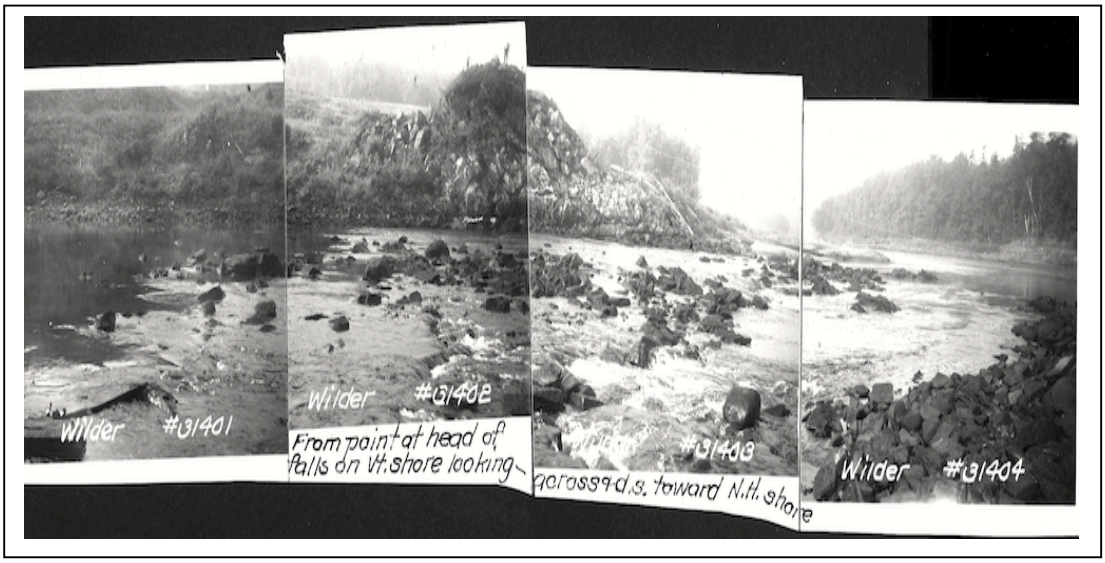
UNITED STATES OF AMERICA
FEDERAL ENERGY REGULATORY COMMISSION

TransCanada Hydro Northeast, Inc.	Wilder Hydroelectric Project FERC No. 1892-026

NEW ENGLAND FLOW, AMERICAN WHITEWATER, AND THE APPALACHIAN MOUNTAIN CLUB'S COMMENTS AND STUDY REQUESTS IN RESPONSE TO THE NOTICE OF INTENT TO FILE LICENSE APPLICATION, FILING OF PRE-APPLICATION DOCUMENT (PAD), COMMENCEMENT OF PRE-FILING PROCESS, AND SCOPING: REQUEST FOR COMMENTS ON THE PAD AND SCOPING DOCUMENT, AND INDENTIFICATION OF ISSUES AND ASSOCIATED STUDY REQUESTS REGARDING THE WILDER HYDROELECTRIC PROJECT, FERC PROJECT NO. 1892-026.

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 25 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. Since 1876, the Appalachian Mountain Club (AMC) has promoted the protection, enjoyment, and understanding of the mountains, forests, waters, and trails of the Appalachian region, and is the largest conservation and recreation organization in the Northeast with more than 90,000 members. All three organizations are "steering committee" members of the Hydropower Reform Coalition based in Washington, D. C. Our members, who are primarily conservation-oriented kayakers, canoeists, and rafters living in this area of the Northeast would enjoy this section of the Connecticut River as a weekend trip.

The original Olcott Rapids at the site of Wilder Dam have been drowned by the Project.



Pre-Construction Panoramic View of Olcott Falls Looking Toward New Hampshire Side

Other rapids looking upstream from Chase Island were lost as the impoundment filled with water.

The Wilder Dam Project on the Connecticut River has the ability to offer improved paddling opportunities of sufficient quality through spillage events. Seven miles downstream from Wilder Dam, located in Hartland, Vermont, lays 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. There are many “catch on the fly” waves and the area is an excellent place for training beginning boaters and for play boaters. At generational and higher flow levels this site provides excellent surfing and currents for squirt boating. At moderate flows the run provides opportunities to complete a wide array of acrobatic tricks called “freestyle” paddling. All manufacturers of kayaks design boats for this purpose.

