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August 29, 2013

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

Subject: Wilder Hydroelectric Project, FERC Project No. 1892
Bellows Falls Hydroelectric Project, FERC Project No. 1855
Vernon Hydroelectric Project, FERC Project No. 1904
Comments on Revised Study Plan

Dear Secretary Bose:

Pursuant to the Federal Energy Regulatory Commission's (Commission or FERC) regulations 18 C.F.R. § 5.13(b), The Nature Conservancy (TNC) is providing comment on TransCanada Hydro Northeast Inc.'s (TransCanada) Revised Study Plan (RSP) for the relicensing of the Wilder (FERC No. 1982), Bellows Falls (FERC No. 1855), and Vernon (FERC No. 1904) Hydroelectric Projects, filed on August 14, 2013. Unless specifically noted, all comments and page references in this letter refer to TransCanada's RSP document.

On July 15, 2013, TNC provided comments on TransCanada's Proposed Study Plan (PSP). Overall, we find that TransCanada has made considerable efforts to respond to and address all of our comments. Our comments on the RSP are therefore minimal, and are focused on providing additional clarity and explanation regarding a particular request for Study 10. The comments that follow are organized by the numbering and study titles provided in the August 14, 2013 RSP.

Revised Study 10: Fish Assemblage Study

Methods

We support the changes that TransCanada has made to improve the sampling design of this study, as described in the RSP. At the scale of the geographic reach, the study now represents a good example of a robust, stratified random sampling design. We have just a few clarifying comments regarding the issue of replicate samples, as it appears there may have been some misunderstanding of our request. On p. E-41, TransCanada states that they disagree with our

request of replicate sampling, yet the study plan as written includes replicates, though perhaps at a larger spatial scale than we were envisioning. As the study is described, solid statistical inference can be drawn at the level of habitat type within a geographic area because at least three randomly selected samples will be collected in each habitat type within each stratum (as long as the habitat is available; p. 122). These randomly selected sample segments are in effect sample replicates of each habitat type. In the suggested methods we provided with our comments regarding TransCanada's PSP, we envisioned much smaller replicates (perhaps on the order of 50- to 100-meters) within each selected 500-meter segment. In this way, statistical inference could be drawn at the site-level as well as at the reach-level, and therefore the quality of the study would increase substantially while overall costs stay the same (see for example the changes made to the study design of Revised Study 12: Tessellated Darter Survey).

We are pleased with the changes that TransCanada has made to the Fish Assemblage Study, but would prefer the inclusion of a more finite level of inference (site-level as well as reach-level). Understanding the occurrence, distribution, and relative abundance of fish species present in the project-affected areas (the study goal, per p. 119) requires that occurrence, distribution, and relative abundance are evaluated at a scale that reflects patterns of spatial variation. If patterns of spatial variation are adequately described at the reach level, then the reach is an appropriate scale at which to describe these patterns; this is how the study is currently designed. If patterns of spatial variation are more adequately described at the scale of the 500-meter segment, then the 500-meter segment is the appropriate scale at which to describe these patterns. Unfortunately, we do not know at what scale the fish species assemblage varies within the project-affected area. Therefore, we propose replicate samples at the site level, if this can be accomplished without significantly increasing the costs of the study. In summary, our intent with regard to requesting sample replicates was not to increase the cost of this study, but to improve the scientific rigor of the study while maintaining its current scope, objectives, and cost.

Analysis

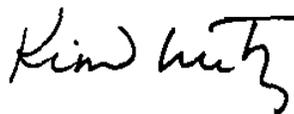
On page 125 of the RSP, TransCanada states, "Summary statistics will be calculated by habitat type..." While it may have been inferred that these statistics would be calculated by habitat type within each of the 7 geographical areas, it was not stated explicitly. We request that this detail be added to the text.

Revised Study 12: Tessellated Darter Survey

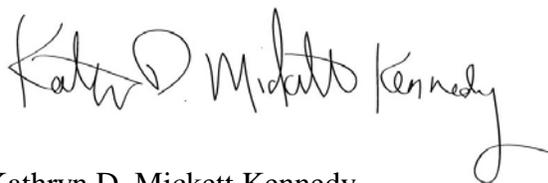
In our estimation, this is a well-designed study. We appreciate the effort that TransCanada has taken to make it so, and look forward to seeing the results.

Thank you for this opportunity to provide comment on TransCanada's Proposed Study Plan. If you have any questions regarding the preceding comments, please contact Katie Kennedy at the Nature Conservancy's Connecticut River Program office (413-586-2349 or kkennedy@tnc.org).

Sincerely,



Kimberly A. Lutz
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