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FEDERAL ENERGY
REGULATORY COMMISSION

April 18, 2018

Kimberly D. Bose, Secretary

Federal Energy Regulatory Commission

888 First St., N.E. Room 1-A

Washington, D.C. 20426

Re: Great River Hydro (GRH) Project nos. 1892-026, 1855-045 and 1904-073.
Comments on Supplemental Erosion Report for Studies 2 and 3.

Dear Secretary Bose,

I am a Certified Crop Advisor and spend most of my time working in the Connecticut River Valley. My range starts at the north border of Massachusetts and runs north for over 130 miles. This happens to be the area of the Connecticut River under the influence of the three dams GRH is seeking to relicense. I am not a hydrologist or geologist, I work primarily with Dairy Farmers helping them grow their crops. I also notice things based on observation.

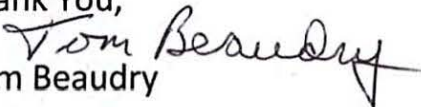
The soils are flood plain soils, primarily silt loams, that rival mid western soils in the ability to grow crops, some of the best in the world. I see a stark difference in the field/river borders north of the dams versus south of the dams. South of the dams there is a riparian border with mature trees and a stable river bank. North of the dams, where river levels fluctuate based on water release, these riparian areas don't exist. It is not safe to walk along the top of these banks much less drive a tractor to harvest crops. The difference is not due to farming practices.

From a layman's perspective what appears to be happening is when the river level is raised the soil gets saturated, as the river level is dropped some of the saturated soil from the toe of the bank goes out with the water. From repeated raising and lowering of the water level the bank gets undercut, after a certain point the whole bank collapses. These field borders are sheer drop offs.

From my understanding the GRH studies looked at entrainment, the movement of sediment in a riverbed based on water release. I expect this is looking below the dams. I see the problem above the dams. Some fields I visit have lost substantial field edge due to this erosion. Farmers shouldn't have to give land away so GRH or any other power provider can make a profit. There are fields north of the Bellows Falls Dam that can no longer be farmed.

I would like to invite you and other members of FERC to make a site visit and actually look at these differences above and below the dams. I will provide my contact info so you may contact me and I would gladly participate in that visit.

Thank You,


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