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FEDERAL ENERGY  
REGULATORY COMMISSION



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April 11, 2024

Willie L. Phillips  
Chairman, Federal Energy Regulatory Commission  
888 First Street NE  
Washington DC 20426

RE: Wilder Hydroelectric Project No. 1892, Wilder, Vermont

Dear Chairman Phillips:

My first letter to FERC about the relicensing of the Wilder Dam on the Connecticut River was eleven years ago, on February 25, 2013, and requested a study of the erosion of the farmland caused by the operations of the Wilder Dam. The ownership of this dam has changed several times in the past eleven years and on February 22, 2024, FERC issued its letter, signed by Stephen Kartalia, for Emily Carter, soliciting comments.

I will try to be brief in my comments. The enclosed materials, *The Erosion Ratio or Erosion for Dummies* and *A Discussion about Erosion Concerns On the Connecticut River*, August 12, 2019, with Congresswoman Annie Kuster, include photographs and other material about this section of the Connecticut River. That material includes many pictures of the erosion on both sides of the Connecticut River, the entire border between New Hampshire and Vermont. Copies of this letter and these enclosures are being sent to the parties listed at the end of this letter.

The erosion studies done by the owners of the Wilder Dam were basically works of fiction as they concluded that the operations of the dam did not contribute to the erosion. Their report in February 2017 used the "erosion ratio" to deny that there is any erosion on the riverbanks related to dam operations. However, at that time, the Connecticut River Conservancy contracted with PrincetonHydro to review that



report and they concluded in May 2017: "This approach (the erosion ratio) is not an accepted scientific practice... No citation or reference is provided for this metric, and the metric is not used, to our knowledge in the extant fluvial geomorphic scientific literature. This study does not demonstrate that the method conforms to generally accepted scientific practice."

Remember: Before the current Wilder Dam, there was no extensive erosion and that is documented in the earliest photographs of the riverbank on my land. Since the construction of the Wilder dam there has been massive erosion of the riverbank and the resulting loss of farmland. This is documented in both contemporary photographs and in measurements by land surveyors.

With this letter I invite anyone from FERC, officials from either Vermont or New Hampshire, or others to visit my land to view the damage and destruction of the farmland that has and continues to be done by the operations of the Wilder Dam.

The farmlands adjacent to the Connecticut River are considered to have some of the finest soils in New England and to be some of the finest farmland in this country, yet the ongoing and continuing operations of the Wilder Dam threaten this land with more massive erosion and soil loss— a loss that can be easily seen and measured.

I may be one of a very few people, perhaps the only person, with three surveys of one line on my property that shows this loss of land. The measurements of that line by licensed surveyors, are:

1961, 943.0 feet,  
1989, 918.6 feet and  
2015, 903.1 feet—

a loss of forty feet of land between 1961 and 2015. A letter from a licensed surveyor about this loss of land has previously been given to FERC and is included in both of the enclosed materials. Over the 0.776 mile of frontage that I own along the river, that may calculate to a loss of over three (3) acres of farmland. Does any other reader of this letter have similar proof of the loss of such an amount of their land by any means? I call your attention to photo B on page 3 of the material summarizing my meeting with Congresswoman Kuster in August 2019. On the left side of picture B you will see the stump of a tree that was cut when the Wilder Dam was built. You see in that one picture the loss of forty (40) feet of land. You see the ever continuing erosion of the land.



As you will see from the pictures in the enclosed materials, this tremendous loss of land is happening in both New Hampshire and Vermont. There will be continued loss of land, *valuable farmland* as I and many others have called it, under the proposed future operation of the Wilder Dam.

My parents put conservation easements on their land, the land that I now own, with both the State of New Hampshire, Department of Agriculture and with the Upper Valley Land Trust. Any license from FERC to continue operating the Wilder Dam in the same way that it has been operated in the past will be little more than a license to destroy valuable farmland. That should not be permitted.

Both the very structure and the operation of the Wilder Dam should be modified now and for the future in order to eliminate the ongoing erosion and destruction of the riverbanks and farmland in both Vermont and New Hampshire. I see nothing in the recently distributed material by the operators of the dam that will accomplish this.

