge
State Senator
Middlesex and Worcester Districts

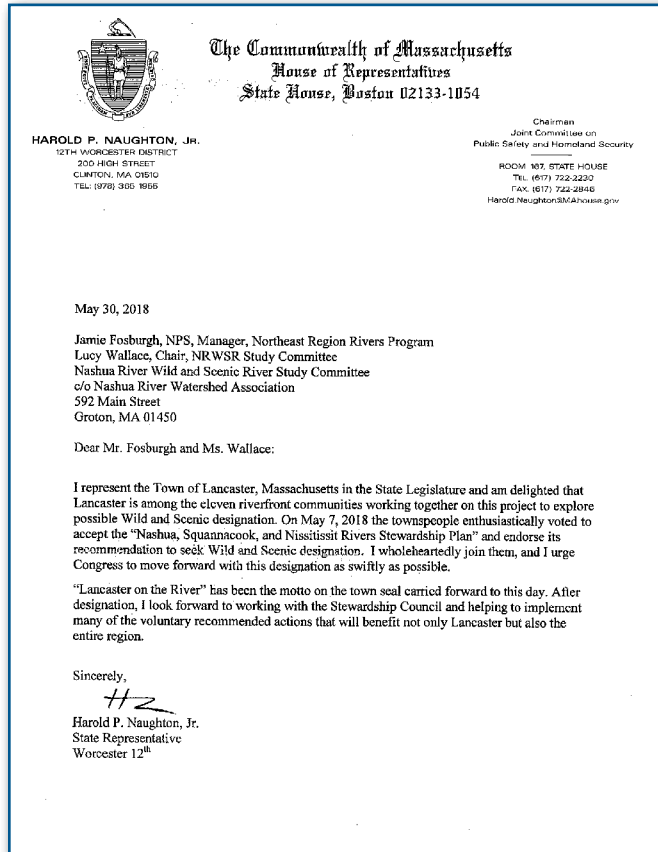
MA Legislators



MA Legislators



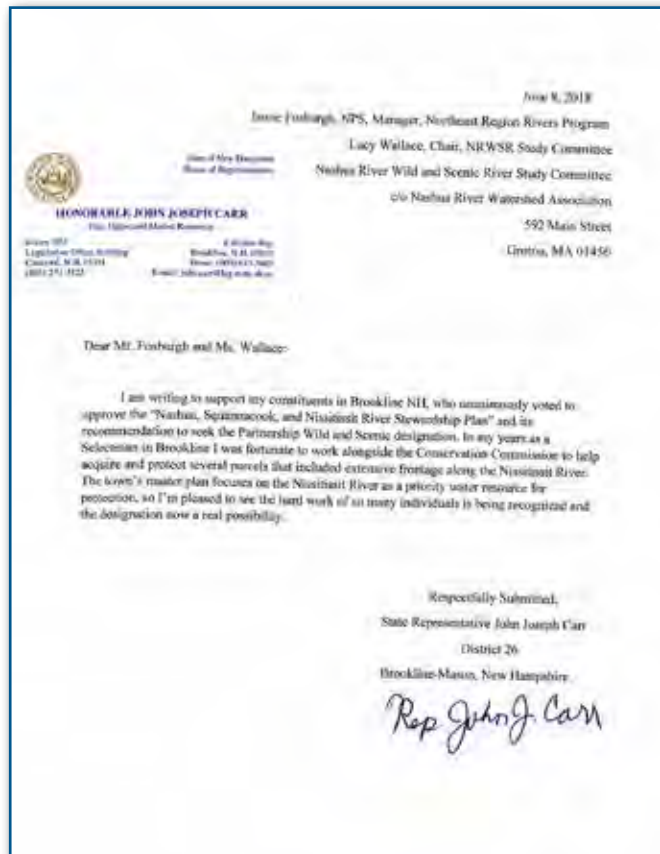
MA Legislators



NH Legislators



NH Legislators



National Heritage Area

FREEDOM'SWAY

National Heritage Area | Nature · Culture · History

94 Jackson Road, Suite 311 | Duxbury, MA 01434

June 13, 2018

Jamie Fosburgh, NPS, Manager, Northeast Region Rivers Program
Lucy Wallace, Chair, NRWSR Study Committee
Nashua River Wild and Scenic River Study Committee
c/o Nashua River Watershed Association
592 Main Street
Groton, MA 01450

Dear Mr. Fosburgh and Ms. Wallace:

The Freedom's Way Heritage Association was founded in 1994 as a nonprofit organization and is the local coordinating entity for the Freedom's Way National Heritage Area, encompassing 45 communities in Massachusetts and New Hampshire.

Our mission is to connect the people, places, and communities of the Heritage Area through preservation, conservation, and educational initiatives to protect and promote shared resources and to encourage residents and visitors to explore the region's landscape, history, and culture. As clearly articulated in our Management Plan, approved by the Secretary of the Interior in August of 2015, the Association recognizes river-related natural, historical, and cultural resources as integral to our landscape and our communities.

All eleven of the riverfront towns participating in the Nashua River Wild and Scenic Study are part of the Freedom's Way National Heritage Area, and we are heartened that they all voted so enthusiastically at their Town Meetings to accept the "Nashua, Squannacook, and Nissitissit Rivers Stewardship Plan" and its recommendation to seek designation as Wild and Scenic Rivers. From our experience with the Sudbury, Assabet, and Concord Rivers, we know that the Partnership Wild and Scenic River model is an excellent opportunity for these towns.

We urge Congress to move swiftly to approve the formal designation and look forward to collaborating with the future Stewardship Council as our shared goals are pursued.

Sincerely,



Patrice Todisco
Executive Director



The Freedom's Way Heritage Association works in partnership with the National Park Service to support the Freedom's Way National Heritage Area in Massachusetts and New Hampshire.

Regional Planning Commissions



SMART GROWTH AND REGIONAL COLLABORATION

June 18, 2018

Jamie Fosburgh, NPS, Manager, Northeast Region Rivers Program
Lucy Wallace, Chair, NRWSR Study Committee
Nashua River Wild and Scenic River Study Committee
c/o Nashua River Watershed Association
592 Main Street
Groton, MA 01450

Dear Mr. Fosburgh and Ms. Wallace:

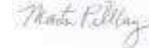
On behalf of the Metropolitan Area Planning Council (MAPC), I am writing in support of the proposed Wild and Scenic River designation of the Nashua, Squannacook and Nissitissit Rivers. MAPC is the state-designated Regional Planning Agency for 101 cities and towns in the Boston Metropolitan Area. The Town of Bolton is one of our member communities, and is our only town within the Nashua River Wild and Scenic River Study Area.

We enthusiastically support the designation of the Nashua, Squannacook and Nissitissit Rivers as Wild and Scenic Rivers, as this will have both local and regional benefits. Locally, the town of Bolton takes care to protect its critical land and water resources through planning, zoning, open space, wetlands and watershed protection measures. The Wild and Scenic designation would bolster and reinforce these important local initiatives. As a strong indication of local support, the Town of Bolton's Board of Selectmen, Planning Board, and Conservation Commission have all formally registered their support of the Wild and Scenic River designation in writing. Further, Bolton's citizens expressed their support of the Wild and Scenic River designation through a unanimous vote at the most recent Annual Town Meeting on May 7, 2018.

From a regional perspective, MAPC's regional plan, *MetroFuture*, calls for greater efforts to protect watershed resources, and for towns to collaborate on these efforts. There is already a long standing Wild and Scenic River designation for the nearby Concord River which has been successful over the last 20 years. Building on that success, the designation of the Nashua, Squannacook and Nissitissit Rivers would extend the same kind of regional stewardship further west into an area that is rich in still-unspoiled resources. These resources, such as the Bolton Flats Wildlife Management Area and the Nashua River, are treasured regional resources deserving of the stewardship that would be made possible by the Wild and Scenic designation.

MAPC shares the enthusiasm of the Town of Bolton in support of the Wild and Scenic River designation, and, going forward, we will be alert to ways in which the Council can assist the town in resource protection efforts that may be pursued by a future Stewardship Council.

Sincerely,



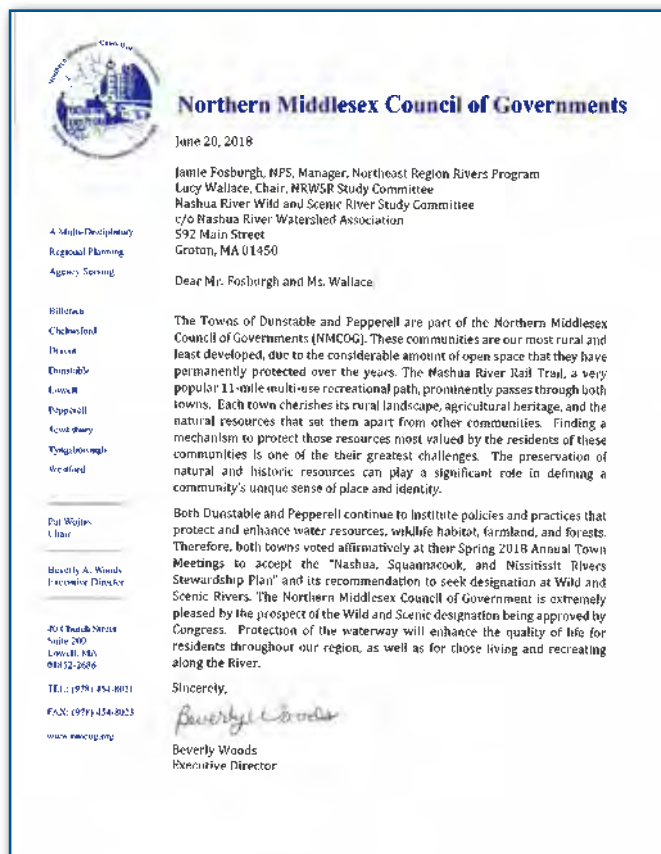
Martin Pillsbury
Director of Environmental Planning

Keith Bergman, President | Erin Wortman, Vice President | Teber Kealy, Treasurer | Sandra Heckman, Secretary | Marc Drakos, Executive Director
Metropolitan Area Planning Council | 60 Temple Place | Boston, Massachusetts 02111 | 617-493-0700 | 617-482-7185 fax | mapc.org

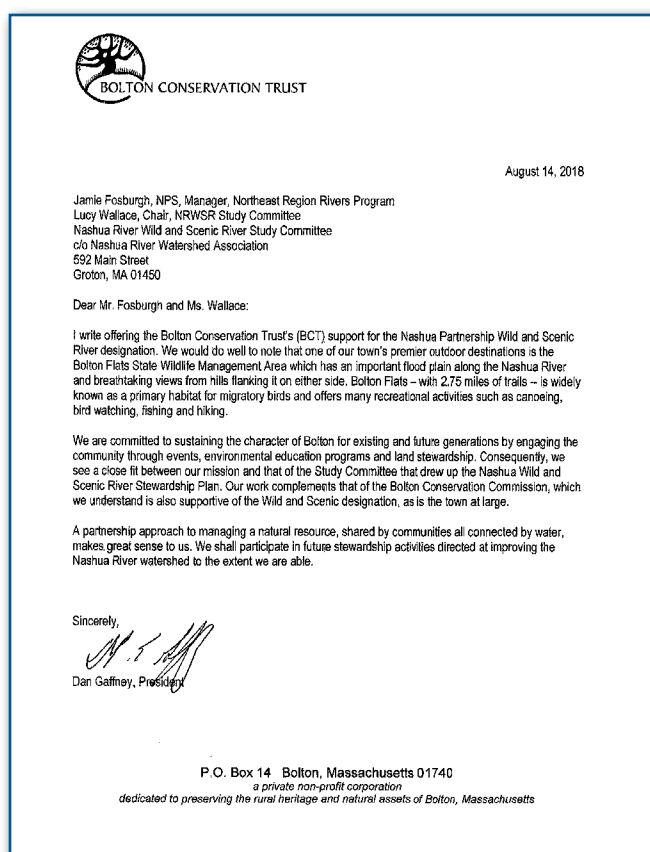
Regional Planning Commissions



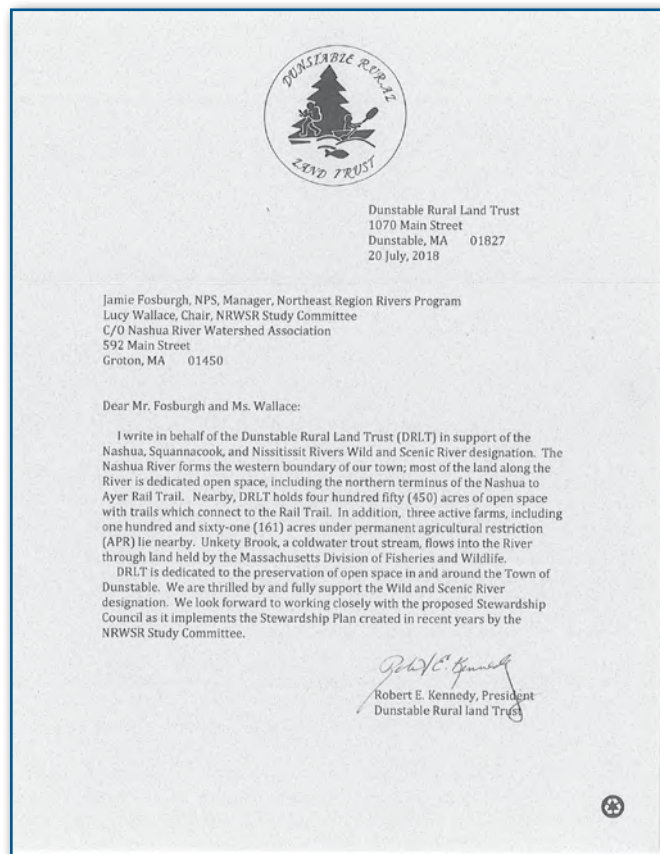
Regional Planning Commissions



Local Land Trusts



Local Land Trusts



Local Land Trusts



Local Land Trusts



P.O. Box 188
Pepperell, MA 01463
www.nashobatrust.org

Jamie Fosburgh, NPS, Manager, Northeast Region Rivers Program
Lucy Wallace, Chair, NRWSR Study Committee
Nashua River Wild and Scenic River Study Committee
c/o Nashua River Watershed Association
592 Main Street
Groton, MA 01450

July 13, 2018

Dear Mr. Fosburgh and Ms. Wallace:

Nashoba Conservation Trust (NCT) is a Pepperell, MA based land trust dedicated to protecting open space and retaining the rural character of our community. Since its incorporation in 1969 NCT has strongly focused its conservation efforts on land adjacent to the Nashua and Nissitissit Rivers and their tributaries with the goal of protecting water quality, as well as aquatic and wildlife habitat. Indeed, the very first parcel protected by NCT abuts Gulf Brook, a cold-water tributary of the Nissitissit.

Today more than half of NCT's holdings in fee are adjacent to the Nashua and Nissitissit Rivers or their tributaries. It is for this reason that we take particular interest in the Nashua, Squannacook, and Nissitissit River (NSN) Study and enthusiastically support its recommendation to seek Wild and Scenic River designation.

Sincerely,

Ken Hartlage
President



Local Land Trusts



June 18, 2018

BOARD OF DIRECTORS

Richelle M. Brown,
President, Leominster
Lucy Crocker Abisalih,
Treasurer, Merrimac
Elizabeth Reid, Clerk,
Fitchburg

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Angela Kearney,
Ashburnham
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Director of Land Protection

Jamie Fosburgh, NPS, Manager, Northeast Region Rivers Program
Lucy Wallace, Chair, NRWSR Study Committee
Nashua River Wild and Scenic River Study Committee
c/o Nashua River Watershed Association
592 Main Street
Groton, MA 01450

Dear Mr. Fosburgh and Ms. Wallace:

The North County Land Trust (NCLT) is a regional land trust that includes the town of Townsend and Lancaster in its service area. We are well aware and supportive of the Nashua, Squannacook, and Nissitissit River Stewardship Plan and the desire to seek partnership Wild and Scenic River designation.

Our mission to conserve the farms, forests and landscapes that define the character of our region is consistent with that of the Study Committee that wrote the Plan, and is reflected in the recommendations it makes therein. This includes focusing land protection efforts in those areas that would geographically allow for wildlife migration in the face of changing climate.

On behalf of the North County Land Trust board and staff, I offer our thanks and support for the efforts of those who are pursuing this designation and we will be elated once this honor is bestowed.

Sincerely,

Anna Wilkins
Executive Director



Local Land Trusts



Regional Land Trusts and Conservation Organizations



Regional Land Trusts and Conservation Organizations



Regional Land Trusts and Conservation Organizations



July 5, 2018

Jamie Fosburgh, NPS, Manager, Northeast Region Rivers Program
Lucy Wallace, Chair, NRWSR Study Committee
Nashua River Wild and Scenic River Study Committee
c/o Nashua River Watershed Association
592 Main Street
Groton, MA 01450

Dear Mr. Fosburgh and Ms. Wallace:

Mass Audubon is fully supportive of the Nashua, Squannacook, and Nissitissit Rivers Wild and Scenic River designation. Mass Audubon supported the study authorization in 2015, and since then we have been following the work of the Study Committee as it has compiled a detailed and thoughtful Stewardship Plan. This locally-driven, voluntary Plan – approved by all 11 participating towns in Massachusetts and New Hampshire – provides a solid set of recommended actions to advance protection of the outstanding resources within these rivers.

We are pleased to see that the Plan also references the Nashua River Watershed Important Bird Area, which is located in the heart of the proposed Nashua River Wild and Scenic River*. The area contains a diversity of intact, interconnected habitats – both wetlands and uplands. We also appreciate the attention paid to the seriousness of the exotic invasives problem and to the significance of the state's Priority Natural Communities, several of which are found along the mainstem Nashua. Extensive areas of land bordering the Nashua, Squannacook and Nissitissit Rivers are protected by federal, state, or local conservation agencies. Additional Greenway land protection and stewardship are among the many recommendations we support.

