



The Nature Conservancy
Connecticut River Program
136 West Street, Suite 5
Northampton, MA 01060

Tel (413) 584-1016

nature.org/ctriver

November 13, 2015

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 Updated Study Report**

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) Updated Study Report (USR) for the relicensing of the Wilder (FERC No. 1982), Bellows Falls (FERC No. 1855), and Vernon (FERC No. 1904) Hydroelectric Projects, filed on September 14, 2015.

Because many of the studies are still in progress, these comments will be minimal and limited to Study 10 Fish Assemblage Study, Study 12 Tessellated Darter Survey, and Study 17 Upstream Passage of Riverine Fish Species Assessment.

Study 10 Fish Assemblage Study

We suggest that when TransCanada finalizes the Study 10 report, fish species data be presented first in taxonomic order (by family), and then alphabetically within a family to facilitate data interpretation. We also request that data be presented by sample location within a reach, rather than presenting sample data lumped together within a reach (as has been done in Table 10-2 of Volume I of the USR, pp. 50-51). In addition, if both non-detections and missing data are reported together, please clearly distinguish true zeros from the absence of data.

The study status reports that the fish assemblage consisted of 35 fish species and two taxonomic groups (Volume I of the USR, p. 48). This language is confusing since there are at least eleven taxonomic groups represented by the 35 fish species; if this language refers to unidentifiable samples that were identified to genus instead of species, please indicate this clearly in the text.

We also believe there is a possibility that the bridle shiner sampled in the Wilder impoundment was a misidentification, perhaps of a bluntnose minnow, since bridle shiner is not known to occur in this area. We suggest that if the specimen was preserved, that it be provided to staff at the New Hampshire Fish & Game Department for an additional expert opinion. If the specimen was not preserved, please provide justification (preferably including photos) for the bridle shiner identification.

Study 12 Tessellated Darter Survey

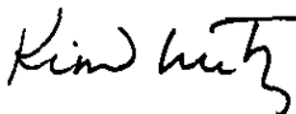
TransCanada's Revised Study Plan for Study 12 states, "Beach seine/backpack electrofish sampling will be used for sampling within all strata (i.e., habitat types) featuring shallow, wadeable water depths..." However, the USR suggests that the only method employed for study 12 was snorkeling, and no variance from the Study Plan was acknowledged. We request that TransCanada please note this as a variance to the Study Plan and provide justification for the change.

Study 17 Upstream Passage of Riverine Fish Species Assessment

Please reconfigure table 17-1 (Volume I of the USR, p. 48) to include separate counts of upstream and downstream passage of each fish species in addition to sum totals (upstream plus downstream) of passage counts.

Thank you for this opportunity to provide comment on TransCanada's Updated Study Report. 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
Director, Connecticut River Program
The Nature Conservancy



Kathryn D. Mickett Kennedy, Ph.D.
Applied River Scientist
Connecticut River Program
The Nature Conservancy

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