Sumner Falls at Low Flow

If regularly scheduled flows of varying frequency were provided, the recreational use of the resources at this project have the potential to add economic value to the region, given its central location and its proximity to Dartmouth College, Norwich University, and the communities of Bellows Falls, Springfield, and White River Jct., Vermont, as well as Lebanon, New Hampshire.

All studies requested by New England FLOW, American Whitewater, and the AMC should contain projections for use by the public during the 30-50 year life of the proposed license, and the adequacy of all facilities and mitigation for that time period.

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

The Wilder Dam project is a 400-foot long dam that blocks flows completely except for a *"minimum* flow of 675 cfs or inflow, whichever is less." Any natural boatable flows have been eliminated because of the dam and are only available during generation or periods of seasonal high spillage and flooding.

Some of the opportunities eliminated at Sumner Falls by the project could be restored by the development of a release schedule that could provide flows of varying volume and could be used

at Sumner Falls from the late spring through the early fall months. The current operation of the project impacts valuable seasonal paddling opportunities.

This recreation-flow relationship would need to be substantiated through both operational and recreational analyses. The correct context to conduct this inquiry is through the use of a "controlled-flow analysis," a stepwise methodology described in Whittaker, et al., *Flows and Recreation: A guide to studies for river professionals* (2005), as we formally request below.

In the PAD, the Licensee proposes no flow enhancement to mitigate the project effects on whitewater recreational use.

In addition to recreation and aesthetics, we recognize that flow-related decisions also affect economic factors related to power generation and other environmental variables, particularly fish passage. We look forward to exploring how all flow-related values relate to one another through participation in this relicensing process.

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

Information provided by canoe clubs and other river recreational interests cite changing demographics and the rise of sea kayaking as reasons for high interest in flatwater paddling and multiple-day canoe trips.

In the PAD, the Licensee cites the Massachusetts SCORP (2006-2011), which indicated a need for "water-based" activities, and one of the goals of the New Hampshire SCORP identified the need for a variety of recreational opportunities. The Vermont SCORP (2005-2009) reveals the need for access to all types of outdoor recreation.

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. These sites are managed and/or maintained by multiple parties, and at a minimum there should be consistent standards for sanitation, safety, and control of litter or camping debris.

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 impacts.

The flow operations and management of the Wilder Dam have significant negative recreational impacts and related socio-economic impacts. By changing the operational scenario of the Wilder Dam Project, the potential exists to create new tourism products for a region that is primed to capitalize on it. Retail activity, and food and lodging opportunities are geared toward non-commercial paddlers, and thousands of people who currently travel to the region each year for canoeing, rafting, kayaking and other outdoor adventure activities will discover added value to the region.

In making a public interest decision, FERC must weigh the value of water in the river against the restriction of flows held only for power generation, and then reach a comprehensive plan for the development of the river that strikes the appropriate balance and is best adapted to the river. In many dam relicensing proceedings the values of flow restoration are largely recreational and ecological, and thus hard to evaluate in dollars. In this case, because of the potential for increased recreational usage with increased and variable flows, we believe FERC should also weigh the predicted economic value associated with the recreational use when looking at various alternatives.

Issue #4: Alternatives for off-site mitigation.

Wilder Dam sits atop a whitewater falls and its reservoir drowns two other whitewater runs, including Olcott Falls and the former rapids upstream of Chase Island within three miles of the dam. Alternatives in the form of off-site mitigation at Bellows Falls or elsewhere in the Connecticut River watershed could mitigate for the loss of whitewater opportunities in the Wilder Dam project area.

Study Requests

We hereby request several studies per 18 CFR 5.9(b).

1. Controlled Whitewater Flow Study for the Sumner Falls Reach.

(1) Describe the goals and objectives of each study proposal and the information to be obtained.

The goal of a whitewater flow study is to assess the presence, quality, access needs, flow information needs, and preferred flow ranges for river-based boating resources in a stepwise manner.

The information to be obtained can be generally characterized as quantitative and qualitative descriptions of:

- The range of optimal and acceptable flows for whitewater paddling in a river setting;
- The frequency, timing, duration and predictability of optimal and acceptable paddling flows under current conditions, and how proposed alternative operations could be used;
- The access needs of whitewater boating use and the current and potential river access options for kayakers and other paddlers, as well as portage opportunities;
- The flow information needs of whitewater boating and the current and potential flow information distribution system;
- The location, challenge, and other recreational attributes associated with Sumner Falls rapid and other river features that may be available.