Mass Audubon has a decades-long involvement with the nearby Sudbury-Assabet-Concord's Wild and Scenic Rivers, during which we have participated in many public awareness events. We also supported the designation of the Taunton River as a National Wild and Scenic River in 2009. We continue involvement in implementation of the Stewardship Plan there, and we are involved in conservation and restoration partnership efforts along the Westfield Wild and Scenic River in western Massachusetts.

The Nashua, Squannacook, and Nissitissit Rivers are truly outstanding and remarkable in their natural, cultural, and recreational values, particularly considering their location so close to the Metro Boston urban area. Mass Audubon wholeheartedly supports this designation, and looks forward to participating in implementation of the Plan with local and regional partners.

Sincerely,

A handwritten signature in blue ink, appearing to read "John J. Clarke".

John J. Clarke
Director



MASSACHUSETTS
Rivers Alliance

2343 Massachusetts Ave, Cambridge, MA 0214C
617-714-4272 • www.massriversalliance.org

June 12, 2018

Jamie Fosburgh, NPS, Manager, Northeast Region Rivers Program
Lucy Wallace, Chair, NRWSR Study Committee
Nashua River Wild and Scenic River Study Committee
c/o **Nashua River Watershed Association**
592 Main Street
Groton, MA 01450

Dear Mr. Fosburgh and Ms. Wallace:

As Executive Director of the Massachusetts Rivers Alliance, I have the privilege of having a "bird's eye view" of all the river systems across the Commonwealth. The mission of the Massachusetts Rivers Alliance is to protect and restore Massachusetts' rivers and streams, and to connect and strengthen our member organizations. The Nashua River Watershed Association is one of 70+ organizational members that make up our alliance. It is with great enthusiasm that I support the Nashua, Squannacook, and Nissitissit Rivers for Partnership Wild and Scenic River designation. Their river-related resources, as detailed in the Stewardship Plan, are without question worthy of this national distinction.

As the former Executive Director of the Organization for the Assabet River, I worked for many years on the Sudbury, Assabet, and Concord designation as Partnership Wild and Scenic Rivers, and I have since seen firsthand both the program's benefits, and what is required to make the most of the opportunity.

I have worked with the Nashua River Watershed Association for over two decades, and am familiar with the exceptionally strong conservation networks and partnerships that have been forged throughout the nine Massachusetts communities and the two New Hampshire communities. This is evidenced in the Association's leadership of the Study Committee and in the development of the Stewardship Plan, which reflects input from resource experts in state agencies and academic institutions, local land trusts and conservation groups, businesses, planning agencies, and municipalities. There is no doubt that the Nashua River Wild and Scenic River Study Committee is poised to work with others in successful implementation of the voluntary Plan.

Mark P. Smith
President
Belmont
Nancy Hammett
Vice President
Watertown
Andrea Franz
Treasurer
Charlestown
Paul Beaulieu
Secretary
Grainby
Anna Aguilera
Needham
Wayne Castonguay
Ipswich
Roger Colton
Belmont
Ian Cooke
Acton
Mary Griffin
Hingham
Judith Grinnell
North Adams
Andrew Magee
Acton
Nagesh Mahanthappa
Acton
Deirdre Menoyo
Manchester
Pam Resor
Acton
Heidi Ricci
Shirley
Emily Scerbo
Westminster
Julia Blatt
Executive Director
Gabby Queenan
Policy Director
Dani Keith
Operations Manager

Recently I attended the national River Rally in Lake Tahoe, California, and participated in the working session for Wild and Scenic Rivers across the country. I was appointed to a new national advisory committee for Wild and Scenic Rivers. Again, having so recently thought about the rivers across the nation, I assert that the Nashua, Squannacook, and Nissitissit Rivers are a perfect fit for the Partnership Wild and Scenic Rivers program and urge Congress to designate them during this 50th Anniversary year of the national program.

On behalf of the Massachusetts Rivers Alliance, I look forward to working with the Nashua River Watershed Association and its partners to implement the "Nashua, Squannacook, and Nissitissit Rivers Stewardship Plan." Please don't hesitate to get in touch if you have any questions for me. Thank you for considering these comments.

Sincerely,

A handwritten signature in blue ink, appearing to read "Julia Blatt".

Julia Blatt
Executive Director

Regional Land Trusts and Conservation Organizations



Massachusetts Watershed Coalition

PO Box 577, Leominster, MA 01453 978.534.0379 mwc@commonwaters.org

June 19, 2018

Jamie Fosburgh, NPS, Manager, Northeast Region Rivers Program
Lucy Wallace, Chair, NRWSR Study Committee
Nashua River Wild and Scenic River Study Committee
c/o Nashua River Watershed Association
592 Main Street
Groton, MA 01450

Dear Mr. Fosburgh and Ms. Wallace:

As Executive Director of the Massachusetts Watershed Coalition I know the threats to the health of our rivers and the gaps in their protection. The "Nashua, Squannacook, and Nissitissit Rivers Stewardship Plan" does an exemplary job of establishing appropriate goals and laying out actions that can be undertaken voluntarily to sustain unique river-related resources. There are many ways the Massachusetts Watershed Coalition can partner to help achieve the goals, particularly with regard to stormwater.

Since 2008, I have been a volunteer with the Nashua River Watershed Association's Volunteer Water Quality Monitoring Program, which has been collecting data for over 20 years. I take this opportunity to underscore the need for ongoing monitoring of the rivers, and I am pleased to see the importance of maintaining good water quality is highlighted in the "Stewardship Plan."

I am also glad to see the "Marion Stoddart Story" is prominently presented in the "Stewardship Plan" as a cultural resource. I served as the Executive Director of the Nashua River Watershed Association from 1981 to 1994. The Clean Up of the Nashua River is a national model and it has been my privilege to know Marion very well. Her role in the Clean Up is truly inspirational to both institutions and individuals alike. The "Marion Stoddart Story" is a story that needs to be told and retold as we go forward.

2018 is Marion's 90th birthday, and it's the 50th Anniversary of the Wild and Scenic Program. This year offers an exceptional opportunity for Congress to designate the Nashua, Squannacook, and Nissitissit Rivers as Partnership Wild and Scenic Rivers!

Sincerely,

Ed Himlan

Ed Himlan
Executive Director



Middlesex Conservation District

319 Lutzner Road, Suite 203
Wardens, MA 01865
(978) 992-2192 Fax: (978) 992-1305

June 23, 2018

Jamie Fosburgh, NPS, Manager, Northeast Region Rivers Program
Lucy Wallace, Chair, NRWSR Study Committee
Nashua River Wild and Scenic River Study Committee
c/o Nashua River Watershed Association
592 Main Street
Groton, MA 01450

Dear Mr. Fosburgh and Ms. Wallace:

The Middlesex Conservation District, a not-for-profit subdivision of state government, was established in 1947 to provide soil and water conservation programming. Our philosophy has always been that local people working to address community conservation needs know best how to solve local problems, and that voluntary conservation, coupled with education, results in long-term success. How familiar it is to see much of the same philosophy within the Stewardship Plan that was written during the three-year study of these rivers. All we need to see is the designation passed and then the voluntary recommendations can begin to be implemented.

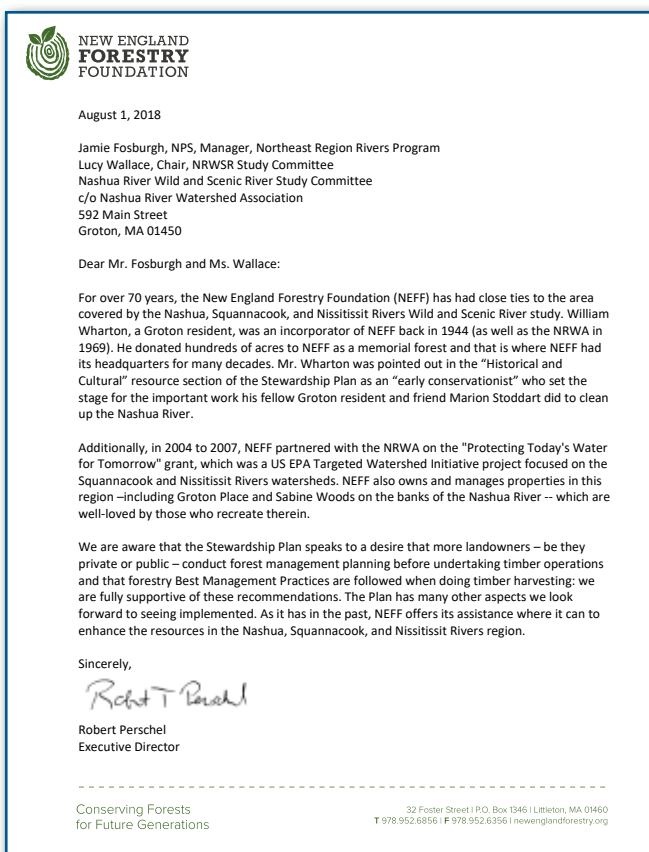
It is good to see references to the issues we deal with daily in the Plan including best management practices related to erosion control practices; pesticide and nutrient management; wildlife management practices; and municipal sediment and erosion control site planning. We are enthused that seven towns (the majority of which are in Middlesex County) will be working together as a Stewardship Council on these very issues. We support this designation process and look forward to hearing good news.

Sincerely,

Elizabeth McGinnis

Elizabeth McGinnis
Administrator

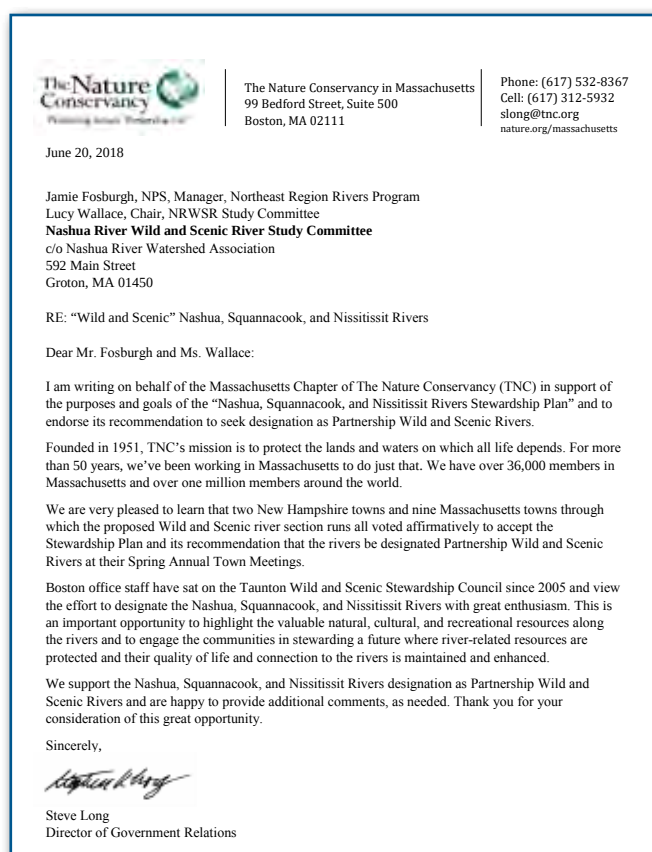
Regional Land Trusts and Conservation Organizations



Regional Land Trusts and Conservation Organizations



Regional Land Trusts and Conservation Organizations



Regional Land Trusts and Conservation Organizations



The Nature Conservancy in New Hampshire
22 Bridge Street, 4th Floor
Concord, New Hampshire 03301-4987

tel [603] 224.5853
fax [603] 228.2459
nature.org/newhampshire

Jamie Fosburgh, NPS, Manager, Northeast Region Rivers Program
Lucy Wallace, Chair, NRWSR Study Committee
Nashua River Wild and Scenic River Study Committee
c/o Nashua River Watershed Association
592 Main Street
Groton, MA 01450

June 13th 2018

RE: Wild and Scenic River Designation

Dear Mr. Fosburgh and Ms. Wallace,

On behalf of the New Hampshire Chapter of The Nature Conservancy, I write to offer my support for the "Nashua, Squannacook, and Nissitissit Rivers Stewardship Plan" and to endorse its recommendation to seek designation as Partnership Wild and Scenic Rivers. This stewardship plan, and the recommendation to seek federal designation of the rivers as wild and scenic was accepted by all eleven participating communities in 2018, speaking to the broad support for this effort. The need to protect water quality and outstanding values such as biological diversity, recreation, and historical resources attracts broad support here in New Hampshire. Our intact streams and rivers define our communities and the character of our state, fostering our tourist economy and attracting long-term residents. In recent years, however, we've come to recognize that we can't take these resources for granted. Issues such as polluted drinking water and toxic algal blooms have emphasized the need for us to craft a vision for the future of our rivers and streams. One of the keys to successfully maintaining healthy water resources such as the Nashua, Squannacook, and Nissitissit Rivers is finding approaches for communities to work together. We applaud the grass-roots efforts of the Nashua-Squannacook-Nissitissit Wild & Scenic Study Committee to build a strong coalition of support among local communities. The Nature Conservancy sees these efforts as a model for fostering local engagement and hopes to see similar projects develop in other areas of the state.

Sincerely

David Patrick Ph.D.
Director of Conservation Programs



Boston Office
6 Beacon Street
Suite 615
Boston, MA
02108
t: 617.367.6200
f: 617.367.9885
tpl.org

June 26, 2018

Jamie Fosburgh, NPS, Manager, Northeast Region Rivers Program
Lucy Wallace, Chair, NRWSR Study Committee
Nashua River Wild and Scenic River Study Committee
c/o Nashua River Watershed Association
592 Main Street
Groton, MA 01450

Dear Mr. Fosburgh and Ms. Wallace:

I am writing to express The Trust for Public Land's support for the Nashua, Squannacook and Nissitissit Rivers Wild and Scenic River designation. We have been actively involved in the protection of important lands in the Nashua River Watershed for many years. We were partners with the NRWA in 2004 to 2007 on a large three-year US EPA Targeted Watershed Initiative collaborative grant project entitled: "Protecting Today's Water for Tomorrow", which proactively combatted threats to drinking water in the Squannacook and Nissitissit Rivers sub-basins. This project covered six of the eleven towns currently participating in this Wild and Scenic River undertaking. The Trust for Public Land was also hugely involved in several other major land protection projects in this same area: Belmont Springs (a key tributary to the Nissitissit River) in Pepperell, MA and Surrenden Farm (along the Nashua River) in Groton, MA; both these properties host riparian trails and other natural features.

The Trust for Public Land recognizes the myriad resources that warrant protection in this tri-river region, be they ecological, historic and cultural, or recreational and scenic. The Trust for Public Land therefore supports the Nashua, Squannacook, and Nissitissit Rivers Wild and Scenic River designation. We know that the people of the region -residents and visitors alike - have so much to gain from this designation and we will urge Congress to pass the legislation that will move this designation over the goal line.

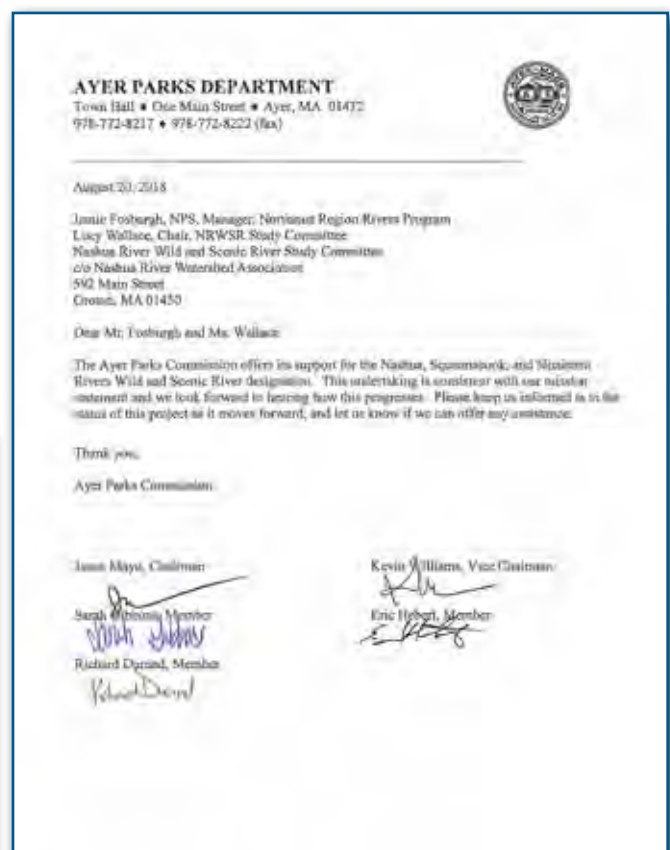
Sincerely,

Kevin Essington
Southern New England Area Director

Regional Land Trusts and Conservation Organizations



Recreation Organizations



Recreation Organizations



MICHAEL DONNELLY, 883 MOUNT ELAM ROAD, FITCHBURG, MASSACHUSETTS 01420

June 13, 2018

Jamie Fosburgh, NPS, Manager, Northeast Region Rivers Program
Lucy Wallace, Chair, NRSR Study Committee
Nashua River Wild and Scenic River Study Committee
c/o Nashua River Watershed Association
592 Main Street
Groton, MA 01450

Dear Mr. Fosburgh and Ms. Wallace:

Waterfowl hunting is a recreational sport prized by our membership. Members of the Nashua River Chapter of Ducks Unlimited particularly frequent the "Pepperell Pond" area of the Nashua River with its many oxbows. We are very familiar with the outstandingly remarkable resources of the Nashua River and seek to protect them.

Members of our Chapter have assisted in hand-pulls of the aquatic invasive water chestnut plants in "Pepperell Pond," providing a motor boat to help transport the harvested weeds to shore for disposal. We look forward to assisting where we can with the implementation of the "Nashua, Squannacook, and Nissitissit Rivers Stewardship Plan."

During this 50th Anniversary year of the Wild and Scenic Program, we encourage Congress to designate the Nashua, Squannacook, and Nissitissit Rivers as Partnership Wild and Scenic Rivers.

