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July 15, 2013

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

Re: Wilder Project (FERC Project No. 1892-026) and Bellows Falls Project (FERC Project No. 1855-045) –
Comments on Study Plan

Via e-file

Dear Secretary Bose:

The undersigned are owners of land in Cornish and Claremont, New Hampshire, with approximately one mile of frontage on the Connecticut River downstream from the Wilder Project. Our land is subject to Bellows Falls Flowage Rights.

This letter constitutes our comments on the proposed study plan for the subject relicensing. At the May 16th TransCanada and FERC meeting in White River Junction, TransCanada Project Manager John Ragonese stated that “only one operational alternative will be studied.” When queried about this unusual stance, given that the National Environmental Policy Act calls for all “reasonable alternatives” to be studied, Mr. Ragonese stated “If we find any problems with the results of any of the studies, we’ll go back and add alternatives later.”

Mr. Ragonese rejected our formal request for the inclusion of a second operational alternative in the studies. This second operational alternative would limit the rate of change of outflow of the dams, such that the transition from minimum flow to maximum flow would take place over the course of some minutes – rather than the current operational practice of a near-instantaneous change.

A July 2012 report by the Upper Valley Land Trust (a 501(c)3 organization that holds a conservation easement on a portion of our land) notes that a 1968 survey entitled “Property of Harrison E. Miles prepared by Breckenridge Land Surveys” records the distance from the railroad tracks to the river’s edge of our property as 622 feet. The Land Trust measured this distance in the summer of 2012 and found the distance to be 490 feet – an alarming 132-foot longitudinal loss of land. Multiplying this distance by the 30+ foot bank height and hundreds of feet of frontage, this equates to thousands of cubic yards of material that have been lost. This significant erosion jeopardizes agricultural soils of statewide significance and threatens the existence of the endangered dwarf wedge mussel. As you know, the dwarf wedge mussel (*Alasmidonta heterodon*) is classified as an endangered species by the federal government. According to the U.S. Fish and Wildlife Service, this mussel once inhabited much of the mainstem of the Connecticut River and many of its tributaries but now is found at only four sites in the

watershed – including the frontage along our property. The U.S. Fish and Wildlife service notes that “siltation...degrade[s] mussel habitat.”

We attribute the significant erosion problem on our property to rapidly fluctuating water levels on the river caused by the operation of the Wilder Dam. Our children have seen shoes, towels and swim gear swept downstream because the change in water level is so rapid on summer afternoons that they cannot react in time. Wilder Dam operation has caused kayaks to capsize and has resulted in at least one fatality (a local fisherman whose hip waders became flooded due to rapidly rising water level, resulting in drowning).

It is our understanding that flow from the dam can vary from a minimum of 700 cubic feet per second (cfs) to the facility’s full hydraulic capacity of 10,700 cfs. This change in flow – a 15-fold increase in water volume – can occur almost instantaneously. Our concern stems not from any particular flow rate assumed in the studies but, rather, from the lack of any operational alternatives that address reasonable limitations in rate of change in flow.

We request that TransCanada be requested to add a second operational alternative, one with a limitation in rate of change in flow of 5000 cfs per hour (that is, requiring the operator to transition from minimum flow to full hydraulic capacity over two hours when practicable to do so). We believe TransCanada’s suggestion that it will revisit operational alternatives at a later date should study results warrant to be inconsistent with NEPA.

You can reach us at the above address or at 1-603-448-8738 (days) or 1-603-675-9110 (evenings) should you have any questions. We look forward to your response.

Very truly yours,

F. William Lipfert, Jr.

Jennifer Lipfert

cc: Kenneth Hogan, FERC