



Appalachian Power Company
P. O. Box 2021
Roanoke, VA 24022-2121
aep.com

Via Electronic Filing

April 13, 2021

Kimberly D. Bose, Secretary
Federal Energy Regulatory Commission
888 First Street, N.E.
Washington, D.C. 20426

**Subject: Byllesby Buck Hydroelectric Project (FERC No. 2514-186)
Response to Comments on the Initial Study Report**

Dear Secretary Bose:

Appalachian Power Company (Appalachian or Licensee), a unit of American Electric Power (AEP), is the Licensee, owner, and operator of the two-development Byllesby-Buck Hydroelectric Project (Project) (Project No. 2514) located on the upper New River in Carroll County, Virginia. The Project is currently licensed by the Federal Energy Regulatory Commission (FERC or Commission). The Project underwent relicensing in the early 1990s and the current operating license for the Project expires on February 29, 2024. Accordingly, Appalachian is pursuing a subsequent license for the Project pursuant to the Commission's Integrated Licensing Process (ILP), as described at 18 Code of Federal Regulations (CFR) Part 5.

Pursuant to 18 CFR § 5.15(c), Appalachian filed the Initial Study Report (ISR) with the Commission on January 18, 2021. The ISR filing also included notification of the ISR Meeting date, time, and proposed agenda. As required by the ILP schedule, within 15 days of the ISR filing Appalachian held a virtual ISR Meeting via WebEx from 9:30am to 3pm on Thursday, January 28, 2021. The ISR meeting summary was filed with FERC on February 12, 2021. Stakeholders comments on the ISR meeting summary were due by March 14, 2021.

The United States Fish and Wildlife Service (USFWS or the Service) and FERC provided written comments in response to Appalachian's filing of the ISR meeting summary. A letter from the Virginia Department of Wildlife Resources (VDWR) was also received; however, they stated that the meeting summary captured all concerns and needs for clarification on completed and continuing studies for the relicensing and they had no further concerns or comments.

Appalachian is hereby providing responses to stakeholder comments received on the ISR.

Aquatic Resources Study

Stakeholder Comment:

FERC requests that when filing the Updated Study Report (USR), Appalachian provide the raw length data (as approved in the Revised Study Plan [RSP]), preferably in Microsoft Excel format. The file should include species and sampling information (i.e., sampling date/location/gear) for each measured individual. Information on the size distribution of fish in the vicinity of the projects will aid FERC staff's analysis of the susceptibility of resident fishes to impingement and entrainment.

Appalachian's Response:

Appalachian will provide the raw catch length data as available in the USR, which will include the date, site, species, and gear type used.

Stakeholder Comment:

The USFWS notes that the ISR meeting summary captured all concerns and identified appropriate action items. The Service confirms they are satisfied with the impingement / entrainment study plan; however, they would like to review the intake structure drawings and screen approach velocity calculations when the study results are published.

Appalachian's Response:

Appalachian greatly appreciates the Service's participation at the ISR meeting and concurrence on the ISR meeting summary and action items. Appalachian will provide detailed historical intake structure drawings as an appendix or attachment to the final Fish Community Study Report that will be filed with the USR. (Appalachian has done a preliminary review of relevant drawings and believes they can be filed publicly; if the drawings are determined to contain sensitive information that would require filing as CEII, Appalachian will coordinate with the Service to directly provide the requested information.) The intake structure approach velocity calculations were provided in the ISR meeting summary and will also be included in the final Fish Community Study Report.

Stakeholder Comment:

The USFWS also notes that the protected status of the Green Floater (*Lasmigona subviridis*) is currently under review, and that should the review lead to federal protection as a listed species, a new mussel survey will be requested.

Appalachian's Response:

Appalachian appreciates the Service's comment about the Green Floater and will continue to track the federal listing status of this species.

Bypass Reach Flow and Aquatic Habitat Study

Stakeholder Comment:

The Commission notes that Figure 6-9 of the Preliminary Bypass Reach Flow and Aquatic Habitat Study Report shows continuously recorded water levels from water level loggers deployed in the Buck bypass reach in 2020. While total Project inflows are plotted on these figures, there is no indication of what portion of the total inflow is released (spilled) into the bypass reach and how much flow is being passed through the powerhouse. Adding this information on the flows in the bypass reach and through the powerhouse would improve the interpretability of the figure and allow FERC staff to more easily discern how water levels in the bypass reach change under varying amounts of spill, which would in turn aid the analysis of the potential for fish stranding in the bypass reach following high-flow (spill) events. Therefore, in the USR, FERC recommends adding bypass reach and powerhouse flows to Figure 6-9 (2020 field season) and any similar figures generated from data collected during the upcoming 2021 field season.

