

# FINAL LICENSE APPLICATION

## Volume II of V

### Part 4 - Consultation Appendix Book 2 of 3

#### Byllesby-Buck Hydroelectric Project (FERC No. 2514)

*February 28, 2022*

Prepared by:



Prepared for:

Appalachian Power Company



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# Appendix I

Consultation Summary  
Book 2 of 3

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UNITED STATES OF AMERICA  
FEDERAL ENERGY REGULATORY COMMISSION

Appalachian Power Company

Project No. 2514-188

ORDER GRANTING REHEARING FOR  
FURTHER CONSIDERATION

(January 16, 2020)

Rehearing has been timely requested of the Commission's letter order issued November 18, 2019, in this proceeding, by the Director, Office of Energy Projects. In the absence of Commission action within 30 days from the date the rehearing request was filed, the request for rehearing (and any timely requests for rehearing filed subsequently)<sup>1</sup> would be deemed denied. 18 C.F.R. § 385.713 (2019).

In order to afford additional time for consideration of the matters raised or to be raised, rehearing of the Commission's letter order is hereby granted for the limited purpose of further consideration, and timely-filed rehearing requests will not be deemed denied by operation of law. Rehearing requests of the above-cited order filed in this proceeding will be addressed in a future order. As provided in 18 C.F.R. § 385.713(d), no answers to the rehearing requests will be entertained.

Nathaniel J. Davis, Sr.,  
Deputy Secretary.

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<sup>1</sup> See *San Diego Gas & Electric Company v. Sellers of Energy and Ancillary Services into Markets Operated by the California Independent System Operator and the California Power Exchange, et al.*, 95 FERC ¶ 61,173 (2001) (clarifying that a single tolling order applies to all rehearing requests that were timely filed).

170 FERC ¶ 61,108  
UNITED STATES OF AMERICA  
FEDERAL ENERGY REGULATORY COMMISSION

Before Commissioners: Neil Chatterjee, Chairman;  
Richard Glick and Bernard L. McNamee.

Appalachian Power Company

Project No. 2514-188

ORDER ON REHEARING

(Issued February 20, 2020)

1. On November 18, 2019, the Director, Office of Energy Projects (Director), issued a study plan determination pursuant to the Integrated Licensing Process (ILP) for Appalachian Power Company's (Appalachian) proposed relicensing of the 30.1-megawatt Byllesby-Buck Hydroelectric Project No. 2514.<sup>1</sup> On December 18, 2019, Appalachian filed a request for rehearing objecting to one aspect of the required water quality study: the timing and scope of monitoring to gather data on turbidity. As discussed below, we grant in part and deny in part Appalachian's request for rehearing.

**I. Background**

2. The Byllesby-Buck Project consists of two developments, Byllesby and Buck, which are located on the New River in Carroll County, Virginia. The Byllesby development is located about nine miles north of the City of Galax, while the Buck development is located approximately three river miles downstream of Byllesby. Each development includes an impoundment, concrete gravity dam and spillway, and powerhouse.

3. On January 7, 2019, Appalachian initiated the ILP for relicensing the project pursuant to Part 5 of the Commission's regulations.<sup>2</sup> As part of the ILP, Appalachian is required to consult with resource agencies, tribes, and other stakeholders to develop and conduct studies that will inform Commission staff's environmental analysis and, ultimately, the Commission's decision on whether, and with what conditions, to issue a

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<sup>1</sup> *Appalachian Power Co.*, Study Plan Determination for the Byllesby-Buck Hydroelectric Project (Nov. 18, 2019).

<sup>2</sup> 18 C.F.R. pt. 5 (2019).

new license for the project.<sup>3</sup> The studies also provide information that resource agencies can use to prepare comments, recommendations, and terms and conditions for inclusion in any license that may be issued for the project.

4. Any request for a particular study must address seven criteria<sup>4</sup> designed to ensure that the requested study is “not [] frivolous and would add some appreciable evidentiary value to the record.”<sup>5</sup> The license applicant files a proposed study plan.<sup>6</sup> After a comment period, the applicant files a revised study plan for the Commission’s approval.<sup>7</sup> The Director then issues a study plan determination that includes any modifications the Director determined necessary.<sup>8</sup>

**A. Appalachian’s Pre-Application Document (PAD) and Proposed Study Plan**

5. In its PAD, Appalachian proposed to conduct a single-season water quality study,<sup>9</sup> in which it would monitor dissolved oxygen, water temperature, and water levels at 15-minute intervals and measure temperature, dissolved oxygen, pH, and specific conductance monthly.<sup>10</sup> This proposed water quality study did not include a component to study water turbidity.

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<sup>3</sup> *TransCanada Hydro Ne. Inc.*, 151 FERC ¶ 61,116, at P 4 (2015); *see also* 18 C.F.R. §§ 5.1, 5.6(b) (2019). The study plan development process is governed by sections 5.9 through 5.14 of the Commission’s regulations. 18 C.F.R. §§ 5.9-5.14 (2019).

<sup>4</sup> 18 C.F.R. § 5.9(b).

<sup>5</sup> *Hydroelectric Licensing Under the Federal Power Act*, Order No. 2002, 104 FERC ¶ 61,109, at P 87 (2003) (discussing the purpose of the study criteria) (citing *Hydroelectric Licensing Under the Federal Power Act*, Notice of Proposed Rulemaking, 102 FERC ¶ 61,185, at P 67 (2003)).

<sup>6</sup> 18 C.F.R. § 5.11(a).

<sup>7</sup> *Id.* §§ 5.12, 5.13.

<sup>8</sup> *Id.* § 5.13(c).

<sup>9</sup> Appalachian January 7, 2019 Pre-Application Document at 6-3 to 6-4.

<sup>10</sup> *Id.* at 6-4.

6. At a public scoping held on April 11, 2019, participants, including the Virginia Department of Game and Inland Fisheries (Virginia DGIF), commented that the New River carries a heavy sediment and debris load. Appalachian stated that it takes actions to mitigate or prevent adverse effects caused by sedimentation and debris accumulation at the project.<sup>11</sup> For example, Appalachian stated it routinely uses a drag rake system installed at both developments in 1997, which “goes out into the forebay any distance you want, drops to the bottom, to the forebay bed, drags along that, and then comes up to the intake screen.”<sup>12</sup> While larger debris collected by the drag rake is deposited into an above-water trash trough that sluices the debris downstream, material that is small enough to pass through the project’s intake trash racks (i.e., re-suspended fine sediments) will pass downstream through the powerhouse.<sup>13</sup>

7. On May 7, 2019, Virginia DGIF filed comments on the PAD and Scoping Document 1, asserting that “[l]iberation of reservoir sediment deposits during operations result in increased turbidity in downstream reaches influenced by project flow, disrupting ecological processes, suspending contaminants like PCB’s, and negatively affecting angling and recreational use.”<sup>14</sup> The U.S. Fish and Wildlife Service (FWS) noted that the project is located on a stretch of the New River that is important for recreation<sup>15</sup> and, more specifically, mirrored Virginia DGIF’s concerns about the increased turbidity negatively affecting angling and recreational use.<sup>16</sup> Both agencies also explicitly stated

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<sup>11</sup> Transcript of April 11, 2019 Public Scoping Meeting held in Galax, Virginia at 32-38.

<sup>12</sup> *Id.* at 35.

<sup>13</sup> *Id.* at 35-36.

<sup>14</sup> Virginia DGIF May 7, 2019 Comments at 2.

<sup>15</sup> FWS May 7, 2019 Comments at 4; *see also id.* at 8 (noting that there are desirable fishing locations at the tailrace areas of both dams). These comments are consistent with the PAD, which states that the upper New River is a popular sportfishing area and that the project area is specifically known for the quality of angling opportunities for several species of fish. Appalachian January 7, 2019 Pre-Application Document at 5-35.

<sup>16</sup> FWS May 7, 2019 Comments at 4. FWS also identified as a resource management goal “angling opportunities” when requesting a hydraulic and instream flow study. *See id.* at 12.



that the water quality study needs to “examine turbidity effects of project operations.”<sup>17</sup> The New River Conservancy echoed these comments.

8. On June 21, 2019, Appalachian filed its proposed study plan. It proposed a water quality study consisting of Task 1 – Continuous Water Temperature and [Dissolved Oxygen] Monitoring and Task 2 – Monthly Water Quality Monitoring of temperature, dissolved oxygen, pH, specific conductance, chlorophyll a, and turbidity. Appalachian added that “[c]hlorophyll a and turbidity will also be measured in the forebay of each development during the monthly sampling events.”<sup>18</sup> Appalachian stated that the estimated level of effort for the water quality study in total would be approximately 400 hours, at a cost of approximately \$60,000.<sup>19</sup>

9. On June 21, 2019, Commission staff issued a revised scoping document. Responding to the comments by Virginia DGIF, FWS, and the New River Conservancy, the document stated that “turbidity could be affected by project operation and maintenance (e.g., by releasing sediment collected by the drag rake through the project intakes) . . . Accordingly, . . . our environmental analysis will include the effects of project operation and maintenance on turbidity levels . . . .”<sup>20</sup>

10. On September 18, 2019, Virginia DGIF commented on the proposed study plan, again noting that “[l]iberation of reservoir sediment deposits during Project operations result in increased turbidity in downstream reaches influenced by Project flow, disrupting ecological processes and negatively affecting angling and recreational use.”<sup>21</sup> Virginia DGIF also stated that its “staff mentioned concerns about downstream turbidity effects of the Project in our May 7 comments, but this study fails to provide a plan for assessing turbidity effects.”<sup>22</sup> On September 19, 2019, FWS commented that the proposed study plan “does not address the magnitude and spatial scale of Project influence. Determining

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<sup>17</sup> Virginia DGIF May 7, 2019 Comments at 5; FWS May 7, 2019 Comments at 7.

<sup>18</sup> Appalachian June 21, 2019 Proposed Study Plan at 7.6.2.

<sup>19</sup> *Id.* at 7.8.

<sup>20</sup> *Appalachian Power Co., Scoping Document 2 for the Byllesby-Buck Hydroelectric Project at 7-8 (June 21, 2019).*

<sup>21</sup> Virginia DGIF September 18, 2019 Comments at 1.

<sup>22</sup> *Id.* at 2.

the spatial scale of Project influence should include consideration of Project flow attenuation and downstream turbidity effects of Project operations . . . .”<sup>23</sup>

**B. Appalachian’s Revised Study Plan**

11. On October 18, 2019, Appalachian filed a revised study plan, proposing, as relevant here, to add to Task 2 measuring turbidity monthly at each of the continuous water quality monitoring locations using a portable turbidity meter to measure turbidity at a single depth of approximately one meter.<sup>24</sup> Appalachian estimated the level of effort for the water quality study in total would increase to approximately 500 hours and the cost to approximately \$110,000.<sup>25</sup> Appalachian also stated in the revised study plan that “the [drag] rake[s] [are] not intended to clear sediment, but that some sediments are incidentally scraped/mobilized during operation.”<sup>26</sup>

12. On November 4, 2019, Virginia DGIF commented on the revised study plan, again noting that “[l]iberation of reservoir sediment deposits during Project operations result in increased turbidity in downstream reaches influenced by Project flow, disrupting ecological processes and negatively affecting angling and recreational use” and that “[d]etermining the downstream spatial influence will involve consideration of Project flow attenuation and downstream turbidity effects of Project operations.”<sup>27</sup> Virginia DGIF also noted that it “appreciate[d] the inclusion of data collection on [turbidity] at the Project reservoirs.”<sup>28</sup> On November 4, 2019, FWS provided a nearly identical comment.<sup>29</sup> It also added that “data collection for [turbidity] at the Project reservoir [is an] important improvement[.]” to the revised study plan.<sup>30</sup>

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<sup>23</sup> FWS September 19, 2019 Comments at 1.

<sup>24</sup> Appalachian October 18, 2019 Revised Study Plan at 5.6.2.

<sup>25</sup> *Id.* at 5.8.

<sup>26</sup> *Id.* at 5.1.

<sup>27</sup> Virginia DGIF November 4, 2019 Comments at 1.

<sup>28</sup> *Id.* at 3.

<sup>29</sup> FWS November 4, 2019 Comments at 1.

<sup>30</sup> *Id.*

### C. Director's Study Plan Determination Regarding Turbidity

13. The study plan determination rejected Appalachian's proposal to sample turbidity once per month as lacking the "frequency needed to properly assess the effects of project operation (drag rake) on downstream turbidity at each development" because the drag rake operation, while dependent on debris load, generally occurs multiple times per day.<sup>31</sup> The Director instead required Appalachian to "install continuously-recording turbidity sensors (with 15-minute measurement intervals) on each of the 10 multiparameter data sondes that would be deployed across . . . eight sampling sites."<sup>32</sup> The Director also required that Appalachian maintain a daily log of drag rake operations, reasoning that such a log would allow for turbidity values "to be compared between time periods when the drag rakes are operating and when they are not, which would facilitate an evaluation of the relative role of (natural) high-flow events versus drag rake operations in causing turbidity spikes."<sup>33</sup>

14. The determination referenced Virginia DGIF's and FWS's comments on turbidity<sup>34</sup> and explained that the drag rake operations in each forebay (Byllesby and Buck) cause resuspension of sediment from the bottom (due to the scraping action of the rake), which is then passed downstream through the intakes and could increase downstream turbidity and affect aquatic and recreation resources. Finally, the Director noted that the study results:

could inform the development of potential license requirements (e.g., the optimal timing of drag rake operation in terms of maintaining desirable turbidity levels during prime angling periods) [section 5.9(b)(5)]. The cost would be minimal and largely depend on whether Appalachian currently has access to additional turbidity sensors or needs to purchase them (the approximate cost of the sensors is \$10,000 to \$15,000). Additional field efforts associated with staff's recommended turbidity monitoring would be minimal because the turbidity sensors would be added to the same sondes

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<sup>31</sup> *Appalachian Power Co., Study Plan Determination for the Byllesby-Buck Hydroelectric Project at B-7* (Nov. 18, 2019).

<sup>32</sup> *Id.* The eight sampling sites are: (1) upper end of the Byllesby impoundment; (2) Byllesby forebay; (3) Byllesby bypassed reach; (4) Byllesby tailrace; (5) Buck forebay; (6) upper Buck bypassed reach; (7) lower Buck bypassed reach; and (8) Buck tailrace.

<sup>33</sup> *Id.* at B-7 to B-8.

<sup>34</sup> *Id.* at B-7.

that would be used for continuous monitoring of temperature and [dissolved oxygen].<sup>35</sup>

#### **D. Appalachian's Rehearing Request**

15. On December 18, 2019, Appalachian requested rehearing of the Director's determination. Appalachian asks for the continuous turbidity monitoring requirement to be removed from the determination, or alternatively that the Commission accept a revised water quality study that includes continuous turbidity monitoring during a two-day period to address turbidity effects associated with drag rake operation.

### **II. Discussion**

16. Appalachian argues that no participant in the proceeding requested continuous turbidity monitoring, the Director's determination relies on assertions not in the record, and the Director erroneously determined that the cost and level of effort associated with continuous monitoring would be minimal. Alternatively, Appalachian argues that should the Commission require continuous turbidity monitoring, it should adopt its proposed revised study parameters. We address these arguments below.

#### **A. Continuous Monitoring Is Appropriate**

##### **1. Record Support**

17. Appalachian contends that the Director's determination is unsupported by the record, first noting that neither Virginia DGIF nor FWS asked for continuous turbidity monitoring in their comments on the PAD.<sup>36</sup> Appalachian further states that it added monthly turbidity measuring in each development's forebay to its proposed study plan in response to agency comments that any water quality study should examine turbidity,<sup>37</sup> but that no reference to *downstream* turbidity was made until Virginia DGIF later commented on the proposed study plan.<sup>38</sup> Appalachian also points out that Virginia DGIF's comment lacked the study plan criteria required by section 5.9 of the

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<sup>35</sup> *Id.* at B-8.

<sup>36</sup> Appalachian Rehearing Request at 4, 10.

<sup>37</sup> *Id.* at 4-6.

<sup>38</sup> *Id.* at 6-7.

Commission's regulations. In addition, Appalachian cites to the agencies' approving comments regarding the proposed data collection in the revised study plan.<sup>39</sup>

18. We disagree. When read in their entirety, agency comments on the PAD, proposed study plan, and revised study plan all express concerns about downstream turbidity and potential negative effects on angling and recreation.<sup>40</sup> These comments, along with statements made at the scoping meeting, support the explanation in the determination that "concern remains regarding the mobilization of impoundment sediment deposits during project operation, which could result in increased turbidity in downstream reaches that disrupts ecological processes and negatively affects angling and recreational use."<sup>41</sup>

19. Moreover, notwithstanding Appalachian's suggestion to the contrary, section 5.9 of the Commission's regulations does not limit the Director to consider only requested studies. Under the Commission's regulations, the Director's determination may ultimately include "any modifications determined to be necessary in light of the record."<sup>42</sup> The Director's study plan determination is intended to require studies that will produce the information necessary to further shape both Commission staff's environmental analysis and the Commission's eventual legally enforceable license order.

20. Here, the Director determined that continuous turbidity monitoring is necessary because "Appalachian's proposal to sample turbidity once per month . . . lacks the sampling frequency needed to properly assess the effects of project operation (drag rake)

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<sup>39</sup> *Id.* at 10-11. Appalachian also notes that Commission staff did not file comments related to water quality on the PAD or proposed study plan or inform Appalachian of the need for information or study requests related to turbidity monitoring. *Id.* at 4, 7.

<sup>40</sup> *See, e.g.*, Virginia DGIF May 7, 2019 Comments at 2; FWS May 7, 2019 Comments at 4; Virginia DGIF September 18, 2019 Comments at 1; Virginia DGIF November 4, 2019 Comments at 1; FWS November 4, 2019 Comments at 1. We also note that Commission staff called out in the scoping document 2 that "turbidity could be affected by project operation and maintenance (e.g., by releasing sediment collected by the drag rake through the project intakes)" and noted that the forthcoming environmental analysis conducted under the National Environmental Policy Act would include effects of project operation and maintenance on turbidity levels. *See Appalachian Power Co.*, Scoping Document 2 for the Byllesby-Buck Hydroelectric Project at 7-8 (June 21, 2019).

<sup>41</sup> *Appalachian Power Co.*, Study Plan Determination for the Byllesby-Buck Hydroelectric Project at B-7 (Nov. 18, 2019).

<sup>42</sup> 18 C.F.R. § 5.13(c) (emphasis added).

on downstream turbidity at each development.”<sup>43</sup> Because the drag rake may operate multiple times per day, depending on debris load, the Director required continuous monitoring to ascertain the effects of the operation of the drag rake on downstream turbidity. As discussed in more detail below, the required monitoring will help the Commission determine both project impacts and any necessary mitigation.<sup>44</sup>

## 2. Information is Needed to Inform Potential License Conditions

21. Appalachian questions how continuous turbidity monitoring could inform potential license conditions.<sup>45</sup> As indicated above, the Director, based on the stated concerns of the resource agencies, noted that operation of the project’s drag rake may increase downstream turbidity and negatively affect angling and recreational use. Therefore, in order to identify and fully quantify the scope of the potential effect, turbidity data would need to be collected continuously during the period spanning from prior to commencement of the event (raking), for a sufficient enough duration to establish pre-raking turbidity levels at the monitoring sites, to when the raking has been completed and any increased turbidities caused by the event have subsided. Continuously recorded downstream values from the tailraces would be compared to those continuously recorded in each forebay as well as the monitoring location in the upper portion of Byllesby reservoir, which would provide information on background turbidity levels of waters entering the project. To the extent drag rake operations are found to increase downstream turbidity levels relative to background turbidity levels, continuous turbidity monitoring data collected during drag rake events could be used to inform the need for and identify potential license requirements for consideration to minimize downstream turbidity effects of drag rake operation on angling and recreational use (e.g., implementing a drag rake operation plan that involves shifting the operation of the drag rake to time periods outside of prime fishing hours, or limiting the duration of a drag rake event, or implementing

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<sup>43</sup> *Appalachian Power Co.*, Study Plan Determination for the Byllesby-Buck Hydroelectric Project at B-7 (Nov. 18, 2019).

<sup>44</sup> Appalachian’s statement that the study plan determination must be supported by “substantial evidence,” see Appalachian Rehearing Request at 9 (citing 16 U.S.C. § 825l(b) (2018); *City of Centralia*, 213 F.3d 742, 748 (D.C. Cir. 2000); *Bangor Hydro-Electric Co. v. FERC*, 78 F.3d 659, 663 (D.C. Cir. 1996)), is correct. Section 313(b) of the Federal Power Act states that the “finding of the Commission as to the facts, if supported by substantial evidence, shall be conclusive.” 16 U.S.C. § 825l(b). As we demonstrate in P 21, *infra*, the monitoring study will yield information relevant to our consideration of Appalachian’s license application, thus providing substantial evidence supporting the study requirement.

