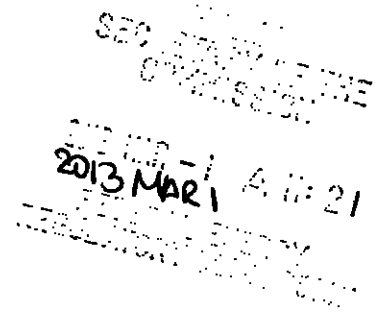


ORIGINAL

F. WILLIAM LIPPERT, JR., AND JENNIFER LIPPERT
1349 NH Route 12A
Cornish, NH 03745

February 25, 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) Scoping Study Request

Via certified mail

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. Pursuant to the December 2012 "Scoping Document 1," this letter constitutes a formal request for a study related to the benefits of limiting the rate of change of Wilder dam discharges in reducing dam-related erosion of the riverbanks.

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. The attached photo shows a portion of our property with significant active erosion along the river front.

As you know, the dwarf wedge mussel (*Alasmodonta 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 but, rather, from the lack of any FERC-imposed or voluntary measures to provide reasonable limitations in *rate of change* in flow. We suggest that 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) is a reasonable operating requirement that will enhance safety, reduce erosion and minimize degradation of habitat for endangered species.

In accordance with the December 2012 "Scoping Document 1," we request a comprehensive hydrology and soils study of the benefits of imposing a rate of change limitation in flow of 5000 cfs per hour (or similar value) as a requirement for Wilder Dam relicensing in 2018. We request that the study utilize detailed and site-specific computer simulation models to compare predicted soil erosion with and without such rate of change requirements. We would be pleased to support the effort by providing access to our property for computer simulation model development and calibration. We request that such a study be performed by an independent laboratory (such as the U.S. Army Cold Regions Research and Engineering Laboratory (CRREL)) or research university. We specifically request that such a study not be performed by a consultant engaged by the project applicant due to conflict of interest concerns.

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.

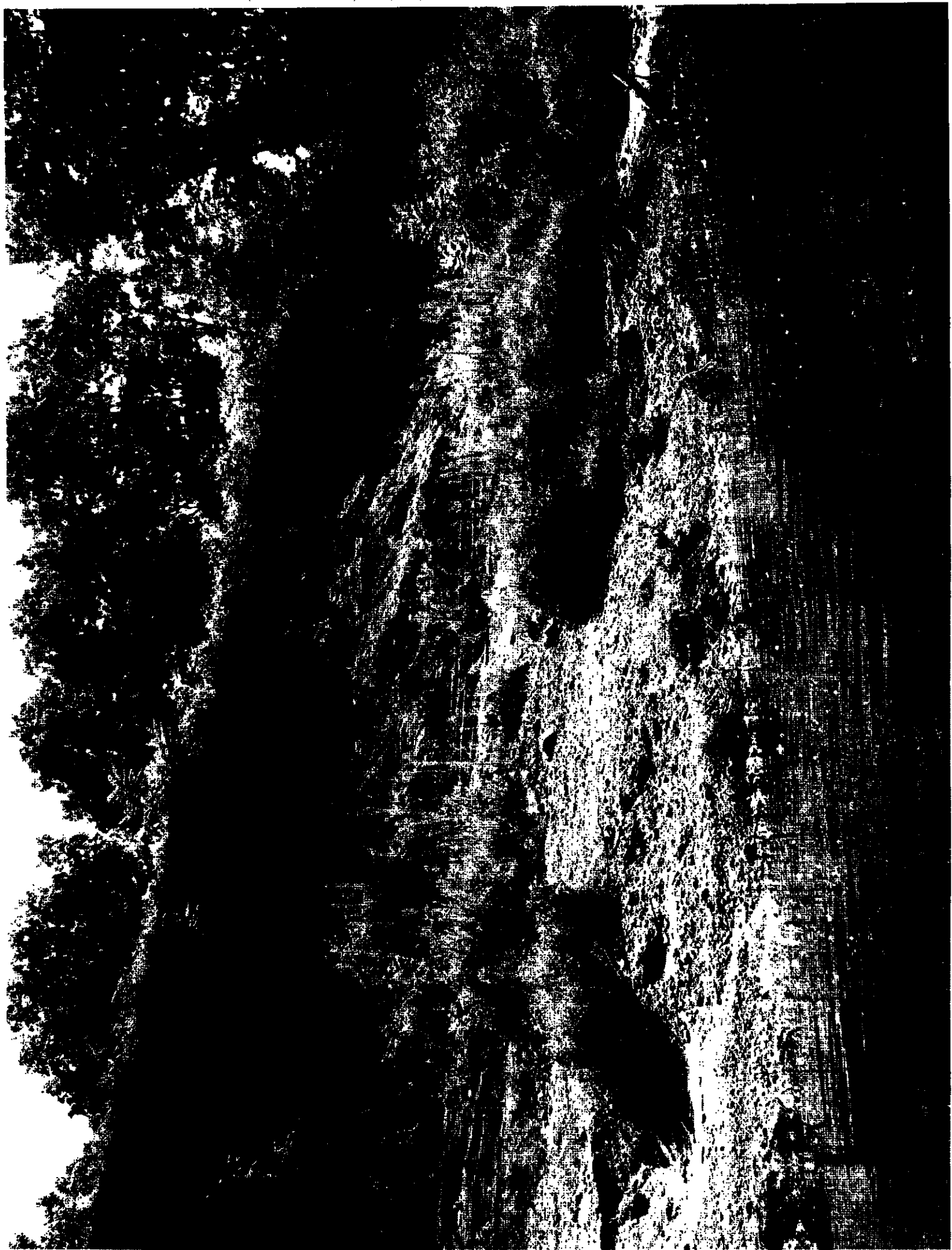
Very truly yours,


F. William Lipfert, Jr.


Jennifer Lipfert

cc: Kenneth Hogan, FERC

Att: 7 paper copies of this letter and supporting documentation



Document Content(s)

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