

Tara Bamford, East Thetford, VT.  
VIA ELECTRONIC FILING

Honorable Kimberly D. Bose, Secretary  
Federal Energy Regulatory Commission  
888 First Street  
Washington, D.C. 20426

Re: Comments on TransCanada Hydro Northeast Inc.'s Updated Study  
Results for Wilder Hydroelectric Project No. 1892-026

April 29, 2016

Dear Secretary Bose,

Under the New Hampshire Rivers Management and Protection Act, the Connecticut River Joint Commissions Subcommittees have a responsibility to consider and comment on any federal, state, or local governmental plans to approve, license, fund or construct facilities that would alter the resource values and characteristics for which the river or segment is designated. (RSA 483-8a) The resource values upon which the river designation was based included: geologic, wildlife, plant and fish resources; water quality; scenic values; water withdrawals; wastewater discharges; hydroelectric resources; historic and archaeological resources; community resources; and recreational resources. The CRJC Upper Valley Subcommittee fulfills this role for the segment of Connecticut River on which the Wilder Hydroelectric Project is located. I provide staff support to the Subcommittee including meeting minutes.

On March 21, this Subcommittee met and discussed the Updated Study Results for the Wilder Hydroelectric Project.

It is the opinion of this Subcommittee that Study #1 as presented is misleading and not unbiased. As reported by TransCanada's consultant for Study #1, John Field (March 17 Study Update Presentation):

- Segments of the river that have been armored with rip rap or other means because erosion was threatening homes or public infrastructure are labeled as no longer eroding. This is true even in some segments where the armor has slumped down into the river.
- Banks that are being undercut are not considered to be eroding if they still have some slumped vegetation.
- Banks that erode and then green up with some kind of vegetation are not labeled as eroding.
- Various studies of erosion over time being compared in Study #1 were not consistent as to what was considered to be erosion.

Simply put, digitizing bad inconsistent data does not make it relevant or meaningful. The only river-wide erosion study done utilizing a consistent methodology was done in the 1990's for CRJC by the USDA NRCS. This Subcommittee believes this data set presents the only meaningful baseline data.

In addition, the Subcommittee members present voted unanimously to request, in light of the ongoing issues around riverbank erosion and siltation, that FERC in issuing the new permit for this facility, consider the following three permit conditions:

1. Require the owner to establish a mitigation fund for riverbank restoration and stabilization projects to protect public and private property.
2. Require that the operational model be optimized to manage ramping in a manner that will minimize riverbank erosion.
3. Require increased cooperation with the valley's agricultural industry regarding access to plant fields in the spring in a timely manner.

Thank you for considering the comments of the CRJC Upper Valley Subcommittee.

Sincerely,

Tara E. Bamford  
On Behalf of the CRJC Upper Valley Subcommittee

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