<sup>45</sup> Appalachian Rehearing Request at 10.

seasonal restrictions on when the drag rake is allowed to scrape the forebay bed). Spot sampling once per month as originally proposed by Appalachian would not necessarily result in the collection of turbidity data precisely during a drag rake operational event, let alone the collection of turbidity data during the full period of the event.

### 3. Costs

22. Appalachian also objects to the cost and level of effort associated with continuous turbidity monitoring, which the determination described as “minimal.”<sup>46</sup> Appalachian explains that it planned to deploy a HOBO logger instrument<sup>47</sup> at each continuous monitoring location to record water temperature and dissolved oxygen levels, and a more expensive Hydrolab sonde instrument<sup>48</sup> would be moved from site to site to measure additional water quality parameters, including turbidity, on a monthly basis.<sup>49</sup> According to Appalachian, HOBO loggers can only measure water temperature and dissolved oxygen; thus, Appalachian would be required to rent or purchase Hydrolab MS5 sondes for each location to continuously monitor turbidity at a cost of \$67,500, rather than the Director’s estimate of \$10,000 to \$15,000.<sup>50</sup> Appalachian also states that additional effort and labor will be required to maintain the larger Hydrolab sondes at “various river levels [and] to address data gaps as a result of such issues.”<sup>51</sup> Finally, Appalachian expresses concern that “placing large sondes *in situ* . . . will result in higher rates of damage and other problems with the probes,”<sup>52</sup> asserting that the larger Hydrolab sondes would be more visible to the public and thus more susceptible to vandalism or theft.<sup>53</sup>

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<sup>46</sup> *Id.* at 12.

<sup>47</sup> Appalachian states that the list price for a HOBO logger is \$1,250. *See id.* at Appendix B.

<sup>48</sup> Appalachian estimates each Hydrolab sonde to cost \$10,000 to purchase or \$1,500 to rent per month based on “past experiences of Appalachian personnel and consultants.” *Id.* at 6 & n.17.

<sup>49</sup> *Id.* at 12-13.

<sup>50</sup> *Id.* at 13.

<sup>51</sup> *Id.*

<sup>52</sup> *Id.*

<sup>53</sup> *Id.* at 6.

23. As indicated in the study plan determination, Commission staff inferred from the information in the record that the continuous turbidity sensors could be added to the same multiparameter sondes<sup>54</sup> that Appalachian would deploy to measure water temperature and dissolved oxygen, at a minimal additional cost.<sup>55</sup> Based on the additional information Appalachian provides in its rehearing request, we acknowledge that the instrument Appalachian would need to use for continuous turbidity monitoring would increase the cost beyond the Director's estimate. While we find continuous turbidity monitoring to be justified, as discussed above, given the additional level of effort and cost, we will reevaluate whether a refined scope and timing of turbidity monitoring would be sufficient to meet our information needs, as discussed below.

#### **B. Alternative Water Quality Study Proposed by Appalachian**

24. In its rehearing request, Appalachian proposes to conduct turbidity monitoring at five-minute intervals over a two-day period under relatively low-flow conditions using continuously-recording Hydrolab sondes deployed at five locations: (1) in the upstream extent of the Byllesby reservoir to characterize background turbidity levels; (2) in the Byllesby forebay at mid-depth; (3) in the Byllesby powerhouse tailrace; (4) in the Buck forebay at mid-depth; and (5) in the Buck powerhouse tailrace. Appalachian indicates the two-day monitoring effort would occur under a "predetermined range of normal operating regimes" for the drag rakes and generating units.<sup>56</sup> Appalachian estimates this modification will add \$20,000 to the cost of the water quality study.<sup>57</sup>

25. We conclude that Appalachian's proposal for continuous turbidity monitoring is generally sufficient to provide information on the potential effects of drag rake operation on downstream turbidity and inform potential license conditions, except in the following respects. First, Appalachian does not specify what constitutes a "predetermined range of normal operating regimes." For instance, the effects of the drag rake on downstream

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<sup>54</sup> Some brands of multiparameter sondes include extra ports to which additional optical sensors, including those for turbidity, can be added. See <https://www.yei.com/products/multiparameter-sondes>.

<sup>55</sup> *Appalachian Power Co.*, Study Plan Determination for the Byllesby-Buck Hydroelectric Project at B-8 (Nov. 18, 2019). This determination was based on Appalachian's statements in its study plans that it would use "multiparameter water quality instrumentation (i.e., sondes)" to continuously monitor water temperature and dissolved oxygen. See Appalachian June 21, 2019 Proposed Study Plan at 7.6.1; Appalachian October 18, 2019 Revised Study Plan at 5.6.1.

<sup>56</sup> Appalachian Rehearing Request at Appendix A, 5.6.3.

<sup>57</sup> *Id.* at Appendix A, 5.8.



turbidity may depend on how far the drag rake extends into the forebay and scrapes along its bed, as turbidity values would be expected to increase with raking distance because more sediment would be disturbed. Second, it is unclear if the “relatively low flow conditions” under which Appalachian proposes to assess the potential effects of drag rake operation on turbidity would be representative of environmental conditions (background turbidity levels, river flows, etc.) under which the drag rake would still be operated. For instance, there may be some conditions (e.g., low flow and low background turbidity levels during mid-summer) under which the drag rake may otherwise have a measurable effect on downstream turbidity but would not typically operate under such conditions. Finally, it is unclear whether the two-day sampling window chosen would coincide with times and conditions under which both the drag rake would be operating and anglers would be fishing in the project’s tailraces. Given that the potential negative effect of project (drag rake) operation on angling and recreational use in the project tailraces is an environmental concern raised in the proceeding, as indicated above, any turbidity monitoring should occur during the primary fishing season.

26. To address these concerns, we accept Appalachian’s proposed alternative water quality study plan (alternative plan) with the following modifications. Rather than specifically limiting the continuous sampling window to two days, Appalachian must consult with the resource agencies (Virginia DGIF and FWS) to identify a sampling window that occurs: (1) during the fishing season; (2) when there is drag rake operation for the purposes of raking both the forebay bed and the trash rack; and (3) when flows and background turbidity are at levels such that drag rake operation would be expected to be representative of a worst-case scenario (i.e., low flows and low background turbidity levels) causing an effect on downstream turbidity. Regarding the second criterion, the drag rake should be extended various distances into the forebay up to the maximum distance and include a minimal distance scenario in which the drag rake would only clean the trash racks and not extend into the forebay. If one sampling window cannot accomplish all three criteria, then Appalachian should propose multiple sampling windows, as needed. Appalachian must file, in its study report, documentation of consultation with the agencies regarding the sampling window, as noted above.

27. The scope of this modified study is reduced relative to the prior determination (now, only five turbidity monitoring locations versus ten).<sup>58</sup> The expected sampling window would be on the order of about ten days, rather than continuously over a five-month period as previously required. Therefore, the expected cost to continuously monitor turbidity as specified in this modified study would be considerably less than that

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<sup>58</sup> Continuous turbidity monitoring would occur at five-minute intervals at the five stations proposed by Appalachian in its Task 3 under 5.6.3 of the alternative plan.

required by the determination. Furthermore, the shorter sampling time frame reduces the likelihood that the Hydrolab instruments would be lost to high flows or vandalized.

### **III. Conclusion**

28. Accordingly, we grant rehearing in part and approve Appalachian's proposed alternative plan, as modified above.

#### The Commission orders:

(A) The request for rehearing filed by Appalachian on December 18, 2019 is denied in part and granted in part.

(B) Appalachian's December 18, 2019 proposed Alternative Water Quality Study Plan is approved as modified by ordering paragraphs (C) and (D) of this order and replaces the Water Quality Study turbidity monitoring modifications in the Director's November 18, 2019 Study Plan Determination.

(C) The following recommendation, which was adopted in the Director's November 18, 2019 Study Plan Determination and which modified 5.6.1 Task 1 – Continuous Water Temperature and [Dissolved Oxygen] Monitoring of Appalachian's October 19, 2019 Revised Study Plan, is struck:

Accordingly, we recommend that Appalachian install continuously-recording turbidity sensors (with 15-minute measurement intervals) on each of the 10 multiparameter data sondes that would be deployed across the eight sampling sites described above. We also recommend that Appalachian maintain, and provide in the study report, a log of daily drag rake operations (e.g., daily start and stop times for the drag rakes).

(D) Appalachian will conduct a study to evaluate the potential effect of project operation (drag rake) on turbidity. During the study period, the timing of drag rake operation must be recorded and a Hydrolab or similar data sonde equipped with a turbidity sensor will be installed at each of the locations listed below to continuously record turbidity concentrations (in Nephelometric turbidity units) at 5-minute intervals:

- One location in the upstream extent of the Byllesby reservoir to characterize background turbidity levels
- One location in the Byllesby forebay at approximate mid-depth
- One location in the Byllesby powerhouse tailrace
- One location in the Buck forebay at approximate mid-depth
- One location in the Buck powerhouse tailrace

Project No. 2514-188

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The study will be conducted during the study period identified by Appalachian, in consultation with Virginia DGIF and FWS, that meets the criteria set forth in the Commission's February 20, 2020 order.

By the Commission.

( S E A L )

Kimberly D. Bose,  
Secretary.

## Yayac, Maggie

---

**Subject:** FW: Byllesby/Buck Project Proposed Site Visit

**From:** Elizabeth B Parcell [mailto:ebparcell@aep.com]

**Sent:** Tuesday, February 25, 2020 1:00 PM

**To:** Bill Kittrell (Bill.Kittrell@dgif.virginia.gov) <Bill.Kittrell@dgif.virginia.gov>; John Copeland (John.Copeland@dgif.virginia.gov) <John.Copeland@dgif.virginia.gov>; SAM.SWEENEY@DCR.VIRGINIA.GOV; JAMES.ELLIOTT@DCR.VIRGINIA.GOV; sharon.ewing@dcr.virginia.gov

**Cc:** Kulpa, Sarah <Sarah.Kulpa@hdrinc.com>; Yayac, Maggie <Maggie.Yayac@hdrinc.com>; Jonathan M Magalski <jmmagalski@aep.com>

**Subject:** Byllesby/Buck Project Proposed Site Visit

**CAUTION:** [EXTERNAL] This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Good afternoon,

Appalachian Power Company and our consultant, HDR, are preparing for relicensing field study activities scheduled to begin this spring for the Byllesby-Buck Project (FERC No. 2514). As we discussed during the Proposed Study Plan meeting this past July and outlined in the Revised Study Plan approved by FERC in November, for the Recreation Study we plan to convene a site visit with interested relicensing participants to discuss existing and potential recreational facilities and enhancements at the Project. We envision this will be a full day site visit, to allow time to visit each recreation facility. We plan to propose potential dates for the site visit to parties who have expressed interest in the Recreation Study but wanted to start by checking with VDGIF and VDCR. At your earliest convenience, will you please let me know your availability to participate in this one-day site visit on April 28 or 29?

Thanks for your help with this process.

Liz



**ELIZABETH B PARCELL | PROCESS SUPV**  
[EBPARCELL@AEP.COM](mailto:EBPARCELL@AEP.COM) | D:540.985.2441  
40 FRANKLIN ROAD SW, ROANOKE, VA 24011

## Yayac, Maggie

---

**Subject:** FW: AEP Byllesby-Buck Relicensing: Recreation Facilities Site Visit

**From:** Kulpa, Sarah

**Sent:** Friday, March 6, 2020 12:02 PM

**To:** joseph.grist@deq.virginia.gov; sharon.ewing@dcr.virginia.gov; claytorlakegirl@gmail.com; janet\_norman@fws.gov; rex.hill@carrollcountyva.gov; james.elliott@dcr.virginia.gov; Bill Kittrell (Bill.Kittrell@dgif.virginia.gov) <Bill.Kittrell@dgif.virginia.gov>; John Copeland (John.Copeland@dgif.virginia.gov) <John.Copeland@dgif.virginia.gov>; SAM.SWEENEY@DCR.VIRGINIA.GOV

**Cc:** 'ebparcell@aep.com' <ebparcell@aep.com>; 'jmmagalski@aep.com' <jmmagalski@aep.com>; Yayac, Maggie <Maggie.Yayac@hdrinc.com>

**Subject:** AEP Byllesby-Buck Relicensing: Recreation Facilities Site Visit

Good afternoon,

Appalachian Power Company is preparing for relicensing field study activities scheduled to begin this spring for the Byllesby-Buck Project (FERC No. 2514). As we discussed during the Proposed Study Plan meeting this past July and outlined in the Revised Study Plan approved by FERC in November, for the Recreation Study we plan to convene a site visit with interested relicensing participants to discuss existing and potential recreation facilities and enhancements at the Project.

We envision this will be a full-day site visit to allow time to visit each recreation facility. We propose to begin the day at the VDGIF Boat Launch on river-right at 9 a.m. We will continue to the Byllesby dam and work our way towards the Buck dam to view all six recreation facilities.

We are presently targeting **Wednesday, April 29<sup>th</sup>** to complete the site visit and wanted to give early notice to this group for planning purposes. Please let me know at your earliest convenience if you are interested in/available to participate or have any questions, or if you would like to suggest additional potential participants.

We will plan to follow up in a few weeks with additional information and meeting logistics.

Please don't hesitate to get back to Liz Parcell or myself with any questions or concerns, and thanks in advance for your participation in this process.

**Sarah Kulpa**

*Project Manager*

**HDR**

440 S. Church Street, Suite 900

Charlotte, NC 28202-2075

**D** 704.248.3620 **M** 315.415.8703

sarah.kulpa@hdrinc.com

[hdrinc.com/follow-us](http://hdrinc.com/follow-us)

# Yayac, Maggie

**Subject:** FW: Walleye gill net methods (Byllesby Reservoir)

**From:** Jon Studio [mailto:JStudio@envsi.com]

**Sent:** Friday, April 3, 2020 2:23 PM

**To:** Copeland, John <john.copeland@dgif.virginia.gov>; Huddleston, Misty <Misty.Huddleston@hdrinc.com>

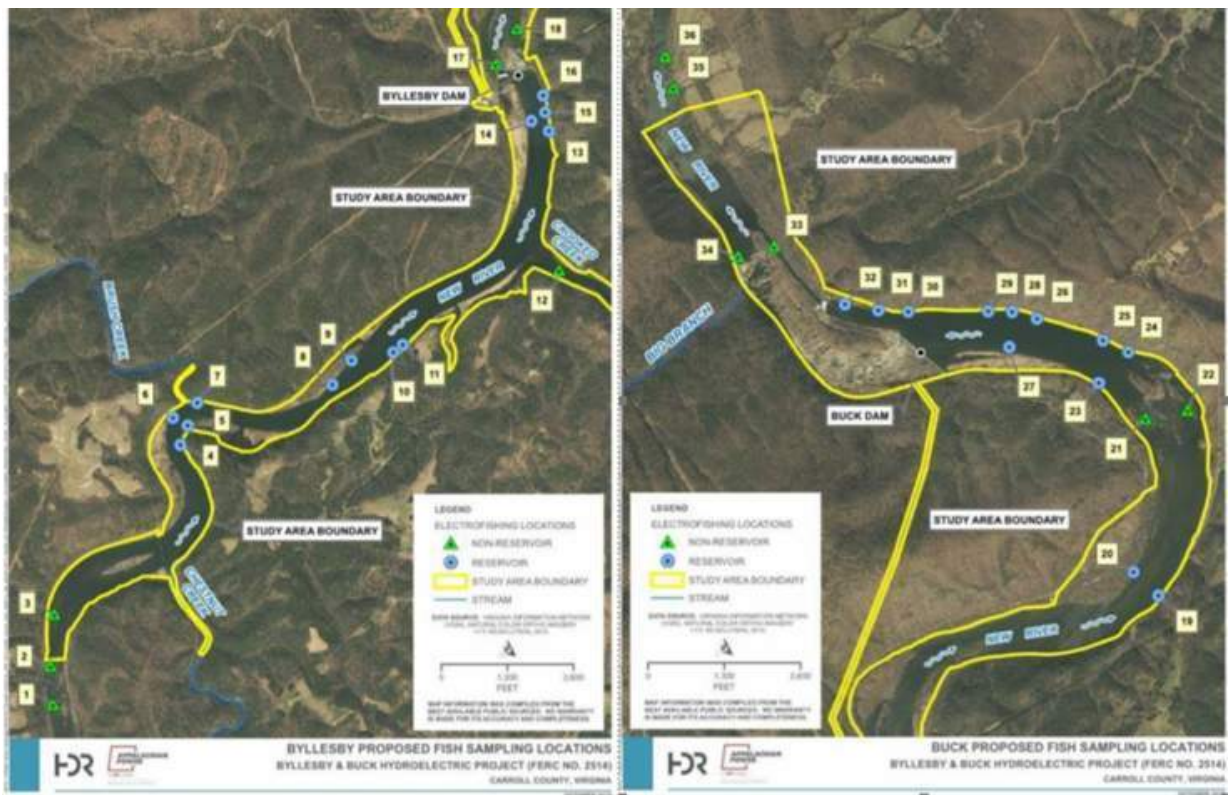
**Cc:** Bill.Kittrell@dgif.virginia.gov; John Spaeth <jspaeth@envsi.com>; Kulpa, Sarah <Sarah.Kulpa@hdrinc.com>; Jonathan M Magalski <jmmagalski@aep.com>; Elizabeth B Parcell <ebparcell@aep.com>

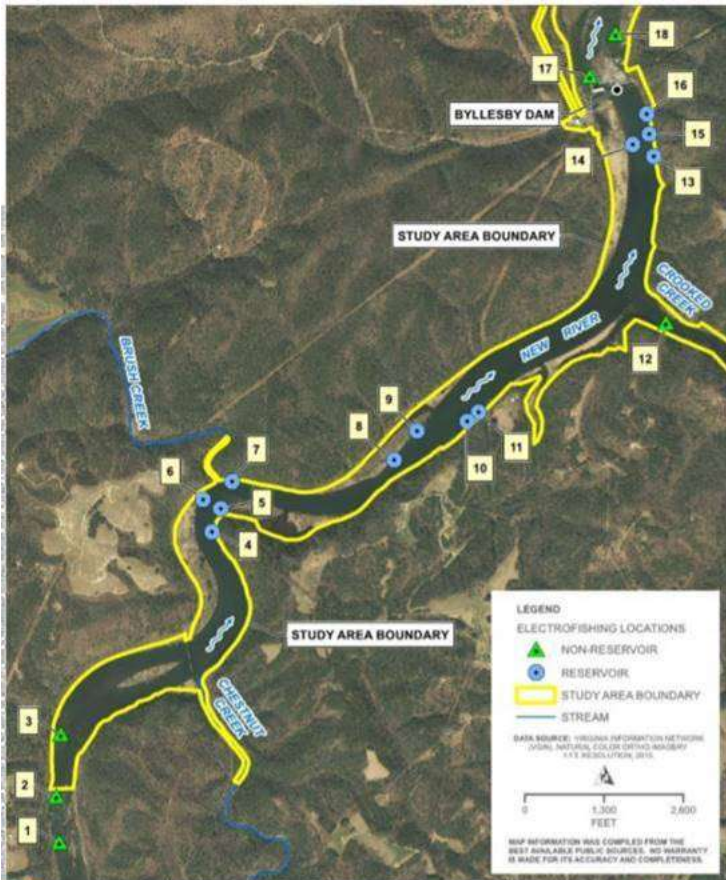
**Subject:** RE: Walleye gill net methods (Byllesby Reservoir)

**CAUTION:** [EXTERNAL] This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

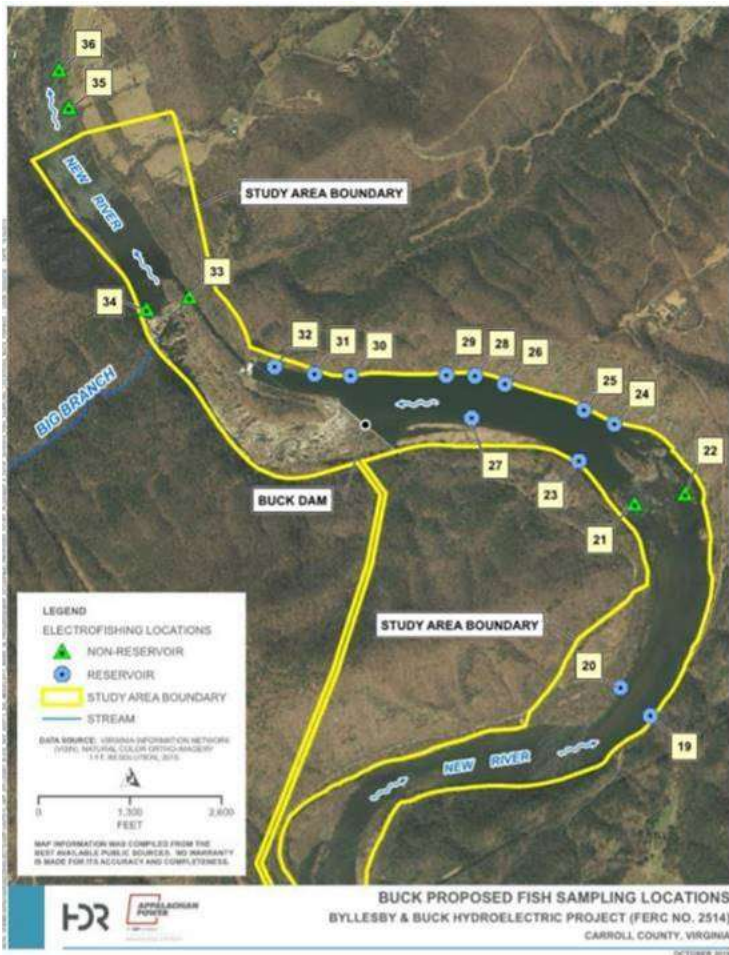
John,

Below are the tentative field sampling sites. Non-reservoir (green; backpack electrofishing) and Reservoir (blue; boat electrofishing) sites are shown. Tentative gill net sites coincide with Figure 4 from the 1991 report. It was agreed upon during development of the Study Plan that hoop netting will not be used because hoop net methods did not yield novel information in the previous study. We will be in touch at the beginning of next week regarding gill net mesh sizes. Enjoy your weekend.