Thus, the information to be obtained for the whitewater flow study is a combination of user-generated flow preferences and other information on current and proposed operation (e.g. discharges), geographic information and basic recreational information.

Sumner Falls at low flow 2012. Connecticut River below Wilder Dam.

(2) If applicable, explain the relevant resource management goals of the agencies or Indian tribes with jurisdiction over the resource to be studied.

The requester is not a resource agency.

(3) If the requester is not a resource agency, explain any relevant public interest considerations in regard to the proposed study.

The Wilder Dam offers the public an opportunity to enjoy a quality whitewater boating resource at Sumner Falls. Conducting the necessary studies and implementing the necessary measures to ensure the public has access to quality outdoor recreational resources is in the public interest. It is widely accepted that outdoor recreation has significant benefits to participants, including health, well being, and quality-of-life. Outdoor recreation also has proven economic benefits for communities located near recreational resources.

Restoration of recreation opportunities in the Connecticut River and its tributaries has the potential to offer the region significant economic benefits. FERC has concluded that *"to fully evaluate the project's effect on whitewater recreation opportunities and to balance potential enhancement opportunities with their cost, a controlled-flow whitewater boating study is relevant to Commission's public interest determination."* This is equally true regarding the Sumner Falls reach on the Connecticut River.

The Licensee owns and operates several river access areas on the Connecticut River within project boundaries, and both the states of Vermont and New Hampshire manage additional sites in the vicinity of the Project. Thus, there is a clear interest in the public's ability to traverse the Connecticut River in boats and to develop recreational uses. In addition to this interest, the Connecticut River has been designated as America's first *"Heritage River"* and *"National Blueway."* Please see comments under Study #5 below concerning the National Blueway designation and its relationship to agencies.

(4) Describe existing information concerning the subject of the study proposal, and need for additional information.

While many controlled-flow studies as described above have been conducted on New England's rivers (Deerfield in Massachusetts, and Kennebec and Rapid in Maine) that have a long and illustrious history of whitewater paddling use, flows on this section of the Connecticut River have been fractured and are undependable. The potential of developing a quality river reach at Sumner Falls as a recreational facility and destination should not be ignored.

Current and historic project operations, however, provide no consistent releases or meaningful information for this reach. The result has been flows too low to paddle, or flashy, spiking high flows that flatten out the rapids. It should be determined what flows are best suited for maximum recreational use.

(5) Explain any nexus between Project operations and effects (direct, indirect, and/or cumulative) on the resource to be studied, and how the study results would inform the development of license requirements.

The Project controls the entire flow in the Connecticut River with the exception of releasing the required minimum flow of 675 cfs or when generating. The result is chaotic and unpredictable timing for paddlers wishing to recreate at Sumner Falls, and the elimination of valuable and regionally needed summer paddling opportunities. The Connecticut River can be a high quality paddling resource, and since paddling is a flow dependent activity, the project directly affects paddling on the Connecticut River. The project nexus is direct. The results of a controlled flow study would help determine the need for license requirements for whitewater releases.

(6) Explain how any proposed study methodology (including any preferred data collection and analysis techniques, or objectively quantified information, and a schedule including appropriate field season(s) and the duration) is consistent with generally accepted practice in the scientific community or, as appropriate, considers relevant tribal values and knowledge.

We request that the licensee conduct a controlled-flow study on the Sumner Falls reach of the Connecticut River. The study should follow the standard methodology as described in Whittaker et al., cited above. This methodology is designed to gather information to assess the presence, quality, and preferred flow ranges for river-based boating resources in a step-wise manner. The process steps are generally 1) desktop analyses, 2) on-land feasibility assessment, 3) on-water single flow assessment, 4) on-water multiple flow assessment.

We will work with the licensee to document the known information regarding the river. We will provide volunteers and technical support for the study as appropriate. We hope to work collaboratively with the licensee on this study. The whitewater boating study methodology we have requested has been used on dozens of other FERC regulated reaches.

(7) Describe considerations of level of effort and cost, as applicable, and why any proposed alternative studies would not be sufficient to meet the stated information needs.

We are willing to work with the licensee on the whitewater paddling controlled-flow study to keep costs reasonable and the quality of information high. Any information that is already known can jump-start the study process and avoid un-needed effort. What will be subsequently needed is the integration of this information and then an organized flow study during which several flows are paddled by boaters with still image and video documentation, surveys of the boaters, a guided conversation among the boaters, and subsequently a written report.

