

Comments on Initial Study Report Meeting Summary
Claytor Project No. 739-018, Dublin, Virginia, Appalachian Power Company
Submitted by Laura Bullard, Individual and FOCL Board Member

January 15, 2008

Attention: Magalie R. Salas, Secretary
Federal Energy Regulatory Commission
888 First Street, N.E., Room 1A
Washington, D.C. 20426

I wish to express my concern over what I consider to be a lack of adequate assessment by the relicensing studies for the Claytor Project No. 739-018 in Dublin, Virginia, of stakeholders' need for annual drawdown to protect and maintain shoreline properties.

In their relicensing relevance statement of Appalachian Power Company's November 2007 Initial Study Report, erosion and sediment study consultants Kleinschmidt and Baird stated, "Erosion of the shoreline within the project boundary and downstream due to project operations can result in damage to adjacent properties and the accumulation of sediment and debris within the project reservoirs" (pg. 2).

Appalachian Power Company's Proposed Erosion Study Plan of June 2006 and Revised Erosion Study Plan of October 2006 listed Objective 8 as, "Assess the effects of and need for an annual drawdown for allowing construction of shoreline stabilization" (pg. 5). This objective was to be accomplished by gathering information "from local, state, and federal agencies as well as local stakeholders to determine the need for and past participation in the annual drawdown to allow for construction of shoreline stabilization in areas identified as experiencing accelerated shoreline erosion and areas susceptible to future erosion" (pg. 9).

Despite Baird's identification of 61.5% of project shoreline banks as actively eroding (Appalachian Power Company's December 2007 Initial Study Report Meeting Summary), there has been no effort to collect information from agencies or other stakeholders to assess their need for drawdown to prevent erosion damage. The only attempt at drawdown assessment has been three questions imbedded in a five-page recreation survey mailed to a sample of shoreline residents. The cover letter, which made no mention of drawdown, stated the information would be used to report to FERC "on the condition of recreation in the project area." The survey question inquiring about the necessity of drawdown asked, "How would you rate the seasonal drawdown on your recreation use from your property at Claytor Lake?"

According to Appalachian Power Company's December 2007 Initial Study Report Meeting Summary, Objective 8 of the Erosion Study also does not provide for gathering information from stakeholders to assess their need for drawdown. Instead, fieldwork and literature reviews, and model scenario analysis are listed as associated tasks.

I request that, within the current relicensing studies, a survey of relevant stakeholders be conducted, dedicated to assessing their participation in and need for annual drawdown, including depth of drawdown, to maintain and protect shoreline properties.

Respectfully submitted,

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