**BYLLESBY PROPOSED FISH SAMPLING LOCATIONS**  
**BYLLESBY & BUCK HYDROELECTRIC PROJECT (FERC NO. 2514)**  
 CARROLL COUNTY, VIRGINIA



Thank you,  
Jon Studio

**From:** Copeland, John <john.copeland@dgif.virginia.gov>

**Sent:** Tuesday, March 31, 2020 1:00 PM

**To:** Huddleston, Misty <Misty.Huddleston@hdrinc.com>

**Cc:** Jon Studio <JStudio@envsi.com>; Bill.Kittrell@dgif.virginia.gov; John Spaeth <jspaeth@envsi.com>; Kulpa, Sarah <Sarah.Kulpa@hdrinc.com>; Jonathan M Magalski <jmmagalski@aep.com>; Elizabeth B Parcell <ebparcell@aep.com>; John Copeland <john.copeland@dgif.virginia.gov>

**Subject:** Re: Walleye gill net methods (Byllesby Reservoir)

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I appreciate the summary Misty provided. In my earlier email I meant to say that **Walleye were NOT a factor** during the 1990 fisheries sampling. We did not start stocking New River strain Walleye intensively in the Upper New River area (including Byllesby Reservoir) until the early 2000's. I think Byllesby was experimentally stocked with Walleye from another source in the mid-late 1990's. Since we started our New River strain Walleye work, we have stocked Byllesby occasionally, but most of the Walleye using Byllesby are coming from stockings at the low water bridge downstream from Fries Dam, which we try to stock annually.

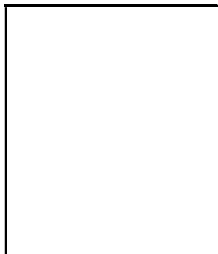


With this background in mind, take a look at the attached spreadsheet from Claytor Lake gill net surveys from 2010 to 2019. In order to collect the smaller size Walleye, the 3/4 in bar mesh net is important. As you can see, the 1.25 in bar mesh net is very important as well, so **I think adding these sizes (0.75 and 1.25 in bar mesh) to gill nets used in the current survey in addition to the ones proposed below by Misty Huddleston will provide better length data on Walleye in Byllesby Reservoir and not detract from collecting other species or comparisons to historic data.** At Claytor Lake, plenty of Walleye are collected in the 1.0, 1.5, 2.0, and 2.5 in bar mesh nets, but the smaller net sizes are important. We always get larger size Walleye in a variety of mesh sizes due to their propensity to get lip hung and roll in the nets, but collecting the smaller Walleye requires using smaller mesh sizes. I see you are planning for 120 foot nets with 6 panels, so adding panels will limit either the mesh sizes or the panel sizes. In the 1990 survey, each mesh size had 30 foot panels that were 6 feet deep (180 square feet of panel). Since you are planning 8 foot deep nets instead of the 6 foot deep nets used in the 1990 survey, if you employ 8 mesh sizes of 15 feet each (120 feet total length) it will still yield 120 square feet of each mesh panel, instead of what you propose with 6 mesh sizes of 20 feet each, which will yield 160 square feet of each mesh panel.

I would like to see the other planned methods for the 2020-2021 fisheries survey (electrofishing, hoop netting) and what sites will be sampled for each technique. I'm particularly interested in what reference sites will be sampled upstream and downstream from the Project. **If you are planning to replicate the 1990 fisheries study locations and techniques shown in Figure 4 of the 1991 report, then you can simply let me know that is your plan.**

**If you think we need to resolve anything in a conference call, I am available tomorrow (Wednesday, April 1), but not Friday, April 3.** We appreciate the coordination of this study in advance of sampling.

Thanks.



**John R. Copeland**

*Fisheries Biologist III*

**P** 540.961.8304

**M** 540.871.6064

**Virginia Department of Game & Inland Fisheries**

**A 2206 South Main Street, Suite C, Blacksburg, VA 24060**

**[www.dgif.virginia.gov](http://www.dgif.virginia.gov)**

*CONSERVE. CONNECT. PROTECT.*

On Tue, Mar 31, 2020 at 9:31 AM Huddleston, Misty <[Misty.Huddleston@hdrinc.com](mailto:Misty.Huddleston@hdrinc.com)> wrote:

Jon/John,

Following up on the email chain below.

The 1991 fisheries study at Byllesby/Buck used electrofishing, gillnet, and hoop net gear types. No Walleye were collected during the study.

For the upcoming fisheries work at Byllesby/Buck it is important that we have parity with previous collection methods. However, there is room for deviation as long as the gear changes are not expected to decrease the representativeness of the fish community.

The 1991 study report does not clarify if the gillnet mesh used was bar or stretch measurements; however, the measurements are consistent with typical bar mesh sizes used in experimental gill nets.

I have summarized the information from the 1991 study, provided by John from Claytor Lake surveys, and for reference purposes included gillnet specifications used by the USGS National Water Quality Assessment.

At the bottom of the table, I have provided my thoughts on gillnet specifications that could be used to meet the fish community study goals and target Walleye.

**Summary of gillnet information:**

Gillnet Source	Depth (feet)	Width (feet)	Number and Width (feet) of Panels	Bar Mesh Size (inches)	Notes
1991 study	6	120	4 – 30'	1 to 4	
Claytor Lake	8	100	4 – 25'	0.5 to 2.5	Walleye collected on 0.75 in, 1.0 in, 1.25 in, 1.5 in, 2.0 in, and 2.5 mesh
NAWQA (for reference)	6	120	6 – 20'	0.5 to 4	0.5-in, 1.0-in, 1.5-in, 2.0-in, 3.0-in, 4.0
<b>Potential Specifications for 2020-2021 Bylesby/Buck Sampling</b>	<b>8</b>	<b>120</b>	<b>6 – 20'</b>	<b>1 to 4</b>	<b>Mesh sizes of 1.0-in, 1.5-in, 2.0-in, 2.5-in, 3.0-in, 4.0-in</b>

\*NAWQA: US Geological Survey, National Water Quality Assessment Methodology

If we need to have a call to discuss further, I am available anytime on Wednesday, April 1<sup>st</sup> or Friday, April 3<sup>rd</sup>.

I have quite a bit of availability next week if we need to push a discussion to sometime next week.

Thanks,

Misty

**Misty Huddleston**, PhD

Associate, SR. Environmental Scientist

**HDR**

440 S. Church Street, Suite 900  
 Charlotte, NC 28202-2075  
 D 704.248.3614 M 865.556.9153  
[Misty.Huddleston@hdrinc.com](mailto:Misty.Huddleston@hdrinc.com)

---

**From:** Jon Studio [mailto:[JStudio@envsi.com](mailto:JStudio@envsi.com)]  
**Sent:** Friday, March 27, 2020 2:46 PM  
**To:** Copeland, John <[john.copeland@dgif.virginia.gov](mailto:john.copeland@dgif.virginia.gov)>  
**Cc:** [Bill.Kittrell@dgif.virginia.gov](mailto:Bill.Kittrell@dgif.virginia.gov); John Spaeth <[jspaeth@envsi.com](mailto:jspaeth@envsi.com)>; Huddleston, Misty <[Misty.Huddleston@hdrinc.com](mailto:Misty.Huddleston@hdrinc.com)>; Kulpa, Sarah <[Sarah.Kulpa@hdrinc.com](mailto:Sarah.Kulpa@hdrinc.com)>; Jonathan M Magalski <[jmmagalski@aep.com](mailto:jmmagalski@aep.com)>; Elizabeth B Parcell <[ebparcell@aep.com](mailto:ebparcell@aep.com)>  
**Subject:** RE: Walleye gill net methods (Byllesby Reservoir)

**CAUTION: [EXTERNAL]** This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

John,

I appreciate your timely response. One objective of the fish community study for this project is “*Compare current aquatic resources data to historical data to determine any significant changes to species composition or abundance.*” Using similar methods may allow us to make more direct comparisons (e.g., CPUE); however, it is also important to use the best methodology to sample and quantify the current aquatic resources.

Sarah and Misty, can you speak to the importance of parity with previous collection methods?

Attached is the 1991 fisheries study from the Byllesby-Buck Project Area. After looking over the paper, please propose a few times that work for you and I will try to make myself available for a phone conversation.

Thank you,

Jon Studio

---

**From:** Copeland, John <[john.copeland@dgif.virginia.gov](mailto:john.copeland@dgif.virginia.gov)>  
**Sent:** Friday, March 27, 2020 2:23 PM  
**To:** Jon Studio <[JStudio@envsi.com](mailto:JStudio@envsi.com)>  
**Cc:** [Bill.Kittrell@dgif.virginia.gov](mailto:Bill.Kittrell@dgif.virginia.gov); John Spaeth <[jspaeth@envsi.com](mailto:jspaeth@envsi.com)>; Huddleston, Misty <[Misty.Huddleston@hdrinc.com](mailto:Misty.Huddleston@hdrinc.com)>; Kulpa, Sarah <[Sarah.Kulpa@hdrinc.com](mailto:Sarah.Kulpa@hdrinc.com)>; Jonathan M Magalski

<[jmagalski@aep.com](mailto:jmagalski@aep.com)>; Elizabeth B Parcell <[ebparcell@aep.com](mailto:ebparcell@aep.com)>; John Copeland <[john.copeland@dgif.virginia.gov](mailto:john.copeland@dgif.virginia.gov)>

**Subject:** Re: Walleye gill net methods (Byllesby Reservoir)

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Jon:

I think parity with previous collection methods is one factor to consider, but, since walleye were a developed fishery during the last relicensing studies, that's less of a concern for me for walleye.

Were walleye collected during the previous relicensing studies?

Do you know if the mesh sizes described in the previous methodology were bar mesh sizes or stretch mesh sizes?

If your gill netting is targeting fish across the fish community, then parity with previous collection methods is a good idea.

In annual sampling at Claytor Lake, I use 100 ft by 8 ft experimental nets with varying bar mesh sizes in 25 ft panels from 0.5 inch (1 inch stretch mesh) up to 2.5 inch bar mesh (5 inch stretch mesh). The mesh sizes include the following bar mesh sizes in inches: 0.5, 0.625, 0.75, 1.0, 1.25, 1.5, 2.0, and 2.5. Not all of these mesh sizes are useful for collecting walleye. Most of the Walleye I catch in those nets are in the 0.75 in, 1.0 in, 1.25 in, 1.5 in, 2.0 in, and 2.5 in mesh sizes, since the smaller mesh sizes are primarily catching gizzard shad and alewife.

Walleye could also be collected using night electrofishing, which could be effective in Byllesby Reservoir in April. At Claytor Lake, we also collect some walleye during day electrofishing, but not frequently, since they tend to be deeper during the day.

I'm not sure where to find the previous fisheries study in my files.

If you send me the previous fisheries study, I can take a look early next week and we can talk about it by phone.



**John R. Copeland**

*Fisheries Biologist III*

**P** 540.961.8304

**M** 540.871.6064

**Virginia Department of Game & Inland Fisheries**

**A 2206 South Main Street, Suite C, Blacksburg, VA 24060**

**[www.dgif.virginia.gov](http://www.dgif.virginia.gov)**

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On Thu, Mar 26, 2020 at 10:27 AM Jon Studio <[JStudio@envsi.com](mailto:JStudio@envsi.com)> wrote:

Good morning Bill and John,

Environmental Solutions & Innovations, Inc. (ESI) anticipates conducting gill net surveys targeting walleye in the Byllesby Reservoir at the dam relicensing Project Area (New River) during the 2020 field season. ESI understands you participated in Study Plan review for this Project. To obtain representative information on the relative abundance and size structure of the walleye population (per VDGF requests), sampling as early in April as possible is necessary. ESI also requests your recommendations for the following gill net methods at the Byllesby Reservoir Project Area: 1) gill net length, height, and float line height, 2) gill net mesh sizes, and 3) gill net duration.

The following gill net methods were used in the fish community study in 1991: *“Gill nets were 6 ft x 120 ft monofilament, with four 30-ft panels of mesh size ranging from 1-4 inches. Net sets were placed at two sites each on the upper, middle, and lower portions of the Byllesby Reservoir... Each net was checked after 24 hours, reset, and checked and removed after 48 hours”*. ESI requests your advice regarding the most effective methods/techniques for sampling walleye in the Byllesby Reservoir. Please feel free to contact us if you have questions or additional information is required. Thank you.

Kind regards,



**Jon Studio**

Aquatic Scientist

Environmental Solutions & Innovations, Inc.

4300 Lynn Road | Ravenna, OH 44266 | USA

**office:** 513.591.6134 **direct:** 440.413.4609

[jstudio@envsi.com](mailto:jstudio@envsi.com) | [www.envsi.com](http://www.envsi.com)

---

**Subject:** FW: AEP Byllesby-Buck Relicensing: Recreation Facilities Site Visit

**From:** Kulpa, Sarah

**Sent:** Monday, April 13, 2020 4:15 PM

**To:** Laura <claytorlakegirl@gmail.com>

**Cc:** joseph.grist@deq.virginia.gov; sharon.ewing@dcr.virginia.gov; claytorlakegirl@gmail.com; janet\_norman@fws.gov; rex.hill@carrollcountyva.gov; james.elliott@dcr.virginia.gov; Bill Kittrell (Bill.Kittrell@dgif.virginia.gov) <Bill.Kittrell@dgif.virginia.gov>; John Copeland (John.Copeland@dgif.virginia.gov) <John.Copeland@dgif.virginia.gov>; SAM.SWEENEY@DCR.VIRGINIA.GOV; Ben Boyette <ben.boyette@dgif.virginia.gov>; Hampton, Tom (DGIF) <Tom.Hampton@dgif.virginia.gov>; 'ebparcell@aep.com' <ebparcell@aep.com>; 'jmmagalski@aep.com' <jmmagalski@aep.com>; Yayac, Maggie <Maggie.Yayac@hdrinc.com>

**Subject:** RE: AEP Byllesby-Buck Relicensing: Recreation Facilities Site Visit

Thanks for checking in, Laura. Yes, the April 29<sup>th</sup> Byllesby-Buck site visit/meeting is cancelled due to prevailing travel/meeting restrictions.

We'll be sending out an update on the revised schedule for certain study activities in a couple weeks. We expect to push this site visit back until later this summer and will plan to coordinate with this group in the future to find a day that works for most.

I've copied the rest of the group here. I hope this email finds you all well, and we look forward to talking more about this one when life gets more normal. Please get in touch with Liz Parcell if you have any questions or concerns in the meantime.

Thanks, be safe, and have a good week.

**Sarah Kulpa**

**D** 704.248.3620 **M** 315.415.8703

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---

**From:** Laura [mailto:claytorlakegirl@gmail.com]

**Sent:** Monday, April 13, 2020 3:36 PM

**To:** Kulpa, Sarah <Sarah.Kulpa@hdrinc.com>

**Subject:** RE: AEP Byllesby-Buck Relicensing: Recreation Facilities Site Visit

**CAUTION:** [EXTERNAL] This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Sara

I am assuming that this has been cancelled? Is there a reschedule?

Laura Walters

New River Conservancy

Laura Walters

6718 Dunkard Road

Dublin Virginia 24084

claytorlakegirl@gmail.com  
540 230-6272

---

**From:** Kulpa, Sarah <Sarah.Kulpa@hdrinc.com>

**Sent:** Friday, March 6, 2020 12:02 PM

**To:** joseph.grist@deq.virginia.gov; sharon.ewing@dcr.virginia.gov; claytorlakegirl@gmail.com; janet\_norman@fws.gov; rex.hill@carrollcountyva.gov; james.elliott@dcr.virginia.gov; Bill Kittrell (Bill.Kittrell@dgif.virginia.gov) <Bill.Kittrell@dgif.virginia.gov>; John Copeland (John.Copeland@dgif.virginia.gov) <John.Copeland@dgif.virginia.gov>; SAM.SWEENEY@DCR.VIRGINIA.GOV

**Cc:** 'ebparcell@aep.com' <ebparcell@aep.com>; 'jmmagalski@aep.com' <jmmagalski@aep.com>; Yayac, Maggie <Maggie.Yayac@hdrinc.com>

**Subject:** AEP Byllesby-Buck Relicensing: Recreation Facilities Site Visit

Good afternoon,

Appalachian Power Company is preparing for relicensing field study activities scheduled to begin this spring for the Byllesby-Buck Project (FERC No. 2514). As we discussed during the Proposed Study Plan meeting this past July and outlined in the Revised Study Plan approved by FERC in November, for the Recreation Study we plan to convene a site visit with interested relicensing participants to discuss existing and potential recreation facilities and enhancements at the Project.

We envision this will be a full-day site visit to allow time to visit each recreation facility. We propose to begin the day at the VDGIF Boat Launch on river-right at 9 a.m. We will continue to the Byllesby dam and work our way towards the Buck dam to view all six recreation facilities.

We are presently targeting **Wednesday, April 29<sup>th</sup>** to complete the site visit and wanted to give early notice to this group for planning purposes. Please let me know at your earliest convenience if you are interested in/available to participate or have any questions, or if you would like to suggest additional potential participants.

We will plan to follow up in a few weeks with additional information and meeting logistics.

Please don't hesitate to get back to Liz Parcell or myself with any questions or concerns, and thanks in advance for your participation in this process.

**Sarah Kulpa**  
*Project Manager*

**HDR**  
440 S. Church Street, Suite 900  
Charlotte, NC 28202-2075  
**D** 704.248.3620 **M** 315.415.8703  
sarah.kulpa@hdrinc.com

hdrinc.com/follow-us

---

**Subject:** FW: Walleye gill net methods (Byllesby Reservoir)

---

**From:** Jonathan M Magalski [mailto:jmmagalski@aep.com]

**Sent:** Wednesday, April 15, 2020 9:42 AM

**To:** Copeland, John <john.copeland@dgif.virginia.gov>

**Cc:** Bill.Kittrell@dgif.virginia.gov; John Spaeth <jspaeth@envsi.com>; Kulpa, Sarah <Sarah.Kulpa@hdrinc.com>; Elizabeth B Parcell <ebparcell@aep.com>; Huddleston, Misty <Misty.Huddleston@hdrinc.com>; Jon Studio <JStudio@envsi.com>

**Subject:** RE: Walleye gill net methods (Byllesby Reservoir)

**CAUTION:** [EXTERNAL] This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Thanks, John, for your input and feedback to date on the survey methods. ESI and HDR will be continuing to advance protocol and plans for the field surveys, and we look forward to further discussions with you. We wanted to let you know that the fish community survey originally scheduled for this month (targeting early April) has been postponed until next spring (2021) due to prevailing COVID-19 travel restrictions and safety concerns. This decision probably comes as no surprise. At this time we still plan to complete the next seasonal fish community survey in August-September of this year. We'll be sending out a formal schedule update to FERC and the relicensing participants over the next few weeks, but I wanted to give you a heads up, as relates to this ongoing discussion.

