



**Vermont Department of Environmental Conservation**

Watershed Management Division

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August 29, 2013

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

RE: Vernon Hydroelectric Project – FERC No. 1904-073  
Impacts of Vermont Yankee Nuclear Power Plant Decommissioning on Proposed Study Plans

Dear Secretary Bose:

As you may be aware, Entergy Corporation announced on August 27, 2013 that it plans to cease operation of the Vermont Yankee Nuclear Power Plant in late 2014. Vermont Yankee is located approximately one half-mile upstream of the Vernon Dam in Vernon, Vermont. Its operation has the potential to influence the aquatic communities in sections of the Connecticut River within the boundaries of TransCanada's Vernon Hydroelectric Project through the discharge of heated effluent into the Connecticut River and the impingement and entrainment of organisms at the system's cooling water intake structure.

Accordingly, the relevance of results obtained from several studies proposed by TransCanada for the 2014 field season may not be valid moving forward. For example, results of studies examining migration and movement of adult and juvenile shad during 2014 (with Vermont Yankee thermal discharge) may be quite different from results obtained if these studies were conducted in 2015 (without Vermont Yankee thermal discharge). As another example, Vermont Yankee entrains and impinges a large number of fish each year. Vermont Yankee entrained an estimated 61.5 million larval fish during a 26-week period (April 2006 to September 2006) and impinged 38,604 fish over a 20-month sampling period (March 2005 through November 2006)<sup>1</sup>. Any fish assemblage study results would likely be influenced by the presence or absence of this impingement and entrainment.

Earlier today, TransCanada filed a request with the Commission requesting an additional 30 days to consult with Entergy Corporation and stakeholders in the Vernon relicensing and to possibly amend its revised study plan. We support that request, and further request an additional 15 days to provide comments on any amended study plans.

In closing, the ecosystem baseline in the Vernon impoundment will likely change with the closure of Vermont Yankee and as a result we have concerns with the long-term validity of results from some of the studies proposed for 2014.

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<sup>1</sup> Normandeau Associates, Inc. 2011. Impingement, entrainment, and nearfield ichthyoplankton studies performed at Vermont Yankee Nuclear Power Plant from 29 March 2005 through 28 November 2006. Analytical Bulletin 91.

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Thank you.

Very truly yours,

A handwritten signature in black ink, appearing to read "B. Fitzgerald". The signature is stylized and cursive.

Brian T. Fitzgerald  
Streamflow Protection Coordinator

c: Marie Caduto, Department of Environmental Conservation  
Lael Will, Department of Fish and Wildlife  
Rod Wentworth, Department of Fish and Wildlife  
John Warner, U.S. Fish and Wildlife Service  
Melissa Grader, U.S. Fish and Wildlife Service  
Gregg Comstock, N.H. Department of Environmental Services  
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Gabe Gries, N.H. Fish and Game Department  
Caleb Slater, MA Department of Fish and Game  
John Ragonese, TransCanada  
David Deen, Connecticut River Watershed Council

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