Yours truly,

Michael Donnelly

Michael Donnelly
Nashua River Chapter Ducks Unlimited, Massachusetts

Contact : Michael Donnelly cell (978) 855-4590, home (978) 342-0901, E-mail MichaelDonnellyHimself@comcast.net

Friends of Nashua River Rail Trail
Duane Cromwell, Co-Chair
19 Champney Street
Groton, MA 01450

June 11, 2018

Jamie Fosburgh, NPS, Manager, Northeast Region Rivers Program
Lucy Wallace, Chair, NRSR Study Committee
Nashua River Wild and Scenic River Study Committee
c/o Nashua River Watershed Association
592 Main Street
Groton, MA 01450

Dear Mr. Fosburgh and Ms. Wallace:

Friends of Nashua River Rail Trail has dedicated its efforts to improving conditions on the 11-mile shared use trail that extends from Ayer, MA in the south to the NH state line in Dunstable, MA. Our focus is on the four towns – also including Groton and Pepperell – through which the rail trail passes and all four are in the Nashua, Squannacook, and Nissitissit River Study area. Needless to say, the Nashua River features as the most prominent and unifying element of the rail trail.

We are writing in support of the NSN Stewardship Plan and its recommendation to seek Wild and Scenic River designation; and its goal that on or each of the four towns as seen by their voting for such at their recent ATMs. We look forward to working with the Study Committee or Stewardship Council on future trail-oriented and public-awareness raising initiatives.

Sincerely,

Duane Cromwell
Duane Cromwell, Co-Chair

Try Rockwood
Try Rockwood, Co-Chair

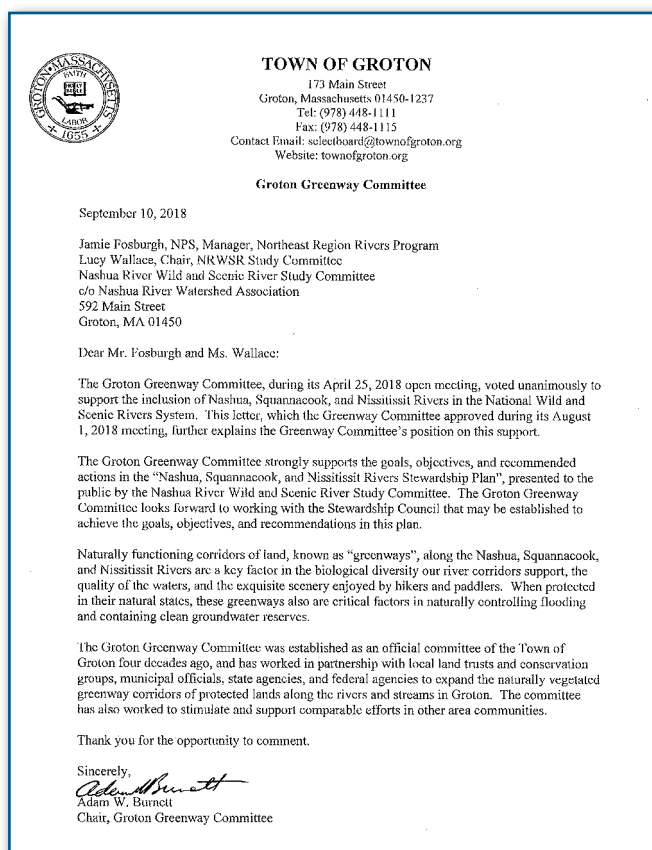
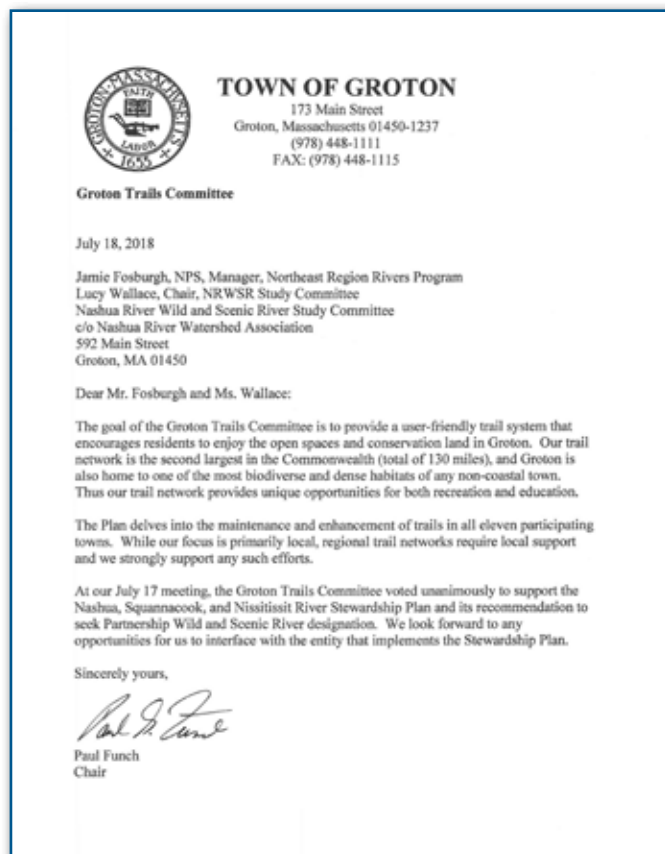
Members
Peter S. Cunningham
Thomas Miller
William Watson

Signatures
Peter S. Cunningham
Thomas Miller
William Watson

James J. Boudreau
Steve Kauter

James J. Boudreau
Steve Kauter

Recreation Organizations



Recreation Organizations

83 Groton St.
Pepperell, MA 01463
June 27, 2011

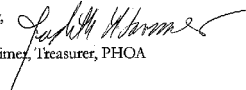
Jamie Fosburgh, NPS, Manager, Northeast Region Rivers Program
Lucy Wallace, Chair, NRWSR Study Committee
Nashua River Wild and Scenic River Study Committee
c/o Nashua River Watershed Association
592 Main Street
Groton, MA 01450

Dear Mr. Fosburgh and Ms. Wallace:

The Pepperell Horse Owners Association (PHOA), founded in 2003, has a mission to preserve and promote equine activities. Our membership is keenly interested in maintaining trails throughout the region that are suitable for horseback riding; the members are also interested in helping to educate people about safety on multi-use trails. The eleven mile Nashua River Rail Trail is a very important recreational asset to our members, as is the network of trails in the protected lands along the rivers, such as the J. Harry Rich State Forest in Groton. I personally ride the Nashua River Rail Trail frequently — it is my access to the Harry Rich State Forest, Shepley Hill, and a broad network of trails in Groton, Pepperell, and Dunstable. I have forwarded your draft letter to the members of our board and invited them to add their own comments. The Pepperell Horse Owners Fall Trail Ride utilizes trails along the Nissitissit River as well. I also run a benefit trail ride that includes the Groton/Town Forest and trails bordering the Squannacook River. Protecting these trails is essential to our enjoyment of our horses on the protected areas managed by various agencies within the state, including the Pepperell Conservation Association, the Nashoba Conservation Trust, NRWA, Fish & Wildlife, and the DCR, and various town conservation organizations, among others.

PHOA members gave input to the *Nashua, Squannacook, and Nissitissit Rivers Stewardship Plan* and we look forward to helping implement voluntary actions in the *Stewardship Plan* that relate to our organization's mission as appropriate.

Congressional designation of the Nashua, Squannacook, and Nissitissit Rivers as Partnership Wild and Scenic Rivers will help the communities and local organizations come together to protect and enhance the many outstanding river-related resources identified in the *Stewardship Plan*. We look forward to designation as soon as possible.

Sincerely,

Judy Lorimer, Treasurer, PHOA

Squannacook Greenways, Inc.

Board of Directors
Addendum to Meeting Minutes
April 21, 2018

Attending: Mark Graft, Don Klein, Steve McLean, Bill Ridout, Joan Witkowski

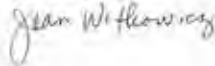
There being a quorum gathered at the Earth Day event on the Townward Common, we voted unanimously to support the designation of the Nashua, Squannacook, and Nissitissit Rivers as Wild and Scenic Rivers. Bill Ridout volunteered to send out an email newsletter that links to the Wild & Scenic video and encourage readers to attend the town meetings in Groton and Townsend. The newsletter will also have an article called "Constitution to Construction: Fall 2018" which was the theme of our Earth Day luncheon.

Respectfully submitted,

Joan Witkowski

Clerk

Squannacook Greenways, Inc.



Recreation Organizations



Townsend Rod and Gun
46 Emery Rd
Townsend MA 01469

June 20, 2018

Jamie Fosburgh, NPS, Manager, Northeast Region Rivers Program
Lucy Wallace, Chair, NRWSR Study Committee
Nashua River Wild and Scenic River Study Committee
c/o Nashua River Watershed Association
592 Main Street
Groton, MA 01450

Dear Mr. Fosburgh and Ms. Wallace:

The Townsend Rod and Gun Club is supportive of the Nashua, Squannacook, and Nissitissit Rivers Wild and Scenic River designation. We note that Townsend's residents have shown their nearly unanimous support of this designation at our Spring Annual Town Meeting.

Our Club is located on Bixby Brook a trout stream and tributary to and close by the Squannacook River, which flows through the center of our town (and is a coldwater fishery). The Study Committee that has moved this process forward had reached out to our club early on in the process when they were reaching out to local groups that have an interest in the rivers such as ourselves. We were invited to a forum on the recreational aspects of the Stewardship Plan that was in draft form, as they were looking for our feedback.

The final Plan well captures our thoughts concerning how to maintain and enhance the natural resources that are such a draw to sportsmen like ourselves. We welcome seeing the voluntary recommendations in the Stewardship Plan implemented and especially welcome the designation of these rivers as locally-managed Partnership Wild and Scenic Rivers.

Sincerely,

Jennifer Bellrose^{AF}

Jennifer Bellrose
Board of Directors



SQUANNA-COOK CHAPTER

July 19, 2018

Jamie Fosburgh, NPS, Manager, Northeast Region Rivers Program
Lucy Wallace, Chair, NRWSR Study Committee
Nashua River Wild and Scenic River Study Committee
c/o Nashua River Watershed Association
592 Main Street
Groton, MA 01450

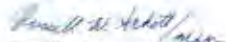
Dear Mr. Fosburgh and Ms. Wallace:

The Squannacook Chapter of Trout Unlimited is based in Pepperell, Massachusetts and draws its membership from the surrounding communities. Our mission is to "Preserve, protect and restore the Nissitissit and Squannacook watersheds through better scientific understanding and partnerships with other conservation groups." We are a particularly active Chapter. Our projects include supporting the removal of Turner Dam on the Nissitissit River in 2015, replacing culverts for stream continuity on Gulf Brook, a tributary to the Nissitissit River, and working to remove Keyes Dam on Sackett Brook, another Nissitissit tributary.

Our members are keenly aware of the unique resources we have in the cold water fisheries of the Squannacook and Nissitissit Rivers. Avid fly fishermen/fishermen, they value the opportunity to fish for Brook, Brown and Rainbow Trout in beautiful rivers flowing through protected lands, giving one the peaceful sense of "being in the wilderness" while only an hour away from major metropolitan areas.

The Squannacook Chapter of Trout Unlimited sees numerous ways in which we can participate in achieving the worthy goals delineated in the "Nashua, Squannacook, and Nissitissit Stewardship Plan" as developed by the Nashua River Wild and Scenic River Study Committee over the last several years. We encourage Congress to move swiftly to designate the Nashua, Squannacook, and Nissitissit Rivers as Partnership Wild and Scenic Rivers.

Sincerely,


Russell W. Schott
Chapter Secretary

P.O. Box 654 • Pepperell, MA 01463 • www.troutunlimited.org

Recreation Organizations

200 Sportsmen Club	Harvard Sportsmen's Club	Norco Sportsman's Club	Southborough Rod and Gun Club
Auburn Sportsmen's Club	Holiston Sportsmen's Association	North Brookfield Sportsmen's Club	Spencer Fish and Game
Barns Sportsmen's Club	Hopkinton Sportsmen's Association	North Grafton Fox, Game and Bird	Templeton Fish and Game Club
Black Patch Muzzleloaders	Hubbardston Rod and Gun Club	North Worcester Fox and Coon Club	Uxbridge Rod and Gun Club
Blackstone Valley Beagle Club	Leicester Rod and Gun Club	NWTF Central Mass.	Webster Fish and Game
Brookfield Rod and Gun	Leominster Sportsmen's Association	Other River Sportsman Club	Westminster Rod and Gun Club
Century Sportsmen's Club	Marlborough Fish and Game Club	Peterborough Gun Club	Whitinsville Fish and Game Club
Eight Point Sportsmen's Club	Mayenook Rod and Gun Club	Raykinton Fish and Game Club	Wichiting Sportsman's Club
Fitchburg Rod and Gun Club	Mass. Women's Gun Owners Assn.	Rutland Sportsman's Club	Worcester Fish and Game Association
Fitchburg Sportsmen's Club	Millers River Chapter, Trout Unlimited	Singletary Rod and Gun Club	Worcester Pistol and Rifle Club
Gardner Rifle and Pistol Club	New England Fly Tiers	South Bame Rod and Gun Club	
Hamilton Rod and Gun Club	Nimrod League of Holden	South Fitchburg Hunting & Fishing Club	



Worcester County League of Sportsmen's Clubs
P.O. Box 766, West Boylston, MA 01583

To:

Jamie Fosburgh, NPS, Manager, Northeast Region Rivers Program
Lucy Wallace, Chair, NRWSR Study Committee
Nashua River Wild and Scenic River Study Committee
c/o Nashua River Watershed Association
592 Main Street
Groton, MA 01450

June 28, 2018

Dear Mr. Fosburgh and Ms. Wallace

The Worcester County League of Sportsmen's Clubs (WCLSC) represents over 50 sporting clubs with over 25,000 members in total, that include our region's many devoted hunters and anglers. The League does support the designation of the Nashua, Squannacook, and Nissitissit Rivers as Partnership Wild and Scenic Rivers. The League itself has a 4 Point Program in its mission that encompasses conservation and land/waterway stewardship and supports Community efforts that complement what the League does.

The League recognizes and values the vast corridors of conservation lands along these rivers, including the MA State's Wildlife Management Areas (WMA) of Bolton Flats, Squannacook River, and Nissitissit River, as well as the J. Harry Rich MA State Forest, the Groton Town Forest, and the Oxbow National Wildlife Refuge. The rivers and conservation lands provide a wide range of outdoor recreational activities including wildlife observation, hiking, boating, hunting, and fishing. Within these rivers and on these lands, there are outstanding fly-fishing and diverse hunting opportunities. With these important natural resources becoming part of the Partnership Wild and Scenic Rivers program, the League does not recommend or support any new restrictive changes for the continued management of the wildlife and their supporting habitat as currently managed today by State and Federal agencies. Our concerns would include any restrictions to the stocking of birds or fish, as well as any access restrictions to the rivers and the MA State's WMAs.

Many organizations, towns, agencies, including our League and its members will benefit from the ongoing focus on protecting the natural resources of this area with access to more resources to do so. The League recognizes the Nashua River Wild and Scenic River Study Committee, that is responsible for this project to date, as the best positioned organization to lead the way forward.

Taking action this year to designate the Nashua, Squannacook, and Nissitissit Rivers as Partnership Wild and Scenic River would give further visibility and appreciative recognition with the half-century anniversary year of the Wild and Scenic Program.

Respectfully,

Wayne M. Adams

WCL Corresponding Secretary on behalf of the WCLSC Board and Officers

Historical and Cultural Organizations



July 18, 2018

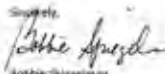
Jamie Fosburgh, NPS, Manager, Northeast Region Rivers Program
Lucy Wallace, Chair, NRWSR Study Committee
Nashua River Wild and Scenic River Study Committee
c/o Nashua River Watershed Association
592 Main Street
Groton, MA 01450

Dear Mr. Fosburgh and Ms. Wallace:

The Groton Historical Society and the Groton History Center (GHC) offers its support for the Nashua, Squannacook, and Nissitissit Rivers Wild and Scenic River designation. The GHC is dedicated to familiarizing a wider community of citizens with Groton's 350-year history.

When the Nashua Stewardship Plan was being developed we were asked to share any pertinent historical information we could find in our archives. This information regarding early settlers (notably John Viner's trading post in what is now the J. Harry Rich State Forest) and points of interest (such as the "Stoney Fordway" near the present day Potapoway trail launch) was incorporated into the historical and cultural section of the Plan.

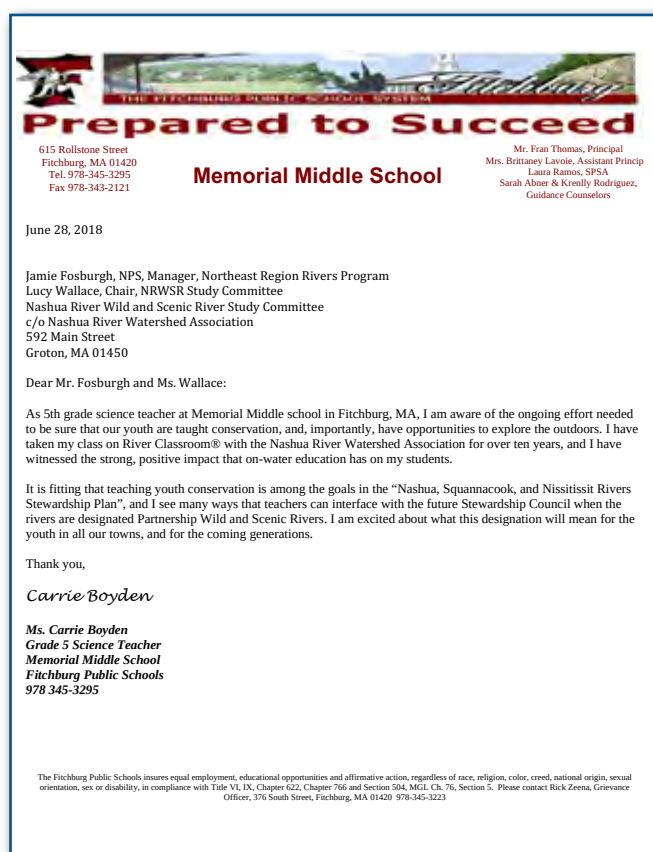
We were happy to provide what input we could to the process and we are now happy to lend our voice of support to the push for designation of these key rivers which have defined our region for so long and continue to do so.