Please let Liz or I know if you have any questions or concerns regarding the process. Stay safe and healthy....Jon



**JONATHAN M MAGALSKI | ENVIRONMENTAL SPEC CONSULT**  
[JMMAGALSKI@AEP.COM](mailto:jmmagalski@aep.com) | D:614.716.2240 | A:8.200.2240  
1 RIVERSIDE PLAZA, COLUMBUS, OH 43215



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**Subject:** FW: [EXTERNAL] RE: AEP Byllesby-Buck Relicensing: Recreation Facilities Site Visit

**From:** Elizabeth B Parcell [mailto:ebparcell@aep.com]

**Sent:** Friday, April 17, 2020 4:27 PM

**To:** Norman, Janet <janet\_norman@fws.gov>; Kulpa, Sarah <Sarah.Kulpa@hdrinc.com>

**Cc:** Jonathan M Magalski <jmmagalski@aep.com>

**Subject:** RE: [EXTERNAL] RE: AEP Byllesby-Buck Relicensing: Recreation Facilities Site Visit

**CAUTION:** [EXTERNAL] This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Hi Janet,

We are still fine tuning the schedule but we'll definitely let you know as quickly as possible once it is finalized.

Thanks for providing the cell phone number. Mine is below as well. Have a good weekend! We'll be in touch.

Liz



**ELIZABETH B PARCELL | PROCESS SUPV**  
[EBPARCELL@AEP.COM](mailto:EBPARCELL@AEP.COM) | D:540.985.2441 | C:540.529.4191  
40 FRANKLIN ROAD SW, ROANOKE, VA 24011

---

**From:** Norman, Janet <janet\_norman@fws.gov>

**Sent:** Monday, April 13, 2020 4:27 PM

**To:** Kulpa, Sarah <Sarah.Kulpa@hdrinc.com>; Elizabeth B Parcell <ebparcell@aep.com>

**Subject:** Re: [EXTERNAL] RE: AEP Byllesby-Buck Relicensing: Recreation Facilities Site Visit

This is an **EXTERNAL** email. **STOP. THINK** before you **CLICK** links or **OPEN** attachments. If suspicious please click the '**Report to Incidents**' button in Outlook or forward to [incidents@aep.com](mailto:incidents@aep.com) from a mobile device.

Thank you Sarah and Liz,

I appreciate the update. Please keep me posted as any other delays or rescheduling occurs with study plan development. Any timelines for the resource agencies coming up that you foresee, so I can prepare my boss? Please see my cell phone number in this contact block, if anyone needs to get a hold of me by phone, as we are all working from home.

Well wishes, Janet

Janet Norman

Fish and Wildlife Biologist

USFWS Chesapeake Bay Field Office

177 Admiral Cochrane Dr.

Annapolis, MD 21401

(O) 410-573-4533

(Fax) 410-269-0832

(cell) 410-320-5519

---

**From:** Kulpa, Sarah <[Sarah.Kulpa@hdrinc.com](mailto:Sarah.Kulpa@hdrinc.com)>

**Sent:** Monday, April 13, 2020 4:14 PM

**To:** Laura <[claytorlakegirl@gmail.com](mailto:claytorlakegirl@gmail.com)>

**Cc:** [joseph.grist@deq.virginia.gov](mailto:joseph.grist@deq.virginia.gov) <[joseph.grist@deq.virginia.gov](mailto:joseph.grist@deq.virginia.gov)>; [sharon.ewing@dcr.virginia.gov](mailto:sharon.ewing@dcr.virginia.gov) <[sharon.ewing@dcr.virginia.gov](mailto:sharon.ewing@dcr.virginia.gov)>; [claytorlakegirl@gmail.com](mailto:claytorlakegirl@gmail.com) <[claytorlakegirl@gmail.com](mailto:claytorlakegirl@gmail.com)>; Norman, Janet <[janet\\_norman@fws.gov](mailto:janet_norman@fws.gov)>; [rex.hill@carrollcountyva.gov](mailto:rex.hill@carrollcountyva.gov) <[rex.hill@carrollcountyva.gov](mailto:rex.hill@carrollcountyva.gov)>; [james.elliott@dcr.virginia.gov](mailto:james.elliott@dcr.virginia.gov) <[james.elliott@dcr.virginia.gov](mailto:james.elliott@dcr.virginia.gov)>; Bill Kittrell ([Bill.Kittrell@dgif.virginia.gov](mailto:Bill.Kittrell@dgif.virginia.gov)) <[Bill.Kittrell@dgif.virginia.gov](mailto:Bill.Kittrell@dgif.virginia.gov)>; John Copeland ([John.Copeland@dgif.virginia.gov](mailto:John.Copeland@dgif.virginia.gov)) <[John.Copeland@dgif.virginia.gov](mailto:John.Copeland@dgif.virginia.gov)>; [SAM.SWEENEY@DCR.VIRGINIA.GOV](mailto:SAM.SWEENEY@DCR.VIRGINIA.GOV) <[SAM.SWEENEY@DCR.VIRGINIA.GOV](mailto:SAM.SWEENEY@DCR.VIRGINIA.GOV)>; Ben Boyette <[ben.boyette@dgif.virginia.gov](mailto:ben.boyette@dgif.virginia.gov)>; Hampton, Tom (DGIF) <[Tom.Hampton@dgif.virginia.gov](mailto:Tom.Hampton@dgif.virginia.gov)>; 'ebparcell@aep.com' <[ebparcell@aep.com](mailto:ebparcell@aep.com)>; 'jmmagalski@aep.com' <[jmmagalski@aep.com](mailto:jmmagalski@aep.com)>; Yayac, Maggie <[Maggie.Yayac@hdrinc.com](mailto:Maggie.Yayac@hdrinc.com)>

**Subject:** [EXTERNAL] RE: AEP Byllesby-Buck Relicensing: Recreation Facilities Site Visit

Thanks for checking in, Laura. Yes, the April 29<sup>th</sup> Byllesby-Buck site visit/meeting is cancelled due to prevailing travel/meeting restrictions.

We'll be sending out an update on the revised schedule for certain study activities in a couple weeks. We expect to push this site visit back until later this summer and will plan to coordinate with this group in the future to find a day that works for most.

I've copied the rest of the group here. I hope this email finds you all well, and we look forward to talking more about this one when life gets more normal. Please get in touch with Liz Parcell if you have any questions or concerns in the meantime.

Thanks, be safe, and have a good week.

**Sarah Kulpa**

**D** 704.248.3620 **M** 315.415.8703

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---

**From:** Laura [<mailto:claytorlakegirl@gmail.com>]

**Sent:** Monday, April 13, 2020 3:36 PM

**To:** Kulpa, Sarah <[Sarah.Kulpa@hdrinc.com](mailto:Sarah.Kulpa@hdrinc.com)>

**Subject:** RE: AEP Byllesby-Buck Relicensing: Recreation Facilities Site Visit

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Sara

I am assuming that this has been cancelled? Is there a reschedule?

Laura Walters

New River Conservancy

Laura Walters

6718 Dunkard Road

Dublin Virginia 24084

[claytorlakegirl@gmail.com](mailto:claytorlakegirl@gmail.com)

---

**From:** Kulpa, Sarah <[Sarah.Kulpa@hdrinc.com](mailto:Sarah.Kulpa@hdrinc.com)>

**Sent:** Friday, March 6, 2020 12:02 PM

**To:** [joseph.grist@deq.virginia.gov](mailto:joseph.grist@deq.virginia.gov); [sharon.ewing@dcr.virginia.gov](mailto:sharon.ewing@dcr.virginia.gov); [claytorlakegirl@gmail.com](mailto:claytorlakegirl@gmail.com); [janet\\_norman@fws.gov](mailto:janet_norman@fws.gov); [rex.hill@carrollcountyva.gov](mailto:rex.hill@carrollcountyva.gov); [james.elliott@dcr.virginia.gov](mailto:james.elliott@dcr.virginia.gov); Bill Kittrell ([Bill.Kittrell@dgif.virginia.gov](mailto:Bill.Kittrell@dgif.virginia.gov)) <[Bill.Kittrell@dgif.virginia.gov](mailto:Bill.Kittrell@dgif.virginia.gov)>; John Copeland ([John.Copeland@dgif.virginia.gov](mailto:John.Copeland@dgif.virginia.gov)) <[John.Copeland@dgif.virginia.gov](mailto:John.Copeland@dgif.virginia.gov)>; [SAM.SWEENEY@DCR.VIRGINIA.GOV](mailto:SAM.SWEENEY@DCR.VIRGINIA.GOV)

**Cc:** 'ebparcell@aep.com' <[ebparcell@aep.com](mailto:ebparcell@aep.com)>; 'jmmagalski@aep.com' <[jmmagalski@aep.com](mailto:jmmagalski@aep.com)>; Yayac, Maggie <[Maggie.Yayac@hdrinc.com](mailto:Maggie.Yayac@hdrinc.com)>

**Subject:** AEP Byllesby-Buck Relicensing: Recreation Facilities Site Visit

Good afternoon,

Appalachian Power Company is preparing for relicensing field study activities scheduled to begin this spring for the Byllesby-Buck Project (FERC No. 2514). As we discussed during the Proposed Study Plan meeting this past July and outlined in the Revised Study Plan approved by FERC in November, for the Recreation Study we plan to convene a site visit with interested relicensing participants to discuss existing and potential recreation facilities and enhancements at the Project.

We envision this will be a full-day site visit to allow time to visit each recreation facility. We propose to begin the day at the VDGIF Boat Launch on river-right at 9 a.m. We will continue to the Byllesby dam and work our way towards the Buck dam to view all six recreation facilities.

We are presently targeting **Wednesday, April 29<sup>th</sup>** to complete the site visit and wanted to give early notice to this group for planning purposes. Please let me know at your earliest convenience if you are interested in/available to participate or have any questions, or if you would like to suggest additional potential participants.

We will plan to follow up in a few weeks with additional information and meeting logistics.

Please don't hesitate to get back to Liz Parcell or myself with any questions or concerns, and thanks in advance for your participation in this process.

**Sarah Kulpa**  
*Project Manager*

**HDR**  
440 S. Church Street, Suite 900  
Charlotte, NC 28202-2075  
**D** 704.248.3620 **M** 315.415.8703  
[sarah.kulpa@hdrinc.com](mailto:sarah.kulpa@hdrinc.com)

[hdrinc.com/follow-us](http://hdrinc.com/follow-us)

---

**Subject:** FW: Byllesby-Buck Project No. 2514 Recreation Study

**From:** Elizabeth B Parcell [mailto:ebparcell@aep.com]

**Sent:** Wednesday, April 29, 2020 4:51 PM

**To:** joseph.grist@deq.virginia.gov; sharon.ewing@dcr.virginia.gov; claytorlakegirl@gmail.com; janet\_norman@fws.gov; rex.hill@carrollcountyva.gov; james.elliott@dcr.virginia.gov; Bill.Kittrell@dgif.virginia.gov; John.Copeland@dgif.virginia.gov; SAM.SWEENEY@DCR.VIRGINIA.GOV

**Cc:** Jonathan M Magalski <jmmagalski@aep.com>; Kulpa, Sarah <Sarah.Kulpa@hdrinc.com>; Yayac, Maggie <Maggie.Yayac@hdrinc.com>; Henry W Parker <hwparser@aep.com>

**Subject:** Byllesby-Buck Project No. 2514 Recreation Study

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Hello,

I hope this e-mail finds you all well, in good health, and ready for the evening rains. Appalachian Power Company is continuing the Recreation Study for the Byllesby-Buck Project (FERC No. 2514). As scheduled in the Recreation Study Plan approved by FERC in November, Appalachian has developed a recreation visitor use online survey to provide respondents the opportunity to respond and give feedback electronically.

The Online Survey has been posted to the Project website as a way to capture data from recreationists. Please share with your stakeholder groups as you find appropriate. This survey is presently scheduled to be available through the end of October 2020 and signs notifying users of the online survey will be installed over the next month at the recreation facilities. This notification will be included in the upcoming quarterly Progress Report, which will also include schedule revisions due to COVID-19 restrictions.

Please find the online survey here: <http://www.aephydro.com/hydroplant/byllesbybuck>

Please let me know if you have any questions.

Liz



**ELIZABETH B PARCELL | PROCESS SUPV**  
[EBPARCELL@AEP.COM](mailto:EBPARCELL@AEP.COM) | D:540.985.2441  
40 FRANKLIN ROAD SW, ROANOKE, VA 24011

# Meeting Summary

Project: Byllesby-Buck Hydroelectric Project (FERC No. 2514)

Subject: Study Schedule Update

Date: Tuesday, June 30, 2020

Location: WebEx (2:00pm-3:00pm)

Attendees: Bill Kittrell (VDGIF)  
John Copeland (VDGIF)  
Janet Norman (USFWS)  
Joe Grist (VDEQ)  
Jon Magalski (AEP)  
Liz Parcell (AEP)  
Sarah Kulpa (HDR)  
Maggie Yayac (HDR)

## **Introduction**

Liz (AEP) thanked everyone for being available to discuss the Byllesby-Buck Project and explained that the purpose of the meeting would be to discuss the changes to the ILP study schedule due to COVID-19 travel restrictions and related concerns. Liz noted that a revised schedule was provided in the meeting invite. AEP plans on filing the revised schedule with FERC, which will include an extension of time for the Initial Study Report (ISR) (January 18<sup>th</sup>) and ISR meeting (February 2<sup>nd</sup>).

## **Study Schedule Update**

- Sarah (HDR) explained that AEP is currently planning on initiating field studies in July and expects to continue field work through the fall, potentially into November if needed. Time-sensitive spring studies that were not able to be completed due to travel restrictions have been re-scheduled for the spring of 2021. AEP is aiming to collect field data this year in support of the bypass reach, aquatic resources, and water quality studies, where doing so is compatible with the remaining study season, and studies that are more baseline characterization in nature are being postponed to 2021. This will allow AEP and their consultants to appropriately allocate resources to priority studies.
- AEP plans on filing the revised schedule with FERC and will also be requesting an extension of time to file the Initial Study Report and to conduct the Initial Study Report meeting. Sarah noted that this schedule change will not affect the schedule for filing of the Updated Study Report in 2021 or the overall licensing schedule. The extension is being requested to provide more time for AEP and their consultants to develop preliminary or draft study reports for filing with the ISR, following the completion of field activities this fall. Jon M. (AEP) also noted the extension of time

avoids a review period for the agencies over the holidays. There was no opposition to the proposed request for extension of time.

#### **Flow and Bypass Reach Aquatic Habitat Study**

- LiDAR data and orthoimagery have been captured at the Byllesby-Buck Project and HDR will be using this information to begin building the hydraulic model to support the Flow and Bypass Reach Aquatic Habitat Study (i.e. identify level logger placement, flow test scenarios, etc.). Additionally, the flow test scenarios will be developed and sent to agencies for review and comment in late July/early August. Janet noted that she will be out of office the last week of July and first week of August. AEP and HDR agreed to target the first week of August to get the flow test scenarios to this group, for a 2-week review and comment period.
- Flow tests are scheduled to take place in mid to late August/early September dependent on flow conditions. Sarah noted the test timing is dependent on no spill conditions at the developments. (Flashboard repairs are ongoing at Byllesby and currently scheduled to be completed within the next 3 weeks.)

#### **Water Quality Study**

- Sarah explained that the updated study schedule water quality monitoring (continuous and monthly sampling) is expected to begin in late July and continue through the end of September (can be continued into October if September is a hot/dry month). Agencies will have opportunity to review results of this monitoring in the ISR and provide feedback on the quality and quantity of the data at the ISR Meeting, with respect to whether the abbreviated water quality monitoring period is sufficient to meet the study objectives.
- VDGIF agreed that the revised timeframe for the Water Quality Study, while shorter, is the time to target (high temperature/lower inflow conditions) and noted that flows were high this spring.
- Sarah confirmed the turbidity monitoring study is still proposed for this study season (August-September). Discussion of timing of study given higher flows and more angling in May-July period. Jon M. explained the intent of the original schedule in the RSP, which was to try to capture incremental turbidity impacts of trashrake operation during lower flow (i.e., worse case) condition and during fishing season, as VDGIF had previously requested. John C. (VDGIF) agreed that the turbidity monitoring is preferred under a low flow condition and during fishing season and questioned whether adding an additional turbidity study in early July 2021 would be possible. Group agreed this would be evaluated at the ISR and based on the results of this year's study.

#### **Aquatic Resources Study**

- Sarah explained that the Fish Community Study will still be conducted in August or September. John C. agreed this time period is adequate since there will be some young-of-year fish.

- AEP is rescheduling the spring season of the fish community and macroinvertebrate and crayfish studies for 2021. No objections from agencies. John C. noted that based on his experiences with these sites, the survey scheduled for the spring (April-May) may have to be shifted to later in May or even June if high flow conditions prevail through the spring.
- The mussel survey is expected to be conducted in August or September, which is within the original timeframe. VDGIF noted Brian Watson (VDGIF) may typically do these surveys earlier in the year and that they'd like his concurrence with the August-September timeframe.
  - **Action Item:** AEP's consultant (Stantec) to follow up with Brian Watson to confirm the timing of the mussel survey. (Note Stantec sent e-mail to Brian Watson on 7/13, no response received yet.)
- HDR plans on providing 2020 results in a preliminary study report that would also include a preliminary desktop impingement and entrainment study. The final fish community study report would be prepared at the end of 2021 as part of the Updated Study Report.
- Janet (USFWS) would like AEP/HDR to consult with USFWS's fishway engineer to ensure parameters of blade strike analysis are sufficient prior to conducting. **Action Item:** Janet will connect Sarah to the USFWS fishway engineer.

#### **Wetland, Riparian, and Littoral Habitat, Terrestrial Resources, Shoreline Stability and Cultural Studies**

- Desktop and fieldwork rescheduled for spring-summer 2021.
- John C. questioned the timing of the field verification for the Wetland, Riparian and Littoral Habitat and noted VDGIF may prefer the survey take place in the late summer/early fall, which is the best time to survey for aquatic vegetation. Sarah reminded the group that the original schedule was intended to accommodate/overlap the Virginia spiraea flowering season, in the event any spiraea are present (none expected based on results of 2017 and prior surveys, as well as historical records). Janet agreed that the USFWS would like the survey to account for *Virginia spiraea*. **Action Item:** Check *Virginia spiraea* flowering and surveying timeframe as the group would like this to overlap with VDGIF request to identify aquatic vegetation. (Note AEP sent *Virginia spiraea* survey timeframes to Janet and has updated the survey window in the revised ILP study schedule to be filed with FERC to late July/August). VDGIF agreed that if the survey targeted late July, that should be sufficient to observe elodea and hydrilla.
- John C. noted preference that the Shoreline Stability Assessment take place in early spring (i.e. March to early April), if possible.

#### **Recreation Study**

- Trail camera observations have been on-going since November 2019 and are scheduled for completion this November. If any observations are obtained from the

cameras that may be of interest to VDGIF (sited managed by VDGIF) but not directly relevant to the Recreation Study Report, AEP will share that information directly with VDGIF.

- AEP has begun the online survey data collection. It is presently expected to continue through this November. VDGIF asked about potential to extend the period of data collection through 2021. AEP and HDR agreed this would be a relatively incremental effort and may be reasonable to do so; issue to be reevaluated at ISR (or if/when online survey proposed to be taken offline).
- Stakeholder meeting and site visit is not yet scheduled. Agencies and AEP agreed that pushing the stakeholder site visit as far out as possible would be preferable. Schedule has been updated to October-November, with potential to reschedule for the spring of 2021 if needed due to travel restrictions or concerns.
- Bill noted this is an irregular recreation usage year due to COVID-19 and they have seen usage increase at their recreation facilities so far this spring and summer.

#### **Other**

- AEP plans on submitting an update to FERC shortly and would like to include a record of consultation with the agencies and verbal agreement that there was no opposition. This will also serve as the first ILP Quarterly Progress Report.
- Agency representatives on the call agreed that they are in agreement with the schedule adjustments and AEP's request for extension of time to file the ISR.
- VDGIF noted the name of their agency is changing to the Virginia Department of Wildlife Resources (VDWR) as of 7/1/2020.



