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Agency of Natural Resources

May 21, 2024

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

Re: FERC No. 1855, Bellows Falls Dam, Great River Hydro LLC
Vermont Fish & Wildlife comments on Great River Hydro LLC's application for a new license

Dear Secretary Reese,

Great River Hydro (GRH) has a unique opportunity to ensure long-term habitat protection for species facing consistent, dramatic population declines, including a species listed as threatened in both NH and VT. It is our hope that FERC will consider our request to provide a more certain future for grassland-dependent birds in the Upper Valley of VT and NH, as part of the relicensing requirements, and also as part of GRH's standing commitment to supporting important wildlife habitat.

The Upper Meadows, owned and managed by GRH, is a rare gem for grassland birds in the CT River Upper Valley. The fields support a vibrant suite of grassland birds that serves as a refuge for species experiencing long-term, steep declines at all scales - locally, regionally, nationally, and continentally. In our region, this bird community has been disappearing, county by county. The Upper Meadows has in fact become one of their last bastions in all of eastern VT and western NH.

We are grateful for GRH's cooperation and support in recent years for conservation of quality grassland bird habitat at Upper Meadows. GRH opened the door for volunteers to successfully apply for USDA EQIP funding that enhanced and protected nesting grassland birds by delaying the mowing of the fields. Specifically, EQIP helped offset the foregone income from mowing less frequently. Importantly, GRH also gave permission for volunteers to hold workshops and conduct bird surveys on the property. These activities facilitated an appreciation of grassland



bird ecology, provided a showcase for compatible agricultural practices, and gave the local community a place to enjoy species that are otherwise scarce.

Ecologically functional grassland habitat is rapidly diminishing in the region, and the species dependent upon are in dire need. Grassland bird populations have been undergoing consistent, steep declines for decades, more than any other avian group in North America (Rosenberg et al. 2019). The Upland Sandpiper has already “blinked out” of all but one or two sites in VT and NH.

If grassland habitat loss continues unabated, the Eastern Meadowlark (*Sturnella magna*) will be the next species to disappear in the region. Across North America, their populations have declined by more than 75% during the last 40 years, and 95% in the New England and North Atlantic region during the same period (Sauer et al. 2022). In Vermont, the distribution of Eastern Meadowlark shrank by 55% between the late 1980s and the early 2000s (Renfrew et al. 2013). These trends combined with the continued loss of habitat and an estimated breeding population below 300 individuals statewide resulted in Eastern Meadowlark being listed in VT as state threatened (V.S.A. Title 10, Chapter 123, Sections 5401 – 5402) in 2022; the species was already listed as threatened in NH.

The major threats to grassland birds include the loss of grass-based agricultural lands to development, and for those that remain, the increased management intensity on the hayed land (more frequent mowing) and pastureland (higher cattle stocking rates). During the last decade in Vermont, VFWD has witnessed solar arrays rapidly filling open fields that once supported Eastern Meadowlarks and Bobolinks, and this trend has no indication of slowing down. This has prompted VFWD to begin planning restoration of some of our open State Wildlife Management Areas in the Champlain Valley to create grassland bird habitat. It will be a long-term commitment of significant staff resources, but we are eager to do our part to ensure that grassland birds remain part of Vermont’s natural heritage.

It is our hope that FERC/GRH will join our efforts. The EQIP funds for delayed mowing on the Upper Meadows will end in 2025, with no option to re-apply. To maintain this vitally important and unique opportunity, we strongly recommend that GRH carry on with the work that volunteers began with GRH support. We hope that GRH will continue the delayed-mow management of Upper Meadows as part of their new FERC licensing agreement.

In addition, to secure stable, reliable habitat, we ask that GRH go one step further by carrying out similar habitat on the Great Meadows across the CT river in Charlestown, NH. The Upper Meadows and Great Meadows locations are close enough to each other to be biologically connected for the birds, will provide sufficient habitat acreage for a robust and more stable albeit small population, and reduce the risk of genetic isolation and inbreeding.



Amidst the many threats faced by wildlife that seem insurmountable and beyond our control, the proven measures to maintain viable grassland bird populations on the landscape are straightforward.

Request: We ask that FERC include the Upper Meadows and Great Meadows properties to be conserved and consistently managed as habitat for grassland birds, as a requirement of relicensing. This is a once in a lifetime opportunity that will not likely be available again in 40 years. It will make a significant, lasting contribution that will likely determine whether this suite of birds will continue to be part of the Upper Valley landscape and enjoyed by the community's future generations.

Sincerely,

A handwritten signature in cursive script that reads "John M. Austin".

John Austin, Director

Division of Wildlife
Vermont Fish & Wildlife Department

Citations

Renfrew, R. B. 2013. Eastern Meadowlark (*Sturnella magna*). Pages 438-439 in R. B. Renfrew, Editor. The Second Atlas of Breeding Birds of Vermont. University Press of New England, Hanover, NH and London.

Rosenberg, Kenneth & Dokter, Adriaan & Blancher, Peter & Sauer, John & Smith, Adam & Smith, Paul & Stanton, Jessica & Panjabi, Arvind & Helft, Laura & Parr, Michael & Marra, Peter. 2019. Decline of the North American avifauna. *Science*. 366. eaaw1313. 10.1126/science.aaw1313.

Sauer, J. R., D. K. Niven, J. E. Hines, D. J. Ziolkowski, Jr, K. L. Pardieck, J. E. Fallon, and W. A. Link. 2021. The North American Breeding Bird Survey, Results and Analysis 1966 - 2021. Version 2.07.2021 USGS Patuxent Wildlife Research Center, Laurel, MD.

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