Appalachian's Response:

Appalachian agrees that adding powerhouse flow and bypass reach flow (in addition to total flow) would be of benefit to more easily discern how water levels in the bypass reach change under varying amounts of spill into the bypass reach. This information will be included in the USR for the figure referenced above (i.e., Figure 6-9 of the Preliminary Bypass Reach Flow and Aquatic Habitat Study Report for the Buck bypass reach) as well as any similar figures generated from the upcoming 2021 field season for the Byllesby bypass reach.

Stakeholder Comment:

The USFWS states that they have continued interest in the Bypass Reach Flow and Aquatic Habitat Study (reference pages 7-10 of the ISR meeting summary). The USFWS expects to learn more as Appalachian moves into the 2021 study year as habitat modeling is refined with respect to seasonal hydrology and potential impacts related to fish stranding and to Walleye (*Sander vitreus*) spawning habitat.

Appalachian's Response:

Appalachian appreciates the USFWS's continued interest in the Bypass Reach Flow and Aquatic Habitat Study and plans to host a virtual meeting in May or June 2021 with stakeholders to review seasonal hydrology (in particular as it relates to the potential for Walleye spawning in March; the peak month identified by the VDWR during the ISR meeting) and discuss other flow scenarios of interest at the Buck development from a fish habitat modeling perspective.

Water Quality Study

Stakeholder Comment:

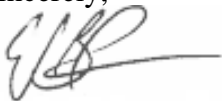
FERC notes that the preliminary Water Quality Study Report provides no confirmation as to whether the Project was operating normally during the 2020 water quality monitoring period from August 17, 2020 through October 8, 2020. Therefore, in the USR, FERC requests that the License indicate for the previous (2020) and upcoming (2021) monitoring periods whether the Project was operating normally and identify any periods during which there were unit outages, flashboard failures, or station trips that may have increased spill into the bypass reaches relative to normal Project operation. Providing this operational data will assist FERC staff's analysis of the potential effects of Project operation on water quality.

Appalachian's Response:

Appalachian will provide information related to Project operations in the USR for the 2020 and 2021 water quality monitoring periods. This information will include identification of any periods during which there were unit outages, flashboard failures, or station trips that may have increased spill into the bypass reaches relative to normal Project operations.

Appalachian sincerely appreciates the detailed comments provided by relicensing stakeholders and has put careful consideration into the proposals and commitments presented in this response. If there are any questions regarding this filing, please do not hesitate to contact me at (540) 985-2441 or via email at ebparcell@aep.com.

Sincerely,



Elizabeth Parcell
Process Supervisor
American Electric Power Services Corporation

cc: Distribution List
Jonathan Magalski (AEP)

Byllesby/Buck Hydroelectric Project (FERC No. 2514)

Distribution List

Federal Agencies

Mr. John Eddins
Archaeologist/Program Analyst
Advisory Council on Historic Preservation
401 F Street NW, Suite 308
Washington, DC 20001-2637
jeddins@achp.gov

Ms. Kimberly Bose
Secretary
Federal Energy Regulatory Commission
888 1st St NE
Washington, DC 20426

FEMA Region 3
615 Chestnut Street
One Independence Mall, Sixth Floor
Philadelphia, PA 19106-4404

Mr. John Bullard
Regional Administrator
NOAA Fisheries Service
Greater Atlantic Regional Fisheries Office
55 Great Republic Drive
Gloucester, MA 01930-2276

Mr. John A. Bricker
State Conservationist
US Department of Agriculture
Natural Resources Conservation Service
1606 Santa Rosa Road, Suite 209
Richmond, VA 23229-5014

Mr. Harold Peterson
Bureau of Indian Affairs
US Department of the Interior
545 Marriott Dr, Suite 700
Nashville, TN 37214
Harold.Peterson@bia.gov

Office of the Solicitor
US Department of the Interior
1849 C Street, NW
Washington, DC 20240

Ms. Lindy Nelson
Regional Environmental Officer, Office of
Environmental Policy & Compliance
US Department of the Interior, Philadelphia
Region

Custom House, Room 244
200 Chestnut Street
Philadelphia, PA 19106

Ms. Barbara Rudnick
NEPA Team Leader - Region 3
US Environmental Protection Agency
1650 Arch Street
Philadelphia, PA 19103-2029

Mr. Martin Miller
Chief, Endangered Species - Northeast Region
(Region 5)
US Fish and Wildlife Service
300 Westgate Center Drive
Hadley, MA 01035

Ms. Janet Norman
Chesapeake Bay Field Office
US Fish and Wildlife Service
177 Admiral Cochrane Drive
Annapolis, MD 21401
janet_norman@fws.gov

Ms. Cindy Schulz
Field Supervisor, Virginia Field Office
US Fish and Wildlife Service
6669 Short Lane
Gloucester, VA 23061