---

**Subject:** FW: Byllesby-Buck Spiraea Follow-up

**From:** Elizabeth B Parcell [mailto:ebparcell@aep.com]

**Sent:** Wednesday, July 1, 2020 10:53 AM

**To:** Norman, Janet <janet\_norman@fws.gov>

**Cc:** Jonathan M Magalski <jmmagalski@aep.com>; Kulpa, Sarah <Sarah.Kulpa@hdrinc.com>; Yayac, Maggie <Maggie.Yayac@hdrinc.com>; John Copeland (John.Copeland@dgif.virginia.gov) <John.Copeland@dgif.virginia.gov>; Bill Kittrell (Bill.Kittrell@dgif.virginia.gov) <Bill.Kittrell@dgif.virginia.gov>

**Subject:** Byllesby-Buck Spiraea Follow-up

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Janet,

Thank you for your time yesterday and your comments. We took the action item to confirm the Virginia spiraea flowering season which appears to be late May to late July. Additionally, the USFWS website cites the optimal survey timeframe for the Virginia spiraea from May 1 through September 30<sup>th</sup>. This is the website we are referring to: [https://www.fws.gov/northeast/virginiafield/pdf/endangeredspecies/20120125\\_VIRGINIASurveytimeframeforplants.pdf](https://www.fws.gov/northeast/virginiafield/pdf/endangeredspecies/20120125_VIRGINIASurveytimeframeforplants.pdf)

Would you agree that revising the schedule for the Wetland, Riparian, and Littoral survey timeframe for late July-August 2021 would be acceptable?

Thank you. We look forward to hearing from you.

Liz



**ELIZABETH B PARCELL | PROCESS SUPV**  
[EBPARCELL@AEP.COM](mailto:EBPARCELL@AEP.COM) | D:540.985.2441 | C:540.529.4191  
40 FRANKLIN ROAD SW, ROANOKE, VA 24011

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**Subject:** FW: Byllesby-Buck Project Relicensing Study Schedule Update Meeting Notes  
**Attachments:** ByllesbyBuck ILP Study Schedule UPdate 06 22 2020.pdf

**From:** Elizabeth B Parcell [mailto:ebparcell@aep.com]

**Sent:** Friday, July 17, 2020 4:07 PM

**To:** John Copeland (John.Copeland@dgif.virginia.gov) <John.Copeland@dgif.virginia.gov>; Bill Kittrell (Bill.Kittrell@dgif.virginia.gov) <Bill.Kittrell@dgif.virginia.gov>; Norman, Janet <janet\_norman@fws.gov>; Grist, Joseph <joseph.grist@deq.virginia.gov>; SAM.SWEENEY@DCR.VIRGINIA.GOV; JanNorman12@gmail.com

**Cc:** Yayac, Maggie <Maggie.Yayac@hdrinc.com>; Kulpa, Sarah <Sarah.Kulpa@hdrinc.com>; Jonathan M Magalski <jmmagalski@aep.com>

**Subject:** Byllesby-Buck Project Relicensing Study Schedule Update Meeting Notes

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Good afternoon,

I hope you are well and ready for the weekend.

Attached please find the draft summary of our discussion from a couple of weeks ago regarding the updated ILP study schedules and request to FERC for extension of the deadline to file the ISR. We plan to include a copy of this summary in the upcoming FERC filing. Please provide any comments or questions on the attached summary as soon as you can get to it, or no later than the end of next week.

Thanks and have a great weekend.

Liz



**ELIZABETH B PARCELL | PROCESS SUPV**  
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40 FRANKLIN ROAD SW, ROANOKE, VA 24011

---

**Subject:** FW: Byllesby-Buck Project Relicensing Study Schedule Update Meeting Notes

**From:** Copeland, John [mailto:john.copeland@dwr.virginia.gov]

**Sent:** Monday, July 20, 2020 4:21 PM

**To:** Elizabeth B Parcell <ebparcell@aep.com>

**Cc:** John Copeland (John.Copeland@dgif.virginia.gov) <John.Copeland@dgif.virginia.gov>; Bill Kittrell (Bill.Kittrell@dgif.virginia.gov) <Bill.Kittrell@dgif.virginia.gov>; Norman, Janet <janet\_norman@fws.gov>; Grist, Joseph <joseph.grist@deq.virginia.gov>; SAM.SWEENEY@DCR.VIRGINIA.GOV; JanNorman12@gmail.com; Yayac, Maggie <Maggie.Yayac@hdrinc.com>; Kulpa, Sarah <Sarah.Kulpa@hdrinc.com>; Jonathan M Magalski <jmmagalski@aep.com>

**Subject:** Re: Byllesby-Buck Project Relicensing Study Schedule Update Meeting Notes

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I think this summary captures our discussion very well. I have no revisions to suggest.

## John R. Copeland

*Fisheries Biologist III*

P 540.961.8397 / M 540.871.6064

### Virginia Department of Wildlife Resources

*CONSERVE. CONNECT. PROTECT.*

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On Fri, Jul 17, 2020 at 4:06 PM Elizabeth B Parcell <[ebparcell@aep.com](mailto:ebparcell@aep.com)> wrote:

Good afternoon,

I hope you are well and ready for the weekend.

Attached please find the draft summary of our discussion from a couple of weeks ago regarding the updated ILP study schedules and request to FERC for extension of the deadline to file the ISR. We plan to include a copy of this summary in the upcoming FERC filing. Please provide any comments or questions on the attached summary as soon as you can get to it, or no later than the end of next week.

Thanks and have a great weekend.

Liz



**ELIZABETH B PARCELL | PROCESS SUPV**  
[EBPARCELL@AEP.COM](mailto:EBPARCELL@AEP.COM) | D:540.985.2441 | C:540.529.4191  
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Appalachian Power Company  
P. O. Box 2021  
Roanoke, VA 24022-2121  
aep.com

July 27, 2020

***VIA ELECTRONIC FILING***

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)  
First Quarterly Study Progress Report, Updated ILP Study Schedule, and  
Request for Extension of Time to File Initial Study Report**

Dear Secretary Bose:

Appalachian Power Company (Appalachian or Applicant), a unit of American Electric Power (AEP) is the Licensee, owner, and operator of the 30.1 megawatt (MW) Byllesby-Buck Hydroelectric Project (Project No. 2514-186) (Project or Byllesby-Buck Project), located on the New River in Carroll County, Virginia. The Project is currently undergoing relicensing following the Federal Energy Regulatory Commission's (FERC's or Commission's) Integrated Licensing Process (ILP).

The purposes of this filing are to (1) inform FERC and Project stakeholders of revised timeframes for conducting certain field activities to be performed pursuant to the approved ILP Study Plan for the Project and (2) request Commission approval of a modification to the approved ILP Process Plan and Schedule that would extend the filing deadline for the Initial Study Report (ISR) for the Project from November 17, 2020 to January 18, 2021. As further explained below, these modifications are required in light of ongoing and presently anticipated resource and schedule challenges associated with the ongoing Novel Coronavirus Disease (COVID-19) pandemic and are not expected to impact Appalachian's ability to timely file an application for a new license by the statutory deadline (February 28, 2024).

This filing also serves as Appalachian's First Quarterly Study Progress Report for the Project. This progress report describes the activities performed since this Study Plan Determination (SPD), as well as ILP activities generally expected to be conducted in quarter 3 (Q3) of 2020.

**Background**

In accordance with 18 CFR §5.11 of the Commission's regulations, Appalachian developed a Revised Study Plan (RSP) for the Project that was filed with the Commission and made available to stakeholders on October 18, 2019. On November 18, 2019 FERC issued the Study Plan

Byllesby-Buck Hydroelectric Project (FERC No. 2514)  
First Quarterly Study Progress Report, Updated ILP Study Schedule, and Request for Extension of Time  
to File Initial Study Report  
Page 2

Determination (SPD). On December 12, 2019, Appalachian filed a clarification letter on the SPD with the Commission. The SPD was subsequently modified by FERC by an Order on Rehearing dated February 20, 2020. The RSP, as subsequently approved and modified by the FERC, establishes Appalachian's proposed schedule to complete desktop and field activities and develop reports for the following studies. A proposed study schedule is included in the RSP for each of the studies listed below:

1. Flow and Bypass Reach Aquatic Habitat Study;
2. Water Quality Study;
3. Aquatic Resources Study;
4. Wetlands, Riparian, and Littoral Habitat Characterization Study;
5. Terrestrial Resources Study;
6. Shoreline Stability Assessment Study;
7. Recreation Study; and
8. Cultural Resources Study.

### **Updated Study Schedule and Study Progress**

Appalachian's intent, at the time of filing the RSP, was to complete ILP study activities in the first ILP study season (2020) to the greatest extent possible. The study schedules were based on an expectation of commencing field work by early April and developing draft study reports and the ISR by mid-November 2020.

Appalachian commenced the Recreation Study in November 2019 and installed trail cameras to capture recreation use at Project facilities. Data from the installed cameras have been downloaded approximately monthly by Appalachian and Appalachian's consultant. Appalachian notes that Trail Camera #6, installed at the Buck Dam Picnic Area, has been out of service since May 18, 2020 due to the tree falling down and is expected to be reinstalled in a similar location on July 28, 2020. The Recreation Facility Inventory and Condition Assessment was completed in the fall of 2019. Additionally, Appalachian initiated the recreation visitor use online survey on April 27, 2020 and distributed notification of the availability of the online survey to interested agencies. Signs prompting visitors to complete the survey were installed at Appalachian's recreation facilities in May.

Due to prevailing restrictions on non-essential travel and safety considerations for staff who would be traveling for and performing fieldwork, Appalachian and Appalachian's consultants have not been able to commence fieldwork for the other studies (i.e., studies requiring intensive periods of fieldwork in the spring) as originally proposed in the RSP. Appalachian and Appalachian's

Byllesby-Buck Hydroelectric Project (FERC No. 2514)

First Quarterly Study Progress Report, Updated ILP Study Schedule, and Request for Extension of Time to File Initial Study Report

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consultants continue to monitor evolving conditions and presently anticipate commencing field study activities in early August 2020. As a result, conduct of several season-sensitive spring field studies will have to be deferred until the second (2021) study season, and the study period for the water quality study will be shortened (though notably is still expected to include the majority of the targeted low inflow and high temperature season). Other studies that would potentially have commenced in the spring or early summer are expected to be shifted to the mid- to late summer or fall seasons. On a resource allocation basis, Appalachian does not expect to be able to complete all of the required ILP study activities within the remaining study season. As such, Appalachian proposes to also shift the timing for conducting studies that are more baseline condition-characterization in nature to 2021.

A detailed schedule is attached (Attachment 1), which shows the schedule proposed in the RSP (as modified by the SPD and subsequent Order on Rehearing) alongside the revised proposed schedule.

Appalachian shared an earlier version of this table with the primary resource agencies (U.S. Fish and Wildlife Service, Virginia Department of Wildlife Resources, Virginia Department of Conservation and Recreation, and the Virginia Department of Environmental Quality) and conducted a conference call on June 30, 2020 to review the revised study schedule and solicit agency feedback and comments. Participants in this meeting concurred with Appalachian's proposed schedule revisions, and minor revisions to the schedule were made based on comments received during this meeting, as documented in the meeting summary included in Attachment 2.

### **Request for Extension of Time to File the ISR**

Because the study delays forced by COVID-19 conditions are expected to lead to significant field study activities continuing through the fall of 2020, it will not be feasible to develop draft study reports and a comprehensive ISR by the November 17, 2020 deadline. Appalachian believes that a comprehensive ISR, inclusive of draft study reports where possible, will be to the benefit of the ILP process for this Project, as well as to Project stakeholders. As such, Appalachian is requesting that the deadline to file the ISR be extended to January 18, 2021. Appalachian does not propose and is not requesting any subsequent adjustment of the ISR deadline (November 21, 2021).

Appalachian notified the agencies listed above of Appalachian's intention to file a request for extension of time to file the ISR (and the subsequent shift of the ISR meeting and comment deadline into early 2021) during the June 30, 2020 conference call. As indicated in the attached meeting summary, participants in this meeting did not express any opposition to or concerns with this request.

Appalachian notes the extraordinary circumstances that have shifted the ILP study schedule for the Project and believes this request is consistent with guidance from the Commission and

Byllesby-Buck Hydroelectric Project (FERC No. 2514)  
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to File Initial Study Report  
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Commission staff regarding potential impacts of COVID-19 on non-statutory deadlines and required notifications to and approvals by FERC. Appalachian thanks the Commission staff for their consideration of this request and hopes that this filing finds Commission staff and Project stakeholders in good health.

If there are any questions regarding the proposed ILP study schedule changes, please do not hesitate to contact me at (540) 985-2441 or via email at [ebparcell@aep.com](mailto:ebparcell@aep.com).

Sincerely,

A handwritten signature in black ink, appearing to read 'EB', with a long horizontal stroke extending to the right.

Elizabeth Parcell  
Process Supervisor  
American Electric Power Services Corporation

Attachments (2)

cc: Distribution list



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**ATTACHMENT 1**

**ILP STUDY SCHEDULE UPDATE**

**Table 1.** Proposed Changes to the 2020-2021 Study Plan Schedule for the Byllesby-Buck Project (FERC No. 2514)

Proposed Scheduling Changes to the 2020-2021 Study Plan Schedule for the Byllesby/Buck Project (FERC No. 2514)			
Study	Activities	Approved Timeframe for Completion (RSP and SPD)	Proposed Timeframe for Completion (July 2020 update)
Flow and Bypass Reach Aquatic Habitat Study	Topographic Mapping and Photogrammetry Data Collection	Fall 2019	Completed (January 2020)
	Desktop Habitat Assessment	November 2019 – March 2020	July – August 2020
	Mesohabitat Mapping and Substrate Characterization Field Data Collection	Summer 2020	August – September 2020
	Distribute Proposed Flow Test Scenario Framework to Interested Parties for Review	May 2020	August 2020
	Conduct Flow and Water Level Assessment and Hydraulic Modeling	June – October 2020	July – December 2020
	Distribute Draft Study Report with the ISR	November 2020	January 2021
Water Quality Study	Study Planning and Existing Data Review	January – March 2020	July 2020
	Continuous and Monthly Water Quality Monitoring (Dissolved Oxygen and Temperature)	May – September 2020	Late July* – September 2020 * Conditioned on completion of reinstallation of flashboards tripped during May 2020 high flow event
	Turbidity Monitoring Study	June – August 2020	August – September 2020
	Distribute Draft Study Report with the ISR	November 2020	January 2021

**Proposed Scheduling Changes to the 2020-2021 Study Plan Schedule for the Byllesby/Buck Project (FERC No. 2514)**

<b>Study</b>	<b>Activities</b>	<b>Approved Timeframe for Completion (RSP and SPD)</b>	<b>Proposed Timeframe for Completion (July 2020 update)</b>
<b>Aquatic Resources Study</b>	Desktop Literature Review	January – March 2020	July – August 2020
	Macroinvertebrate and Crayfish Community Study	March – August 2020	August – September 2020 (target September), April – May 2021
	Fish Community Study	April – September 2020	September 2020, April – May 2021
	Mussel Community Study	April – September 2020	August – September 2020
	Desktop Impingement and Entrainment Evaluation	August – November 2020	September – December 2020
	Distribute Draft Aquatic Resources Study Report with the ISR/USR	November 2020	January 2021/November 2021
<b>Wetlands, Riparian, and Littoral Habitat Characterization</b>	Desktop Mapping of Wetland, and Riparian, and Littoral Habitats	January – March 2020	February – April 2021
	Field Verification of Preliminary Maps and Wetland Delineations and Riparian and Littoral Habitat Characterizations	August 2020 – September 2020	Late July – August 2021
	Distribute Draft Study Report with the USR	November 2020	November 2021
<b>Terrestrial Resources Study</b>	Desktop Mapping and Study Planning	February – March 2020	February – April 2021
	Field Verification	April – July 2020	April – July 2021
	Distribute Draft Study Report with the USR	November 2020	November 2021



**Proposed Scheduling Changes to the 2020-2021 Study Plan Schedule for the Byllesby/Buck Project (FERC No. 2514)**

<b>Study</b>	<b>Activities</b>	<b>Approved Timeframe for Completion (RSP and SPD)</b>	<b>Proposed Timeframe for Completion (July 2020 update)</b>
<b>Shoreline Stability Assessment Study</b>	Study Planning and Data Review	January – March 2020	February – April 2021
	Shoreline Survey and Determination of Areas Potentially Needing Remediation	April – July 2020	April – July 2021
	Distribute Draft Study Report with the USR	November 2020	November 2021
<b>Recreation Study</b>	Study Planning and Existing Data Review	November 2019 – March 2020	Completed (November 2019)
	Trail Camera Data Collection	November 2019 – November 2020	November 2019 – November 2020
	Recreation Facility Inventory and Condition Assessment	November – December 2019	Completed (November 2019)
	Stakeholder Site Visit/Meeting	April 2020	October – November 2020* *Conditioned on no travel and meeting restrictions; if meeting not completed in the fall of 2020 will be rescheduled for spring 2021
	Recreation Visitor Use Online Survey	April – October 2020	April – October 2020
	Distribute Draft Study Report with the ISR	November 2020	January 2021
<b>Cultural Resources Study</b>	Determination of Area of Potential Effect (APE)	January – June 2020	July – September 2020
	Background Research and Archival Review	January – June 2020	August 2020 – November 2020
	Phase I Reconnaissance Survey of APE	May – October 2020	April – July 2021
	Inventory of Traditional Cultural Properties	October 2019 – October 2020	August 2020 – August 2021
	Review and Updates to the Existing CRMP	November 2020	November 2021
	Distribute Draft Study Report with the ISR/USR	November 2020	November 2021

**ATTACHMENT 2**

**JUNE 30, 2020 MEETING SUMMARY**

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**Subject:** FW: Byllesby-Buck Project Relicensing Study Schedule Update Meeting Notes  
**Attachments:** ByllesbyBuck ILP Study Schedule UPdate 06 22 2020.pdf

**From:** Elizabeth B Parcell [mailto:ebparcell@aep.com]

**Sent:** Friday, July 17, 2020 4:07 PM

**To:** John Copeland (John.Copeland@dgif.virginia.gov) <John.Copeland@dgif.virginia.gov>; Bill Kittrell (Bill.Kittrell@dgif.virginia.gov) <Bill.Kittrell@dgif.virginia.gov>; Norman, Janet <janet\_norman@fws.gov>; Grist, Joseph <joseph.grist@deq.virginia.gov>; SAM.SWEENEY@DCR.VIRGINIA.GOV; JanNorman12@gmail.com

**Cc:** Yayac, Maggie <Maggie.Yayac@hdrinc.com>; Kulpa, Sarah <Sarah.Kulpa@hdrinc.com>; Jonathan M Magalski <jmmagalski@aep.com>

**Subject:** Byllesby-Buck Project Relicensing Study Schedule Update Meeting Notes

**CAUTION:** [EXTERNAL] This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Good afternoon,

I hope you are well and ready for the weekend.

Attached please find the draft summary of our discussion from a couple of weeks ago regarding the updated ILP study schedules and request to FERC for extension of the deadline to file the ISR. We plan to include a copy of this summary in the upcoming FERC filing. Please provide any comments or questions on the attached summary as soon as you can get to it, or no later than the end of next week.

Thanks and have a great weekend.

Liz



**ELIZABETH B PARCELL | PROCESS SUPV**  
[EBPARCELL@AEP.COM](mailto:EBPARCELL@AEP.COM) | D:540.985.2441 | C:540.529.4191  
40 FRANKLIN ROAD SW, ROANOKE, VA 24011

# Meeting Summary

Project: Byllesby-Buck Hydroelectric Project (FERC No. 2514)

Subject: Study Schedule Update

Date: Tuesday, June 30, 2020

Location: WebEx (2:00pm-3:00pm)

Attendees: Bill Kittrell (VDGIF)  
John Copeland (VDGIF)  
Janet Norman (USFWS)  
Joe Grist (VDEQ)  
Jon Magalski (AEP)  
Liz Parcell (AEP)  
Sarah Kulpa (HDR)  
Maggie Yayac (HDR)

## **Introduction**

Liz (AEP) thanked everyone for being available to discuss the Byllesby-Buck Project and explained that the purpose of the meeting would be to discuss the changes to the ILP study schedule due to COVID-19 travel restrictions and related concerns. Liz noted that a revised schedule was provided in the meeting invite. AEP plans on filing the revised schedule with FERC, which will include an extension of time for the Initial Study Report (ISR) (January 18<sup>th</sup>) and ISR meeting (February 2<sup>nd</sup>).