Sincerely,

Bobbie Schlegel
President

Historical and Cultural Organizations



Schools and Teachers



Schools and Teachers

Francis W. Parker Charter Essential School
& Theodore R.Sizer Teachers Center
49 Antietam Street, Devens, MA 01434
Telephone (978) 772-3293 Fax (978) 772-3295
www.theparkerschool.org

July 2, 2018

Jamie Foshburgh, NPS, Manager, Northeast Region Rivers Program
Lucy Wallace, Chair, NRWSR Study Committee
Nashua River Wild and Scenic River Study Committee
c/o Nashua River Watershed Association
592 Main Street
Groton, MA 01450

Dear Mr. Foshburgh and Ms. Wallace:

As Principal of the Francis W. Parker Charter Essential School in Devens, Massachusetts, I am pleased to see that one of the timely goals in the *Nashua, Squannacook, and Nissitissit Rivers Stewardship Plan* is to "Foster, Stimulate and Support the Next Generation of Conservationists."

Our Charter Public School organizes our inquiry-based curriculum around an Essential Question each year. This year the question has been, "How Can We Make Tomorrow Better Than Today?" As students explore such a question they of course come up with many interpretations. It seems to me that the prospect of designating the Nashua, Squannacook, and Nissitissit Rivers as Partnership Wild & Scenic Rivers is inspiring in both youth and adults alike as we look toward a better tomorrow.

Another of the goals in the *Stewardship Plan* strikes me as particularly apt: "Preserve the History of the Clean-up of the Nashua River as a National Model and Preserve 'The Marion Stoddard Story.'" I have become very familiar with this story as an educator, a conservationist, a Groton resident, and a former Director of the Nashua River Watershed Association. I have long felt that finding creative ways to keep this empowering, internationally important story alive will have exponential positive results.

After designation, when the Stewardship Council is established, I look forward to exploring ways in which Parker and its students can help forward the goals of the Stewardship Plan.

Sincerely,

Todd Summa
Principal



GROTON SCHOOL

OFFICE OF THE DEAN OF STUDENTS
(OFFICE OF THE DEAN OF STUDENTS)

June 27, 2018

Jamie Foshburgh, NPS, Manager, Northeast Region Rivers Program
Lucy Wallace, Chair, Study Committee
Nashua River Wild and Scenic River Study Committee
c/o Nashua River Watershed Association, Inc.
592 Main Street
Groton, MA 01450

Dear Mr. Foshburgh and Ms. Wallace:

Groton School has a 400 acre campus alongside the Nashua River in Groton, Massachusetts. The school's crew has used the Nashua River since the school's founding in 1884. Many of our graduates, including Franklin D. Roosevelt, '00, have enjoyed spending time at the river. The Nashua River is an extraordinary recreational asset and also a river of great beauty and cultural significance. As the head rowing coach at Groton School since 1980, I welcome the "Nashua, Squannacook, and Nissitissit Rivers Stewardship Plan" and would like to see the rivers achieve designation as Partnership Wild and Scenic Rivers.

Sincerely,

Andy Anderson

Andy Anderson
Director of Rowing
Coach, Varsity Boys Crew

Schools and Teachers



Lawrence Academy

P. O. Box 992 • Groton, MA 01450-0992 • www.lacademy.edu
978-448-6535 • 978-448-9208 fax

June 28, 2018

Jamie Fosburgh, NPS, Manager, Northeast Region Rivers Program
Lucy Wallace, Chair, NRWSR Study Committee
Nashua River Wild and Scenic River Study Committee
c/o Nashua River Watershed Association
592 Main Street
Groton, MA 01450

Dear Mr. Fosburgh and Ms. Wallace:

Lawrence Academy, founded in 1793, is a secondary boarding and day school located in Groton, Massachusetts. Our students benefit from the strong academic program we offer, and, they also benefit from the extraordinary natural resources in Groton and the surrounding communities. We recognize the importance of connecting with nature, and we encourage that through a variety of our practices and programs. This is especially evident in our summer Everyday Adventure Camps, and we often use the services of Nashoba Paddler, LLC to enable the students to get out on the Nashua or Squannacook Rivers. We've also bused our students up to Brookline, New Hampshire to experience the beautiful Nissitissit River.

As a resident of Groton as well as the Associate Head of School of Lawrence Academy, I have followed the work of the Nashua River Wild and Scenic Study Committee and am delighted that progress is being made toward formal designation as Partnership Wild & Scenic Rivers during this 50th Anniversary year of the National Park Service's Wild & Scenic Rivers Program.

The "Nashua, Squannacook, and Nissitissit Rivers Stewardship Plan" recognizes the importance of connecting youth with nature and fostering stewardship in the coming generations. I look forward to being called upon if I can help forge connections between the future Stewardship Council and Lawrence Academy.

Sincerely,

Robinson Moore
Associate Head of School

Forestry and Wildlife
Nesmith Hall
131 Main Street
Durham, NH 03824
www.nhwoods.org



June 29, 2018

Jamie Fosburgh, NPS, Manager, Northeast Region Rivers Program
Lucy Wallace, Chair, NRWSR Study Committee
Nashua River Wild and Scenic River Study Committee
c/o Nashua River Watershed Association, Inc.
592 Main Street
Groton, MA 01450

Dear Mr. Fosburgh and Ms. Wallace,

The University of New Hampshire Cooperative Extension has been providing services for over 100 years. Our mission is to strengthen people and communities in New Hampshire by providing trusted knowledge, practical education, and cooperative solutions.

I'm delighted that two of our New Hampshire communities – Brookline and Hollis – are participating the effort to seek designation for the Nashua, Squannacook, and Nissitissit Rivers as Partnership Wild and Scenic Rivers. I am familiar not only with the communities involved, but also with such lead partners as the Nashua River Watershed Association, with whom I have done projects over the years.

I have followed the activities and success of the Lamprey Partnership Wild and Scenic River with great interest. I foresee a similarly positive outcome from the Nashua, Squannacook, and Nissitissit Rivers designation.

As the UNH Cooperative Extension's State Forestry Specialist, I see many ways in which we might be able to help advance of the goals of the "Nashua, Squannacook, and Nissitissit Rivers Stewardship Plan" and look forward to being invited to do so.

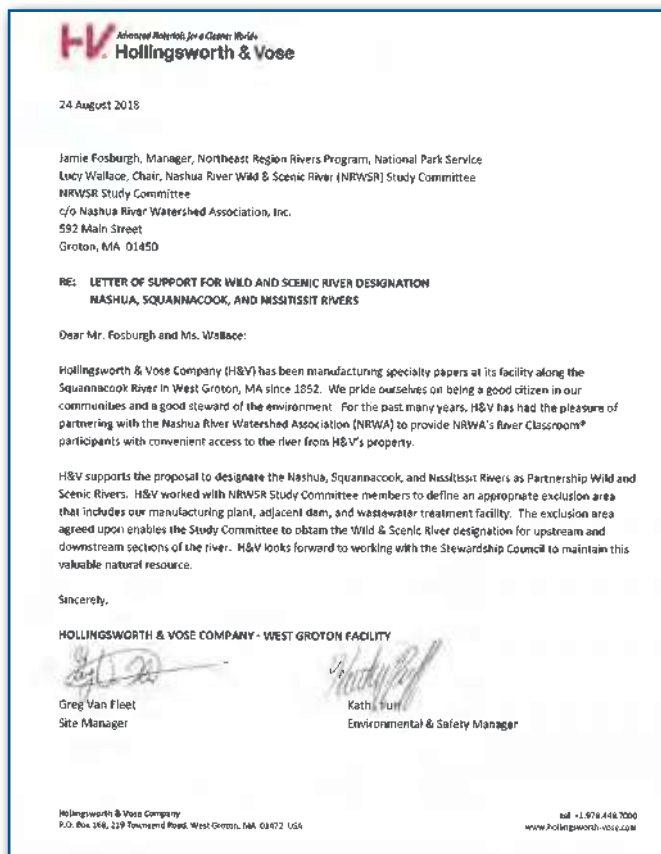
Sincerely,

Karen P. Bennett
Extension Forestry Professor and Specialist

Businesses, Chamber of Commerce, Rotaries, and Town Office of Community and Economic Development



Businesses, Chamber of Commerce, Rotaries, and Town Office of Community and Economic Development



Businesses, Chamber of Commerce, Rotaries, and Town Office of Community and Economic Development



CANOE & KAYAK Rentals, Tours,
Instruction, & RIVER CAMP

June 13, 2018

Jamie Fosburgh, NPS, Manager, Northeast Region Rivers Program
Lucy Wallace, Chair, NRWSR Study Committee
Nashua River Wild and Scenic River Study Committee
c/o Nashua River Watershed Association
592 Main Street
Groton, MA 01450

Dear Mr. Fosburgh and Ms. Wallace:

Nashoba Paddler, LLC is a small, family-owned, family-friendly business located on the riverbank of the Nashua River in Groton, Massachusetts. Eight thousand unique visitors use canoes and kayaks from Nashoba Paddler each season to explore the Nashua and Squannacook Rivers. Our goals are two-fold: to get people out on the river so that they can connect with nature and the river environment and become educated stewards, and, to promote paddlesports as an activity that can be enjoyed at any age. We serve as an outfitter, give tours, provide paddling instruction, run a recreational summer camp, and also partner with the Nashua River Watershed Association on their River Classroom program®.

In season, I am on the rivers daily. I know firsthand the biological diversity they enable, the recreation they support, and the river-related historical and cultural treasures that came into being because of them. The "Nashua, Squannacook, and Nissitissit Rivers Stewardship Plan" was developed with a great deal of expertise and local input – there are many, many recommendations that Nashoba Paddler can assist with going forward.

Based here in Groton, I have become close friends with Marion Stoddart, who is such an inspirational model to youth. Marion just celebrated her 90th birthday last weekend at the Groton Greenway River Festival along the Nashua River. What could be more wonderful than designating the three rivers as Partnership Wild and Scenic Rivers this year to celebrate the **50th Anniversary of the Wild and Scenic Program** and coincidentally celebrate **Marion Stoddart's 90th birthday**!

Sincerely,


Diane Carson
Owner, Nashoba Paddler LLC

Nashoba Paddler LLC
380 West Main St, Groton, MA
PO Box 228, West Groton, MA 01472
(978) 448-8699 www.nashobapaddler.com



July 2, 2018

Jamie Fosburgh, NPS, Manager, Northeast Region Rivers Program
Lucy Wallace, Chair, NRWSR Study Committee
Nashua River Wild & Scenic River Study Committee
c/o Nashua River Watershed Association, Inc.
592 Main Street
Groton, MA 01450

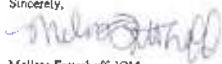
Dear Mr. Fosburgh and Ms. Wallace:

The Nashoba Valley Chamber of Commerce has about 600 members and provides opportunities for businesses to increase their exposure and to build business relations and partnerships within our region. Our members recognize that their work force and customers are drawn to this area in large part by the livability and charm of our communities. The character of our communities is forged from our beautiful landscapes, and our rich cultural heritage, and our natural resources. The Nashua, Squannacook, and Nissitissit Rivers run through the heart of nine of the Chamber's communities: Ayer, Bolton, Devens, Groton, Harvard, Lancaster, Pepperell, Shirley, and Townsend.

Designation by Congress of the Nashua, Squannacook, and Nissitissit Rivers as Partnership Wild & Scenic Rivers would provide the national recognition that these rivers deserve and be a tremendous source of pride to our business members and the townspeople at large.

The Nashua, Squannacook, and Nissitissit Rivers Stewardship Plan recommends many voluntary actions that will likely be of interest to our members, and I foresee many opportunities for partnerships in the coming years.

Sincerely,


Melissa Fetterhoff, ID#
President & CEO

Businesses, Chamber of Commerce, Rotaries, and Town Office of Community and Economic Development



Businesses, Chamber of Commerce, Rotaries, and Town Office of Community and Economic Development



Individuals

From: Center [mailto:bboutdoor1@aol.com]
Sent: Tuesday, June 19, 2018 10:30 PM
To: Alf@nashuariverwatershed.org; bboutdoor1@aol.com
Subject: Rivers should always be wild

Gentleman, Ladies and Mr. President,

The term WILD AND SCENIC is used over and over but here in Massachusetts we rarely have the opportunity to declare a set of 3 rivers just that.

The Nashua River is some 28 miles long and is fed by the trout-inhabited Nissitissit River that flows approximate. 7 miles from NH and the 9 mile long trout filled Squannacook River. The Nashua River is the Grandfather of the river system. As the other 2 empty their contents into the Nashua River forming a beautiful wild and very scenic region.

People swim here, Kayak, canoe in and go boating in the Nashua. The Audubon finds dozens of birds and waterfowl up and down this water way and in the spring and fall this area is a migratory waterfowl area for ducks and geese. Canada Geese, wood ducks, green wing and blue wing teal are just a few of the migrant waterfowl found here.

Please take the time and place your ink on the paper and approve this are. Come and see it you will be happy you did. Oh and bring a fishing pole. There are trout and bass to catch!

Bill Biswanger
1 Hayes Drive
Townsend Ma 01469

Individuals



Individuals

To: Lucy Wallace, Chair, Nashua Wild and Scenic Study Committee

From: Judd Gregg

Date: June 8, 2018

Re: Support for Designation of the Nashua River in NH as a locally managed, Partnership Wild and Scenic River

Dear Ms. Wallace:

I write to offer my support for the proposed designation of the Nashua, Squannacook and Nissitissit Rivers as a locally managed, Partnership Wild and Scenic River under the National Wild and Scenic Rivers System.

As a United States Senator in 1995 I joined with fellow NH Republican, US Representative Bill Zeliff and Senator Bob Smith, as an original legislative sponsor of the Lamont River in NH for inclusion in the system. Designated in 1996, the Lamont has more than 20 years of success as a Partnership Wild and Scenic River. Until my retirement from the Senate in 2013, I was a strong supporter of the Lamont designation and the Partnership program. I remain so today.

The local management model of the Partnership Wild and Scenic Rivers is an excellent fit with New Hampshire's tradition of community governance and empowerment. The Wild and Scenic designation brings communities together to steward shared river resources with support from the National Park Service. The designation recognizes and rewards local leadership in conservation.

No New Hampshire communities have earned such recognition and support more than Hollis and Brockton, whose leadership in the protection of our beloved Nissitissit River is unparalleled.

Having grown up and lived in the Nashua, I can attest to the efforts that many conservation organizations made in the last half century to keep the Nashua River in positive shape.

This designation will continue that effort and assist in keeping this unique natural resource protected and available for generations to come.

Sincerely,



Judd Gregg

U.S. Senator Kristin Griffith
Senator Margaret Conway
Representative Ann Kuster

Elizabeth "Libby" Herland
194 Wendell Ave
Pittsfield, MA 01201

Mr. Jamie Fosburgh, Manager
Northeast Region Rivers Program
National Park Service
15 State Street
Boston, MA 02109

Ms. Lucy Wallace, Chair
Nashua River Wild and Scenic River Study Committee
c/o Nashua River Watershed Association
592 Main Street
Groton, MA 01450

June 18, 2018

Dear Mr. Fosburgh and Ms. Wallace,

With great pleasure, I add my voice to those who know and love the Nashua River in expressing support for the designation of the Nashua River and its major tributaries, the Squannacook and Nissitissit Rivers, as Partnership Wild and Scenic Rivers. I know the Nashua River well, as about 8 miles of the river flows through the Oxbow National Wildlife Refuge (NWR). For 34 years, until my retirement in the fall of 2017, I had the privilege of serving as the manager of the Eastern Massachusetts National Wildlife Refuge Complex. This 8-refuge complex includes the 1,698-acre Oxbow NWR, primarily located in Harvard, Ayer and Shirley, Massachusetts. The Nashua River and its associated riverine wetlands are the heart of the refuge. The river and the adjacent lands are so valuable for wildlife and for people that they have been permanently protected by the U.S. Fish and Wildlife Service as a part of a national network of lands and waters known as the National Wildlife Refuge System.

The "Nashua, Squannacook, and Nissitissit Stewardship Plan" covers three types of outstandingly remarkable river-related resources. The Oxbow NWR is host to recreational opportunities (hunting, wildlife observation, hiking, and paddling), beautiful scenery (lush forested riverbanks and riverine wetlands), and significant biological diversity (Blanding's turtles). The Oxbow NWR - a "crown jewel" of permanently protected land - will become the anchor in a newly designated Partnership Wild and Scenic River.

A Partnership Wild and Scenic River designation of the Nashua, Squannacook and Nissitissit Rivers will not only benefit the rivers and their resources, but also all the protected lands along these rivers. History has already proven the wisdom of this type of river designation. The Eastern Massachusetts NWR Complex also contains the 3,858-acre Great Meadows NWR, which contains 12 miles of the Sudbury and Concord Rivers. These rivers, along with portions of the Assabet River, were designated by Congress in 1995 as Partnership National Wild and Scenic Rivers. This designation helped secure the

outstandingly remarkable scenic, ecological, recreational, historical and literary values of the Sudbury, Assabet and Concord (SuAsCo) rivers, and helped secure an enduring protection of the lands and waters and conservation values of the Great Meadows NWR.

As the manager of the Great Meadows NWR, I sat on the SuAsCo River Stewardship Council. I witnessed the benefits of the partnership designation to the municipalities along the rivers and the agencies and organizations who worked to protect and enhance the values of the rivers. The partnership designation was important; it brought people together, encouraged us to develop and work toward common goals, and helped make the rivers a vital and meaningful part of each town.

