



New Hampshire Fish and Game Department

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Glenn Normandeau
Executive Director

July 15, 2013

Kimberly D. Bose, Secretary
Federal Energy Regulatory Commission
888 First Street, N.E., Room 1A
Washington, DC 20426

RE: Additional Information for Final Review of the Draft Proposed Study Plans for FERC project numbers P-1904 (Vernon), P-1855 (Bellows Falls), and P-1892 (Wilder) relative to Non-Game Insect Species studies.

Dear Secretary Bose:

As the agency responsible for protecting fish and wildlife resources in New Hampshire, the New Hampshire Fish and Game Department (NHFGD) monitors and attempts to reduce the impacts of hydroelectric facilities on fish and wildlife species and their habitats. The mission of the New Hampshire Fish and Game Department (NHFGD) is to conserve, manage and protect the state's fish, wildlife and marine resources and their habitats, and to provide the public with opportunities to use and appreciate these resources.

The NHFGD submits the following attached recommendations and comments for final review of the Draft Proposed Study Plans (PSP) being developed for the Vernon (FERC No. 1904), Bellows Falls (FERC No. 1855), and Wilder (FERC No. 1892) projects. These are additional comments and recommendations that were not included in recent submissions involving fisheries issues. These comments are exclusively to the study protocols involving Non-game insect species.

Thank you for this opportunity to comment on this very important relicensing project. If you have any questions regarding these recommendations, please do not hesitate to contact either Wildlife Biologist, Emily Preston at 603-271-2461.

Sincerely,

A handwritten signature in black ink, appearing to read "Glenn Normandeau".

Glenn Normandeau
Executive Director

Comments on FERC Relicensing study protocols:

COBBLESTONE AND PURITAN TIGER BEETLE SURVEY

The Puritan Tiger Beetle is also listed as endangered in NH. This should be noted and the permit request to NHFG should include that species. The goals listed from the VT Wildlife Action Plan are similar to that in the NH Wildlife Action Plan. The study area should include Johnson, Burnaps, Chase and Walpole Islands as well as any identified during their habitat assessment.

DRAGONFLY AND DAMSELFLY INVENTORY AND ASSESSMENT

Given the rarity of the focal species that really should be considered SCGN, (*Gomphus quadricolor* and *Gomphus ventricosus*) I'm not sure the proposed methods will be that productive in getting a better feel for their distribution and behavior - and thus inform conservation actions. Because emerging riverine Odonata can be highly variable in space and time, the proposed sampling scheme is not likely fully capture the broader patterns, especially for rare species. By sampling only three times over the summer, it is quite possible to completely miss the peak emergence events for some species, thus limiting the amount of data that can be collected. Similarly, random survey transects perpendicular to the shore will easily miss clusters of exuviae/emerging adults that could be only a few meters away. In combination with a reduced temporal sample, there is a reasonable chance that no exuviae of some focal species would be found at a given site on a given visit, depending on the number of transects (which is not stated in the proposal). A better approach would likely be a survey plot covering several meters of shoreline, and still extending up the bank so as to measure emergence distances. I believe this is the method used by Morrison and colleagues during their studies on the river in Massachusetts.

The other species listed by VT as being SCGN are not considered so in NH due to the results of the NH Dragonfly Survey. We can supply the application with the report of that Survey and some of the data if they would like it.

Document Content(s)

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