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Protecting land & water in our community

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16 Buck Road
Hanover, NH 03755
(603) 643-3433
info@hanoverconservancy.org
Hanoverconservancy.org

February 28, 2013

REF: Wilder Dam, Connecticut River
FERC NO. 1892-026
TransCanada Hydro Northeast, Inc.

COMMENTS ON THE PRE-APPLICATION DOCUMENTS ENDORSEMENT OF STUDY REQUESTS

Kimberly Bose, Secretary
Federal Energy Regulatory Commission
888 First Street, NE, Room 1A
Washington, DC 20426

Dear Secretary Bose,

The Hanover Conservancy wishes to comment on the Pre-Application Document (PAD) submitted by TransCanada in anticipation of the relicensing of the Wilder Dam on the Connecticut River in New Hampshire and Vermont. We also wish to express our support for particular studies being requested by several public natural resource agencies, as they align well with our interests.

The Hanover Conservancy is the oldest local land trust in New Hampshire, established in 1961. Our mission is to protect land and water in our community of Hanover, New Hampshire. We own, protect, and manage land in Hanover to preserve habitat and water quality and to offer natural areas for public recreation.

Nexus: Our private, non-profit membership organization owns and manages two nature preserves on Connecticut River tributaries that are influenced by operations at Wilder Dam: the 112-acre Mink Brook Nature Preserve and the 32-acre Lower Slade Brook Natural Area. We also hold a conservation easement on the 27-acre Rinker-Steele Natural Area on lower Camp Brook, and are in the process of acquiring a conservation easement on the 14-acre South Esker, between the mouth of Mink Brook and TransCanada's property at Gilman Island. All are influenced by the Wilder impoundment.

Comments on the Pre-Application Document: We offer the following comments and corrections:

- The 112-acre Mink Brook Nature Preserve is incorrectly depicted as publicly owned on the map on page 184. While there is a small parcel of town-owned land next to Route 10, the majority of the Preserve is owned by the private Hanover Conservancy (formerly known as the Hanover Conservation Council). A significant portion of Mink Brook flowing through our preserve is impounded by Wilder Dam.
- Resource materials should include the *Habitat Assessment and Inventory of the Mink Brook Nature Preserve*, 1999, by Ehrhard Frost, Alice Schori, Alcott Smith, and Linda Wilson.
- The PAD cites (p. 194) the Connecticut River Joint Commissions' recommendation to encourage new car-top boat access, but concludes that ample such access exists.
- The PAD reports extensively on the Phase IA study of archeological and historical resources in the project area, and notes that it "will share" the results with the state historic preservation offices. The PAD was submitted in October, 2012. We have learned that as of February 26, 2013, the New Hampshire SHPO has not received this Phase IA study. We strongly urge the applicant to share the results of this study soon and to consult the SHPO to determine the appropriate next steps in investigating and protecting archeological and historical resources that may be affected by project operations. The Hanover Conservancy's Mink Brook Preserve, which is directly affected by project operations, is a known site of significance to the Abenaki. We wish to know whether sites of tribal importance here, or similar sites that may exist nearby at the South Esker, are threatened by water level fluctuations and erosion in the Wilder impoundment.

Endorsement of Study Requests

The Hanover Conservancy commends the New Hampshire Department of Environmental Services (NH DES), the New Hampshire Fish and Game Department (NHF&G), Vermont Fish and Wildlife Department (VT F&W), US Fish and Wildlife Service (US FWS), and Connecticut River Joint Commissions (CRJC) for their care in assembling and presenting the following study requests, which we endorse:

- **NH DES Study Request 1 - Water quality monitoring within the project impoundment (and tailrace).** The Hanover Conservancy is interested in learning more about project operations' effects upon water quality.
- **NH DES Study Request 2 - Shoreline and downstream erosion from water level fluctuation in the impoundment and downstream from peaking operations.** The Hanover Conservancy has observed the effects of soil piping on Hanover riverbanks, and is interested in learning more about how project operations could be changed to mitigate impacts on shoreline erosion on all Hanover riverbanks and affected tributaries. We are especially interested in exploring how ramping rates could reduce bank slumping, shelf formation, and sedimentation, such as at our preserve on lower Mink Brook and at Pine Park.
- **NH DES Study Request 3 - Wilder Project: Impacts of Water Level Fluctuations on Aquatic Vegetation, Including Invasive Species, in the Project Impoundment.** The Hanover Conservancy is interested in learning more about the effects of peaking operations on riparian and aquatic vegetation. We have invested significantly in riparian vegetation restoration in the area of our Mink Brook Preserve that is influenced by Wilder Dam, under a cost-share agreement with the USDA Natural Resources Conservation Service.

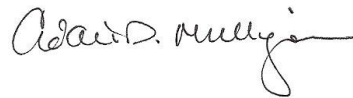
- **NH F&G Study Request - Impacts of the [Vernon, Bellows Falls and] Wilder Project Operations on Tributary and Backwater Area Access and Habitats.** Our Mink Brook Preserve hosts an annual run of white suckers and also offers prime wild brook trout habitat (especially in the Mink Brook tributary, Trout Brook), censused in 2011 by NH Fish & Game. We are especially interested in learning how much lotic habitat could be restored in our preserve with a reduced impoundment elevation.
- **US FWS Study Request - Climate Change as it Relates to Continued Operation of the [Vernon, Bellows Falls], Wilder, [Northfield Mountain Pumped Storage, and Turners Falls Projects].** The Hanover Conservancy would like to know more about how warmer water in the impoundments could affect cold-water fisheries, such as the wild brook trout population in our Mink Brook Preserve.
- **VT F&W Study Request - Recreational Survey and Enhancement Study at Wilder Hydroelectric Project.** The Hanover Conservancy is interested in learning how recreational opportunities in the vicinity of the project could be developed to enhance future recreational opportunities, including river access for car-top boats, foot access, and scenic overlooks. Hanover needs more access for car-top boats. The study should include tributary mouths near the Wilder impoundment.
- **CRJC Study Request - Request for Watershed-wide Stormwater Model.** The Hanover Conservancy strongly endorses the request to develop high-resolution LiDAR coverage for the watershed, for public safety, stormwater management and dam operations planning, and especially for its value in providing a framework for ecological and habitat assessments to prioritize land conservation and restoration efforts.

Thank you very much for your consideration of these comments and endorsement of study requests.

Very truly yours,



Nancy C. Collier
President



Adair D. Mulligan
Executive Director