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New England FLOW~~~~~

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UNITED STATES OF AMERICA
FEDERAL ENERGY REGULATORY COMMISSION

TransCanada Hydro Northeast, Inc.

026 Wilder Hydroelectric Project No. 1892-
045 Bellows Falls Project No. 1855-
Project No. 1904-073 Vernon Hydroelectric

NEW ENGLAND FLOW
COMMENTS ON REVISED STUDY PLANS
FOR THE WILDER HYDROELECTRIC PROJECT, FERC PROJECT NO. 1892-026, THE BELLOWS
FALLS PROJECT, FERC NO. 1855-045, AND THE VERNON HYDROELECTRIC PROJECT, FERC.
NO. 1904-073.

Since 1988 New England FLOW (FLOW) has promoted the protection, enjoyment, and understanding of the mountains, forests, waters, and trails of the New England region. FLOW is the largest coalition of whitewater boaters in the Northeast, many of whom live within three hours of the Connecticut River and would enjoy this section as a daylong or longer trip, or as a whitewater opportunity. 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.

Representatives of New England FLOW attended face-to-face sessions held by TransCanada on June 6 and 7, 2013, at White River Junction to discuss the proposed study plans. We reference our comments made at those meetings.

We appreciate the effort TransCanada has expended in considering our revised study requests and, for the most part, agree with the revisions to the proposed studies. Our comments below provide several suggestions that we believe would improve those studies and provide better analysis for the activities proposed for the whitewater study areas at Bellows Falls and Sumner Falls.

FLOW Comments

1. Revised Study 30-Recreation Facility Inventory, Use & Needs Assessment: We believe there are elements of the proposed recreation studies inadequate to fully quantify the resource values that are important to recreational boaters.

TransCanada is surveying 2,400 nearby residents, which present opportunities for asking why someone might avoid using the facilities, or what facilities in the area they prefer when compared with TransCanada's. However the list of "uncommon and potential users groups" should be expanded to include more canoeists, kayakers, and other self-propelled cartop

watercraft, and multi-day paddlers. There are difficult portages, concrete boat ramps, and variable conditions at campgrounds that would discourage recreationists in those groups.

We feel more questions should be asked of non-users, and more questions should be asked about the use of informal campgrounds and access points along the river.

By not paying sufficient attention to non-users of the river and of its facilities the studies neglect to accurately predict what future boating and other recreational demands will be. By directing more survey attention to non-users, some of the weaknesses in Project facilities will be discovered. Reaching out to NGOs may be helpful to secure additional contacts for these surveys.

Survey questions can ask for improvements to facilities that would attract non-users. This is important information in meeting the goal to "Collect information (e.g., activity type and resource needs, visitation levels and trip frequency, and obstacles to recreation in project areas) regarding recreational use and user preferences of uncommon and potential user groups.

2. Revised Study 31 Whitewater Boating Flow Assessment—Bellows Falls and Sumner Falls: TransCanada has proposed whitewater boating flow assessments on the Bellows Falls and Sumner Falls reaches. The "controlled-flow study" suggested by the applicant is an instrument that has been used in many of the relicensing projects over the past 20 years and one which New England boaters have experience in using. We appreciate that TransCanada will consult with stakeholders as the study is developed and conducted.

The proposed number of controlled releases at Sumner Falls is three. We feel a minimum of four or more is needed. In every relicensing in New England over the past twenty years in which FLOW and AW has had a prominent role as testers or advisors; there have never been less than four test flows. Since this is a known reach and local paddlers are well aware of the useable flows at Sumner Falls, the exact number of test releases should be based upon the advice and experience of paddlers who are familiar with the current variation of flows in this reach.

Regarding the Bellows Falls controlled releases TransCanada is being cautious about putting water into the bypass reach; FLOW shares their concerns about safety. Unfortunately for boaters and TransCanada, the inherent danger of test flows in this reach is directly tied to the presence of the "fish stopper" dam near the railroad bridge two-thirds of the way down into the bypass reach. We think this dam should be removed, not only for boater safety, but for any number of ecological reasons too numerous to mention.

TransCanada's consultants have been studying natural flow events over this structure and have suggested to FLOW and AW that it may be safe at several levels. If the dam is considered un-runnable at the test observation flow, the controlled flow study should still proceed. Rapids upstream and rapids downstream of the fish barrier dam can be studied at various flow levels. Provisions should be made for boaters to make a short, safe portage around the dam during the controlled flow study.

In the event FERC should order the removal of the "fish stopper" dam as part of any "License Articles, and boaters have not been provided with releases because of "perceived"

safety concerns through a suitable controlled flow study, prior to the dam removal, we request that a subsequent controlled flow study be conducted.

FLOW will continue to work with TransCanada on the Bellows Falls project, however once we agree to the controlled flow study format, we would certainly need more than three test flows to determine acceptable and optimal release levels. Ten may be needed. As is the case on other rivers, variable releases for different levels of expertise might come out of this study. With no information or experience available about this reach, if only three flows are considered, it hardly gives enough information to determine the range of variable flows.

TransCanada has indicated the controlled flow studies will be limited to between 8-12 participants. We do not agree with this number and again, historically, prior tests in New England have never had less than 12-15 test boaters to cover the range of skills level and types of craft used. On the lower dams owned by FirstLight, their proposed controlled flow study calls for 24 participants. We think TransCanada should take a broader approach to generate enough meaningful data to make the studies worthwhile.

3. Attachment 31-A Boater Survey: Overall, we like the questionnaire form that participants will be asked to use.

4. Section C: Close-out Questions: Question #3 lists 10 flows ranging from 700 cfs to 11,000 cfs. Those flows would be fine for the controlled flow study, but TransCanada has proposed that only three distinct flows would be evaluated. FLOW assumes this inconsistency will be resolved in the final development of the study plan, and we hope to collaborate with TransCanada in determining how many flows will be provided and their size. We look forward to working with TransCanada and its consultants as this study moves forward and request FERC support these changes and modifications to the study as more information becomes known.

Conclusion:

New England FLOW respectfully requests that FERC gives consideration to these comments and direct the licensee to adjust its study plans to address the concerns raised.

Respectfully submitted this 26th day of August, 2013,

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