## **Study Schedule Update**

- Sarah (HDR) explained that AEP is currently planning on initiating field studies in July and expects to continue field work through the fall, potentially into November if needed. Time-sensitive spring studies that were not able to be completed due to travel restrictions have been re-scheduled for the spring of 2021. AEP is aiming to collect field data this year in support of the bypass reach, aquatic resources, and water quality studies, where doing so is compatible with the remaining study season, and studies that are more baseline characterization in nature are being postponed to 2021. This will allow AEP and their consultants to appropriately allocate resources to priority studies.
- AEP plans on filing the revised schedule with FERC and will also be requesting an extension of time to file the Initial Study Report and to conduct the Initial Study Report meeting. Sarah noted that this schedule change will not affect the schedule for filing of the Updated Study Report in 2021 or the overall licensing schedule. The extension is being requested to provide more time for AEP and their consultants to develop preliminary or draft study reports for filing with the ISR, following the completion of field activities this fall. Jon M. (AEP) also noted the extension of time

avoids a review period for the agencies over the holidays. There was no opposition to the proposed request for extension of time.

#### **Flow and Bypass Reach Aquatic Habitat Study**

- LiDAR data and orthoimagery have been captured at the Byllesby-Buck Project and HDR will be using this information to begin building the hydraulic model to support the Flow and Bypass Reach Aquatic Habitat Study (i.e. identify level logger placement, flow test scenarios, etc.). Additionally, the flow test scenarios will be developed and sent to agencies for review and comment in late July/early August. Janet noted that she will be out of office the last week of July and first week of August. AEP and HDR agreed to target the first week of August to get the flow test scenarios to this group, for a 2-week review and comment period.
- Flow tests are scheduled to take place in mid to late August/early September dependent on flow conditions. Sarah noted the test timing is dependent on no spill conditions at the developments. (Flashboard repairs are ongoing at Byllesby and currently scheduled to be completed within the next 3 weeks.)

#### **Water Quality Study**

- Sarah explained that the updated study schedule water quality monitoring (continuous and monthly sampling) is expected to begin in late July and continue through the end of September (can be continued into October if September is a hot/dry month). Agencies will have opportunity to review results of this monitoring in the ISR and provide feedback on the quality and quantity of the data at the ISR Meeting, with respect to whether the abbreviated water quality monitoring period is sufficient to meet the study objectives.
- VDGIF agreed that the revised timeframe for the Water Quality Study, while shorter, is the time to target (high temperature/lower inflow conditions) and noted that flows were high this spring.
- Sarah confirmed the turbidity monitoring study is still proposed for this study season (August-September). Discussion of timing of study given higher flows and more angling in May-July period. Jon M. explained the intent of the original schedule in the RSP, which was to try to capture incremental turbidity impacts of trashrake operation during lower flow (i.e., worse case) condition and during fishing season, as VDGIF had previously requested. John C. (VDGIF) agreed that the turbidity monitoring is preferred under a low flow condition and during fishing season and questioned whether adding an additional turbidity study in early July 2021 would be possible. Group agreed this would be evaluated at the ISR and based on the results of this year's study.

#### **Aquatic Resources Study**

- Sarah explained that the Fish Community Study will still be conducted in August or September. John C. agreed this time period is adequate since there will be some young-of-year fish.

- AEP is rescheduling the spring season of the fish community and macroinvertebrate and crayfish studies for 2021. No objections from agencies. John C. noted that based on his experiences with these sites, the survey scheduled for the spring (April-May) may have to be shifted to later in May or even June if high flow conditions prevail through the spring.
- The mussel survey is expected to be conducted in August or September, which is within the original timeframe. VDGIF noted Brian Watson (VDGIF) may typically do these surveys earlier in the year and that they'd like his concurrence with the August-September timeframe.
  - **Action Item:** AEP's consultant (Stantec) to follow up with Brian Watson to confirm the timing of the mussel survey. (Note Stantec sent e-mail to Brian Watson on 7/13, no response received yet.)
- HDR plans on providing 2020 results in a preliminary study report that would also include a preliminary desktop impingement and entrainment study. The final fish community study report would be prepared at the end of 2021 as part of the Updated Study Report.
- Janet (USFWS) would like AEP/HDR to consult with USFWS's fishway engineer to ensure parameters of blade strike analysis are sufficient prior to conducting. **Action Item:** Janet will connect Sarah to the USFWS fishway engineer.

#### **Wetland, Riparian, and Littoral Habitat, Terrestrial Resources, Shoreline Stability and Cultural Studies**

- Desktop and fieldwork rescheduled for spring-summer 2021.
- John C. questioned the timing of the field verification for the Wetland, Riparian and Littoral Habitat and noted VDGIF may prefer the survey take place in the late summer/early fall, which is the best time to survey for aquatic vegetation. Sarah reminded the group that the original schedule was intended to accommodate/overlap the Virginia spiraea flowering season, in the event any spiraea are present (none expected based on results of 2017 and prior surveys, as well as historical records). Janet agreed that the USFWS would like the survey to account for *Virginia spiraea*. **Action Item:** Check *Virginia spiraea* flowering and surveying timeframe as the group would like this to overlap with VDGIF request to identify aquatic vegetation. (Note AEP sent *Virginia spiraea* survey timeframes to Janet and has updated the survey window in the revised ILP study schedule to be filed with FERC to late July/August). VDGIF agreed that if the survey targeted late July, that should be sufficient to observe elodea and hydrilla.
- John C. noted preference that the Shoreline Stability Assessment take place in early spring (i.e. March to early April), if possible.

#### **Recreation Study**

- Trail camera observations have been on-going since November 2019 and are scheduled for completion this November. If any observations are obtained from the

cameras that may be of interest to VDGIF (sited managed by VDGIF) but not directly relevant to the Recreation Study Report, AEP will share that information directly with VDGIF.

- AEP has begun the online survey data collection. It is presently expected to continue through this November. VDGIF asked about potential to extend the period of data collection through 2021. AEP and HDR agreed this would be a relatively incremental effort and may be reasonable to do so; issue to be reevaluated at ISR (or if/when online survey proposed to be taken offline).
- Stakeholder meeting and site visit is not yet scheduled. Agencies and AEP agreed that pushing the stakeholder site visit as far out as possible would be preferable. Schedule has been updated to October-November, with potential to reschedule for the spring of 2021 if needed due to travel restrictions or concerns.
- Bill noted this is an irregular recreation usage year due to COVID-19 and they have seen usage increase at their recreation facilities so far this spring and summer.

#### **Other**

- AEP plans on submitting an update to FERC shortly and would like to include a record of consultation with the agencies and verbal agreement that there was no opposition. This will also serve as the first ILP Quarterly Progress Report.
- Agency representatives on the call agreed that they are in agreement with the schedule adjustments and AEP's request for extension of time to file the ISR.
- VDGIF noted the name of their agency is changing to the Virginia Department of Wildlife Resources (VDWR) as of 7/1/2020.

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**Subject:** FW: AEP Byllesby-Buck and Niagara ILP schedule updates and ISR extension requests  
**Attachments:** AEP ByllesbyBuck Project Revised ILP Schedule and ISR Extension Request.pdf; AEP Niagara Project Revised ILP Schedule and ISR Extension Request.pdf

**From:** Jonathan M Magalski [mailto:jmmagalski@aep.com]  
**Sent:** Tuesday, July 28, 2020 8:37 AM  
**To:** Allyson Conner <Allyson.Conner@ferc.gov>  
**Cc:** Elizabeth B Parcell <ebparcell@aep.com>  
**Subject:** AEP Byllesby-Buck and Niagara ILP schedule updates and ISR extension requests

Good morning Allyson,

I hope you are doing well and staying cool. As you may have already seen, yesterday afternoon we filed an ILP schedule update and ISR extension request for Byllesby-Buck and Niagara to the relicensing dockets. As explained in these filings, the COVID-19 crisis and associated travel restrictions and safety precautions cancellation of our spring ILP study seasons. We are finding ways to move forward now and are finally commencing field study activities this week (initiation of water quality monitoring at Niagara). We've developed updated ILP Study Schedules (Attachment 1 of each of the attached filings) and discussed these with the agencies (USFWS, VDEQ, and VDGIF – now VDWR) on conference calls late last month. The agencies were very supportive and glad that we're able to proceed with much of the field data collection this summer and fall. The updated study schedules are now being provided as information to FERC and additional project stakeholders.

The attached filings also formally request extensions of time to file the ISRs (60 days for Byllesby-Buck, 36 days for Niagara). For safety reasons, we are having to push much of our field study activities, as well as in-office post-processing efforts, into the October-November time period. The requested extensions would allow Appalachian and our consultants additional time to develop study summaries and complete evaluations where we are able to based on the data collected, without compromising the overall ILP schedules. We discussed these extension requests with agencies during the ILP schedule update meetings, and the agencies were all supportive of these requests, recognizing the extraordinary circumstances imposed by the pandemic.

Thanks for your attention to these filings, and please don't hesitate to contact me if you have any questions or would like to further discuss. Have a great rest of your week and stay safe.....Jon

**JONATHAN M MAGALSKI** | ENVIRONMENTAL SPEC CONSULT  
[JMMAGALSKI@AEP.COM](mailto:JMMAGALSKI@AEP.COM) | D:614.716.2240  
1 RIVERSIDE PLAZA, COLUMBUS, OH 43215



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**Subject:** FW: Byllesby-Buck Hydroelectric Project (VA) -- Filing of ILP Study Progress Report  
**Attachments:** AEP ByllesbyBuck Project Rev ILP Schedule and ISR Extension Request.pdf

**From:** Kulpa, Sarah

**Sent:** Tuesday, July 28, 2020 10:59 AM

**To:** ACHP - John Eddins <jeddins@achp.gov>; American Whitewater - Kevin Colburn <kevin@americanwhitewater.org>; Appalachian Trail Conservancy - Andrew Downs <adowns@appalachiantrail.org>; Carroll County - Rex Hill <rex.hill@carrollcountyva.gov>; Carroll County Administrator - Steve Truitt <steve.truitt@carrollcountyva.gov>; Cherokee Nation - Elizabeth Toombs <elizabeth-toombs@cherokee.org>; Fish and Wildlife Conservation - Caitlin Carey <cscairey@vt.edu>; Fish and Wildlife Conservation - Donald J. Orth <dorth@vt.edu>; Friends of the Rivers of VA - Bill Tanger <bill.tanger@verizon.net>; Harold Peterson <harold.peterson@bia.gov>; New River Conservancy - George Santucci <george@newriverconservancy.org>; New River Conservancy - Laura Walters <claytorlakegirl@gmail.com>; New River Outdoor Adventures - Tim Dixon <newriveroutdooradventures@yahoo.com>; New River Trail State Park - Sam Sweeney <Sam.Sweeney@dcr.virginia.gov>; Town of Fries - Scott McCoy <townoffries@friesva.com>; USFWS Chesapeake Bay Field Office - Janet Norman <janet\_norman@fws.gov>; USGS - Mark Bennett <mrbennet@USGS.gov>; VADCR - Jimmy Elliott <james.elliott@dcr.virginia.gov>; VADCR - Lynn Crump <lynn.crump@dcr.virginia.gov>; VADCR - Robbie Ruhr <Robbie.Rhur@dcr.virginia.gov>; VADCR - Sharon Ewing <sharon.ewing@dcr.virginia.gov>; VADEQ <eir@deq.virginia.gov>; VADEQ - Bettina Rayfield <Bettina.rayfield@deq.virginia.gov>; VADEQ - Joe Grist <joseph.grist@deq.virginia.gov>; VADEQ - Matthew Link <matthew.link@deq.virginia.gov>; VADEQ - Scott Kudlas <scott.kudlas@deq.virginia.gov>; VADEQ - Tony Cario <anthony.cario@deq.virginia.gov>; Virginia Council on Indians - Emma Williams <emma.williams@governor.virginia.gov>; Virginia Department of Conservation and Recreation - Rene Hypes <rene.hypes@dcr.virginia.gov>; Virginia Department of Game and Inland Fisheries - John Copeland <John.Copeland@dgif.virginia.gov>; Virginia Department of Game and Inland Fisheries - William Kittrell <bill.kittrell@dgif.virginia.gov>  
**Cc:** Jonathan M Magalski <jmmagalski@aep.com>; Elizabeth B Parcell <ebparcell@aep.com>; Yayac, Maggie <Maggie.Yayac@hdrinc.com>

**Subject:** Byllesby-Buck Hydroelectric Project (VA) -- Filing of ILP Study Progress Report

Byllesby-Buck Hydroelectric Project Stakeholders:

Appalachian Power Company (Appalachian), a unit of American Electric Power (AEP), is the licensee, owner and operator of the Byllesby-Buck Hydroelectric Project (FERC No. 2514) (Project) located on the New River in Carroll County, Virginia. The Project is operated under a license issued by the Federal Energy Regulatory Commission (FERC). The existing FERC license for the Project expires on February 29, 2024. Appalachian is pursuing a new license for the continued operation of the Project in accordance with FERC's Integrated Licensing Process (ILP).

Pursuant to the ILP, Appalachian filed the first ILP Study Progress Report with the Commission on July 27, 2020. We are notifying stakeholders and distributing an electronic copy of this submittal (attached). The filing can also be viewed online at FERC's eLibrary at [http://elibrary.ferc.gov:0/idmws/file\\_list.asp?document\\_id=14879365](http://elibrary.ferc.gov:0/idmws/file_list.asp?document_id=14879365) and will be added to the Project's public relicensing website (<http://www.aephydro.com/HydroPlant/ByllesbyBuck>) in the coming days.

In addition to summarizing progress on ILP studies to date, this filing serves to inform FERC and Project stakeholders of revised timeframes for conducting certain ILP study activities, given schedule modifications driven by the ongoing COVID-19 pandemic. This filing also formally requests a brief extension of time from FERC to file the Initial Study Report at the end of this study year.

On behalf of Appalachian, I hope this email finds you in good health, and thank you for your understanding as we navigate challenging conditions. Should you have any questions regarding this filing, please contact Liz Parcell with AEP at (540) 985-2441 or [ebparcell@aep.com](mailto:ebparcell@aep.com).

Thank you,

**Sarah Kulpa**

*Project Manager*

**HDR**

440 S. Church Street, Suite 900  
Charlotte, NC 28202-2075  
**D** 704.248.3620 **M** 315.415.8703  
sarah.kulpa@hdrinc.com

[hdrinc.com/follow-us](http://hdrinc.com/follow-us)

FEDERAL ENERGY REGULATORY COMMISSION

WASHINGTON, D.C. 20426

August 10, 2020

OFFICE OF ENERGY PROJECTS

Project No. 2514-186 – Virginia  
Byllesby-Buck Hydroelectric Project  
Appalachian Power Company

VIA Electronic Mail

Elizabeth Parcell  
Process Supervisor  
American Electric Power Services Corporation  
P.O. Box 2021  
Roanoke, VA 24022-2021  
ebparcell@aep.com

**Subject: Revised Process Plan and Schedule for the Byllesby-Buck Hydroelectric Project No. 2514**

Dear Ms. Parcell:

On June 21, 2019, the Commission issued a process plan and schedule under the Integrated Licensing Process (ILP) for Appalachian Power Company's (Appalachian) Byllesby-Buck Hydroelectric Project No. 2514 (Byllesby-Buck Project). The process plan and schedule set pre-filing milestones and deadlines for, among other things, filing study reports, requesting modifications to the approved study plan, filing a preliminary licensing proposal (or draft license application), and filing the final license application.

On October 18, 2019, Appalachian filed a revised study plan (RSP) that included eight proposed studies in support of its intent to relicense the project. On November 18, 2019, the Commission issued a study plan determination for the project approving Appalachian's RSP with staff-recommended modifications; the RSP was subsequently modified and approved by the Commission on February 20, 2020.

On July 27, 2020, Appalachian filed its first quarterly study progress report, an updated ILP study schedule, and a request for an extension of time to file the initial study report (ISR) to account for the effects of the Coronavirus pandemic. Appalachian states that current restrictions on non-essential travel and safety considerations for its staff, who would be travelling for and performing the fieldwork, have prevented several of the studies from taking place in the spring and summer of 2020, as originally scheduled in the RSP. Appalachian anticipates commencing fieldwork for a number of studies in the fall of 2020; however, multiple season-sensitive studies must be delayed until the spring

Project No. 2514-186

2

of 2021.<sup>1</sup> On June 30, 2020, Appalachian consulted the U.S. Fish and Wildlife Service, Virginia Department of Wildlife Resources, Virginia Department of Conservation and Recreation, and the Virginia Department of Environmental Quality via conference call to discuss the revising the study schedule. All participants concurred with Appalachian's proposed schedule revisions.

Specifically, Appalachian requests that the Commission revise the process plan and schedule to allow Appalachian to file the ISR on January 18, 2021. Appalachian states that it would not be feasible to complete the study reports and ISR by the current November 17, 2020 deadline. Appalachian states that an extension would provide sufficient time to conduct the field studies that can be initiated this fall, to develop the associated draft study reports, and to finalize a comprehensive ISR. The process plan and schedule for the second study season in 2021 would remain unchanged.

To allow Appalachian additional time to complete the first season's field studies, develop the draft study reports, and complete the ISR, the request to extend the due date for filing the ISR to January 18, 2021 is granted. The revised process plan and schedule for the Byllesby-Buck Project is attached.

If you have any questions, please contact Allyson Conner at (202) 502-6082 or [allyson.conner@ferc.gov](mailto:allyson.conner@ferc.gov).

Sincerely,

Vince Yearick  
Director  
Division of Hydropower Licensing

Attachment: Revised Process Plan and Schedule

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<sup>1</sup> See Attachment 1, ILP Study Schedule Update, of Appalachian's request filed on July 27, 2020.

**ATTACHMENT 1**  
**BYLLESBY-BUCK PROJECT REVISED PROCESS PLAN AND SCHEDULE**

Shaded milestones are unnecessary if there are no study disputes. If the due date falls on a weekend or holiday, the due date is the following business day. Early filings or issuances will not result in changes to these deadlines.

<b>Responsible Party</b>	<b>Pre-Filing Milestone</b>	<b>Date</b>	<b>FERC Regulation</b>
Appalachian	First Study Season	Spring - Fall 2020	5.15(a)
Appalachian	File Initial Study Report	1/18/2021	5.15(c)(1)
All Stakeholders	Initial Study Report Meeting	2/2/2021	5.15(c)(2)
Appalachian	File Initial Study Report Meeting Summary	2/17/2021	5.15(c)(3)
All Stakeholders	File Disagreements/Requests to Amend Study Plan	3/19/2021	5.15(c)(4)
All Stakeholders	File Responses to Disagreements/Amendment Requests	4/18/2021	5.15(c)(5)
FERC	Issue Director's Determination on Disagreements/Amendments	5/18/2021	5.15(c)(6)
Appalachian	Second Study Season	Spring - Fall 2021	5.15(a)
Appalachian	File Preliminary Licensing Proposal (or Draft License Application)	10/1/2021	5.16(a)-(c)
All Stakeholders	File Comments on Preliminary Licensing Proposal (or Draft License Application)	12/30/2021	5.16(e)
Appalachian	File Updated Study Report	11/17/2021	5.15(f)
All Stakeholders	Updated Study Report Meeting	12/2/2021	5.15(f)
Appalachian	File Updated Study Report Meeting Summary	12/17/2021	5.15(f)
Appalachian	File Final License Application	2/28/2022	5.17
All Stakeholders	File Disagreements/Requests to Amend Study Plan	1/16/2022	5.15(f)
Appalachian	Issue Public Notice of Final License Application Filing	3/14/2022	5.17(d)(2)
All Stakeholders	File Responses to Disagreements/Amendment Requests	2/15/2022	5.15(f)
FERC	Issue Director's Determination on Disagreements/Amendments	3/17/2022	5.15(f)

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**Subject:** FW: Byllesby-Buck Project: Flow and Bypass Reach Aquatic Habitat Study  
**Attachments:** Byllesby-Buck Proposed Flow Test Scenarios.pdf

**From:** Elizabeth B Parcell [mailto:ebparcell@aep.com]

**Sent:** Tuesday, August 18, 2020 3:09 PM

**To:** Bill Kittrell (Bill.Kittrell@dgif.virginia.gov) <Bill.Kittrell@dgif.virginia.gov>; John Copeland (John.Copeland@dgif.virginia.gov) <John.Copeland@dgif.virginia.gov>; Grist, Joseph <joseph.grist@deq.virginia.gov>; Norman, Janet <janet\_norman@fws.gov>

**Cc:** Kulpa, Sarah <Sarah.Kulpa@hdrinc.com>; Yayac, Maggie <Maggie.Yayac@hdrinc.com>; Jonathan M Magalski <jmmagalski@aep.com>; Ziegler, Ty <Ty.Ziegler@hdrinc.com>

**Subject:** Byllesby-Buck Project: Flow and Bypass Reach Aquatic Habitat Study

**CAUTION:** [EXTERNAL] This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Good afternoon,

As we discussed in our June 30<sup>th</sup> ILP study update call for Appalachian's Byllesby-Buck Project, HDR has prepared a brief memo describing the flow release range and locations for the upcoming flow tests to be conducted as part of the Flow and Bypass Reach Aquatic Habitat Study. As this fieldwork is presently scheduled to begin as early as August 31, we would greatly appreciate receipt of any questions or comments on the attached by close of business Tuesday, August 25<sup>th</sup>. That will leave us time to schedule a conference call for later next week, if needed to further discuss.

