

April 29, 2009

Kimberly D. Bose, Secretary
Federal Energy Regulatory Commission
888 First Street NE
Washington, DC 20426

Dear Ms. Bose,

The Skyline Soil and Water Conservation District would like FERC to consider in Appalachian Power Company's relicensing application for Claytor Lake (Project No.739-018) the possibilities of reducing erosion and protecting water quality for Claytor Lake and the New River. Our mission at Skyline SWCD is to reduce soil erosion and preserve good water quality. Upon attending the focus group meetings for Appalachian's Shoreline Management Plan for Claytor Lake, it seems likely that there will be no drawdown to perform bank stabilization on erosive sites. This is due to a state threatened mussel species, the Pistolgrip Mussel.

This situation is double-edged in that erosion and sedimentation from shoreline banks is smothering mussel habitat with sediment, and as well as sending nutrients via sediment delivery into the lake which degrades water quality for the whole river system. A conservative estimate based on the Erosion Study's classification of 60,061 feet of shoreline as eroding sapprolite and sand (Final Draft Report, November 2008, p. 40), and using a mean scarp height of 3.5 feet and average erosion rate of .5 feet for Braddock soil type with a moist bulk density of 84 lbs per cubic foot, is that over 4,000 tons of soil are being eroded from shoreline banks into the lake each year. On the other hand, the drawdown may affect the Pistolgrip Mussel by exposing its habitat, which may cause harm to the species.

Appalachian has said in the focus group meetings that habitat is their first concern. However, FERC's Guidance for Shoreline Management Planning at Hydropower Projects, April 2001, states that FERC is mandated to protect water quality, and give "equal consideration to . . . the preservation of other aspects of environmental quality"(p. 1-1). Skyline SWCD requests that FERC, in fulfilling its mandate, require Appalachian to preserve water quality and soil, in addition to habitat. Skyline SWCD recommends that Appalachian develop a plan for performing shoreline stabilization on Claytor Lake, which would include drawdown on a limited basis, and funding for shoreline stabilization and habitat mitigation.

Another recommendation Skyline SWCD would like to make is that the focus group meetings have an unbiased leader so all viewpoints are respected and documented for the group. At present, Appalachian conducts these meetings where they lead as the facilitator as well as present their agenda. An unbiased facilitator would allow all interested parties to express and have their comments equally considered in the focus group.

We appreciate the opportunity to make these comments to FERC in order to ensure equal protection of environmental resources. This letter was approved by the Skyline Soil and Water Conservation Board on April 15, 2009

Cc: Appalachian Power Company, The Honorable Rick Boucher, Mark Warner and Jim Webb

Document Content(s)

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