Ms. Elizabeth Merz
US Forest Service
3714 Highway 16
Marion, VA 24354

Mr. Mark Bennett
Center Director of VA and WV Water Science
Center
US Geological Survey
John W. Powell Building
12201 Sunrise Valley Drive
Reston, VA 20192
mrbennet@usgs.gov

Hon. Morgan Griffith
US Congressman, 9th District
US House of Representatives
Christiansburg District Office
17 West Main Street
Christiansburg, VA 24073

**Byllesby/Buck Hydroelectric Project (FERC No. 2514)
Distribution List**

Mr. Michael Reynolds
Acting Director, Headquarters
US National Park Service
1849 C Street, NW
Washington, DC 20240

Dr. Ralph Northam
Governor
Office of the Governor
PO Box 1475
Richmond, VA 23218

Ms. Catherine Turton
Architectural Historian, Northeast Region
US National Park Service
US Custom House, 3rd Floor
200 Chestnut Street
Philadelphia, PA 19106

Ms. Emma Williams
Office of the Secretary of the Commonwealth
Virginia Council on Indians
PO Box 2454
Richmond, VA 23218
emma.williams@governor.virginia.gov

Hon. Tim Kaine
US Senate
231 Russell Senate Office Building
Washington, DC 20510

Mr. Clyde Cristman
Division Director
Virginia Department of Conservation and
Recreation
600 East Main Street, 24th Floor
Richmond, VA 23219

Hon. Mark Warner
US Senate
703 Hart Senate Office Building
Washington, DC 20510

Ms. Jennifer Wampler
Environmental Programs Planner
Virginia Department of Conservation and
Recreation
600 East Main Street, 24th floor
Richmond, VA 23219
jennifer.wampler@dcr.virginia.gov

State Agencies

Ms. Caitlin Carey
Research Associate
Department of Fish and Wildlife Conservation
1900 Kraft Drive, Ste 105
Blacksburg, VA 24061
cscarey@vt.edu

Ms. Ewing
Virginia Department of Conservation and
Recreation
sharon.ewing@dcr.virginia.gov

Mr. Donald J. Orth
Certified Fisheries Professional
Department of Fish and Wildlife Conservation
Virginia Polytechnic Institute and State
University
Blacksburg, VA 24061
dorth@vt.edu

Ms. Rene Hypes
Natural Heritage Program
Virginia Department of Conservation and
Recreation
600 East Main Street, 24th Floor
Richmond, VA 23219
rene.hypes@dcr.virginia.gov

Mr. Jess Jones
Freshwater Mollusk Conservation Center
Virginia Tech
1B Plantation Road
Blacksburg, VA 24061

Ms. Robbie Rhur
Virginia Department of Conservation and
Recreation
600 East Main Street, 24th Floor
Richmond, VA 23219
Robbie.Rhur@dcr.virginia.gov

Tracy Goodson
District Manager
New River Soil and Water Conservation District
968 East Stuart Drive
Galax, VA 24333

Byllesby/Buck Hydroelectric Project (FERC No. 2514)

Distribution List

Mr. Sam Sweeney
New River Trail State Park Manager
Virginia Department of Conservation and
Recreation
600 East Main Street, 24th Floor
Max Meadows, VA 24360
sam.sweeney@dcr.virginia.gov

Mr. Jimmy Elliott
Virginia Department of Conservation and
Recreation - New River Trail
james.elliott@dcr.virginia.gov

Mr. Tony Cario
Water Withdrawal Permit Writer, Office of
Water Supply
Virginia Department of Environmental Quality
PO Box 1105
Richmond, VA 23218
anthony.cario@deq.virginia.gov

Mr. Joe Grist
Water Withdrawal Program Manager
Virginia Department of Environmental Quality
PO Box 1106
Richmond, VA 23218
joseph.grist@deq.virginia.gov

Mr. Scott Kudlas
Director, Office of Water Supply
Virginia Department of Environmental Quality
PO Box 1105
Richmond, VA 23218
scott.kudlas@deq.virginia.gov

Mr. Matthew Link
Water Withdrawal Permit Writer, Office of
Water Supply
Virginia Department of Environmental Quality
PO Box 1105
Richmond, VA 23218
matthew.link@deq.virginia.gov

Mr. Kelly Miller
Southwest Regional Office
Virginia Department of Environmental Quality
355-A Deadmore Street
Abingdon, VA 24210

Ms. Bettina Rayfield
Environmental Impact Review and Long Range
Priorities Program

Virginia Department of Environmental Quality
PO Box 1105
Richmond, VA 23218
bettina.rayfield@deq.virginia.gov

NEPA Review
Virginia Department of Environmental Quality
eir@deq.virginia.gov

Mr. Chris Sullivan
Senior Area Forester
Virginia Department of Forestry
900 Natural Resources Drive
Charlottesville, VA 22903