Given that this is a main stem reach with access and relatively known hydrology, and given the collaborative approach sought by the paddling community, including in-kind contributions of time and expertise, consultants should be able to complete these studies on behalf of the licensee for a very reasonable cost.

The Licensee PAD proposes no whitewater recreation mitigation analysis, either on-site or off-site.

2: Camping, sanitary and other facilities such as portages available for multiple-day kayaking or canoe trips (Recreation Use and Needs).

(1) Describe the goals and objectives of each study proposal and the information to be obtained.

The goal of this study is to provide quantitative and qualitative analyses of existing facilities to determine their capacity to manage the increasing number of paddlers who are making multiple-day trips on the Connecticut River. This study should also identify other points on the river that would be suitable for the establishment of additional facilities, their adequacy to meet demand for the period of a 30-50 year license, and opportunities for the power company to acquire additional lands to meet the projected need.

(2) If applicable, explain the relevant resource management goals of the agencies or Indian tribes with jurisdiction over the resource to be studied;

The requester is not a resource agency.

(3) If the requester is a not resource agency, explain any relevant public interest considerations in regard to the proposed study.

In the PAD, the Licensee cites the Massachusetts SCORP (2006-2011), which indicated a need for "water-based" activities, and one of the goals of the New Hampshire SCORP identified the need for a variety of recreational opportunities. The Vermont SCORP (2005-2009) reveals the need for access to all types of outdoor recreation.

The public has an interest in healthy rivers and streams that fully support the full suite of beneficial uses and other goals of the Clean Water Act. Access to streams and rivers with adequate base flows and sufficient variability will support high quality recreational use. Information provided by canoe clubs and other river recreational interests cite changing demographics and the rise of sea kayaking as reasons for a high interest in flatwater paddling and multiple-day canoe trips.

The Licensee owns and operates several river access areas on the Connecticut River within project boundaries, and both the states of Vermont and New Hampshire manage additional sites in the vicinity of the Project. Thus, there is a clear interest in the public's ability to traverse the Connecticut River in boats and develop recreational uses. In addition to this interest the Connecticut River has been designated as America's first *"Heritage River"* and *"National Blueway."* Please see comments under Study 4(2) below concerning the National Blueway designation and its relationship to agencies.

(4) Describe existing information concerning the subject of the study proposal, and the need for additional information.

While the applicant has itemized nine camping facilities and 17 access points available on the reach from Wilder Dam to the 15-Mile Falls Dam (only a few of them provided by TransCanada), they have not provided a qualitative analysis of these facilities. These sites are managed and/or maintained by multiple parties listed by the Licensee in the PAD. Current management agencies should be surveyed by the Licensee to gather historical management and operational data, and then provide plans and upgrades to meet future recreational needs.

One of the better publications available to gather this information is *The Connecticut River Boating Guide: Source to the Sea*, published by the Connecticut River Watershed Council, 3rd Edition 2007.

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.

(5) Explain any nexus between Project operations and effects (direct, indirect, and/or cumulative) on the resource to be studied, and how the study results would inform the development of license requirements.

This study will be the defining mechanism for identifying additional sites and improvements that can best be adapted for the increasing needs of public access and multiple-day paddling trips on the Connecticut River. Additional facilities may be required in the license.

(6) Explain how any proposed study methodology (including any preferred data collection and analysis techniques, or objectively quantified information, and a schedule including appropriate field season(s) and the duration) is consistent with generally accepted practice in the scientific community or, as appropriate, considers relevant tribal values and knowledge.

Our interest is in having sufficient information to understand what facilities exist and what, if any, improvements are necessary to manage an increasing public interest in multiple-day kayak and canoe trips on the Connecticut River. Licensee staff have the resources to complete this analysis and should include recommendations for the acquisition and development of additional facilities to meet the interests and needs identified in the multi-state SCORP documents cited by the Licensee in the PAD. This analysis can be completed during any spring, summer, or fall field season.

(7) Describe considerations of level of effort and cost, as applicable, and why any proposed alternative studies would not be sufficient to meet the stated information needs.

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. Beyond the iteration of lists provided by the Licensee in the PAD, there is no comprehensive guide or text that provides this information. Visual inspection of existing sites and facilities should take place and any needed reconstruction or rehabilitation of existing facilities should be identified.

