

Lionel Chute, Unity, NH.
May 20, 2024

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

Via E-Filing

Re: FERC No. 1904, Vernon Dam, Great River Hydro LLC

FERC No. 1855, Bellows Falls Dam, Great River Hydro LLC

Sullivan County NRCD's comments on Great River Hydro LLC's Application for a New License

Dear Secretary Reese:

The Sullivan County Conservation District (SCCD) in New Hampshire aims to connect residents to our local lands and help each one develop an understanding of the natural ecosystems we are a part of, an appreciation for the beauty that surrounds us and the natural resources that sustain us, and foster a sense of place and stewardship ethic. The SCCD offers environmental resources and opportunities to support farmers, teachers, schools, growers, and organizations that work on natural resource conservation and agricultural land education.

The Sullivan NRCD serves all of Sullivan County and is bordered by the Connecticut River on the West. The Sullivan NRCD is submitting comments in response to FERC's issuance of a "Ready for Environmental Assessment" and accompanying comment period for the Amended Final License Application (AFLA) for Bellows Falls Dam, P-1855-050 and Vernon Dam, P-1904-078, submitted in December 2020 and revised in June 2023.

Comments

A. The Application does not include monitoring of bank erosion and sediment transport changes after implementation of a proposed major operational change.

Sullivan County contains significant acreage of agricultural lands bordering the river and within Great River Hydro's Flowage Rights. Measurable and noticeable erosion of these lands have occurred over the course of the current license. We support the proposed operational change that aims to reduce erosive forces along project shorelines. We respectfully request that following implementation, FERC requires long-term monitoring of bank stability and erosion metrics, and the implementation of mitigation measures as needed.

B. The Application does not include a plan to inventory species diversity on Great River Hydro's fee simple lands to ensure priority species are protected.

Great River Hydro owns and manages several hundred acres of open lands along the Connecticut River including the Great Meadow in Charlestown. According to the Charlestown Conservation Commission

"The Great Meadow is part of a regional wildlife corridor, designated as the Middle Connecticut River Important Bird Area (IBA) by the National Audubon Society. At the time of a [2021] field survey bobolinks and grassland sparrows were present. Great Meadow is proximate to a known amphibian crossing area. The 2021 Town of Charlestown Natural Resource Inventory notes that the wildlife habitat of the Great Meadow and other lands held in fee by Great River Hydro are ranked a Tier 1 (Highest ranked habitat in the state and of the greatest conservation priority).

Several of New Hampshire's bird Species of Greatest Conservation Need including the state-endangered Northern Harrier (*Circus cyaneus*), state-threatened Eastern Meadowlark (*Sturnella magna*), Bobolink (*Dolichonyx oryzivorus*), and Vesper Sparrow (*Poocetes gramineus*), have been documented at the Great Meadow but only during the non-breeding season. All of these priority species are grassland specialists who nest on the ground and have specific nesting habitat requirements. According to New Hampshire Fish &

Game's 2015 Wildlife Action Plan which is designed to be a blueprint for conserving Species of Greatest Conservation Need and their habitats —these species are declining across large portions of their continental ranges.

Many of New Hampshire's grasslands have been converted to agriculture and are heavily managed for agricultural outputs. The New Hampshire Wildlife Action Plan states that —Many of the best existing grasslands in New Hampshire are in river valleys, where they are subject to agricultural conversion from hayfields, which are suitable for a wide range of wildlife species, to row crops or sod, which generally are not — Other species of conservation concern that would benefit from the conservation of grasslands include Black Racer, Smooth Green Snake, Northern Leopard Frog, Wood Turtle, and others. Grassland invertebrates include a host of butterflies, moths, native bees, grasshoppers, and spiders.

New Hampshire Fish & Game's draft 2025 Wildlife Action Plan identifies grasslands as a top conservation priority given their vital role in providing critical habitat for species of greatest conservation need. The Great Meadow in Charlestown is currently planted to row crops which do not provide suitable nesting habitat to the priority grassland specialists noted above.

IV. Conclusion

In Summary, we request that Great River Hydro's new licenses include requirements for ongoing monitoring of bank erosion throughout the life of the license, and a requirement to develop an inventory of species diversity on all their terrestrial holdings to support conservation of critical wildlife populations.

Sincerely,

David Grobe
Chair
Sullivan County Conservation District
<https://www.sccdnh.org/>

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