Mr. John Copeland
Fisheries Biologist
Virginia Department of Game and Inland
Fisheries
2206 South Main Street, Suite C
Blacksburg, VA 24060
John.Copeland@dgif.virginia.gov

Mr. William Kittrell
Manager, Marion Office - Region 3 Office
Virginia Department of Game and Inland
Fisheries
1796 Highway Sixteen
Marion, VA 24354
Bill.Kittrell@dgif.virginia.gov

Mr. Jeff Williams
Regional Fisheries Manager
Virginia Department of Wildlife Resources
1796 Highway Sixteen
Marion, VA 24354
jeff.williams@dwr.virginia.gov

Timothy Roberts
Review and Compliance Division
Virginia Department of Historic Resources
2801 Kensington Avenue
Richmond, VA 23221
Tim.Roberts@dhr.virginia.gov.

Local Governments

Mr. Stephen Bear
Wythe County Administrator
340 South Sixth Street
Wytheville, VA 24382
sdbear@wytheco.org

Byllesby/Buck Hydroelectric Project (FERC No. 2514) Distribution List

Mr. Rex Hill
Carroll Board of Supervisor
Carroll County
rex.hill@carrollcountyva.gov

Mr. Mike Watson
Carroll County Administrator
Carroll County
605-1 Pine Street
Hillsville, VA 24343
michael.watson@carrollcountyva.gov

Mr. Scott McCoy
Town Manager
Town of Fries
PO Box 452
Fries, VA 24330
townoffries@friesva.com

Mr. C. M. Mitchell
Mayor
Town of Galax
111 East Grayson Street
Galax, VA 24333

Dr. Beth Taylor
Mayor
Town of Wytheville
beth.taylor@wytheville.org

Tribes

Caitlin Rogers
Tribal Historic Preservation Officer
Catawba Indian Nation
1536 Tom Steven Road
Rock Hill, SC 29730
Caitlin.Rogers@catawba.com

Elizabeth Toombs
Tribal Historic Preservation Officer
Cherokee Nation
P.O. Box 948
Tahlequah, OH 74465
elizabeth-toombs@cherokee.org

Erin Paden
Director of Historic Preservation
Delaware Nation
31064 State Highway 281
Anadarko, OK 73005
epad@delawarenation-nsn.gov

Administration
Delaware Tribe of Indians
5100 Tuxedo Blvd
Bartlesville, OK 74006

Chief Richard Sneed
Eastern Band of Cherokee Indians
PO Box 455
Cherokee, NC 28719

Chief Dean Branham
Monacan Indian Nation
PO Box 1136
Madison Heights, VA 24572

Terry Clouthier
Tribal Historic Preservation Officer
Pamunkey Indian Tribe
1054 Pocahontas Trail
King William, VA 23086
terry.clouthier@pamunkey.org.

Whitney Warrior
Natural Resources & Cultural Preservation
Director
United Keetoowah Band of Cherokee Indians
PO Box 746
Tahlequah, OK 74465
wwarrior@ukb-nsn.org

Non-Governmental

Mr. Bill Tanger
Friends of the Rivers of Virginia
PO Box 1750
Roanoke, VA 24008
Bill.tanger@verizon.net

Ms. Angie Grooms
angie.grooms750@gmail.com

Mr. David Taylor
jklfloat@embarqmail.com
American Canoe Association
503 Sophia Street, Suite 100
Fredericksburg, VA 22401

Mr. Kevin Richard Colburn
National Stewardship Director
American Whitewater
PO Box 1540
Cullowhee, NC 28779
kevin@americanwhitewater.org

**Byllesby/Buck Hydroelectric Project (FERC No. 2514)
Distribution List**

Mr. Andrew Downs
Regional Director
Appalachian Trail Conservancy
799 Washington Street
PO Box 807
Harpers Ferry, WV 25425-0807
adowns@appalachiantrail.org

Mr. Zachary R. Slate
New River Regional Water Authority
newriverwater@gmail.com

Mr. Richard Roth
Friends of the Rivers of Virginia
rroth@radford.edu

Mr. Rick Roth
Treasurer
Friends of the New River
1000 Highland Circle
Blacksburg, VA 24060

Mr. George Santucci
President
New River Conservancy
PO Box 1480
1 N Jefferson Avenue, Suite D
West Jefferson, NC 28694
george@newriverconservancy.org

Ms. Laura Walters
Board Chair
New River Conservancy
6718 Dunkard Road
Dublin, VA 24084
claytorlakegirl@gmail.com

Ms. Andrea Langston
New River Land Trust
PO Box K
Blacksburg, VA 24063-1025

Mr. Tim Dixon
Owner
New River Outdoor Adventures
5785 Fries Road
Galax, VA 24333
newriveroutdooradventures@yahoo.com

Mr. Steve Moyer
Vice President for Government Affairs
Trout Unlimited
1777 N. Kent Street, Suite 100
Arlington, VA 22209