



TransCanada Hydro Northeast, Inc.

Wilder Hydroelectric Project No. 1892-026

NEW ENGLAND FLOW AND AMERICAN WHITEWATER'S COMMENTS AND STUDY REQUESTS

New England FLOW is a regional non-profit organization whose affiliations have represented whitewater boaters, canoeists, rafters, and other river users on multiple project re-licensings throughout New England for over twenty-five years. American Whitewater is a national non-profit organization dedicated to protecting and restoring our nation's whitewater resources and enhancing opportunities to enjoy them safely.

Seven miles downstream from Wilder Dam, located in Hartland, Vermont, lies a river reach known as "Sumner Falls." It is sometimes called "Hartland Rapids" and is a series of ledges sprawled across a wide section of the Connecticut River that creates a whitewater run of approximately ¼ mile.

The original Olcott Rapids at the site of Wilder Dam have been drowned by the Project. We recommend a study of off-site whitewater tributaries as potential mitigation.

If regularly scheduled flows of varying frequency were provided, the recreational use of the resources at this project have the potential to add significant economic value to the region, New Hampshire.

Issue #1: Impacts of Wilder Dam on the Connecticut River flows and on recreational paddling at Sumner Falls.

The Wilder Dam itself has drowned three rapids, over a stretch of one mile, originally known as Olcott Falls and limits use of other rapids known as Sumner Falls.

Issue # 2: Camping and sanitary facilities available for multiple-day kayaking or canoe trips.

While the applicant has itemized 9 camping facilities and 17 access points available throughout the reach from the Wilder Dam upstream to the 15-Mile Falls Dam, they have not provided a qualitative analysis of these facilities.

In the PAD, the Licensee proposes no new camping sites or upgrades to existing facilities, nor do they propose any management plans for maintenance or enforcement.

Issue #3: Economic analysis.

The flow operations and management of the Wilder Dam have significant negative recreational impacts and related socio-economic impacts.

Issue #4: Alternatives for off-site mitigation.

Wilder Dam sits atop a whitewater falls and its reservoir drowns two other whitewater runs within one mile of the dam. Alternatives in the form of off-site mitigation could create compensatory whitewater opportunities.

Study Requests

1. We request a “Controlled Whitewater Flow Study” for the Sumner Falls Reach.

The Licensee PAD proposes no whitewater feasibility analysis and this no-action step will reveal nothing about the project impacts on whitewater recreation at Sumner Falls or opportunities for protection, mitigation, or enhancement measures.

2: We request a study of the adequacy of camping, sanitary and other facilities such as portages available for multiple-day kayaking or canoe trips.

There are multiple sites along the Connecticut River that are used as access points or have camping facilities. However there are vast differences in the ability or capacity of these sites to handle paddling groups of varying size and numbers or sanitation needs.

3: We request an economic analysis for the site recreation potential.

Since the present economic values are unknown because of restricted recreational activity resulting from the construction of Wilder Dam, we request the study be compiled using the “*contingent valuation*” study method that measures individuals’ “*willingness to pay.*”

These values can then be compared to power generation values, and extrapolated to develop an understanding of economic benefits and how those dollars will be multiplied throughout the community as benefits associated with paddling activities.

4. Compensation for Impacts of Lost Whitewater Recreation at Wilder Dam

The goal of this study request is to assess the presence, quality, access needs, flow information needs, and preferred flow ranges for regional whitewater boating resources that would provide

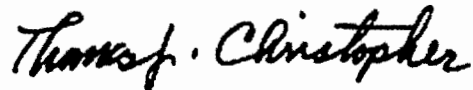
adequate compensation for the loss of whitewater recreation at the Wilder Dam. Rivers in the region that would be candidates for such off-site mitigation would be the West and Winhall Rivers in Vermont, the Millers and Deerfield Rivers in Massachusetts, and the Ashuelot River and Otter Brook in New Hampshire.

The National Blueway concept takes a watershed viewpoint and addresses the river from its source to the sea. The National Blueways System has as its goal "to advance a whole river and watershed-wide approach to conservation, outdoor recreation, education, and sustainable economic opportunities in the watersheds".

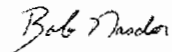
Conclusion:

Restoration of recreation opportunities in the watershed of the Connecticut River has the potential to offer the region significant economic benefits. We respectfully request the hydrological, recreational, and economic studies that will support the dialog and analysis regarding the flows and associated recreational values from the Wilder Dam project.

Respectfully submitted this 28th day of January 2013



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