Cost of this data collection is relatively minimal and can be completed by Licensee staff. This analysis can be completed during any spring, summer, or fall field season.

3: Economic impacts.

(1) Describe the goals and objectives of each study proposal and the information to be obtained.

The goal of the recreational economic impact study is to assess the regional economic value of facility improvements and various flow alternatives that can be provided to improve recreational opportunities at Sumner Falls and on this reach of the river in general.

(2) If applicable, explain the relevant resource management goals of the agencies or Indian tribes with jurisdiction over the resource to be studied.

The requester is not a resource agency.

(3) If the requester is a not resource agency, explain any relevant public interest considerations in regard to the proposed study.

Economic stimulus is clearly in the public interest. Many New England hydropower projects support robust recreation economies. Some sections of the Deerfield (FERC No. 2334-010) are comparable, as well as the Kennebec (FERC Project No.2124), and the Magalloway and Rapid Rivers (FERC Project No. 11834-000) in Maine.

In the PAD, the Licensee cites the Massachusetts SCORP (2006-2011), which indicated a need for "water-based" activities, and one of the goals of the New Hampshire SCORP identified the need for a variety of recreational opportunities. The Vermont SCORP (2005-2009) reveals the need for access to all types of outdoor recreation.

(4) Describe existing information concerning the subject of the study proposal, and the need for additional information.

We are unaware of existing information regarding the economic potential at Wilder Dam and look forward to learning more. However, Crane Associates of Burlington, Vermont, published a study in 2005: *"The Economic Impacts of Whitewater Boating on the West River, Jamaica, Vermont."*

(5) Explain any nexus between Project operations and effects (direct, indirect, and/or cumulative) on the resource to be studied, and how the study results would inform the development of license requirements.

The project has restricted and diminished paddling opportunities throughout the year at Sumner Falls. Many of these days could provide predictable and scheduled kayaking, instructional paddling, and canoeing–all of which have economic values associated with any form of tourism.

Understanding the economic values that could be provided by restoring and increasing paddling recreation from Wilder Dam flows will assist FERC and other stakeholders in balancing the trade-offs associated with generational timing. In the case of the Deerfield River, the value of whitewater recreation outweighed the value of power generation by a margin of 24:1.

(6) Explain how any proposed study methodology (including any preferred data collection and analysis techniques, or objectively quantified information, and a schedule including appropriate field season(s) and the duration) is consistent with generally accepted practice in the scientific community or, as appropriate, considers relevant tribal values and knowledge.

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. Economic values contribute to the public good, and overall visitor spending will contribute to economic significance for the immediate and adjacent region.

(7) Describe considerations of level of effort and cost, as applicable, and why any proposed alternative studies would not be sufficient to meet the stated information needs.

Primary data should be collected through survey instruments circulated through known paddling clubs throughout New England and in the nearby Lebanon and Hanover, New Hampshire, and White River Junction, Vermont, areas during the winter months. Individual interviews should be taken on days when the nearby West River and Deerfield River are having releases, and the survey should include kayakers, canoeists, and rafters of varying abilities. Customers of commercial outfitters should also participate in the survey as well as outfitters that provide tubing equipment for those individuals that enjoy just floating down the river.

The Licensee has proposed no economic studies in the PAD.

Wilder Dam in October 2012.

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

(1) Describe the goals and objectives of each study proposal and the information to be obtained.

The goal of this study is to assess the value of whitewater boating resources eliminated by the Project and the development of on-site and off-site mitigation options that would provide adequate compensation for the loss of whitewater recreation at the Wilder Dam Project.

(2) If applicable, explain the relevant resource management goals of the agencies or Indian tribes with jurisdiction over the resource to be studied.

The requester is not a resource agency.

(3) If the requester is not a resource agency, explain any relevant public interest considerations in regard to the proposed study.

The Wilder Dam effectively eliminates the public's opportunity to enjoy a whitewater boating resource. Conducting the necessary studies and implementing the necessary measures to ensure the public has access to whitewater recreational resources is in the public interest.

Using off-site mitigation has historically been an acceptable practice in FERC licensing. This is evidenced in the Upper Androscoggin Settlement Agreement for the Rapid and Magalloway Rivers in Maine (FERC Project No. 11834-000), as well as the Canada Falls Settlement Agreement (FERC Project No. 2634) for the South Branch of the Penobscot River in Maine.

