

COMMENTS

Appalachian Power Company
Project No. 739-022

Thank you for the opportunity to again comment on Appalachian Power Company's request for a new license to operate the Claytor Hydroelectric Project (No. 739-022). There continue to be significant issues in Appalachian's request that, if granted, would have significant negative impacts on water quality, aquatic and plant life, soil erosion, archaeological sites, and upon most stakeholders in the lake community. I recommend that FERC require Appalachian to address the following issues:

Shoreline Erosion

Appalachian's study of shoreline erosion states that approximately 13% of the shoreline around Claytor Lake is highly erodible. According to the United States Department of Agriculture's soil survey for Pulaski County, Virginia, a significant amount of the highly erodible land at Claytor Lake is composed of Braddock loam. This soil type, with certain slopes, is considered by the USDA to be prime agricultural land that is well suited to locally grown crops. Appalachian's study established erosion rates of up to 0.5 meters per year and bank recession since 1939 of more than 60 feet. This erosion has resulted in thousands of tons of prime soil being deposited into the lake each year.

Appalachian's operation of the project is the direct cause of this massive amount of erosion, and they need to be held responsible. All county, state and federal regulations regarding erosion control in construction and agricultural areas require containment and control of erosion. It seems that prevention of erosion at the lake has not been pursued by any of the regulatory agencies. Therefore, I request that FERC require Appalachian to uphold its obligation to protect resources and minimize negative impacts to the environment by requiring Appalachian to protect the shoreline from erosion in highly erodible areas.

Archaeological Sites

Phase II testing at site number 44PU162 revealed an abundance of artifacts from the Late Archaic era. Based upon his findings, the consultant conducting the study recommended that this significant site be listed on the National Registry of Historic Places. The State Historic Preservation Office (SHPO) disagreed with this recommendation and therefore the site will not be protected under Appalachian's Historic Properties Management Plan. Regardless of SHPO's finding, this site is archaeologically significant and deserves protection.

This site is located on a small peninsula in a highly erodible area of the lake shoreline. Based upon my observation, it appears that erosion rates of greater than 0.5 meters per year are occurring on the southwest side of the site. The majority of the site is owned by Appalachian and I recommend they be required to protect this site from further erosion. If left unprotected, this site will likely be totally eroded away during the period of this license.

Again, thank you for the opportunity to provide input in the licensing process.

Respectfully submitted,
Alan W. Graybeal

Document Content(s)

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