

SKYLINE SOIL AND WATER CONSERVATION DISTRICT

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“COMMENTS”

Appalachian Power Project No. 739-022

November 18, 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 (SWCD) would like the FERC to consider in Appalachian Power Company's current license application for Claytor Lake (Project No. 739-022) 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 water quality.

Appalachian Power states in its executive summary that the project “should not have any significant impact on environmental resources or property in the Project area” (Exhibit E, p. ES-3). With the elimination of drawdown on Claytor Lake, property owners will have a difficult and expensive time stabilizing eroding shorelines and picking up debris and litter found in the lake. This will contribute to the degradation of environmental resources by increasing erosion and allowing sediment, nutrients and contaminants to enter receiving waters, as well as litter and debris to collect in the lake creating a hazard. Sedimentation entering the water will endanger aquatic life by smothering mussels and invertebrates, and reducing dissolved oxygen for fish. Appalachian's proposal to improve and increase boating access to the lake could also further accelerate shoreline erosion due to boat wakes by more than the 100% already demonstrated by the Erosion Study (Kleinschmidt & Baird, 2008). Maintaining higher pond levels for a longer time by extending the levelized flow period will also cause erosion and sedimentation to occur at a faster rate (Exhibit E, p. 4-16).

As an alternative to eliminating drawdown, the Skyline SWCD would like to see a drawdown occur at least once every two years in a two week time frame between the dates of Sept. 15 to Oct 15 to prevent freezing weather from damaging the mussels that live in this zone. To better understand effects on mussels, the SWCD would like to encourage the FERC to require the inclusion of mussel studies within the lake to compare the impact of erosion, sedimentation and drawdown on mussels. To mitigate for the effects of increased boating access, the SWCD suggests that Appalachian perform or help with shoreline stabilization below the 1850 elevation. Mitigating for increased boating activity and an extended levelized flow period could also be done by lowering the lake level within the one-foot levelized flow range (1845-46) when increased boating activity is expected, so that wave action is minimized on existing eroding banks.

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The Skyline SWCD would like to request that a representative of their agency to be included on the Sediment/Erosion Technical Review Committee proposed in Appalachian's Erosion and Sedimentation Monitoring Plans. Lastly, Christopher Barbour's comment letter to the FERC for the Skyline SWCD, dated April 29, 2009, was not included or responded to in Appalachian's License Application, Exhibit E, Appendix A.

We appreciate the opportunity to make these comments to the FERC in order to ensure equal protection of environmental resources. This letter was approved by the Skyline Soil and Water Conservation District Board on November 18, 2009.

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

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