

TO: Federal Energy Regulatory Commission
Office of Energy Projects

cc: John Ragonese, TransCanada Power Marketing Inc.

FROM: John T. B. Mudge
25 Lamphire Hill Lane
Lyme NH 03768
Tel: 603-795-4350 Fax: 603-795-4355
Email: JMudgeNH@aol.com

RE: **Wilder Project, (FERC NO. 1892-026)**

***Response to Study Request Responsiveness Summary prepared by
TRANSCANADA HYDRO NORTHEAST INC. dated April 15, 2013.***

Re: Studies 1, 2, & 3

- 1. Historical Riverbank Position and Erosion Study***
- 2. Riverbank Transect Study***
- 3. Riverbank Erosion Study***

DATE: May 30, 2013

Introduction:

On April 15, 2013, TransCanada Hydro Northeast Inc. submitted to the Federal Energy Regulatory Commission its response to the 245 individual study requests related to the following projects: Wilder Dam (FERC Project No. 1892-026), Bellows Falls Dam (FERC Project No. 1855-045) and Vernon Dam (FERC Project No. 1904-073).

Beginning on May 13, 2013, TransCanada has held a number of public meetings to discuss the proposed studies. On May 16, 2013, TransCanada held a study plan meeting in White River Junction, Vermont, where it discussed the proposed erosion studies noted above. TransCanada's consultant, Mr. John Field, presented much of the information about the proposed studies. As the three erosion studies are related, they were discussed together.

My comments about the three proposed erosion studies are consolidated into a single response here.

Comments about Proposed Studies:

1. RE: Study Request #1, Historical Riverbank Position and Erosion Study:
I believe that there is much historical information that can be obtained from local sources, and I do not believe that the proposed plan shows that all of these sources will be utilized in the studies. Other sources include: 1) property owners who may possess photographs or surveys of land along the river, 2) local historical societies who may possess documents and photographs of the area, 3) the U. S. Department of Agriculture which has worked with landowners to try and control the erosion, 4) conservation groups, including the Upper Valley Land Trust, the Connecticut River Watershed Council, and the Departments of Agriculture in both New Hampshire and the Vermont, to whom conservation easements have been granted on the agricultural lands along the river, and 5) agencies and offices where deeds have been recorded.

The historical study should include a study of the riparian buffer that previously existed on the riverbank. Evidence of this is most clearly found in old photographs. A healthy and strong riparian buffer is the best protection against erosion.

The utilization of all of these and other sources would be more in keeping with FERC's Proposed Methodology as outlined at Schedule B-10 of FERC's March 1, 2013, "Identification of PAD Deficiencies, Additional Information Requests, and Study Requests."

Mention has been made at different meetings of necessary road relocation work that has been done in Lyme, New Hampshire, and is proposed for Charlestown, New Hampshire. Other towns and municipalities should be surveyed to determine what other public works/road projects have been completed or are anticipated due to erosion along the river.

There should also be consultations with the railroads that own and operate the tracks beside the river. Over the years, the railroad companies have done a great deal of work to protect their tracks from erosion.

2. RE: Study Request #2, Riverbank Transect Study: The study proposes that cross sections and water monitoring be done at 20 sites— 10 with Wilder, 6 with Bellows Falls and 4 with Vernon. Given the size of the project and that it encompasses the border between two states, I do not believe that the proposed twenty sites is adequate. FERC should either require that a larger number of sites be studied or incorporate into the plan a provision that more

studies at more sites may be mandated by FERC at a future date without delay or discussion.

3. The different studies propose looking at historic and current rates of erosion. However, as currently proposed, there is no explanation or definition of the terminology that will be used for characterizing the erosion. Whatever the terminology is to be in the final report, it should be defined now in the Study Plan. For example, what would be meant by the use of “minimum,” “moderate,” “severe,” and “extreme” to describe the erosion? For one person, 20+ feet of documented erosion might be “minimum” but to another person that would be “extreme.”

Conclusion:

I believe that there are several shortcomings in the proposed erosion studies that should be addressed now. Erosion and sedimentation in the water affects many aspects of the river and therefore many of the other proposed studies.

In Study 3, Riverbank Erosion Study, the “Project Nexus” section states, “Considerable erosion also occurs on free-flowing portions of the Connecticut River not influenced by dams (Field 2004), so erosion would likely still be occurring in the project-affected area if the dams were not present.”

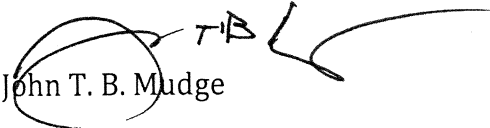
From the Connecticut Lakes in northern New Hampshire to Long Island Sound there is no “free flowing portion” of the Connecticut River. The many dams on the river serve multiple purposes including the generation of electricity, flood control, and recreation, all resulting in the fact that the entire Connecticut River is a very controlled and manipulated waterway. This should be recognized and acknowledged at the outset of doing the proposed studies.

In the past, when there was less manipulation of the water level, there was less erosion. That is clearly shown in pre-Wilder Dam photographs of the river. In the pre-Wilder Dam era there were ice flows, floods, and log drives that undoubtedly damaged the riparian buffer and the riverbank, but they did not destroy the buffer or the riverbank.

The deeds granting the flowage rights to the New England Power Company at the time of the construction of the Wilder Dam granted the company the right “to flow and otherwise damage” the land, but no right was ever granted to destroy the land. The erosion that is visible along the riverbank is more the destruction of land than the damaging of land.

The Upper Valley River Subcommittee of the Connecticut River Joint Commissions was previously invited to visit my family's property to view and learn about the erosion problem that landowners are having throughout the area. The Subcommittee has begun to distribute information about a planned field trip for Monday, June 24, 2013. A recent email reads: "The Upper Valley Local River Subcommittee of the Connecticut River Joint Commissions will hold a field trip on Monday June 24, 2013, from 4-6 pm to view riverbank erosion on a Connecticut River farm in Lyme, NH. This event will offer a unique opportunity to state legislators, local officials, and members of the public to view bank erosion up close and learn more about the concerns of riverfront landowners." I announced plans for this meeting at the Study Plan Meeting that was held on May 16, 2013. At that time I noted that the erosion problems are much more visible when the water level is low and the erosion can be seen and measured from the mudflats between the river and the riverbank. TransCanada's assistance in allowing for the water level to be low on June 24th will be of great value and importance to anyone who takes part in this field trip.

Very truly yours,

The signature is a handwritten scribble in black ink, consisting of several loops and a long horizontal stroke extending to the right. The initials 'T.B.' are clearly visible within the loops of the signature.
John T. B. Mudge

John T. B. Mudge
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Lyme NH 03768
Tel: 603-795-4350

May 30, 2013

Ms. Kimberly Bose, Secretary
Federal Energy Regulatory Commission
888 First Street NE
Washington DC 20426

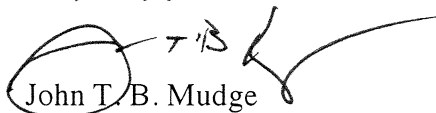
RE: Wilder Project — FERC No. 1892-026

Dear Ms. Bose:

Please find enclosed eight (8) copies of a my response to the April 15, 2013, "Study Request Responsiveness Summary" prepared by TransCanada Hydro Northeast Inc. related to the above mentioned project. A copy of my response in pdf format is on the enclosed disc.

Please contact me if you have any questions.

Very truly yours,


John T. B. Mudge

cc: Mr. John Ragonese,
TransCanada Power Ltd., 4 Park Street, Concord NH 03301