

O. Ross McIntyre, Lyme, NH.
April 4, 2024

Debbie-Anne Reese, Secretary
Federal Energy Regulatory Commission
888 First Street, NE
Room 1A
Washington, D.C. 20426

Re:Great River Hydro, LLC, FERC Project Nos. 1892-030 (Wilder Dam)

Dear Secretary Reese,

I am responding to the opportunity to offer comments upon the license application referenced above for the continued operation of the Wilder Dam Project on the Connecticut River.

Since 1969 I have been the owner of a farm in Lyme, NH that includes a quarter mile along the bank of the Connecticut River that fronts on a field of prime agricultural soils.

During the scoping phase of the license renewal process, I submitted to FERC on behalf of the Lyme Selectboard and the City of Lebanon, NH, a detailed study plan (and budget) that was designed to yield quantitative data for the flow rate and volume of water into and out of soils subjected to changes in water surface levels caused by the operation of the dam. This study was rejected, and we were never informed why after the review. With this kind of treatment, it is easy for us to conclude that the reason it was not approved is that the applicant feared having this kind information available.

Instead, extensive and high budget studies of erosion were undertaken, some of them requiring data loggers to record river flow and water level. When the studies were reported, the applicant chose to ignore the numerical data of flow and water level changes and turned to unproven methods based upon modeling information. The Connecticut River Conservancy chose to support an independent review of the results of these methods. This review supports our contention that the methodology used by the applicant is flawed.

The applicant dismisses the importance of seeping erosion on the basis that the hydraulic gradients are small and therefore are unlikely to produce significant erosion. As noted above, data on the hydraulic gradients was never obtained by the studies nor were rates of seepage flow. In the absence of this data, the applicant cannot know or tell us the relative contributions of seepage erosion secondary to dam produced changes in water elevation. There are obvious reasons not to trust their estimates and conclusions.

A renewal of the license to operate the dam should include a requirement for mitigation payments to compensate for the erosion damage to River Road and compensation for loss of ag soil along with increased erosion protection for affected cropland. The company should build this into the cost of electricity from the dam. Lyme taxes should no longer subsidize the cost of electricity from the dam. If such provisions are not made, then the license for the dam should not be renewed. If litigation is required to accomplish this aim, I wish to join it.

O. Ross McIntyre, M.D.

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