Thank you for your support of this process.

Sincerely,

Liz

**ELIZABETH B PARCELL | PROCESS SUPV**  
[EBPARCELL@AEP.COM](mailto:EBPARCELL@AEP.COM) | D:540.985.2441 | C:540.529.4191  
40 FRANKLIN ROAD SW, ROANOKE, VA 24011



# Memo

Date: August 17, 2020

---

Project: Byllesby-Buck Hydroelectric Project (FERC No. 2514)

---

To: Bill Kittrell (VDWR)  
John Copeland (VDWR)  
Joseph Grist (VDEQ)  
Janet Norman (USFWS)

---

From: Sarah Kulpa (HDR)

---

CC: Liz Parcell (AEP)  
Jon Magalski (AEP)  
Ty Ziegler (HDR)

---

Subject: **Flow and Bypass Reach Aquatic Habitat Study – Proposed Flow Test Scenarios**

Appalachian Power Company's (Appalachian's) Revised Study Plan (RSP), as approved and modified by the Federal Energy Regulatory Commission (FERC), for the Byllesby-Buck Hydroelectric Project (Project) includes a Flow and Bypass Reach Aquatic Habitat Study (Study). The Project includes the Byllesby development and the Buck development, both located on the New River in Carroll County, Virginia. The Buck development is located approximately three river miles downstream of the Byllesby development and 44 miles upstream of Claytor Dam. The objectives of this Study are to conduct a flow and habitat assessment in the tailwater area and bypass reach of both developments (excluding the Byllesby development auxiliary spillway channel) using a combination of desktop, field survey, and hydraulic modeling methodologies to achieve the following goals:

1. Delineate and quantify aquatic habitat and substrate types in the Byllesby and Buck developments' bypass reaches.
2. Identify and characterize locations of habitat management interest within the Byllesby and Buck bypass reaches.
3. Develop an understanding of streamflow travel times and water surface elevation responses under variable base flow and spillway release flow combinations in the tailwater and bypass reach of each development to:
  - Demonstrate the efficacy of ramping rates required by the existing license.
  - Demonstrate the efficacy of the existing powerhouse minimum flow requirement (i.e., 360 cubic feet per second (cfs) minimum flow to maintain aquatic resources, including resident fish species, downstream of each



development consisting of the tailwater areas below each powerhouse and the bypass reaches below the main spillways).

- Evaluate the impacts of providing seasonal minimum flows to the bypass reaches.

### **Flow and Water Level Assessment - Proposed Flow Test Scenarios**

The Flow and Water Level Assessment fieldwork included in Task 3 of the Flow and Bypass Reach Aquatic Habitat Study is presently scheduled to be conducted the weeks of August 31 and September 7, 2020 (suitable inflow and field condition-dependent). The proposed flow release quantities and locations are described below. The proposed flow test scenarios are designed to capture existing (baseline) Project operations and also support the development and calibration of hydraulic models that will allow for visualization and evaluation of flow releases from other gate openings (i.e., demonstration flows at a specific gate location are not required to model flows from that location).

For the Byllesby development, the target flow scenarios (see Table 1) are designed to evaluate the effect of passing the entire minimum downstream flow requirement of 360 cfs through the bypass reach. Tainter Gate #6 is the proposed gate to pass flows as it is near the center of the spillway structure and under existing operating procedures is the first gate operated for releases into the bypass reach (see Figure 1). The three target flows proposed in Table 1 will allow a hydraulic model simulation range from leakage up to approximately 500 cfs.



For the Buck development, the target flow scenarios (see Table 1) are designed to evaluate the effect of the existing ramping rate requirements. Appalachian is required to discharge flows through a 2-foot gate opening for at least three hours following any spills released through a gate opened 2 feet (ft) or more. They are required to reduce the opening to 1 ft for at least an additional three hours, after which time the gate may be completely closed. This gradual reduction of flow allows adequate time for fish that may have traveled upstream into the bypass reach to respond to receding water levels, reducing instances of fish strandings that can potentially occur with sudden flow discontinuation.

Tainter Gate #1 will be utilized at the Buck development to pass the target flows since this reflects current operations (i.e., Tainter Gate #1 is first to open and last to close during high flow events where flows are routed into the bypass reach) (see Figure 2). Gate openings of 2 ft and 1 ft will be evaluated (as per existing ramping rate operating protocols) as well as a gate opening of 0.5 ft to represent flows that would occur between a 1-foot gate opening and leakage conditions. The three target flows proposed in Table 1 will allow a hydraulic model simulation range from leakage up to approximately 2,250 cfs.





**Table 1. Byllesby-Buck Bypass Reach Aquatic Habitat Study – Proposed Flow Test Scenarios**

<b>Byllesby Bypass Reach</b>				
Pool Range: 2078.2 - 2079.2 NGVD 29; Assume starting Pool Elevation is 2078.7 NGVD 29)				
Powerhouse Discharge Capacity: 5,868 cfs				
Powerhouse Minimum Discharge Capacity: 85 cfs/unit				
<b>Tainter Gate #6</b>				
Opening* (ft)	Proposed Target Flows (cfs)	Flow Test Duration (hours)	Volume (acre-ft)	Model Simulation Range (cfs)
0.0	Leakage	NA	0	Leakage  500
0.10	40	5	17	
0.25	105	5	43	
0.5	203	5	84	
<b>Buck Bypass Reach</b>				
Pool Range: 2002.4 - 2003.4 NGVD 29; Assume starting Pool Elevation is 2002.9 NGVD 29				
Powerhouse Discharge Capacity: 3,540 cfs				
Powerhouse Minimum Discharge Capacity: 73 cfs/unit				
<b>Tainter Gate #1</b>				
Opening* (ft)	Proposed Target Flows (cfs)	Flow Test Duration (hours)	Volume (acre-ft)	Model Simulation Range (cfs)
0.0	Leakage	NA	0	Leakage  2,250
0.5	224	8	148	
1.0	448	8	296	
2.0	897	8	593	

Notes: \* Assume starting point is midpoint of operating range with adequate inflow to maintain pond levels during flow tests.



Figure 1. Bylesby Dam Spillway Gates

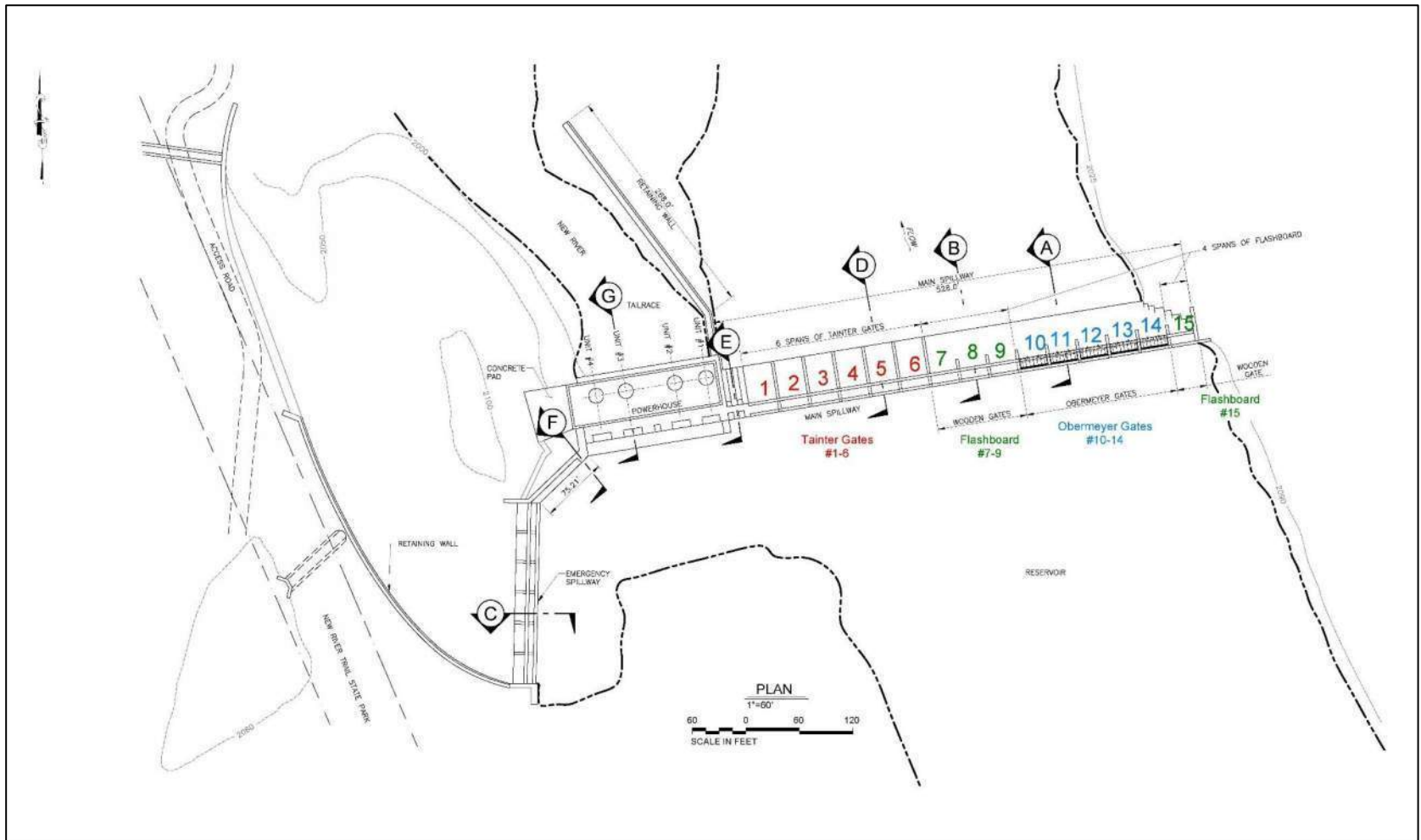
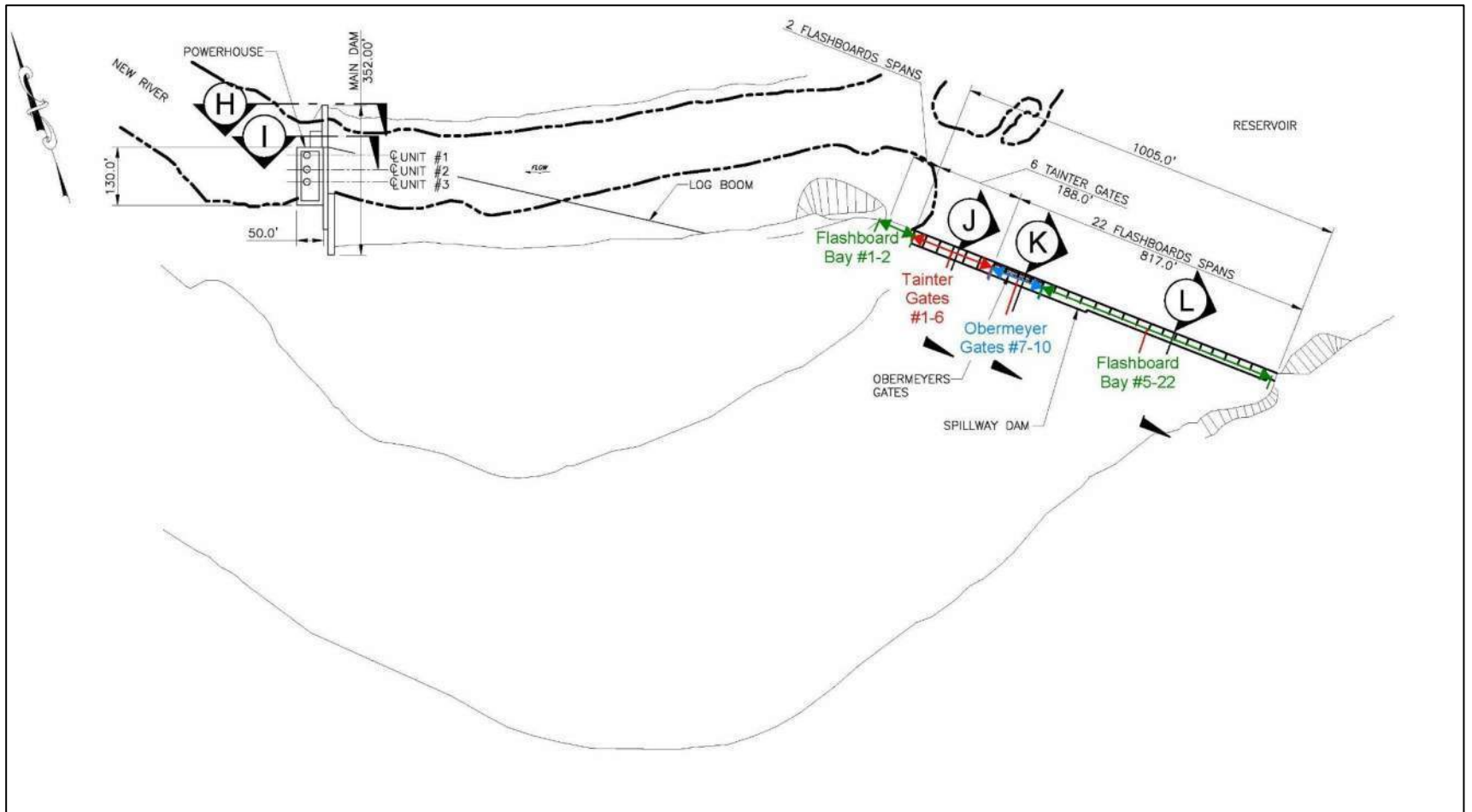




Figure 2. Buck Dam Spillway Gates



---

**Subject:** FW: Byllesby-Buck Project: Flow and Bypass Reach Aquatic Habitat Study

**From:** Copeland, John <john.copeland@dwr.virginia.gov>

**Sent:** Tuesday, August 25, 2020 1:11 PM

**To:** Elizabeth B Parcell <ebparcell@aep.com>

**Cc:** Grist, Joseph <joseph.grist@deq.virginia.gov>; Norman, Janet <janet\_norman@fws.gov>; Kulpa, Sarah <Sarah.Kulpa@hdrinc.com>; Yayac, Maggie <Maggie.Yayac@hdrinc.com>; Jonathan M Magalski <jmmagalski@aep.com>; Ziegler, Ty <Ty.Ziegler@hdrinc.com>; Brian Mcgurk <brian.mcgurk@deq.virginia.gov>; Kittrell, Bill (DGIF) <bill.kittrell@dwr.virginia.gov>; John Copeland <john.copeland@dwr.virginia.gov>; Smith, Scott (DGIF) <scott.smith@dwr.virginia.gov>

**Subject:** Re: Byllesby-Buck Project: Flow and Bypass Reach Aquatic Habitat Study

**CAUTION: [EXTERNAL]** This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Thank you for your email communication with this group about your plans to initiate flow release scenario tests for the Byllesby Buck Project starting Monday, August 31. Most of the agency people copied on your email had a conference call regarding this proposal yesterday. I had a brief discussion and email exchange with Joe Grist (Department of Environmental Quality) yesterday and today.

During our conversation yesterday, we concluded that our questions are numerous enough that we simply could work things out much better in a conference call. I have conferred with all the agency parties: Janet Norman (USFWS), Bill Kittrell (DWR), Scott Smith (DWR instream flow expert), as well as Joe Grist (DEQ - who has appointed Brian McGurk to participate) regarding a conference call this Friday afternoon (August 28). All parties are available.

We hereby request a conference call at your convenience on Friday afternoon, August 28.

**FYI - Please note that our agency email extension has changed from DGIF to DWR, effective July 1, 2020. DGIF still works, but we are requesting use of the DWR extension. This email has the corrected email addresses.**

Respectfully submitted,

**John R. Copeland**

*Fisheries Biologist III*

P 540.961.8397 / M 540.871.6064

**Virginia Department of Wildlife Resources**

*CONSERVE. CONNECT. PROTECT.*

A 2206 South Main Street, Suite C, Blacksburg, VA 24060

[www.dwr.virginia.gov](http://www.dwr.virginia.gov)



On Tue, Aug 18, 2020 at 3:09 PM Elizabeth B Parcell <[ebparcell@aep.com](mailto:ebparcell@aep.com)> wrote:

Good afternoon,

As we discussed in our June 30<sup>th</sup> ILP study update call for Appalachian's Byllesby-Buck Project, HDR has prepared a brief memo describing the flow release range and locations for the upcoming flow tests to be conducted as part of the Flow and Bypass Reach Aquatic Habitat Study. As this fieldwork is presently scheduled to begin as early as August 31, we would greatly appreciate receipt of any questions or comments on the attached by close of business Tuesday, August 25<sup>th</sup>. That will leave us time to schedule a conference call for later next week, if needed to further discuss.

Thank you for your support of this process.

Sincerely,

Liz



**ELIZABETH B PARCELL | PROCESS SUPV**  
[EBPARCELL@AEP.COM](mailto:EBPARCELL@AEP.COM) | D:540.985.2441 | C:540.529.4191  
40 FRANKLIN ROAD SW, ROANOKE, VA 24011

September 1, 2020

To: Attached Section 106 Consultation Distribution List

Subject: **Byllesby-Buck Hydroelectric Project (FERC No. 2514)  
Consultation Regarding the Area of Potential Effects (APE)**

Dear Sir or Madam:

Appalachian Power Company (Appalachian or Applicant), a unit of American Electric Power (AEP), is the Licensee, owner, and operator of the 30.1-megawatt (MW) Byllesby-Buck Hydroelectric Project (Project No. 2514) (Project or Byllesby-Buck Project), located on the New River in Carroll County, Virginia (Figure 1). The Byllesby development is located about nine miles north of the City of Galax, and the Buck development is located approximately three river miles (RM) downstream of Byllesby and 43.5 RM upstream of Claytor Dam.

The existing license for the Project was issued by the Federal Energy Regulatory Commission (FERC or Commission) for a 30-year term, with an effective date of March 28, 1994, and expires February 29, 2024. Accordingly, Appalachian is pursuing a new license for the Project pursuant to the Commission's Integrated Licensing Process (ILP), as described at 18 Code of Federal Regulations (CFR) Part 5. Section 106 of the National Historic Preservation Act (Section 106) requires the Commission to take into account the effects of issuing a new license for the continued operation of the Project on historic properties and to afford the Advisory Council on Historic Preservation (ACHP) a reasonable opportunity to comment<sup>1</sup>. Pursuant to the regulations implementing Section 106, Appalachian is consulting with the Virginia State Historic Preservation Officer (SHPO), ACHP, Indian Tribes, and other parties included on the attached Section 106 Consultation Distribution List to determine and document the Area of Potential Effects (APE) for Project relicensing.

## **Background**

Pursuant to the regulations implementing Section 106<sup>2</sup>, the Commission has determined that issuing a new license for the Byllesby-Buck Project is considered an undertaking with the potential to effect historic properties listed in or eligible for inclusion in the National Register of Historic Places.

Appalachian filed a Pre-Application Document (PAD) and associated Notice of Intent (NOI) with the Commission on January 7, 2019, to initiate the ILP. The Commission issued Scoping Document 1 (SD1) for the Project on March 8, 2019. SD1 was intended to advise resource agencies, Indian tribes, non-governmental organizations, and other stakeholders as to the

<sup>1</sup> 54 United States Code § 306108

<sup>2</sup> 36 C.F.R. Part 800

proposed scope of FERC's Environmental Assessment (EA) for the Project and to seek additional information pertinent to the Commission's analysis.

On April 10 and 11, 2019, the Commission held public scoping meetings in Galax, Virginia. During these meetings, FERC staff presented information regarding the ILP and details regarding the study scoping process and how to request a relicensing study, including the Commission's study criteria. In addition, FERC staff solicited comments regarding the scope of issues and analyses for the EA. Pursuant to 18 CFR §5.8(d), a public site visit of the Project was conducted on April 10, 2019.

Concurrent with the January 7, 2019, PAD and NOI required by the ILP, Appalachian requested designation as the Commission's non-federal representative for carrying out informal consultation pursuant to Section 106. The Commission granted Appalachian's request by notice dated March 8, 2019. While Appalachian is authorized to consult in an informal capacity, the Commission remains legally responsible for all agency findings and determinations under Section 106.