There is no doubt that the synergy that developed in the SuAsCo River Stewardship Council will also develop for the Nashua, Squannacook and Nissitissit Rivers. In fact, I witnessed this start to happen while, in my capacity as the manager of the Oxbow NWR, I served on the Nashua River Wild and Scenic River Study Committee. During that time, I saw the potential goal of achieving a permanent designation of these rivers generate enthusiasm and pride among people living within the study area. This designation will build on existing relationships and projects, including those between the Oxbow NWR and some of the nonprofit agencies and municipalities involved in the Nashua River Wild and Scenic River Study. Once the rivers are designated by Congress, I foresee existing and new levels of cooperation continuing for years and years to come.

In my opinion, all the ingredients for success are now in place as the designation is sought for the Nashua, Squannacook and Nissitissit Rivers. The river-related resources are outstanding, the rivers have been found eligible and suitable by the Study Committee, the Stewardship Plan is comprehensive and excellently-written, the eleven towns in the study area have all attested to their support through affirmative Town Meeting votes, and the partnerships are strong.

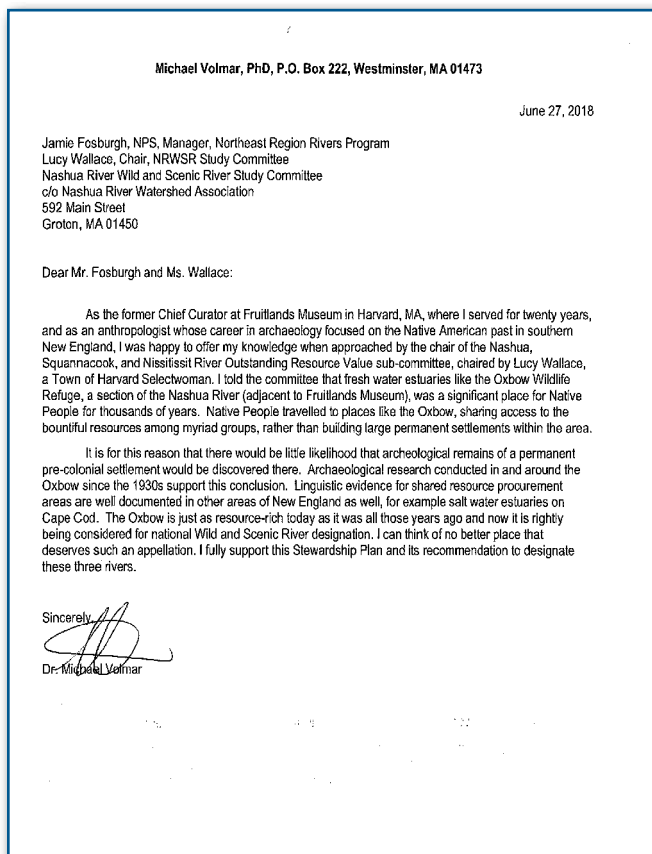
I am so pleased with the work of the Study Committee, and I am thrilled with the acceptance of the Stewardship Plan by all the municipalities within the study area. It will be an honor for the Oxbow NWR to be part of another "Partnership Wild and Scenic River". I wish you tremendous success in achieving this designation.

Most sincerely,



Elizabeth "Libby" Herland

Individuals



Individuals

Main Street
204 Autumn Ridge Drive
Ayer, MA 01432

June 29, 2018

Janie Fookburgh, NPS
Lucy Wallace, Chair, Study Committee
Nashua River Wild & Scenic River Study Committee
592 Main St.
Groton, MA 01450

Dear Janie & Lucy -

I am thrilled that the Nashua, Squannacook & Nissitissit Rivers are on the verge of being designated as Partnership Wild & Scenic Rivers! It was not so very long ago that the Nashua was considered one of the 10 most polluted rivers in the United States. In the 1960's when a group of us organized the Nashua River Cleanup Committee, the Nashua was considered to be dead with no chance for restoration. The highest form then of life in the North Nashua River was a single worm.

-3-

200 miles, and we are working hard to complete the rest of the Greenway for conservation, recreation & educational purposes. The River's restoration is a remarkable story & can be credited to the partnership & persistent work of local businesses, non-profit local, regional, state & federal agencies.

The work is never done! The "Nashua, Squannacook & Nissitissit Rivers Stewardship Plan" is a blueprint for future voluntary action that can be undertaken together. Let's get started NOW! Let's designate these rivers as Partnership Wild & Scenic Rivers during the 50th Anniversary of the Wild & Scenic Program. We started cleaning up the River shortly before the Wild & Scenic Program began.

(2)

In Groton & surrounding communities the sludge was so thick that birds & small animals could walk across the top of the River without getting their feet wet. The River stunk so badly that it could be smelled one mile away. Signs went up at River crossings. "Hold your nose. Nashua River ahead." "Nauseous Nashua."

The PTA gave no value to land in Pepperell along the Nashua River citing the pollution condition of the River. Now, the most prized land lies along the River. Fish have returned along with bald eagles, great blue heron & osprey. People have returned to the River, too, to enjoy such recreational uses as fishing, swimming & boating. We have created a Greenway along the Nashua, Squannacook & Nissitissit Rivers & their major tributaries protecting about one half of our river heritage, approximately

-4-

Now, let's celebrate the 50th Anniversary by recognizing these 3 outstanding rivers!

Sincerely -

William

P.S. I just celebrated my 90th birthday & can think of nothing I would like more than to see the River designated Wild & Scenic this year!!

Appendix 3: Summary of Nashua, Squannacook, and Nissitissit Wild and Scenic Study Outreach and Education Efforts

Highlights of Meetings, Outreach Events, Forums, and Activities January 12, 2015 through May 18, 2018

Establishing a Transparent Process and Convening Study Committee

January 12, 2015: Congresswoman Tsongas's announcement and celebration of the passage and signing into law of the Nashua River Wild and Scenic River Study Act was well-attended, held at the NRWA River Resource Center, Groton, MA and covered by the press. *

Between January and October 2015: The NRWA contacted each of the towns to facilitate the appointment of town representatives. The appointment of Representatives and Alternates to the Study Committee was discussed with and made by each participating town's Board of Selectmen.

The first formal meeting of the Study Committee was held October 8, 2015. The Study Committee meetings, held on the first Thursday of each month, are open to the public. Notes from all Study Committee meetings are posted on the Committee's website: www.WildandScenicNashuaRivers.org. Twenty-seven meetings of the Study Committee have been held through May 17, 2018.

Links from each Town's web-site to the Committee's web-site were established.

Link from the Nashua River Watershed Association's web-site to the Committee's web-site was established.

All Study Committee and related events were listed on the web-site and continue to be listed.

ORRV Subcommittee Meetings (at least monthly)

January 2016 – March 2018

Public Outreach Subcommittee Meetings (at least monthly)

February 2016 – April 2018

The Study Committee's Activities Highlighted at Special Events

May 27, 2016: Bill Ashe Visitor Facility Dedication, Oxbow National Wildlife Refuge, Devens: Outreach Sub-Committee displayed materials, and Study Committee Chair included Wild and Scenic in her remarks.*

September 17, 2016: Congresswoman Tsongas's 10th Annual River Day at Oxbow National Wildlife Refuge, Devens: Focus was on Wild and Scenic, Elizabeth Ainsley Campbell outlined the Study Process, and a videotape of that was produced for posting on the Committee's web-site.* The Study was also highlighted at Congresswoman Tsongas's 2017 River Day event.*

November 2, 2017: Nashua River Watershed Association's Annual Meeting, held at Devens, included a featured speech by the Study Committee Chair on the status of the Study Committee's work.

Examples of Displays for Events and Situations

September 2016 and September 2017: Grotonfest, Groton, MA: Outreach Sub-Committee displayed materials*

*free and open to the public

June 2016 and June 2017: Groton Greenway Festival along the Nashua River in Groton: Outreach Sub-Committee displayed materials*

March 5, 2017: NRWA's special "For the Common Good" event held at the Bull Run Restaurant in Shirley

May 31, 2017: Harvard Environmental Fair (and a similar Fair earlier in the year in Acton)

Updates on the Study's findings were periodically displayed in the Lobby of the NRWA's River Resource Center in Groton

Notice in the lobby of the Bull Run Inn and Restaurant in Shirley requesting public input on the Stewardship Plan

Wild & Scenic included in Presentations include

Series by NRWA Staff/Study Committee members: *Protecting Your Waterways: Water Quality Issues and How You Can Help*

May 4, 2017: Townsend Public Library, "Protecting Townsend's Waterways" *

August 1, 2017: Groton Public Library, "Protecting Groton's Waterways" *

August 3, 2017: Ashby Free Public Library, "Protecting Ashby's Waterways" (which include headwater tributaries to the Squannacook River) *

August 15, 2017: Pepperell's Lawrence Library, "Protecting Pepperell's Waterways"*

August 17, 2017: Dunstable Free Public Library, "Protecting Dunstable's Waterways"*

October 18, 2017: Ayer Public Library, "Protecting Ayer's Waterways"*

November 28, 2017: Shirley Hazen Memorial Public Library, "Protecting Shirley's Waterways"*

Spring 2017: Presentation by NRWA Staff to the Squann-a-tissit Chapter of Trout Unlimited

July 13, 2017: Presentation by Study Committee member/NRWA Staff at Public Meeting of Townsend's Conservation Commission about Large Woody Material Management on the Squannacook River

January 25, 2018: Presentation by NRWA Staff to the Pepperell Rotary, Pepperell

On-River Events

July 19, 2017: Study Committee group paddle on the Nashua River with invited guests

October 16, 2017: Study Committee group paddle on the Nashua River with municipal officials

Walks

November 12, 2017: Fall walk along the Squannacook River; co-sponsored by the Study Committee and the non-profit organization Squannacook Greenways*

January 27, 2018: Keyes Trail hike along Nissitissit River in Hollis and Brookline with Beaver Brook Association trip leader, co-sponsored with Hollis Conservation Commission*

February 18, 2018: Brookline Conservation Commission hike along Potanipo Rail Trail

February 24, 2018: Repeat of hike along Potanipo Rail Trail in direction toward Hollis March 10, 2018: Hike along Nissitissit River in both Hollis & Brookline

Major Public Update and Listening Sessions Held by the Study Committee to Gather Input for the Stewardship Plan

April 27, 2017: Public Update and Listening Session*

October 24, 2017: Recreation and Scenic Resource Values Public Input Meeting, at NRWA*. Event was videotaped for local cable stations, and also put on Study Committee web-site.

November 29, 2017: Historical and Cultural Resource Values Public Input Meeting at Nashua River Watershed Association* Event was videotaped for local cable stations, and also put on Study Committee web-site.

November 28, 2017: Biodiversity Resource Values Public Input Meeting at Nashua River Watershed Association* Event was videotaped for local cable stations, and also put on Study Committee web-site.

Presentations to Boards of Selectmen by the Study Committee, Including Requests for Input on Stewardship Plan
(Note: the PowerPoint presented at these BoS meetings is posted at: www.wildscenicnashuarivers.org)

Ayer: November 1, 2016.
Bolton: June 29, 2017.
Brookline: August 28, 2017.
Dunstable: November 2, 2016.
Groton: July 24, 2017.
Harvard: December 6, 2016.
Hollis: September 11, 2017.
Lancaster: December 5, 2016.
Pepperell: November 14, 2016.
Shirley: November 21, 2016.
Townsend: May 23, 2017.

Presentations to Conservation Commission and Planning Boards by the Study Committee, Including Requests for Input on the Stewardship Plan and Subsequently Endorsements

January 9, 2016: Brookline Conservation Commission.
July 25, 2017: Brookline Conservation Commission.
September 11, 2017: Hollis Conservation Commission.
December 5, 2017: Bolton Conservation Commission.
December 6, 2017: Townsend Conservation Commission.
December 7, 2017: Harvard Conservation Commission and Harvard Conservation Trust.
December 11, 2017: Dunstable Conservation Commission.
December 12, 2017: Pepperell Conservation Commission.
December 18, 2017: Devens Enterprise Commission (DEC).
December 18, 2017: Shirley Conservation Commission.
December 26, 2017: Groton Conservation Commission.
January 8, 2018: Townsend Planning Board.
January 9, 2018: Lancaster Conservation Commission.
January 11, 2018: Groton Planning Board.
January 22, 2018: Harvard Planning Board.
January 24, 2018: Shirley Planning Board.
February 5, 2018: Dunstable Planning Board.
February 12, 2018: Lancaster Planning Board.
February 20, 2018: Hollis Planning Board.
February 28, 2018: Bolton Planning Board.
March 27, 2018: Lancaster Conservation Commission.

April 25, 2018: Townsend Conservation Commission.
May 7, 2018: Townsend Planning Board.

Outreach to all Heads of Departments of Public Works (aka Highway Department) and Water Departments was done via phone and/or email.

Stakeholder Public Forums in each Town prior to ATM votes

March 6, 2018 Brookline.
March 8, 2018 Hollis.
April 3, 2018 Harvard.
April 9, 2018 Shirley.
April 10, 2018 Pepperell.
April 12, 2018 Bolton.
April 22, 2018 Groton.
April 23, 2018 Dunstable.
April 25, 2018 Lancaster.
April 26, 2018 Townsend.
May 3, 2018 Ayer.

Other Presentations and Requests for Input on the Stewardship Plan Addressed by the Study Committee

February 6, 2018: Brookline Lion's Club presentation.
February 14, 2018: Hollis-Brookline Rotary Club presentation.
February 15, 2018: Meeting with Brookline Fire Department Chief.
March 3, 2018: Community Outreach at Hollis Transfer Station Handed out ~200 flyers.
March 13, 2018: Info passed out during ballot voting in Hollis and Brookline.

Organizations and Agencies, in addition to the Town Boards above, and in addition to the Experts Consulted, who were specifically alerted to the opportunity to give input on the draft Stewardship Plan and invited to comment

Appalachian Mountain Club; Mass Bass Fishing Club members; Beaver Brook Association; Bolton Conservation Trust; Ducks Unlimited; Dunstable Rural Land Trust; Forbush Bird Club; Freedoms Way Heritage Association; Friends of the Oxbow National Wildlife Refuge; Groton Conservation Trust; Groton School;

Groton Trails Committee; Groton Turtle Conservation; Harvard Conservation Trust; Johnny Appleseed Trail Association; Lancaster Land Trust; Lancaster Trails Committee; Massachusetts Audubon; MA Department of Transportation; MA Rivers Alliance; MA Watershed Coalition; Metropolitan Area Planning Commission; Montachusett Regional Trails Coalition; Montachusett Regional Planning Commission; Nashoba Conservation Trust; Nashoba Paddler, LLC; Nashua Rail Trail friends group; Nashua Regional Planning Commission; New England Forestry Foundation; New England Mountain Bike Association - Wachusett Chapter; NH Department of Transportation; Nissitissit River Land Trust; North Central MA Chamber of Commerce; North County Land Trust; North Middlesex Regional Council of Government; Other sports groups (including 30+ Bass Fishing groups); Pepperell Horse Owners Association; Piscataquog Land Conservancy; Squannacook Greenways Rail Trail; The Nature Conservancy; The Trustees of Reservations; Townsend Conservation Land Trust; Trailwrights; Trout Unlimited; Trust for Public Land.

Stewardship Plan Copies Made Available at the Following Locations

Town Halls and Town Libraries in each of the eleven participating towns as well as at the NRWA.

Flyers individually tailored for each of the eleven towns

Flyers were made available at each town Stakeholder Public Forum, Committee-led walks, Town Meetings, and extras were placed at public meeting locations. They were passed out at other public gatherings such as the Friends of the Oxbow National Wildlife Refuge walk in April 2018 and Townsend's Earth Day Fair on April 21, 2018.

Educational Video (4 min.) was Produced

A brief educational video addressing what is Wild and Scenic, what towns are involved in the Study, positive aspects of designation, and answers to basic questions the public might have was produced and

distributed to each of the eleven communities through a number of avenues. The video was:

- Shown at each of the Stakeholder Public Forums, including the Earth Day event at the NRWA on April 22nd which celebrated the 50th Anniversary of the Wild and Scenic program with speakers from the National Park Service, the Sudbury, Assabet, and Concord Wild and Scenic Council, the Stewardship Committee with a showing also of the NPS's new 50th anniversary video.
- Submitted to the local cable channels in each of the eleven communities to be broadcast to the public in the month before Annual Town Meetings. A link to the video was placed on the town of Dunstable's website homepage.
- Posted to the Committee website, www.wildandscenicnashuarivers.org and the NRWA's website, www.NashuaRiverWatershed.org.
- Shown at the NRWA's Auction 2018 gala on March 24, 2018.
- Shown to the NRWA's Board of Directors at their March 7, 2018 meeting.
- Included as a link in E-Invites to the Stakeholder Public Forums and reminders to attend Annual Town Meetings.
- Shared on community social media sites.
- Shared via email by Committee representatives, i.e. one representative shared it with over 110 friends and acquaintances ahead of their Annual Town Meeting.
- Shown as part of the presentation of the Warrant question on Wild and Scenic where allowed, which was at five of the eleven Annual Town Meetings including Brookline, Groton, Hollis, Pepperell, and Townsend. It was shown on a laptop in the hallway for those waiting to sign-in for Ayer's and Harvard's Annual Town Meeting.

Related Press Work

Websites

The Nashua River Wild and Scenic River Study Committee created and maintained its own website, www.WildandScenicNashuaRivers.org

Programs and announcements were routinely posted on NRWA website, www.NashuaRiverWatershed.org

PSAs

PSAs were sent to eleven town public access cable channels requesting public input for the River Stewardship Plan

Videos

Congresswoman Tsongas's 2017 River Day event video of Elizabeth Ainsley Campbell remarks on the Wild and Scenic Study process videotaped for posting to Study Committee and NRWA websites.

October 24, 2017: Recreation and Scenic Resource Values Public Input Meeting videotaped for local cable stations.

November 28, 2017: Biodiversity Resource Values Public Input Meeting videotaped for local cable stations.

November 29, 2017: Historical and Cultural Resource Values Public Input Meeting videotaped for local cable stations.

March 2018: "Nashua, Squannacook, and Nissitissit River: Forever Wild & Scenic" educational video produced by Committee (4 min.) and distributed widely, see Video distribution information above.

