

November 24, 2009

COMMENTS

Appalachian Power Co.
Claytor Hydroelectric

Project

FERC NO.

739-022

Dear Madam Secretary:

Having enjoyed Claytor Lake while living in the area during the 1950s and 1960s when lake shore access, recreation areas, and residential development was very limited; we have returned recently to retire and live on the lake. We appreciate the much improved current facilities and enhanced development which has occurred with Appalachian Power Company's (APCO) and Pulaski County's review and approval process. Therefore, we strongly support APCO's re-licensing of the Claytor Dam project, but would appreciate consideration of the following comments/suggestions for improvement to the Shoreline Management Plan.

1. **Lake Drawdowns:** Continue drawdowns in some manner to allow property owners to install shoreline erosion controls, clean-up/remove debris, maintain/repair existing shoreline stabilization, and maintain/repair docks. The drawdown depth, frequency, and timing could be reviewed to minimize the effect on the mussel population.
2. **Shoreline Stabilization:** APCO proposes to prefer the use of rip-rap erosion control. Due to the steep slope topography above and below the water level of most of Claytor Lake, bulkhead erosion control should be allowed as a more cost effective, easier method which requires less disturbance and erosion of the shoreline. Greater flexibility in cost effective erosion control methods will result in more stabilization efforts.
3. **Dock Size and Height:** APCO proposes to limit dock area to 1000 sq. ft. including the shoreline to dock walkway and limit roof height to 16ft. per current requirements. These limits have resulted in docks built that are too small for the current size range of boats and are not practical/adequate for safe use due to limited walkway width, storage, and swim area. Dock regulations for Smith Mountain Lake allow for 1500sq.ft to 3000sq. ft. based on shoreline frontage and do not include the shore to dock walkway in the calculation of dock area. The allowed roof height is 26ft. which allows for a pitched roof structure over double slip docks. The same regulations should apply at Claytor Lake to allow for the changing needs and increased boat sizes. The current and proposed limit for enclosed storage is 48 sq.ft. which is not adequate for dock/boating related secure storage. We request consideration for allowing 72 sq.ft. enclosed storage as allowed at Smith Mountain Lake.
4. **Dock Permitting and Inspection Process:** APCO's re-licensing application appears to remove Pulaski County from the permitting and inspection process except for final building inspection. The current agreement between APCO and Pulaski County should be continued which allows a "one stop shop" approach for dock permit applications, plan review and inspection by Pulaski County. The Pulaski County Zoning Ordinance will need to be revised to reflect the FERC approved Shoreline Management Plan of APCO's new license but the cooperation between APCO and Pulaski County has resulted in a streamlined local process which accommodates the property owner and reduced APCO's management time and expense.

Again, thank you for the opportunity to comment on the re-licensing issues.

Sincerely,

David and Susan Dobyms
4825 Cedar Point Lane
Dublin, VA 24084
540-674-6906

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