On May 24, 2012, Secretary of the Interior Ken Salazar designated the Connecticut River and Watershed as the nation's first National Blueway. A Memorandum of Understanding signed in August by the departments of Interior, Agriculture, and the Army has as one objective "providing opportunities for scientific research, environmental education and outdoor recreation and access within the National Blueway to the extent compatible with agency missions."

The National Blueway concept takes a watershed viewpoint and addresses the river from its source to the sea. The National Blueways System has a goal "to advance a whole river and watershed-wide approach to conservation, outdoor recreation, education, and sustainable economic opportunities in the watersheds in which we live, work, and play." The National Blueway designation includes all of the tributaries in the watershed and involves several federal agencies. These agencies include the U.S. Army Corps of Engineers, the Silvio Conte Refuge, the U.S. Fish and Wildlife Service, the National Park Service, and the States of Connecticut, Vermont, New Hampshire, and the Commonwealth of Massachusetts, which have prioritized conservation, recreation, and restoration in the 7.2 million-acre Connecticut River Watershed.

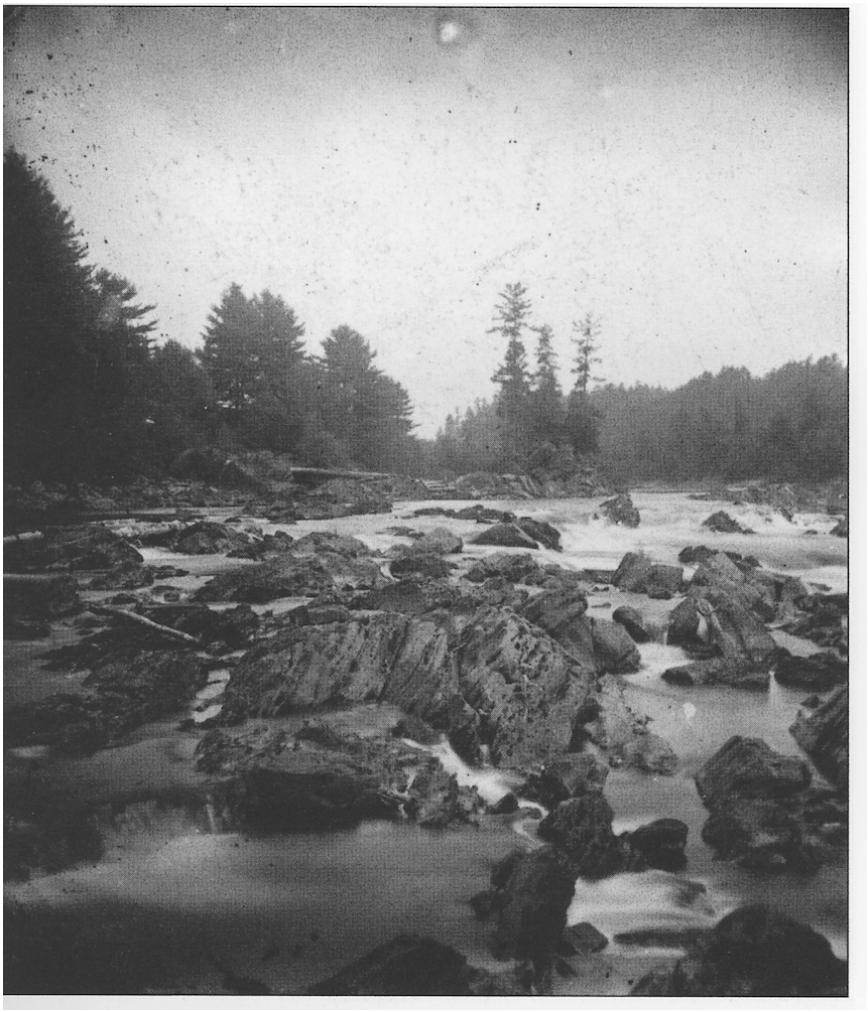
Restoration of recreation opportunities in the watershed of the Connecticut River has the potential to offer the region significant economic benefits.

(4) Describe existing information concerning the subject of the study proposal, and need for additional information.

According to the book by Frank J. Barrett, Jr., *Images of America: Hartford* (Portsmouth, N.H.: Arcadia Publishing, 2009), the Wilder Dam site was originally known as Olcott Falls and White River Falls. "Explorers of the Connecticut River valley encountered a series of three falls over a

distance of about a mile as the river runs," Barrett wrote. Wilder Dam was placed atop the lower falls, thus drowning all three rapids. The total drop of the river over the two upstream falls, according to Barrett, was 37 feet (p. 108). Barrett's book provides two photos of the rapids dating from 1859 and 1882.