April 22, 2018: Earth Day Celebration: "Will the Nashua, Squannacook, and Nissitissit Rivers Join the 50 Year Success Story of the National Wild & Scenic Rivers Program?" videotaped for local cable stations.

April 26, 2018: Groton Channel "Around Town" program featured Study Committee representatives from Groton

Earned Press

May 19, 2017: "Nashua, Squannacook, & Nissitissit Rivers Should Receive 'Wild & Scenic' Protection"—*Groton Herald*

December 3, 2017: "Move to Highlight the Squannacook River"—*Lowell Sun*

December 8, 2017: "The Squannacook River: Protecting a jewel in our own backyard"—*Lowell Sun*

March 30, 2018 : "Nashua River could earn 'wild and scenic' designation"—*The Harvard Press*

March 30, 2018 : "Will the Nashua River be designated 'Wild and Scenic'"—*Nashoba Valley Voice*

March 30, 2018: "Nashua River study heading to Bolton, Lancaster town meetings"—*The Item*, reprinted in *Worcester Telegram* March 30, 2018

April 2018: "Protecting a Bit of Wild and Scenic Dunstable at No Cost to You"—*Neighbor to Neighbor*

April 2, 2018 : "'Wild and Scenic' designation sought for rivers"—Sentinel and Enterprise April 2, 2018: "'Wild and Scenic' designation sought"—*The Sun*

April 4, 2018 : "Local rivers deserve federal recognition"—The Sun Editorial, reprinted in *Nashoba Valley Voice* on April 6, 2018

NRWA E-Newsletter (4,000 on distribution list)

E-Newsletters were also repurposed to serve as upcoming events flyers in thank you letters and as hand-outs at public programs

E-News lead story

February 2015: Passage of Nashua River Wild and Scenic River Study Act

March 2015: Mention of passage of Study Act in opening line of story about Squannacook River Rail Trail

June 2015: Mention of passage of Study Act as part of a recent highlights story

April 2017: Public update and input meeting; one water quality program including info on Wild and Scenic

September 2017: "River Day" with update on Wild and Scenic project

December 2017: Call for input on Stewardship Plan

January 2018: Call for images for Stewardship Plan and Study Committee's video

May 2018: Wild and Scenic River Project: Eleven Communities Vote at Town Meeting

E-News other story

May 2017: Public update and input meeting; one water quality program including info on Wild and Scenic

July 2017: One water quality program including info on Wild and Scenic

August 2017: 2 water quality programs in 2 communities including info on Wild and Scenic

October 2017: Three water quality programs in three communities including info on Wild and Scenic; Recreationalists Public Input Meeting

November 2017: Squannacook River Rail Trail walk; two Public Input meetings for Stewardship Plan- one on biodiversity and one on history/culture

February 2018: Image banner, and thank you for image sharing

NRWA Hardcopy Newsletter (3,000+)

Fall 2015: Short paragraph on the Wild and Scenic project in updates list

Fall 2017: Cover story on Outstandingly Remarkable Resource Values and process update—graphic created for Wild and Scenic process

NRWA Annual Report (3,000 +)

2015 Annual Report

2016 Annual Report

2017 Annual Report—cover story

NRWA E-Invites (average of 25 to 30% open rate)

January 2015: E-Invite to NRWA enews list regarding Congresswoman Tsongas's press event to announce passage of the Nashua River Wild and Scenic River Study Act

April 2017: E-Invite to NRWA enews list regarding Wild and Scenic update and informational meeting

May 2017: E-Invite to Townsend contacts regarding program on water quality in Townsend and Wild and Scenic project

August 2017: E-Invite to Pepperell contacts regarding program on water quality in Pepperell and Wild and Scenic project

September 2017: E-Invites for River Day where update on Wild and Scenic project was highlighted

September 2017: E-Invite to Dunstable contacts

regarding program on water quality in Dunstable and Wild and Scenic project

October 2017: E-Invites to Ayer and Ashby contacts regarding program on water quality in Ayer and Ashby Wild and Scenic project

November 2017: E-Invite to NRWA enews list regarding Wild and Scenic Public input sessions

November 2017: E-Invite to Shirley contacts regarding program on water quality in Shirley and Wild and Scenic project

January 25, 2018: E-Invite to Hollis and Brookline contacts about first informational guided hike

February 15, 2018: E-Invite to Hollis and Brookline contacts regarding informational guided hikes

February 27, 2018: E-Invite to Hollis and Brookline contacts regarding informational guided hikes

March 28, 2018: E-Invite to Harvard contacts regarding Stakeholder Public Forum

April 2, 2018: E-Invite to Pepperell contacts regarding Stakeholder Public Forum

April 17, 2018: E-Invite to NRWA enews list regarding Earth Day Celebration

April 23, 2018: E-Invites to Dunstable, Lancaster, and Townsend contacts regarding Stakeholder Public Forums

April 24, 2018: E-Invite to Ayer contacts regarding Stakeholder Public Forum

May 2, 2018: E-Invite to Harvard contacts to encourage attendance at Annual Town Meeting

May 3, 2018: E-Invite to Devens contacts regarding Stakeholder Public Forum

May 3, 2018: E-Invites to Groton, Bolton, Lancaster, and Pepperell contacts to encourage attendance at Annual Town Meeting

May 4, 2018: E-Invite to Groton, Bolton, Lancaster, and Pepperell contacts reminder about Annual Town Meeting

May 8, 2018: E-Invites to Ayer, Dunstable, and Shirley contacts to encourage attendance at Annual Town Meeting

May 10, 2018: E-Invites to Ayer, Dunstable, and Shirley contacts reminder about Annual Town Meeting

May 15, 2018: E-Invite to Dunstable contacts to encourage attendance at second evening of Annual Town Meeting

May 17, 2018: E-Invite to Dunstable contacts reminder about second evening of Annual Town Meeting

Other E-Invites

April 2018: Squannacook Greenways email about upcoming Town Meetings
May 2018: Ayer town Administrator email about upcoming Town Meeting

Press Releases

January 2015: Press release about Congresswoman Tsongas's press event to announce passage of the Nashua River Wild and Scenic River Study Act sent to 20+ media outlets

April 2017: Press release regarding program on water quality in Townsend and Wild and Scenic project sent to *Nashoba Valley Voice*

July 2017: Press releases regarding program on water quality in Pepperell and Groton and Wild and Scenic project sent to *Nashoba Valley Voice* and *Groton Herald*

August 2017: Press release regarding program on water quality in Dunstable and Wild and Scenic project sent to *Groton Herald*

September 2017: Press release regarding program on water quality in Ayer and Wild and Scenic project sent to *Nashoba Valley Voice*

October 2017: Press release on Stewardship Plan public input session for recreationalists sent to 20+ media outlets

October 2017: Press release regarding program on water quality in Ashby and Wild and Scenic project sent to *Sentinel and Enterprise*

November 2017: Press release on two Stewardship Plan public input sessions on topics of biodiversity and history & culture sent to 20+ media outlets

November 2017: Press release regarding program on water quality in Shirley and Wild and Scenic project sent to *Nashoba Valley Voice*

January 2018: Press release about the Stewardship Plan, public input sought, sent to nine media outlets

February 2018: Press release about Wild and Scenic project and public meetings in Brookline and Hollis submitted to *Hollis-Brookline Journal*

March 2018: Press release about Wild and Scenic project and public meetings in nine MA towns submitted to *Nashoba Valley Voice*

March 2018: Press release about Wild and Scenic project and public meeting in Harvard submitted to *Harvard Press*

April 2018: Press release about Earth Day Celebration sent to 20+ media outlets

April 2018: Press release about Wild and Scenic project in Groton submitted to *Groton Herald*

April 2018: Press release about Wild and Scenic project and public meeting in Bolton submitted to *Bolton Independent*

May 2018: Press release about Town Meeting vote outcome—all 11 communities vote “yes” sent to 20+ media outlets

Miscellaneous

Multiple posts were made on the topics listed above on NRWA's Facebook page.

Programs and meetings were posted to town listserves Talk about Groton and NextDoor Harvard. Hollis and Brookline events were posted to community Facebook page.

NRWA had displays on the Wild and Scenic project in its lobby for the public to view during education programs or other visits to the NRWA's River Resource Center.

Sample E-News to 4,000 NRWA Subscribers

News

Stewardship Plan Being Drafted for the Nashua, Squannacook, and Nissitissit Rivers

Your Input Requested!

Do you care about the biodiversity, history & culture, or recreational & scenic opportunities that are tied to the Nashua, Squannacook, and Nissitissit Rivers? Maybe you love to paddle, fish, or hike along these rivers. Maybe you love the variety of wildlife that makes its home in the river and along the banks. Or maybe you love the history of this area, the stories of the early inhabitants, the rise of the mills, and the story of the Nashua River's clean-up. **The Nashua River Wild and Scenic River Study Committee is looking for your input on its draft Stewardship Plan for sections of these three rivers.**

As part of the Nashua River Wild and Scenic River Study, this locally-driven Stewardship Plan is being drafted for two purposes. One is to provide necessary background information to the National Park Service as part of the process for Partnership Wild and Scenic Rivers designation. The other is to provide guidance to volunteers focused on river stewardship actions going forward.

The importance of the Nashua, Squannacook, and Nissitissit Rivers goes well beyond the confines of the rivers' corridors, and a number of resources contribute to give these river sections regional and national significance. These include:

- Public, permanently protected lands in the "greenway" corridor, including private and municipal conservation areas and forests, four state forests, three state wildlife management areas, and other "wild-like" parcels.
- Outstanding fisheries, which are the best for

trout in eastern Massachusetts and are being improved through local restoration projects.

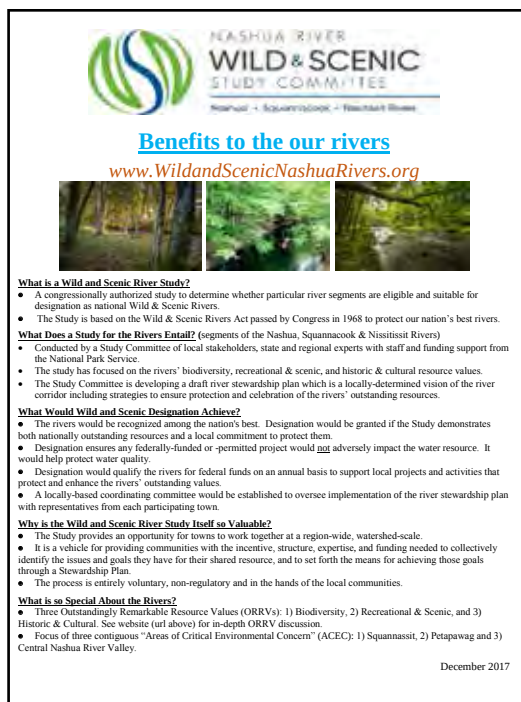
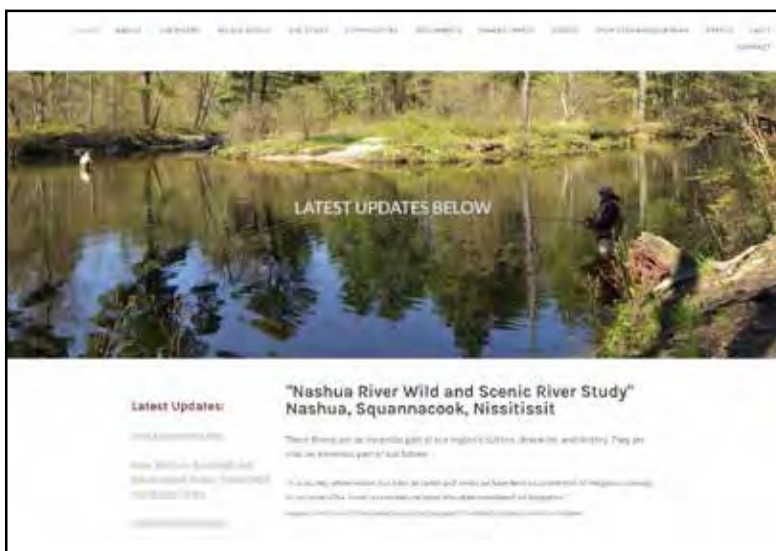
- High quality biodiversity, recreation & scenic, and historic & cultural experiences in close proximity to Boston MA, Worcester MA, and Nashua NH, thus providing local economic stimulus from visitors from these nearby urban areas.
- Varied canoeing and boating opportunities.

A Stewardship Plan for these three rivers is needed, particularly for the Nashua River which is so intensively used, because the residents of this region are concerned about maintaining and enhancing the unique resources. According to this draft Plan, people are seemingly most concerned about sustaining the relatively high water quality, gains that have been decades long in the making, but that are still and increasingly threatened today; and, most people participating in this locally-determined study expressed support for a concerted effort to conserve the key resources of the rivers' for future generations.

What's important to you? How can we work together across community lines to conserve and enhance these outstanding resources?

Representatives from 11 communities in MA and NH are working together on this Plan, and they welcome your input to help make the Plan as robust as possible. You can [read the draft Stewardship Plan online](#). Please share your comments by email with Al Futterman, NRWA Land Programs Director, at AlF@NashuaRiverWatershed.org.

Frontpage of www.WildandScenicNashuaRivers.org, the website of the Nashua River Wild and Scenic River Study Committee.



Front and back of Nashua River Wild and Scenic River Study flyer used at early public outreach events.

General one page flyer used as a general information piece for the public early in the Nashua River Wild and Scenic River Study.

Nashua, Squannacook and Nissitissit Rivers Wild and Scenic River FAQs

What is a Wild and Scenic River Study?

A congressionally authorized study to determine whether a particular river is eligible and suitable for designation as a National Wild and Scenic River under the Wild and Scenic Rivers Act which was enacted by Congress in 1968. The process is entirely voluntary and in the hands of the local community members who are members of the Study Committee.

Isn't Wild and Scenic Designation Geared Toward Federally Owned, Western Rivers?

Many of the originally designated rivers were out west, but there are several rivers designated in New England by the Partnership Wild and Scenic Rivers Program. The Partnership Program helps communities create a local Study Committee to research the river, and works with land in private ownership.

What is a Wild and Scenic River Study Committee?

This Study Committee includes members from each of the eleven communities -- eight Massachusetts and two New Hampshire -- towns in the study area: Ayer, Brookline, Dunstable, Groton, Harvard, Hollis, Lancaster, Peppercorn, Shirley and Townsend. The official appointees were appointed by the town Selectboards. There are also partner organizations on the Committee including: MA Division of Fish and Game, MA Division of Ecological Restoration, National Park Service, US Geological Service, US Fish and Wildlife Service, and the Nashua River Watershed Association. The mission of the committee is to gather information about resources along the rivers, protections which currently exist for these resources, and information about whether the local community understands and supports designation.

What Parts of the Rivers are Being Considered for Wild and Scenic Designation?

The Nashua, Squannacook, and Nissitissit Rivers are being studied in the eight towns listed above. During the time of the study the tributaries are studied as well.

How Would the River be Designated Wild and Scenic?

In order to be designated, the Study Committee must show that there are outstandingly remarkable resource values which are of regional, national, or state-wide significance. The Study Committee is currently determining if the Nashua, Squannacook, and Nissitissit Rivers have these values. The Study Committee must also show community support for designation. This will be accomplished through meetings and discussion with community members, and ultimately by a vote at town meeting in each of the eight towns. If both of these are demonstrated, then legislation is brought to Congress, and if passed signed into law by the President.

Does Designation Mean My Land Will Be Under Federal Control?

No. The federal government does not take control of the rivers which are designated.

What is the Stewardship Plan?

The Study Committee develops a Stewardship Plan during their approximate three year river study. This plan is a compilation of the information collected during the study, and designed to help communities understand the resources and protections which exist for their rivers, and the recommendations gathered by the Study Committee. This plan is non-regulatory, and the management strategies would be implemented through education and outreach.

1

What Effects May Result from Wild and Scenic River Designation?

- If designated, Congress would appropriate funds for projects to preserve the Outstandingly Remarkable Resource Values (ORRVs) -- i.e.: recreational, scenic, historic, cultural, and natural resources -- in the Nashua, Squannacook, and Nissitissit Rivers.
- Landowners would still be the stewards of their lands.
- If attracting tourists is a goal, designation could be a great marketing tool for local businesses and regions supporting ecotourism.
- Applications for grants may be more competitive in the areas designated Wild & Scenic.
- A local Advisory Committee would be established to oversee the designation funds, and provide outreach for the recommendations in the Stewardship Plan.
- This Committee would have input during the review of projects which are fully or partially federally funded, construction/development, and have a direct impact on the river. These types of projects would be reviewed even without designation, but designation provides more local input into the permitting of these projects.
- The Wild and Scenic Act was created at a time of large-scale dam building. In an effort to balance dammed rivers with those which were free-flowing, there is a stipulation in the Act which prevents the establishment of new dams or hydro facilities on the designated portion of the river. This does not affect pre-existing, permitted hydro facilities such as those in Ayer and Peppercorn MA. It also does not prevent existing dams from being retrofitted for purposes other than hydro.

As a Riverfront Landowner, Will Designation Mean New Regulations or Permits?

No. Local land use remains controlled by the local laws including town laws and zoning. The town's laws and regulations would continue to govern private property rights. If you perceive any impacts to your land due to designation, please contact us right away.

What Impacts Will There Be to Projects with Federal Funding?

Designation requires that any construction or development projects that are funded fully, or in part, by federal funds and are river related are reviewed by the local Advisory Committee. In this way, federally funded projects are reviewed by a committee of local representatives. These projects have never been vetoed in New England by the Advisory Committee and National Park Service, and typically projects continue as planned, or with minor changes recommended by the Advisory Committee to protect resources identified by the local communities as important.

Will Designation Help Bring Funding to the Nashua, Squannacook and Nissitissit River Communities?

Historically there have been annual appropriations from Congress to the local Advisory Committees of designated rivers. Also, designation may make grant proposals more desirable, or partnerships with other local or state organizations possible.

Will Hunting and Fishing Be Affected?

