



HANOVER CONSERVANCY

Protecting land & water in our community

April 3, 2025

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Daniel Demers
Water Quality Certification Program Supervisor
NH Department of Environmental Services
29 Hazen Drive
Concord, NH 03302

Re: Wilder (FERC No. 1892) Relicensing and Clean Water Act §401
Certification Application to the State of New Hampshire

Dear Mr. Demers,

The Hanover Conservancy ("HC") respectfully submits these comments regarding the application of Great River Hydro, LLC for New Hampshire Clean Water Act §401 Water Quality Certification for the Wilder (FERC No. 1892) hydroelectric project.

The Hanover Conservancy, New Hampshire's oldest local land trust, has been working since 1961 to protect land and waters in our community. Our work began only 11 years after construction of Wilder Dam. We own and manage many acres of land in our town, most notably the Mink Brook Nature Preserve and Lower Slade Brook Natural Area. Both are located near the mouths of Connecticut River tributaries, both are considered Tier I habitat by the NH Fish and Game Department, and both are affected by operations at Wilder Dam.

The Connecticut River is a public trust resource. Great River Hydro's ("GRH") use of this public resource requires that public values and uses must be maintained and that NH Water Quality Standards must continue to be met.

The Hanover Conservancy strongly supports the proposed changes to river flow management (inflow equals outflow), which is a marked improvement over the current peaking operations without ramping rates. We note, however, that these operational changes were not considered during the relicensing study process, nor were they included in any modeling to predict future environmental impacts. Therefore, important data are lacking for sound decision-making, particularly in the context of climate change.

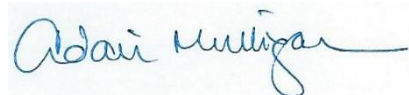
The NH Department of Environmental Services' Draft 401 Water Quality Certificate needs to be strengthened to protect the Connecticut River and its designated uses. Specifically:

1. The Certificate needs to include an improvement or mitigation plan to address how the change in river flow management will impact the river. No meaningful analysis has been done or is being required to understand the effects of changing river flows on erosion, sediment and nutrient transport, and river hydrogeomorphology. Given that peaking flows from the 15 Mile Falls facilities will continue to influence the Wilder impoundment, it is critical to understand how these flows will interact with the new operational regime at Wilder in regard to erosional forces in the Wilder reservoir. There is no analysis regarding this in the application and it directly impacts water quality in our section of the river. An improvement or mitigation plan is needed if project operations are found to exacerbate or cause erosion with negative effects on designated uses and water quality criteria.
2. The Certificate needs to include plans to address bank erosion and stabilization related to dam operations, which has been observed and reported for years, but remains unaddressed. The Certificate should include improvements to the public's access to water quality data and improve public river access. GRH should be required to provide real time flows in more accessible ways, such as real time updates to its website, both for recreationists' planning and for public safety. Public reporting of water quality data should be a condition of the license and include flow, water chemistry, recreation reports, and biological data.
3. The Certificate should address aquatic invasive species and include provisions to improve habitat and riparian buffers. GRH should be required to provide effective boat cleaning units at its recreation facilities to prevent the spread of aquatic invasives, display signage educating visitors about prevention and species of concern, and support efforts to eliminate known infestations that could expand under higher surface water elevations anticipated under the operational change.
4. The Certificate should include conditions to protect against flooding and drawdowns within the project area. These types of events are expected to become more common during the next license term as a result of increasing frequency and intensity of localized storm events under climate change.

Over the life of the new license, we expect that the river will see substantial changes, resulting both from the new operating change and other environmental improvements required as a result of this license, as well as ongoing climate change-related impacts, and changing electricity demands, grids, policies and markets. Because this Certificate will address GRH's operations of the dam for 30-50 years, it is critical that the Certificate address these changing conditions and best position management of the largest river in New England for success.

Thank you for your attention to our comments.

Very truly yours,

A handwritten signature in blue ink that reads "Adair Mulligan". The signature is fluid and cursive, with a long horizontal stroke at the end.

Adair Mulligan
Executive Director