

May 22, 2024  
VIA E-FILING

Debbie-Anne Reese, Secretary  
Federal Energy Regulatory Commission  
888 First Street, NE  
Room 1A  
Washington, D.C. 20426

**Subject: Agri-Mark Comments re: Great River Hydro LLC Relicensing**

FERC No. 1904-078, Vernon Dam, Great River Hydro LLC  
FERC No. 1855-050, Bellows Falls Dam, Great River Hydro LLC  
FERC No. 1892-030, Wilder Dam, Great River Hydro LLC

Dear Secretary Reese,

Agri-Mark, Inc., is pleased to provide comments on the relicensing of Great River Hydro LLC and to highlight several topics specifically related to impacts on agriculture along the Connecticut River.

Agri-Mark, Inc., is a dairy cooperative owned by nearly 500 dairy farm families in New England and New York. Our cooperative has been marketing milk for member dairy farmers since 1916 and has headquarters in Andover, Massachusetts and in Waitsfield, Vermont. Our farm families supply more than 3.2 billion pounds of high-quality milk annually that we use to make our award-winning Cabot and McCadam branded cheeses, dairy products, and ingredients. Agri-Mark operates three cheese manufacturing facilities in Cabot, Vermont, Middlebury, Vermont, and Chateaugay, New York. At our Middlebury, Vermont facility we also produce valuable whey proteins that are marketed around the world. Agri-Mark operates a butter-powder facility in West Springfield, Massachusetts. Lastly, Agri-Mark supplies fresh fluid milk to the region's largest dairy processors.

Our organization's purpose centers on advancing a four-element virtuous cycle. We purchase milk directly from our dairy farm family owners, who are the backbone of our local cultures, communities, and landscapes. Our employees utilize member milk to make award-winning cheese, butter, and dairy products. We enrich the lives of the people who buy, eat, and cook with our products, and we use the profits generated to invest in the future of our cooperative and return profits to our farmer-owners. It is our purpose to ensure that dairy farming and dairy products continue to enrich our communities, landscape, and table.

**Agri-Mark has twenty-two member-owners who reside and farm along the Connecticut River** in New Hampshire and Vermont. The FERC reauthorization process provides a unique opportunity to business challenges for these 22 farms. As such, we thank you for the opportunity to provide comments regarding the FERC reauthorization.

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Dairy farming is a rewarding, yet challenging business to be in. Profit margins can fluctuate drastically based on milk prices (based on volatile global commodity markets) and an often-unpredictable Mother Nature. Farming in the Northeast has unique challenges compared to other areas of the United States (i.e. highest land values and labor markets). It's natural resources, including access to water, provide for advantages that others do not have.

When it comes to dairy farming, animal feed is the highest input cost. Many farmers in the Northeast are lucky to have access to water and highly productive land and soils that allow for them to grow their own feed. This benefits them economically; in that it lowers their input costs. Additionally, home grown feed provides environmental benefits due to the reduced greenhouse gases required to transport feed across the country. Lastly, growing your own feed requires local labor, hereby increasing the economic contribution of dairy farmers in their rural communities by providing jobs. Without this advantage, many farmers in the Northeast could not compete, and the region would risk losing the economic, environmental, recreational, and cultural benefits that our dairy farmers provide. Maintaining the home-grown feed advantage is of critical importance for our members to continue operation, and therefore for our cooperative's virtual cycle to continue.

Our concern with the FERC reauthorization is the potential to have negative impacts on our impacted members and their business viability. Any negative implications these members suffer in turn impact our cooperative's virtual cycle. There are **four key areas of concern we wish to address in our comments**: 1) Unknown and unanticipated consequences of changing the river flow; 2) Notification requirements; 3) Mitigation and enhancement funding; 4) Funding to support appropriate recreational practices.

First, our **impacted farms are concerned about the unknown and unanticipated consequences that a change in river flow could create** on their land and fields, and subsequently their operations, along the Connecticut River. The potential for erosion is a major concern and could have significant implications on their ability to grow their own feed and maintain that cost advantage that they have. We believe Great River Hydro should be held accountable for any impacts that may result from these changes in operation. Additionally, we request that **FERC require Great River Hydro to study these impacts on an ongoing basis over the course of the license**.

Second, **real time instant notification to farmers and landowners** on any changes in river levels throughout the year should take place. Required communication between the dam owners and operators and the farmers both upstream and downstream, including advanced notice on when dam releases will occur, would significantly help farmers plan their business activities accordingly.

Third, we encourage a **mitigation and enhancement fund** managed by a third party to compensate farmers for damages incurred by any changes to river flow.

Fourth, **education on proper recreational uses of the river that avoid erosion** (i.e. no-wake zones) should be supported to prevent avoidable deterioration of the riverbanks. Funding for education (which should include signage) and enforcement of recreational rules would be helpful.

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We take pride in our farmer-owner's persistent commitment to adopt best practices, advance public agriculture policy, and continuous drive for sustainable innovations that improve natural resources, improve animal care, and enrich communities for the benefit of their families and consumers. We thank you for the opportunity to provide comments about the reauthorization and encourage you to consider the far-reaching economic contributions of our farmer-owners when making these decisions.

Sincerely,  
Agri-Mark, Inc.

A handwritten signature in black ink, appearing to read 'Jed Davis'.

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