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My name is Jack Widness. I am a year-round resident of Wilmington Vermont. I write to express my concern, dismay, and outrage with the business behavior of the Great River Hydro (GRH) company that controls the Connecticut River dams along the Vermont border with New Hampshire and elsewhere in New England. In their utilization of the Connecticut's River water to generate hydroelectric power, these companies are greatly benefiting economically at the expense of and to the detriment of the public in the erosive damage that their operation of dams has inflicted along the banks of the Connecticut River. In the FERC process the hydroelectric owner-operators must be held legally accountable by requiring them to commit to taking responsibility for their company's contribution to riverbank erosion. While the change to inflow equaling outflow may reduce changes in surface water elevation behind the dam, Great River Hydro has yet to study this. It is therefore unknown what this change will mean for how the river will react as it reaches its next equilibrium, and what damage this will cause for private property owners all along the Connecticut River, i.e., in property loss and resultant income as a result of GRH-inflicted bank erosion. The company's actions are having significant economic impacts for lands adjacent to the river being used for agriculture, recreation, and other activities.

As mitigation for the damage GRH continues to cause, GRH must be required regularly monitor the Connecticut River affected riverbanks for erosion and other adverse impacts. GRH's monitoring results must be confirmed by third party public overseers. Based on the outcomes of monitoring, the GRH should be held accountable paying for reparation if and where needed. Failure to do so should be swiftly followed with significant fines commensurate with the damage inflicted, i.e., not an inconsequential slap on the wrist. Such action dictated by the FERC authority is fully justified because the profits realized from the hydroelectric dams in their business operations are the direct result of their benefiting from the public's river waters. In addition, as part of the current owners' business practices, effective new regulatory rules need to be put in place that comprehensively "yet fairly" examine the result of the change in flows as determined by the hydroelectric dams along the Connecticut River. The goal of this regulation should focus on achieving minimal erosive damage caused by sediment movement within the river system. Hopefully, GRH and other hydroelectric companies will come to realize that it is in their own best interest to respond proactively to the public's environmental concerns by fostering more natural changes in the river's water level while still mindfully attending to flood mitigation impacts.

In summary, Great River Hydro must be held accountable to the public for their dam regulatory behavior. Current company practices have had significant costly adverse impacts. What the coming changes will mean to property owners as the river readjusts to yet another change in the operation of dams remains to be seen, but needs to be carefully monitored and assessed by third parties.

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