One of the purposes of the Wilder Dam when it was constructed in the late 1940s was to be part of the flood control system of the Connecticut River watershed. At that time, snow melt and large storms across New England could result in the flooding of the river in Massachusetts and Connecticut. Two other dams specifically built for flood control purposes are in the towns of Hartland and Thetford (Pompanoosuc) Vermont. With modern technology and the modern and accurate weather forecasts that we have today, large rainfalls can be more accurately predicted and prepared for than in the past. The emergency preparedness that may have been a factor is building some of the dams nearly eighty years ago is less necessary today. The Wilder Dam should not have to have the same water storage capacity as it did in the past. Today, at times of large storms, the different reservoirs can be managed as a system to protect downriver communities without destroying the farmland that is here in this valley.

Furthermore, a lower water level in the river, as shown in some of the photographs in the enclosed materials such as the photo from the April 1943 *National Geographic* and the April 1974 cover of *New Hampshire Profiles* (a picture probably taken in the 1940s), will provide just as many recreational opportunities and as much, if not more, enjoyment of the river than is possible today at the artificially high level and the resulting massive and dangerous erosion of the riverbanks in the two states. Yes, the artificially high water level behind the Wilder Dam combined with the fluctuation of that water level has resulted in the



tremendous erosion that has created a dangerous environment here. Yes, there is damage and destruction of the riverine habitats of fish, birds, and plants, and the damage and destruction of pre-historic antiquities is all taking place here.

At one point in time the dams on the Connecticut River were under one corporate ownership. That is no longer the case. Today several different corporations own the different dams, and the dams have different times when the licenses are renewed. This fragmentation of the ownership of the dams and the hydroelectric power generated on this river may be an intentional effort to confuse the licensing process of the dams on the river. The hydropower on the Connecticut River should be managed as a unified hydroelectric system and not the fragmented system that the multiplicity of the ownership of the different dams has created.

I repeat: I may be one of the few, if not the only, landowners with the proof of the erosion as has been measured by licensed surveyors. However, I am not alone in recognizing that there is massive and continuing erosion here. In 2017, voters in at least ten towns in Vermont and New Hampshire voted on and passed warrant articles about the erosion on the Connecticut River at their Town Meetings.

The erosion along the river has long been a topic of discussion and the owners of the Wilder Dam have always claimed that there is no connection between the operations of the dam and the extensive erosion. Six years ago, on April 26, 2018, the headline in the *Valley News* was, "N.H.: Dams Are a Factor in Erosion." The article began: "The New Hampshire Department of Environmental Services this week joined Upper Valley residents and conservation groups in criticizing studies from the owner of the Wilder Dam that say the hydropower facility has little effect on erosion along the Connecticut River.... In a just-completed comment period for federal relicensing, area residents and watershed conservancy organizations rebutted a ream of recent studies from Great River Hydro, which argued that natural causes, and not the dams, had eaten away at riverbank soils.... The state (N.H.) Department of Environmental Services was among many to question the findings. 'Visual observations strongly suggest that daily (water surface elevation) fluctuations associated with project operations impact stream bank stability and erosion potential,' the state agency said in a Monday letter filed with FERC. The letter cites several measurements of river flow and riverbank stress that it says the Great River studies left out. 'NHDES requests that this information be provided,' the letter says numerous times."

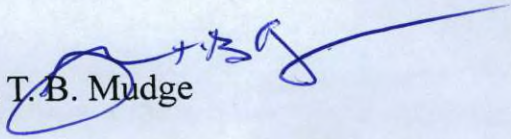
That was six years ago. Obviously we are still talking about the extensive erosion along the Connecticut River in both Vermont and New Hampshire.



I conclude by repeating: I invite anyone from FERC, the members of the two Congressional delegations, officials in Vermont and New Hampshire, or others to visit my property and view the damage and destruction of my land and the damage and destruction of farmland that is simultaneously occurring on land throughout this valley in these two states, tremendous damage that is being caused by the operations of the Wilder Dam.

Very truly yours,

John T. B. Mudge





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