No. Hunting and fishing laws are unaffected by the designation.

Contact Information:

More information is available on our website: www.WildandScenicNashuaRivers.org
Please contact us at: alg@NashuaRiverWatershed.org; 978-448-0299

The Nashua River Wild and Scenic River Study Committee developed a set of Frequently Asked Questions with answers and posted it to its website, as well as using it as a hand-out at public meetings.

Nashua River "Wild and Scenic" River Study Committee Sections of the Nashua, Squannacook, and Nissitissit Rivers www.WildandScenicNashuaRivers.org

- The National Park Service Partnership Wild and Scenic Rivers Program is dedicated to protecting nationally significant river resources through locally based partnerships.
- Legislation sponsored by U.S. Congresswoman Nikki Tsongas was signed into law on December 19, 2014 which authorized the study.
- The Nashua, Nissitissit, and Squannacook Rivers are an essential part of our region's culture, character, & history. They are also an essential part of our future.
- Currently, eight Massachusetts communities along the Nashua, Nissitissit, and Squannacook Rivers are working together on a planning process with local groups and state & federal agencies. Our mission is to craft a vision for the future of these rivers, to consider their eligibility and suitability to be part of the National Wild & Scenic River System, and to determine how these rivers should best be managed in order to protect water quality and outstanding values such as biological diversity, recreation, and cultural & historical resources.
- Upon completion of the three-year planning process, if participating communities vote affirmatively, the US Congress will be asked to designate the rivers as Partnership Wild and Scenic Rivers.
- This process will result in the formation of strong local partnerships and will build public awareness, appreciation of these rivers, and support for the voluntary, locally based management plans to be developed as part of the study. The goal is to protect our shared outstandingly remarkable resources for the future as well as attract public and private funding to enhance public enjoyment of these rivers.



The Nashua, Squannacook, and Nissitissit Rivers- photos by Cindy Ross Photography

Early handout summarizing the Study project that was used at public outreach meetings and hikes like one led by Squannacook Greenways and Study Committee members along the Squannacook River in Groton, MA.



Wild and Scenic designation process graphic developed for the Nashua River Watershed Association's 2017 newsletter story on the progress of the Nashua River Wild and Scenic River Study. Graphic design by GERALYN MILLER DESIGN.



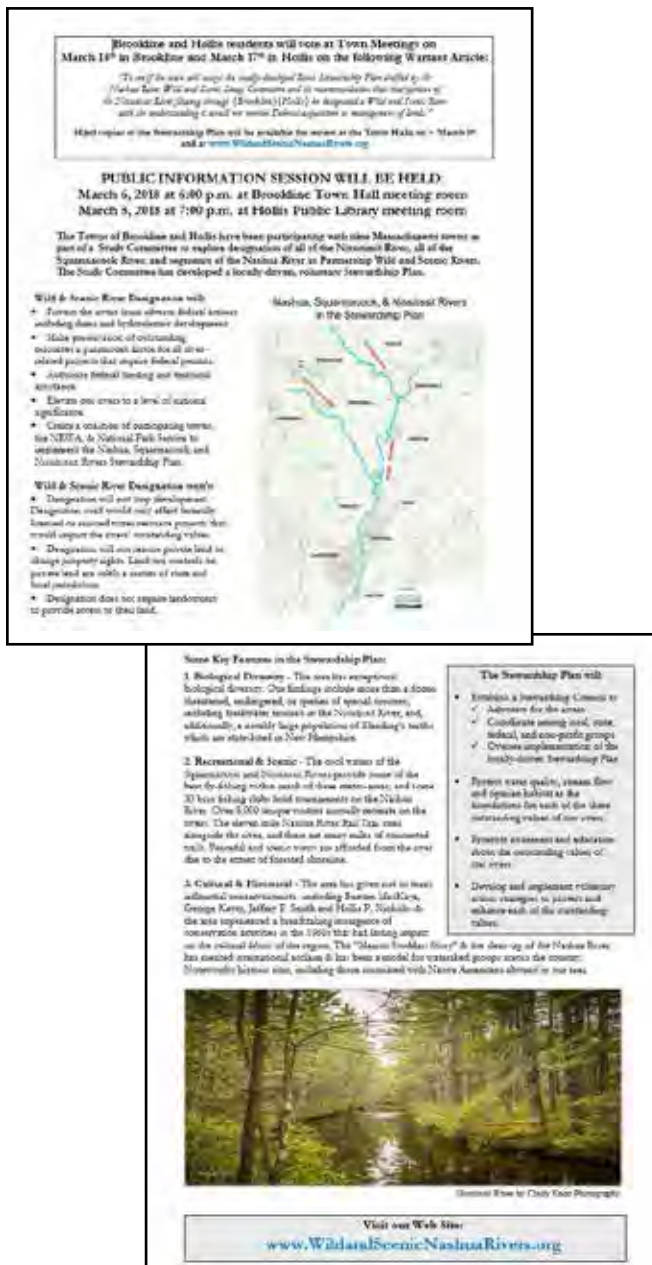
Flyer for Nashua River Wild and Scenic River Study Committee public input session on Recreation and Scenic outstandingly remarkable resource values, held in October 2017.



Flyer for Nashua River Wild and Scenic River Study Committee public input session on Biological Diversity and Historic and Cultural outstandingly remarkable resource values, held in November 2017.



Nashua River Wild and Scenic River Study Committee PSA seeking input on Stewardship Plan, posted to all local cable access channels in the participating communities.



Screenshot of The Groton Channel's video coverage of the Nashua River Wild and Scenic River Study Committee's Earth Day event that both served to be a celebration of the 50th anniversary of the Wild and Scenic Rivers Program and a public information meeting ahead of Groton's Annual Town Meeting, held on April 22, 2018. This video was offered to other local cable access channels for re-broadcast.



Screenshot of The Groton Channel's "Around Town" talk show that featured Nashua River Wild and Scenic River Study Committee members talking about the Study, the Stewardship Plan, and the upcoming Annual Town Meeting vote.

Front and back of flyer distributed at public information meetings in Hollis and Brookline, New Hampshire, beginning in February 2018. Similar flyers were prepared with appropriately individualized information for each of the eleven communities in the Study area, and distributed at public information meetings in each community ahead of their spring 2018 Annual Town Meetings.



"Nashua, Squannacook, & Nissitissit Rivers Should Receive 'Wild & Scenic' Protection" from The Groton Herald, May 19, 2017, by Mary Metzger.



"Local rivers deserve federal recognition" editorial from The Lowell Sun, April 4, 2018.



"11 Town Meetings agree: Nashua River is 'Wild and Scenic'" from the Nashoba Valley Voice, May 25, 2018.

Appendix 4: Background Information on Study Area Working Dams

A) Excerpt from Nashua, Squannacook, and Nissitissit Rivers Stewardship Plan:

Pepperell Dam

The first paper mill was established at the site near the current Pepperell Dam in either 1834 or 1835. Historical documents indicate the first dam was built at Babbittasset Falls (on the Nashua River) in the early 1860s. The location and layout of the dam changed over the years, and the current dam and powerhouse were built in 1920 by the Pepperell Paper Company. The Pepperell Paper Company closed in the early 2000s, and Pepperell Hydro Company, LLC (PHC) purchased the property in 2004. The power plant was grandfathered for operation under the Federal Energy Regulatory Commission (FERC) until upgrades were begun in 2007 by PHC, triggering the need for a FERC license.

At the request of the NPS, the PHC project area was excluded from the Nashua River Wild and Scenic Rivers Study Act, so as not to have the Wild and Scenic River Study efforts interfere with PHC obtaining a FERC license. Subsequently, the NPS confirmed to FERC by letter dated July 17, 2015 that the licensing of the Pepperell Project would not be in conflict with the Wild and Scenic River Study. PHC received a FERC license in 2015 (FERC Project Number P-12721), and in 2016 PHC was sold to Eagle Creek Renewable Energy (retaining the PHC name for the project). The dam operates as run-of-river (outflow from the project equals inflow at all times) and is 23.5-feet high, with 3-foot-high flashboards, and is 251-feet long. Flow from the Nashua River flows through a gated intake structure to a 565.5-foot long penstock. Pepperell Hydro releases a minimum flow of 15 cubic feet per

second (cfs) or inflow (whichever is less) into the bypassed reach over the spillway year round. The project includes a partially constructed permanent downstream passage facility for river herring.

A Recreational Plan for the dam project area has been accepted by the FERC, and will include canoe and kayak portage areas around the dam as well as new parking facilities for paddlers. The FERC licensing requires eel passage and fish passage facilities, once enough anadromous fish have reached the dam from downriver.

There are numerous cultural, recreational, and scenic values associated with the river above and below the Pepperell Dam. These include the Nashua River Rail Trail, which follows the river on the east side; J. Harry Rich State Forest, which also abuts the river on the east; the historic Covered Bridge downriver from the dam; and the Petapawag Conservation Area and boat launch in Groton. Each year, approximately 1,200 students and adult chaperones paddle the Nashua River in the dam project area as part of the Nashua River Watershed Association's River Classroom® activities. The river is the site of numerous yearly bass fishing tournaments, and is a popular destination for hunting waterfowl. Thousands of canoeists and kayakers take to the river to enjoy the quiet and scenery, and it is a destination for birders to witness osprey and bald eagles fishing the river.

Challenges upriver from the dam include the nearly one hundred acres of invasive water chestnut plants and four other invasive aquatic plants that have taken hold there. As part of the FERC licensing for the dam, PHC reached a Settlement Agreement with Stakeholders and is providing funding to address the invasive plants through the established Nashua River Regional Aquatic Invasives Alliance.

The Study Committee and the National Park Service (consistent with the NPS letter of 7-2015)

deem the facility to be compatible with a Wild and Scenic River designation as currently licensed and operating. The NPS Report to Congress will further document this finding. As such, the Pepperell Project will effectively be “grandfathered” as concerns the Wild and Scenic River designation, and the NPS will recommend a technical “exclusion” area be incorporated into the designation legislation to further codify this. This will in no way hinder the post-designation Stewardship Council from working cooperatively with Pepperell Hydro Company to protect and enhance river values consistent with the intent of the Stewardship Plan, including maintaining and improving river access, controlling invasive plants in the area above the dam, preventing migration of invasive plants below the dam, and otherwise enhancing the already remarkable values associated with the river into the future for the benefit of public use.

(Note - not a part of Plan excerpt: Efforts to communicate with Eagle Creek to reach agreement on the extent of an exclusion area have been unsuccessful. Consistent with the approach adopted by the Study Committee and recommended by NPS it is recommended that any designation legislation exclude all lands, buildings and structures owned and operated as a part of the Pepperell Project. At a minimum this would be 1000 feet downstream from the crest of the dam, and 1000 feet upstream from the crest of the dam. The Study Committee also identified a break point 9,240 feet above the crest of the dam as another upstream option based on natural, cultural and recreational attributes. Excluding the entire FERC Project Boundary is a third option, not endorsed by the Study Committee. The 9,240 feet exclusion area identified by the Study Committee is portrayed in the following map as well as on the suitability map found in Chapter 4.)

Ice House Dam

The first dam at the current site of Ice House Dam dates back to the 1790s. The dam was used as a reference marker in laying out the towns, probably due to the rock outcrop in the riverbed, which served to anchor the dam. (Low Impact Hydropower Institute Certificate #44–Ice House Hydropower

Project, Massachusetts, <http://lowimpacthydro.org/lihi-certificate-44-ice-house-hydropower-project-massachusetts-ferc-12769/>). In 1907, a powerhouse was built to power trolley cars, and ice production began in the 1920s. Power production for ice manufacturing was stopped mid-century when refrigerators became popular.

Ice House Partners, Inc. restored the hydropower facility in the early 2000s, and received a FERC license exemption in 2008 (FERC Project Number P-12769). The facility is operated as run-of-river and consists of a 190-foot long, 12-foot high dam topped with 24-inch stoplogs. The Nashua River reach that is bypassed by operating the project (measured from the dam to the tailrace outlet) is about 300 feet long. A million gallon per day flow to the Nashua River is maintained in the bypassed reach year-round. (Federal Energy Regulatory Commission, 122 FERC 62,262, Order Granting Exemption From Licensing, <https://lowimpacthydro.org/assets/files/lihi-cert-app-files/APPENDIX-OrderGrantingExemption>)

The Ice House project lies fully within the Oxbow National Wildlife Refuge. The river immediately up and down from the dam is riverine in nature, and affords paddlers and anglers every opportunity to enjoy the serene benefits of the Nashua River within the ONWR. Ice House Partners maintains a canoe put-in and take-out and fishing access on the opposite side of the river from the project works. Eel passage is maintained for elvers traveling upriver, but fish passage has not been required at the facility due to the existence of downstream fish blockages at other dam projects. The NRWA has hosted canoe and kayak-guided hand-pulls of small patches of invasive water chestnut plant upriver from the dam the past three years, which has nearly eliminated the plant from the reach.

The Study Committee and the National Park Service deem the facility to be compatible with a Wild and Scenic River designation as currently licensed and operating. The NPS Report to Congress will further document this finding. As such, the Ice House Project will effectively be “grandfathered” as concerns the Wild and Scenic River designation,

and the NPS will recommend a technical “exclusion” area be incorporated into the designation legislation to further codify this. The exclusion area begins 700 feet upriver of the dam (latitude 42.55185; longitude -71.62135) and concludes 500 feet downriver of the dam (latitude 42.55325; longitude -71.61735). This will in no way hinder the post-designation Stewardship Council from working cooperatively with Ice House Partners to protect and enhance river values consistent with the intent of the Stewardship Plan, including maintaining and improving river access, controlling invasive plants in the area above the dam, and otherwise enhancing the already remarkable values associated with the river into the future for the benefit of public use. The dam is deeded to Ice House Partners, Inc. and includes historical water rights, which will not be extinguished, impaired or interfered with by this designation

Hollingsworth & Vose Dam

The West Groton village, known as the Hollingsworth & Vose area mill village, was originally the site of a Federal Period starch mill. Paper manufacturing began at the site before the original mill burned in 1846, and continues today. (Groton Historical Commission, <http://books.gpl.org/GPLDL3/HollingsworthVoseAreaFormA.pdf>). The village, consisting of the mill and approximately 20 houses, grew up around this industry.

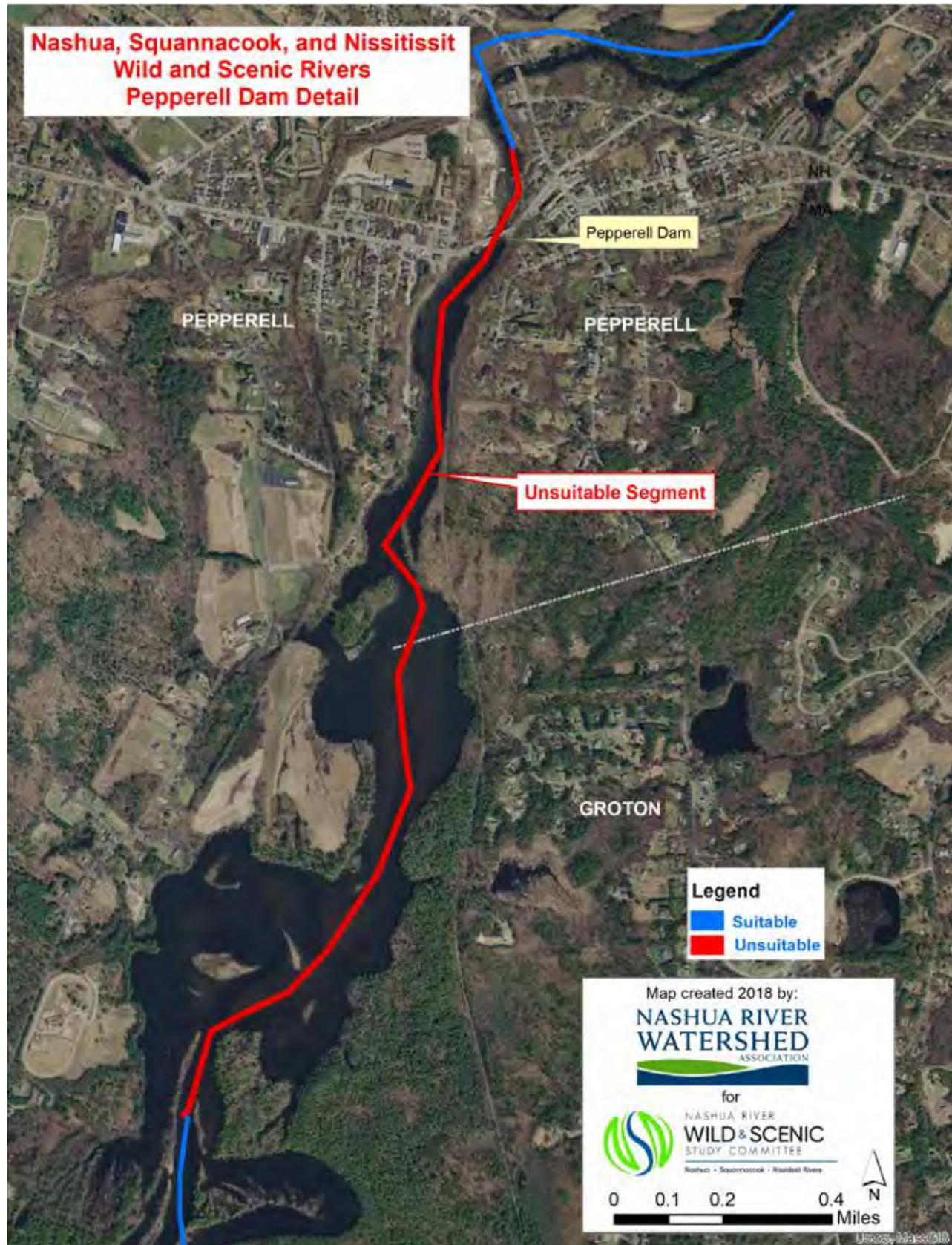
H&V is now a specialty filter paper manufacturing company. The company maintains a small impoundment for process water. The dam was first constructed in the 1840s for the previous starch factory, but no original construction records are available. The dam’s hydraulic height is 15 feet, and is 225 feet long, with the impounded volume of 350 acre-feet. Each year, 15-inch flashboards are

installed in May and removed again in November. Water is withdrawn from the impounded area, and returned to the river downstream through a water treatment facility. H&V holds a National Pollutant Discharge Elimination System (NPDES) permit for this discharge.