Current and historic project operations at the Wilder Dam provide no consistent or meaningful information for this type of mitigation. It should be determined what flows in the region are best suited for maximum recreational use.



Olcott Falls Middle Falls 1882 (Barrett, *Hartford*, p. 109)

(5) Explain any nexus between Project operations and effects (direct, indirect, and/or cumulative) on the resource to be studied, and how the study results would inform the development of license requirements.

The Project controls the entire flow in the Connecticut River with the exception of releasing the required minimum flow or when generating. The result damages regionally needed summer

paddling opportunities on the main stem. FERC needs to balance the paddling resource and power generation under the "*Electric Consumers Protection Act*" (*16 U.S. C. §797,803*). The project nexus is direct.

Study results would and should develop the basis of license terms, including possible off-site mitigation, that could protect the public interest and provide the balance mandated under ECPA.

(6) Explain how any proposed study methodology (including any preferred data collection and analysis techniques, or objectively quantified information, and a schedule including appropriate field season(s) and the duration) is consistent with generally accepted practice in the scientific community or, as appropriate, considers relevant tribal values and knowledge.

Analyses would include gathering information to assess the presence and quality of rivers that could be candidates for off-site mitigation. The process steps are generally 1) collaboratively identify candidate rivers and issues with the paddling community, 2) resource agency identification and feasibility assessment, 3) inter-agency meetings with resource agencies, Licensee, and representatives of the boating community with experience with assessing the feasibility of proposed measures.

We will provide volunteers and technical support for the studies as appropriate. We hope to work collaboratively with the Licensee and other agencies on this study.

(7) Describe considerations of level of effort and cost, as applicable, and why any proposed alternative studies would not be sufficient to meet the stated information needs.

We are willing to work with the Licensee on an on-site and off-site mitigation study to keep costs reasonable and the quality of information high. We believe that potential mitigation options can be easily and affordably identified through collaborative discussions. What will be subsequently needed is the integration of this information and organized meetings to study the feasibility of alternatives, and subsequently a written report.

Given the collaborative approach sought by the paddling community, including in-kind contributions of time and expertise, the Licensee and agencies should be able to complete these studies for this unique approach to mitigation for a very reasonable cost.

The Licensee PAD proposes no whitewater recreation mitigation analysis, either on-site or off-site.

Conclusion:

We respectively 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.

These studies should address the projected needs and interests for the term of a 30-50 year FERC license.

In addition, in these comments we offer our comments on the PAD to better inform this relicensing process. Thank you for considering these comments.

Respectfully submitted this 28th day of February, 2013

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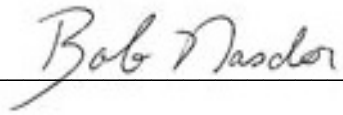

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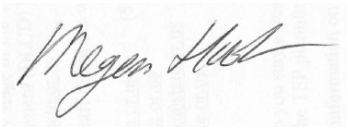
UNITED STATES OF AMERICA
BEFORE THE
FEDERAL ENERGY REGULATORY COMMISSION

TransCanada Hydro Northeast, Inc.	Wilder Hydroelectric Project FERC No. 1892-026

CERTIFICATE OF SERVICE

Pursuant to Rule 2010 of the Commission's Rules of Practice and Procedure, I hereby certify that I have this day caused the foregoing NEW ENGLAND FLOW, AMERICAN WHITEWATER, AND THE APPALACHIAN MOUNTAIN CLUB'S COMMENTS AND STUDY REQUESTS IN RESPONSE TO THE NOTICE OF INTENT TO FILE LICENSE APPLICATION, FILING OF PRE-APPLICATION DOCUMENT (PAD), COMMENCEMENT OF PRE-FILING PROCESS, AND SCOPING: REQUEST FOR COMMENTS ON THE PAD AND SCOPING DOCUMENT, AND INDENTIFICATION OF ISSUES AND ASSOCIATED STUDY REQUESTS REGARDING THE WILDER HYDROELECTRIC PROJECT, FERC PROJECT NO. 1892-026 to be served upon each person designated on the official service list compiled by the Secretary in this proceeding.

Dated this 28th day of February, 2013.



Megan Hooker
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Document Content(s)