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May 22, 2024

Debbie-Anne Reese, Acting Secretary
Federal Energy Regulatory Commission
888 First Street NE, Room 1A
Washington, DC 20426

Subject: COMMENTS AND RECOMMENDATIONS
Application Ready for Environmental Analysis
Wilder Hydroelectric Project, FERC Project No. 1892-030
Bellows Falls Hydroelectric Project, FERC Project No. 1855-050
Vernon Hydroelectric Project, FERC Project No. 1904-078

Dear Acting Secretary Reese:

On February 22, 2024, the Federal Energy Regulatory Commission (Commission or FERC) filed Notices of Application Ready for Environmental Analysis for the proposed relicensing of the Wilder (P-1892), Bellows Falls (P-1855), and Vernon (P-1904) hydroelectric projects (hereafter, Projects), owned by Great River Hydro, LLC (GRH). In response to these notices, The Nature Conservancy provides the comments and recommendations herein.

The Nature Conservancy (Conservancy or TNC) is a private, non-profit 501(c)3 international conservation organization with more than one million members worldwide. The Conservancy has been active in the Connecticut River Watershed for over 50 years, applying our collaborative, science-based, and solutions-oriented approach to conservation to achieve our mission to “conserve the lands and waters on which all life depends.” We are committed to tackling the dual global crises of climate change and biodiversity decline, achieving ambitious renewable energy goals while also maintaining and improving the health and function of our ecological systems. As such, we have been engaged in the relicensing of the GRH Projects since 2012 to pursue solutions that achieve both of these goals, as well as the many interests of the diverse parties that benefit from the resources and value that the Connecticut River provides.

While we acknowledge the inherent inequities of the relicensing process, which favors interests and organizations with the means and resources to participate, we have striven to use our own limited resources to advocate for the inclusion of diverse interests and ensure solutions that benefit these many users and interests of the Connecticut River’s resources and ecosystem. At the start of the relicensing process, TNC participated in an open working group focused on aquatic resources, with an aim of understanding operational conditions and impacts on aquatic resources and developing operational solutions. In March 2020, at the request of GRH, this working group entered mitigation discussions to explore how to change operations in support of river ecosystem goals. Because GRH discussed privileged information on their projects and operations, they requested that these discussions remain confidential. The mitigation discussions of the aquatic

working group ultimately culminated in a collaborative solution and a Memorandum of Understanding (MOU) among the working group members, which included TNC, Vermont Agency of Natural Resources, New Hampshire Department of Environmental Services, U.S. Fish and Wildlife Service, and the Connecticut River Conservancy. As part of the MOU, GRH agreed to put this alternative operation forward in their Amended Final License Applications (AFLAs) as their preferred alternative.

From an ecological perspective, one of the primary challenges of hydropower projects like the GRH Projects is the nature of their “peaking” operations, in which water is held in the reservoir during times of low energy demand and released during periods of high demand. These operations create rapid fluctuations downstream, from very low to very high flows, sometimes on a daily or more frequent basis. In the impoundment behind the dams, these changes correspond to reciprocal fluctuations in the impoundment whenever water is released from the dams. These operations have impacts on aquatic species and their habitat both upstream and downstream from the dams, including decreased habitat availability and persistence and reduced rates of reproduction and growth, which can lead to decreased population sizes and local extirpation.

The proposed changes in operation are expected to:

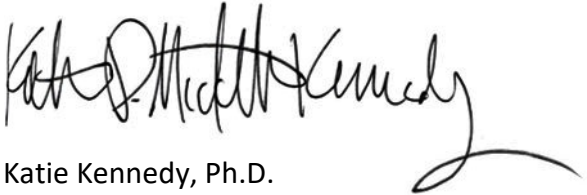
- Improve river flows to benefit the ecosystem:
 - Base operations that are characterized by a stable reservoir, with project outflows equivalent to inflows (i.e., “run-of-river” operations)
 - Reduced frequency of peaking events
 - Increased baseflows and reduced rates of change downstream of the dams
 - Maintained minimum flow requirements to support resources and users downstream during low flow conditions
- Improve aquatic habitat:
 - A stable impoundment that will protect shoreline habitat and likely reduce erosional forces on upstream properties and shorelands
 - Increased availability and persistence of downstream habitat for multiple aquatic species, including threatened and endangered species like the dwarf wedgemussel and cobblestone tiger beetle
- Continue the production of needed low carbon electricity, maintain grid stability, and support the economic viability of the hydropower facilities:
 - Provide for the ability of the GRH Projects to support and respond to regional power system needs and emergencies that will be increasingly critical as the grid transitions to more non-carbon, variable renewable generation sources
 - Maintain the Projects’ capability to be flexible and responsive to current wholesale energy, forward capacity, reserve and other ancillary services markets managed by the New England Independent System Operator (ISO-NE)

The Nature Conservancy has a vision of thriving aquatic and terrestrial ecosystems in a low-carbon energy future, and while we must always grapple with trade-offs, we are committed to the premise that these goals are not mutually exclusive. As such, we recommend that the Commission include license conditions that are consistent with the Alternative Operation proposal as described in Attachments A and B of the Projects’ AFLAs ([Accession # 20201207-5219](#)). We also agree with the comments and recommendations of the U.S. Fish and Wildlife Service, the Connecticut River

Conservancy, the Vermont Agency of Natural Resources, and the Elnu Abenaki Tribe regarding issues specific to recreation, fish passage, erosion, and cultural resources. These are important and relevant values that were not included in the alternative operations solution of the MOU.

Thank you for this opportunity to provide these comments. If you have any questions, please contact me at kkennedy@tnc.org or (413) 588-1959.

Sincerely,

A handwritten signature in black ink, appearing to read "Katie Kennedy", written in a cursive style. The signature is contained within a thin black rectangular border.

Katie Kennedy, Ph.D.
Applied River Scientist
North America Region
The Nature Conservancy

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