Upriver of the dam, the H&V impoundment provides access to the Squannacook River for the NRWA’s River Classroom® activities. Over 1,100 students and adult chaperones each year paddle north from the impoundment to learn about the natural environment of the Squannacook River and its environs.

The Study Committee and the National Park Service deem the facility to be compatible with a Wild and Scenic River designation. The NPS Report to Congress will further document this finding, and although this project is not licensed by FERC, it does have a federal permit in the form of its NPDES discharge permit. As such, the H&V dam, together with its NPDES permit, will effectively be “grandfathered” as concerns the Wild and Scenic River designation, and the NPS will recommend a similar technical “exclusion” area be incorporated into the designation to further codify this. The exclusion area for the H&V dam is proposed to be approximately 2,665 feet downriver from the dam (latitude 42.60791; longitude -71.63240) and approximately 1,200 feet upriver to the shore of the impounded area (latitude 42.61421; longitude -71.63899). This will in no way hinder the post-designation Stewardship Council from working cooperatively with H&V to protect and enhance river values consistent with the intent of the Stewardship Plan into the future for the benefit of the public.

B) Maps of Working Dam Areas



Map of Nashua, Squannacook, and Nissitissit Wild and Scenic Rivers Pepperell Dam Detail.



Map of Nashua, Squannacook, and Nissitissit Wild and Scenic Rivers Ice House Dam Detail.



Map of Nashua, Squannacook, and Nissitissit Wild and Scenic Rivers H&V Co. Dam Detail

C) Consultation History

Hollingsworth & Vose-owned Dams:

June 29, 2017: Martha Morgan, NRWA Water Programs Directors and a member of the Nashua River Wild and Scenic River Study Committee, met with Kathy Puff, Senior Environmental Engineer at Hollingsworth & Vose (H&V) regarding H&V-owned dams to discuss possible exclusion areas.

October 3, 2017: Martha Morgan, Elizabeth Ainsley Campbell, NRWA Executive Director and a member of the Nashua River Wild and Scenic River Study Committee, and Jamie Fosburgh, NPS Manager of the Northeast Rivers Program, met with Kathy Puff and Peter DiPasca, Jr. PE Environmental

Compliance Manager at H&V to discuss Partnership Wild and Scenic designation and possible dam exclusion areas. Allen Orsi and Briscoe Lang of Pare Engineering Consultants joined the discussion on a conference call on behalf of H&V.

January 29, 2018: Martha Morgan sent a letter to Kathy Puff and Peter DiPasca, Jr. of H&V regarding a proposed exclusion area around the H&V-owned working dam in West Groton. No exclusion was proposed for the non-working dam in Townsend.

February 2, 2018: Martha Morgan received email feedback from H&V regarding the proposed dam exclusion area.

February 8, 2018: Martha Morgan received email feedback that all changes to proposed language

looked good, and H&V accepted the language, as amended, that is in the Stewardship Plan, Appendix A, pp. 3-4, as endorsed by the Nashua River Wild and Scenic River Study Committee on February 15, 2018.

Pepperell Dam

July 17, 2015: NPS Letter to FERC regarding compatibility of the Pepperell Project with the Wild and Scenic River Study. (attached)

July 20, 2017: Martha Morgan sent a letter to Evan Quille, Environmental Coordinator at Eagle Creek Renewable Energy, LLC indicating that the NRWA and the National Park Service would like to meet to discuss the progress of the Nashua River Wild and Scenic River Study Committee and the exclusion area proposed for the Pepperell Dam.

November 21, 2017: Robert A. Gates, Executive Vice President of Operations at Eagle Creek Renewable Energy, LLC (ECRE), sent a response letter.

January 29, 2018: Martha Morgan sent a follow-up letter to Robert A. Gates of ECRE regarding a proposed dam exclusion area.

February 15, 2018: The Nashua River Wild and Scenic River Study Committee endorsed the “Nashua, Squannacook, and Nissitissit Stewardship Plan”, which included language in Appendix A, p. 2, that “...the Pepperell Project will effectively be ‘grandfathered’ as concerns the Wild and Scenic River designation, and the NPS will recommend a technical ‘exclusion’ area be incorporated into the designation legislation to further codify this.”

February 26, 2018: Elizabeth Ainsley Campbell and Martha Morgan spoke via conference call with ECRE representatives Evan Quille and Michael Scarzello, Regulatory Director, about treatment of invasive plants on the Nashua River. NRWA offered to arrange a meeting to discuss Partnership Wild and Scenic designation with ECRE representatives, either by conference call or in person (ECRE is based in New Jersey).

Ice House Dam

August 22, 2017: Martha Morgan, Elizabeth Ainsley Campbell, and Jamie Fosburgh met with Liisa Grady Marino, owner of Ice House Dam, to discuss Partnership Wild and Scenic designation and a possible dam exclusion area.

January 29, 2018: Martha Morgan sent a letter to Liisa Grady Marino of Ice House Dam regarding a proposed dam exclusion area.

February 14, 2018: Martha Morgan received an email from Liisa Grady Marino with minor edits to the proposed language changes to the description of the dam exclusion area. The minor edits were accepted, and the language, as amended, is in the “Nashua, Squannacook, and Nissitissit Rivers Stewardship Plan”, Appendix A, p. 3, as endorsed by the Nashua River Wild & Scenic River Study Committee on February 15th, 2018.

D) FERC, NPS Letters and Congressional Testimony re Pepperell Project

FEDERAL ENERGY REGULATORY COMMISSION

Washington, D.C. 20426

June 22, 2015

OFFICE OF ENERGY PROJECTS

Project No. 12721-006 – Massachusetts
Pepperell Hydroelectric Project
Pepperell Hydro Company, LLC

Jamie Fosburgh
National Park Service
New England Team Leader, NER Rivers Program
15 State Street
Boston, MA 02109

Reference: Wild and Scenic Rivers Act Determination

Dear Mr. Fosburgh:

On October 9, 2013, Pepperell Hydro, LLC (Pepperell Hydro) filed an original license application with the Federal Energy Regulatory Commission (Commission) to increase the capacity of, and continue to operate and maintain, the existing, unlicensed Pepperell Hydroelectric Project. The project is located on the Nashua River, in the towns of Pepperell and Groton, in Middlesex County, Massachusetts.

On April 11, 2014, Pepperell Hydro filed a settlement agreement on behalf of itself, the U.S. Department of the Interior's (Interior) Fish and Wildlife Service and National Park Service, Massachusetts Division of Fisheries and Wildlife, Massachusetts Department of Environmental Protection, Nashua River Watershed Association, and Pepperell Conservation Commission. The purpose of the settlement agreement is to resolve among the signatories all issues associated with issuance of an original license, including the installation of upstream and downstream eel and river herring passage facilities and recreational facilities at the project.

On December 8, 2014, Commission staff issued an Environmental Assessment (EA) analyzing the effects of the proposed project, including the proposed measures in the settlement agreement. In the EA, Commission staff recommended issuing a license for the project that includes most of the measures proposed in the settlement and a few additional measures.¹

¹ The staff-recommended alternative is described in section 5.1 of the EA.

Project No. 12721-006

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On December 19, 2014, the Carl Levin and Howard P. “Buck” McKeon National Defense Authorization Act for Fiscal Year 2015 (NDAA 2015)² was signed into law. NDAA 2015 amended section 5(a) of the Wild and Scenic Rivers Act³ to designate two segments of the Nashua River located upstream and downstream of the existing and proposed project facilities for study. Specifically, NDAA 2015 designated for study the mainstem of the Nashua River from the confluence with the North and South Nashua Rivers in Lancaster, Massachusetts, north to the Massachusetts-New Hampshire State line, excluding the approximately 4.8-mile segment of the mainstem of the Nashua River from the Route 119 bridge in Groton, Massachusetts, downstream to the confluence with the Nissitissit River in Pepperell, Massachusetts.

Section 7(b) of the Wild and Scenic Rivers Act bars the Commission from licensing the construction of any dam, water conduit, reservoir, powerhouse, transmission line, or other project works on or directly affecting any river listed in section 5(a). However, section 7(b) does not “preclude licensing of, or assistance to, developments below or above a potential wild, scenic or recreational river area or any stream tributary thereto which will not invade the area or diminish the scenic, recreational, and fish and wildlife values present in the potential wild, scenic or recreational river area.”

Because the project is located between the two segments of the Nashua River study area, we are requesting a determination from Interior that the proposed project would not “invade the area or diminish the scenic, recreational, and fish and wildlife values present in the potential wild, scenic or recreational river area.”⁴ Please respond, in writing, within 30 days.

Please file your response using the Commission’s eFiling system at <http://www.ferc.gov/docs-filing/efiling.asp>. For assistance, please contact FERC Online Support at FERCOnlineSupport@ferc.gov, (866) 208-3676 (toll free), or (202) 502-8659 (TTY). In lieu of electronic filing, please send a paper copy to: Secretary, Federal Energy Regulatory Commission, 888 First Street N.E., Washington, D.C. 20426. The first page of any filing should include docket number P-12721-006.

² Public Law 113-291 (2014).

³ Public Law 90-542; 16 U.S.C. §§ 1271 - 1287 (2012).

⁴ See 16 U.S.C. § 1278(b) (2012).

Project No. 12721-006

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If you have any questions, please contact Brandon Cherry at (202) 502-8328 or brandon.cherry@ferc.gov.

Sincerely,

Bob Easton, Chief
New England Branch
Division of Hydropower Licensing

cc: Mailing List, Public Files



United States Department of the Interior

NATIONAL PARK SERVICE
Northeast Region Office
15 State Street
Boston, Massachusetts 02109-3572

IN REPLY REFER TO:

July 17, 2015

Bob Easton, Chief
New England Branch
Division of Hydropower Licensing
Federal Energy Regulatory Commission
888 First Street, NE
Washington, DC 20426

Re: P-12721-006 (Pepperell Hydro Project)

Dear Mr. Easton:

Thank you for your letter of June 22, 2015 requesting a determination by the National Park Service (NPS) as to whether the licensing of P-12721-006 (Pepperell Hydro Project) consistent with FERC staff recommendations contained in the EA would be in conflict with the status of the Nashua River as a congressionally authorized Study River under the Wild and Scenic Rivers Act.

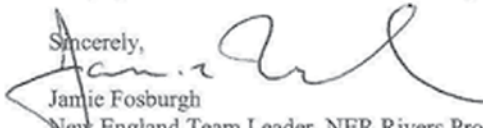
As noted in your letter, the NPS (through the Department of the Interior), has previously engaged in substantive comments and review of the proposed licensing of the Pepperell Hydro Project, resulting in the filing of a settlement agreement (filed with FERC on April 11, 2014) with NPS as one signatory. NPS specifically ensured that any known issues related to the potential Wild and Scenic River Study of the Nashua were included and addressed in this document, as we were aware of the pending Study legislation. As part of that effort, NPS requested that the applicant provide a detailed map of the project boundary so that NPS, the applicant and the FERC could establish a common understanding regarding the geographic extent of project impacts. This has been accomplished successfully.

We have subsequently reviewed the FERC EA and staff recommendations for licensing of the Pepperell Hydro Project, and believe that they are likewise consistent with the intent of the Wild and Scenic Rivers Act and the specific provisions of Section 7(b) (as cited in your letter).

Therefore, the NPS has no objection to FERC issuance of a license for the Pepperell Hydro Project consistent with staff recommendations of the EA, and finds that such issuance would not "invade the area or diminish the scenic, recreational, and fish and wildlife values" associated with the segments of the Nashua River which are under study as potential additions to the National Wild and Scenic Rivers System.

If you have any questions regarding this letter, need further information, or desire to coordinate further in any way regarding this project or the Nashua's status as a Study River, please feel free to contact me.

Sincerely,


Jamie Fosburgh
New England Team Leader, NER Rivers Program
617-223-5191
Jamie_fosburgh@nps.gov

**STATEMENT OF CHRISTINA GOLDFUSS, DEPUTY DIRECTOR,
CONGRESSIONAL AND EXTERNAL RELATIONS, NATIONAL PARK
SERVICE, DEPARTMENT OF THE INTERIOR, BEFORE THE SENATE
SUBCOMMITTEE ON NATIONAL PARKS, COMMITTEE ON ENERGY AND
NATURAL RESOURCES, CONCERNING H.R. 412, TO AMEND THE WILD
AND SCENIC RIVERS ACT TO DESIGNATE A SEGMENT OF THE NASHUA
RIVER AND TRIBUTARIES IN THE COMMONWEALTH OF
MASSACHUSETTS FOR STUDY FOR POTENTIAL ADDITION TO THE
NATIONAL WILD AND SCENIC RIVERS SYSTEM, AND FOR OTHER
PURPOSES.**

JULY 23, 2014

Mr. Chairman, thank you for the opportunity to appear before you today to present the views of the Department of the Interior on H.R. 412, a bill to amend the Wild and Scenic Rivers Act to designate a segment of the Nashua River and its tributaries in the Commonwealth of Massachusetts for study for potential addition to the National Wild and Scenic Rivers System, and for other purposes. This bill passed the House on June 23, 2014.

The Department supports enactment of this legislation with amendments. The river segments and tributary areas proposed for study exhibit the types of qualities and resource values that would make it a worthy and important candidate for potential addition to the National Wild and Scenic Rivers System. However, we feel that priority should be given to the 24 previously authorized studies for potential units of the National Park System, potential new National Heritage Areas, and potential additions to the National Trails System and National Wild and Scenic Rivers System that have not yet been transmitted to Congress.

H.R. 412 directs the Secretary of the Interior to study a 19-mile segment of the mainstem of the Nashua River, except for a 4.8-mile segment that is currently the subject of a Federal Energy Regulatory Commission (FERC) licensing proceeding for an existing hydroelectric facility (Pepperell Hydro Company, P-12721). It is the Department's understanding that this excepted segment would appropriately allow the FERC to complete the ongoing licensing proceeding without the delay that a Wild and Scenic River Study would otherwise impose. As specified in the bill, the study would include unnamed tributaries of the Nashua River along the segment designated for study, in addition to the two named tributaries, the Squannacook and Nissitissit Rivers. The bill requires the study to be completed and transmitted to Congress within three years after funding is made available for it. We estimate the cost of the study to be approximately \$300,000, based on similar studies recently conducted by the National Park Service (NPS).

The Nashua River, once severely polluted, played an important role in the nation's river conservation history by inspiring support for both the state and federal Clean Water Acts.

The transformation of the Nashua from a neglected and polluted waterway to one which now boasts the Oxbow National Wildlife Refuge, regionally significant paddling and fishing opportunities, a remarkable protected greenway system, and other important natural and cultural values, is a remarkable success story. The Squannacook and Nissitissit Rivers are two of eastern Massachusetts' most significant remaining cold-water trout fisheries.

The Northeast Regional Office of the NPS recently completed a reconnaissance survey of the Nashua River at the request of Representative Niki Tsongas, the sponsor of H.R. 412. The survey provided a preliminary evaluation of the approximately 27.5 miles of river that would be studied under H.R. 412 as a step toward a full Wild and Scenic River Study. The findings of the survey indicate that segments of the Nashua River exhibit the characteristics and resource values likely to meet eligibility criteria for inclusion in the National Wild and Scenic Rivers System. In addition, over the course of the past four years, the NPS has responded to interest and inquiries from local advocates and town officials regarding a potential Wild and Scenic Rivers study for the Nashua River, and there appears to be strong local support for protecting the river system.

If enacted, the National Park Service intends to undertake the study in close cooperation with the affected communities, the relevant agencies of the Commonwealth of Massachusetts, the U.S. Fish and Wildlife Service, and interest groups such as the Nashua River Watershed Association through a partnership-based study approach. The partnership-based approach is recognized in Section 10(e) of the Wild and Scenic Rivers Act as a means of encouraging state and local governmental participation in the administration of a component of the National Wild and Scenic Rivers System. The partnership-based approach also allows for development of a proposed river management plan as part of the study, which helps landowners and local jurisdictions understand their potential future roles in river management should Congress decide to designate part or all of the rivers being studied.

Although the Wild and Scenic Rivers Act requires the development of a comprehensive river management plan within three years of the date of designation, it has become the practice of the National Park Service to prepare this plan as part of a study of potential wild and scenic rivers when much of the river runs through private lands. This allows the National Park Service to consult widely with local landowners, federal and state land management agencies, local governments, river authorities, and other groups that have interests related to the river prior to determining if the river is suitable for designation. Early preparation of the plan also assures input from these entities as well as users of the river on the management strategies that would be needed to protect the river's resources.

As passed by the House, H.R. 412 includes certain requirements for the study which we recommend deleting. These requirements include determining the effect of the designation on existing commercial and recreational activities and on activities concerning energy production and transmission infrastructure, and on the authority of state and local governments to manage those activities. They also include requiring the identification of any authorities that would compel or permit the Secretary of the Interior

to include or participate in local land use decisions or place restriction on non-federal lands, or that could be used to condemn property. And, they include requiring the identification of all private property located in the study area. The purpose of conducting a study is to determine whether a river meets the established criteria for eligibility for the National Wild and Scenic Rivers System. We believe that the existing criteria used for making that determination result in a sufficient amount of information and analysis of the effects of a Wild and Scenic River designation. The additional requirements included in these bills could potentially increase the cost of the study and the time required to complete it.

This concludes my prepared remarks, Mr. Chairman. I would be happy to answer any questions you or other committee members may have regarding this bill.



Nashua River Wild and Scenic River Study Committee

c/o Nashua River Watershed Association
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Squannacook River. Photo: Cindy Knox Photography.



Nissitissit River. Photo: Ken Hartlage.

Cover photo – Nashua River. Photo: Cindy Knox Photography.