On October 18, 2019, Appalachian filed a Revised Study Plan (RSP) with the Commission describing the studies that the Licensee is proposing to conduct in support of relicensing the Project, including a Cultural Resources Study. As described in the RSP, Appalachian preliminarily proposed to define the Study Area/APE to include lands within the FERC-approved Project boundary, and lands outside of the Project boundary where Project operations, Project-related recreation activities or other enhancements, and routine maintenance activities associated with implementation of the license by the Commission could cause changes in the character or use of historic properties, if any such properties exist.

### **Request for Concurrence**

At this time, Appalachian is seeking concurrence from the Virginia SHPO, Indian Tribes, ACHP, and other parties included on the attached Section 106 Consultation Distribution List regarding the APE as defined above and delineated on the attached map (Figure 1). Appalachian believes that this definition is appropriate, as the APE currently encompasses all lands necessary for Project operations. If the results of consultation or studies conducted in support of relicensing indicate that the Project is having a potential effect on lands outside the APE, or if Appalachian proposes to undertake Project-related activities outside of the proposed APE, Appalachian will consult with the parties on the attached Section 106 Consultation Distribution List to refine the geographic extent of the APE and will provide FERC with consultation documentation.

Appalachian respectfully requests that the consulting parties provide written concurrence regarding the APE presented herein within 30 days of the date of this letter (e.g., on or before October 1, 2020). If there are any questions regarding the proposed APE or the relicensing

process, please do not hesitate to contact me at (540) 985-2241 or via email at ebparcell@aep.com.

Sincerely,

A handwritten signature in black ink, appearing to read 'E. Parcell', with a long horizontal stroke extending to the right.

Elizabeth Parcell  
Process Supervisor  
American Electric Power Services Corporation

Attachment: Byllesby-Buck Hydroelectric Project Section 106 Consultation Distribution List  
Figure 1 – Map of Proposed APE



**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  
jeddings@achp.gov

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

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

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

**State Agencies**

Ms. Julie Langan  
State Historic Preservation Officer  
Virginia Department of Historic Resources  
2801 Kensington Avenue  
Richmond, VA 23221

**Tribes**

Elizabeth Toombs  
Tribal Historic Preservation Officer  
Cherokee Nation  
22361 Bald Hill Road  
Tahlequah, OK 74464  
elizabeth-toombs@cherokee.org

Chief Bill Harris  
Catawba Indian Nation  
996 Avenue of the Nations  
Rock Hill, SC 29730

Wenonah Haire  
Tribal Historic Preservation Officer  
Catawba Indian Nation  
1536 Tom Steven Rd.  
Rock Hill, SC 29730

Deborah Dotson  
President  
Delaware Nation  
PO Box 825  
Anadarko, OK 73005

Chief Robert Gray  
Pamunkey Indian Tribe  
1054 Pocahontas Trail  
King William, VA 23086


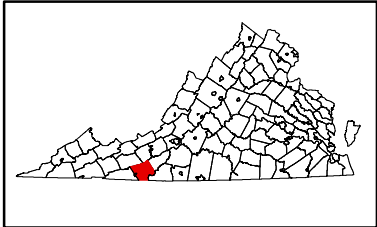
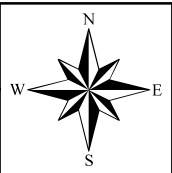
Chief Richard Sneed  
Eastern Band of Cherokee Indians  
P.O. Box 455  
Cherokee, NC 28719

**Non-Governmental**

Forrest Morgan  
President  
Archaeological Society of Virginia  
12106 Weyanoke Rd.  
Charles City, VA 23030  
(804) 829-2272



Figure 1. Proposed Byllesby-Buck Study Area/APE.  
Base Map: ESRI World Imagery.

 Byllesby Buck Study Area/APE	 <p><b>APPALACHIAN POWER</b><sup>™</sup></p> <p>An <b>AEP</b> Company</p> <p>BOUNDLESS ENERGY<sup>™</sup></p>															
	<table border="1"> <tr> <td>Project No.</td> <td>73197281</td> </tr> <tr> <td>Date:</td> <td>August 2020</td> </tr> <tr> <td>Drawn By:</td> <td>BGG</td> </tr> <tr> <td>Reviewed By:</td> <td>BGG</td> </tr> </table>	Project No.	73197281	Date:	August 2020	Drawn By:	BGG	Reviewed By:	BGG	 <p>521 Clemson Rd. Columbia, SC PH. (803) 741-9000 terracon.com</p>	<table border="1"> <tr> <td>STUDY AREA/APE</td> </tr> <tr> <td>BYLLESBY-BUCK HYDROELECTRIC PROJECT CARROLL COUNTY, VA</td> </tr> </table>	STUDY AREA/APE	BYLLESBY-BUCK HYDROELECTRIC PROJECT CARROLL COUNTY, VA	<table border="1"> <tr> <td>Figure</td> </tr> <tr> <td><b>1</b></td> </tr> </table>	Figure	<b>1</b>
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Date:	August 2020															
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STUDY AREA/APE																
BYLLESBY-BUCK HYDROELECTRIC PROJECT CARROLL COUNTY, VA																
Figure																
<b>1</b>																

## Yayac, Maggie

---

**Subject:** FW: [EXTERNAL] Re: Byllesby-Buck Project: Flow and Bypass Reach Aquatic Habitat Study MEETING NOTES

**Attachments:** Byllesby-Buck\_Flow Study Scenarios Coord with Stakeholders\_Meeting Summary\_20200828.pdf

**From:** Elizabeth B Parcell <ebparcell@aep.com>

**Sent:** Thursday, September 10, 2020 4:41 PM

**To:** Copeland, John <john.copeland@dwr.virginia.gov>; Grist, Joseph <joseph.grist@deq.virginia.gov>; Norman, Janet <janet\_norman@fws.gov>; Brian Mcgurk <brian.mcgurk@deq.virginia.gov>; Kittrell, Bill (DGIF) <bill.kittrell@dwr.virginia.gov>; Smith, Scott (DGIF) <scott.smith@dwr.virginia.gov>; jennifer\_pica@fws.gov

**Cc:** Kulpa, Sarah <Sarah.Kulpa@hdrinc.com>; Ziegler, Ty <Ty.Ziegler@hdrinc.com>; Jonathan M Magalski <jmmagalski@aep.com>; Yayac, Maggie <Maggie.Yayac@hdrinc.com>; Frederick A Colburn <facolburn@aep.com>; Dvorak, Joseph <Joseph.Dvorak@hdrinc.com>; Huddleston, Misty <Misty.Huddleston@hdrinc.com>

**Subject:** RE: [EXTERNAL] Re: Byllesby-Buck Project: Flow and Bypass Reach Aquatic Habitat Study MEETING NOTES

**CAUTION: [EXTERNAL]** This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

All,

Attached please find a meeting summary on the Byllesby-Buck Flow Study scenarios discussion held via conference call on August 28, 2020. Please let us know by the end of next week (9/18) if there are any comments.

Many thanks.

Liz



**ELIZABETH B PARCELL | PROCESS SUPV**  
[EBPARCELL@AEP.COM](mailto:EBPARCELL@AEP.COM) | D:540.985.2441 | C:540.529.4191  
40 FRANKLIN ROAD SW, ROANOKE, VA 24011

**From:** Copeland, John <john.copeland@dwr.virginia.gov>

**Sent:** Tuesday, August 25, 2020 1:11 PM

**To:** Elizabeth B Parcell <ebparcell@aep.com>

**Cc:** Grist, Joseph <joseph.grist@deq.virginia.gov>; Norman, Janet <janet\_norman@fws.gov>; Kulpa, Sarah <Sarah.Kulpa@hdrinc.com>; Yayac, Maggie <Maggie.Yayac@hdrinc.com>; Jonathan M Magalski <jmmagalski@aep.com>; Ziegler, Ty <Ty.Ziegler@hdrinc.com>; Brian Mcgurk <brian.mcgurk@deq.virginia.gov>; Kittrell, Bill (DGIF) <bill.kittrell@dwr.virginia.gov>; John Copeland <john.copeland@dwr.virginia.gov>; Smith, Scott (DGIF) <scott.smith@dwr.virginia.gov>

**Subject:** [EXTERNAL] Re: Byllesby-Buck Project: Flow and Bypass Reach Aquatic Habitat Study

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Thank you for your email communication with this group about your plans to initiate flow release scenario tests for the Byllesby Buck Project starting Monday, August 31. Most of the agency people copied on your email

had a conference call regarding this proposal yesterday. I had a brief discussion and email exchange with Joe Grist (Department of Environmental Quality) yesterday and today.

During our conversation yesterday, we concluded that our questions are numerous enough that we simply could work things out much better in a conference call. I have conferred with all the agency parties: Janet Norman (USFWS), Bill Kittrell (DWR), Scott Smith (DWR instream flow expert), as well as Joe Grist (DEQ - who has appointed Brian McGurk to participate) regarding a conference call this Friday afternoon (August 28). All parties are available.

We hereby request a conference call at your convenience on Friday afternoon, August 28.

**FYI - Please note that our agency email extension has changed from DGIF to DWR, effective July 1, 2020. DGIF still works, but we are requesting use of the DWR extension. This email has the corrected email addresses.**

Respectfully submitted,

**John R. Copeland**

*Fisheries Biologist III*

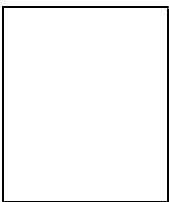
**P** 540.961.8397 / **M** 540.871.6064

**Virginia Department of Wildlife Resources**

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**A** 2206 South Main Street, Suite C, Blacksburg, VA 24060

[www.dwr.virginia.gov](http://www.dwr.virginia.gov)



On Tue, Aug 18, 2020 at 3:09 PM Elizabeth B Parcell <[ebparcell@aep.com](mailto:ebparcell@aep.com)> wrote:

Good afternoon,

As we discussed in our June 30<sup>th</sup> ILP study update call for Appalachian's Byllesby-Buck Project, HDR has prepared a brief memo describing the flow release range and locations for the upcoming flow tests to be conducted as part of the Flow and Bypass Reach Aquatic Habitat Study. As this fieldwork is presently

scheduled to begin as early as August 31, we would greatly appreciate receipt of any questions or comments on the attached by close of business Tuesday, August 25<sup>th</sup>. That will leave us time to schedule a conference call for later next week, if needed to further discuss.

Thank you for your support of this process.

Sincerely,

Liz



**ELIZABETH B PARCELL | PROCESS SUPV**  
[EBPARCELL@AEP.COM](mailto:EBPARCELL@AEP.COM) | D:540.985.2441 | C:540.529.4191  
40 FRANKLIN ROAD SW, ROANOKE, VA 24011

# Meeting Summary

Project: Byllesby-Buck Hydroelectric Project (FERC No. 2514)

Subject: Bypass Study Flow Test Scenarios Discussion with Stakeholders

Date: Friday, August 28, 2020

Location: WebEx (2:00pm-3:30pm)

Attendees:	Bill Kittrell (VDGIF)	Liz Parcell (AEP)
	John Copeland (VDGIF)	Fred Colburn (AEP)
	Janet Norman (USFWS)	Sarah Kulpa (HDR)
	Jessica Pica (USFWS)	Misty Huddleston (HDR)
	Brian McGurk for Joe Grist (VDEQ)	Ty Ziegler (HDR)
	Scott Smith (VDWR)	Joe Dvorak (HDR)

## **Introduction**

On August 18, 2020, AEP submitted a proposed flow test scenario plan for Byllesby-Buck for stakeholder review based on mutually agreed timeline discussed on a June 30th call. The purpose of the call was to work through agency questions with AEP and HDR regarding the proposed flow test scenarios and how the bypass study model will be used to assess and inform downstream flow needs for providing fish habitat and maintaining connectivity in the bypass channels.

## **Flow and Bypass Study Flow Study Status Update**

- Ty Ziegler (HDR) kicked off the call by providing a summary of the proposed test flow scenarios presented in the memo submitted on August 18<sup>th</sup>.
  - Model inputs consist of depth, flow, substrate, and topography.
  - Ty stated that the LiDAR data and orthoimagery have been captured at the Byllesby-Buck Project and were used to build a preliminary hydraulic model to support the Flow and Bypass Reach Aquatic Habitat Study and to perform a desktop GIS-based characterization of substrates in the bypass channel.
  - Preliminary substrate characterization was field confirmed on August 17 and 18.
  - Ty discussed the flow test scenarios and clarified that tests are scheduled to take place at Byllesby and Buck in mid to late September, but is dependent on instream flow conditions and station operations. Sarah Kulpa (HDR) noted the test timing is dependent on having no-spill conditions and no precipitation events at the developments in the days prior to the tests.
  - The next step is to collect additional bathymetry data in areas that were inundated during LIDAR data collection and collect water depths, and velocities at each of the test flows to support model validation.

- Ty clarified that proposed test flows were selected to capture the current operational scenarios and a range of flows based on what the projects are capable of passing, in addition to capturing the existing license requirements.
  - Byllesby 360 cfs minimum downstream flow requirement
  - Buck ramping rate when gates have been opened greater than 2-ft
  - *[AEP Clarification – The 360 cfs minimum downstream flow requirement of License Article 403 pertains to both developments and can be met by the sum flow through the hydro plant and the spillway gates.]*

## Agency Questions/Responses

### Model Scenarios

- Janet Norman (USFWS) expressed concern that the proposed scenarios did not propose a sufficiently wide range of scenarios to inform an adequate evaluation of the need for increased minimum flow requirements. Scott Smith (VDWR) agreed that a test scenario at higher flows may be ideal to help evaluate specific areas for potential to serve as Walleye spawning habitat during spring months in addition to evaluating connectivity.
- Jessica Pica (USFWS's fishway engineer) was interested in understanding which model type was being used, how it worked, and if we know or will be able to identify the flow level where connectivity starts/stops downstream of Buck. Jessica also wanted to understand why additional bathymetry data were being collected.
  - Ty stated that the model will be able to answer that question.
  - Ty also provided additional data, based on field observations, about how the channel topography appears to influence connectivity when the channel is watering up or drawing down. Group discussed how the natural topography and geology of the channel directs flows to the trail side of the river and how that likely contribute to the anecdotal observations of fish getting trapped in the disconnected pool just below the dam on the left side of the river (facing downstream).
  - Ty mentioned that there may be dam operation scenarios that would be capable of releasing sufficient flow in that portion of the channel to maintain connectivity, although they may require installation of new equipment/technology.
  - Bill Kittrell (VDGIF) stated that there may be potential for permitting some form of physical channel alteration that would help maintain channel connectivity to that left-side pool (trail side of river/downstream facing).
  - Ty suggested that an evaluation could be done of the impact on connectivity of altering flows at gates where flashboards are currently experiencing leakage. Bill emphasized that flashboards have historically been part of the problem. Group discussed the challenge that flashboards present to operations and modeling of scenarios due to impacts of flashboard operation and passage of larger flows downstream, or when they are newly installed may allow more leakage flows.

- Ty explained that additional bathymetry data are needed for areas that were inundated during LIDAR collection to improve model accuracy.
- Joe Dvorak (HDR) stated that we will be using the Innovyze ICM software to develop a 2-D type model for the flow study. ICM was selected over HEC-RAS because it is better for calculating hydraulics in complex channels, better at capturing the influence of vertical spillways, and better at modeling turbulent flows.
- In response to a question from Scott Smith, Joe Dvorak clarified that the model would allow identification of wetted area, specific flow release values, and velocities and depths in specific areas under specific flow scenarios. Janet, Jessica, and Scott each indicated that they were satisfied with the explanations and stated that they anticipate and hope the model will work well and help provide answers to their questions.
- The group discussed methods and challenges for addressing leakage flows in the models. Ty stated that we intend to try and measure those flows if possible, otherwise, an effort will be made to estimate those flows for inclusion in the model.
- Janet wanted to understand how leakage flows may change over time, is there seasonality to the leakage flows, how frequently do they need replaced, etc.
  - Ty indicated that leakage flows are impacted by flashboard condition (i.e., new versus old) and if they have had time to be silted in.

### Model Outputs and HSI Curves

- John Copeland (VDGIF) noted that he would like to see how Walleye use the Buck reach under different flow scenarios, preferably via field observation.
  - Janet stated that evaluation should include a seasonality component to demonstrate availability of suitable conditions throughout the year.
  - Ty clarified that this is part of the evaluation.
    - *[HDR Clarification – while not specifically discussed during the call, as part of the study plan, Walleye habitat suitability curves will be used in conjunction with the hydraulic model results to evaluate potential suitable habitat under various model flow simulations].*
- In the study report, Janet requested additional information be provided to provide characterization of normal hydrological conditions and spilling operations at the developments. The group referred to Table 4-1 in the RSP during discussion. Janet specifically requested the 25<sup>th</sup> and 75<sup>th</sup> percentiles be added to the table and better labeling.
  - Sarah suggested that a line graph may be more appropriate for the information being presented.
  - All on call agreed that more information for Table 4-1 is needed (**Action Item**) in the future study report.



- Brian McGurk (VDEQ) asked if the existing license requires monitoring of flows and gate operations. Sarah clarified that this information is monitored and available and was used to create an operations model for the developments.

Based on this discussion, AEP and HDR are proceeding with the flow demonstration study as proposed in the memo, as soon as field conditions allow. The call wrapped up with all indicating they were satisfied with the information presented and AEP's and HDR's responses to questions. Call participants expressed their appreciation of the effort made to share information and improve understand regarding the study.

## Yayac, Maggie

---

**Subject:** FW: [EXTERNAL] Re: Byllesby-Buck Project: Flow and Bypass Reach Aquatic Habitat Study MEETING NOTES

**From:** Pica, Jessica E <jessica\_pica@fws.gov>

**Sent:** Friday, September 18, 2020 4:17 PM

**To:** Norman, Janet <janet\_norman@fws.gov>

**Cc:** Elizabeth B Parcell <ebparcell@aep.com>

**Subject:** Re: [EXTERNAL] Re: Byllesby-Buck Project: Flow and Bypass Reach Aquatic Habitat Study MEETING NOTES

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Overall the notes look good. My main question was how confident are folks that calibrating the hydraulic model at lower flows could be extrapolated to higher flows. I think that's captured. I would change the word "why" to "where" in the sentence "Jessica also wanted to understand **where** additional bathymetry data were being collected."

Thanks and have a great weekend!  
Jessica

---

**From:** Norman, Janet <[janet\\_norman@fws.gov](mailto:janet_norman@fws.gov)>

**Sent:** Friday, September 18, 2020 3:13 PM

**To:** Pica, Jessica E <[jessica\\_pica@fws.gov](mailto:jessica_pica@fws.gov)>

**Cc:** Elizabeth B Parcell <[ebparcell@aep.com](mailto:ebparcell@aep.com)>

**Subject:** Re: [EXTERNAL] Re: Byllesby-Buck Project: Flow and Bypass Reach Aquatic Habitat Study MEETING NOTES

Great, thanks! Sorry I didn't notice until now. Are you good with the depiction of our conference call in the notes?

Janet

Janet Norman

Fish and Wildlife Biologist

USFWS Chesapeake Bay Field Office

177 Admiral Cochrane Dr.

Annapolis, MD 21401

(O) 410-573-4533

(Fax) 410-269-0832

(cell) 410-320-5519

---

**From:** Pica, Jessica E <[jessica\\_pica@fws.gov](mailto:jessica_pica@fws.gov)>

**Sent:** Friday, September 18, 2020 3:12 PM

**To:** Norman, Janet <[janet\\_norman@fws.gov](mailto:janet_norman@fws.gov)>

**Cc:** Elizabeth B Parcell <[ebparcell@aep.com](mailto:ebparcell@aep.com)>

**Subject:** Re: [EXTERNAL] Re: Byllesby-Buck Project: Flow and Bypass Reach Aquatic Habitat Study MEETING NOTES

Hi Janet. Liz noticed that my email was wrong and forwarded me the information separately. Thanks for keeping me in the loop!

## Yayac, Maggie

---

**Subject:** FW: [EXTERNAL] Re: Byllesby-Buck Project: Flow and Bypass Reach Aquatic Habitat Study MEETING NOTES

**From:** Norman, Janet <janet\_norman@fws.gov>

**Sent:** Friday, September 18, 2020 2:49 PM

**To:** Kittrell, William <bill.kittrell@dwr.virginia.gov>; Elizabeth B Parcell <ebparcell@aep.com>; Pica, Jessica E <jessica\_pica@fws.gov>

**Cc:** Copeland, John <john.copeland@dwr.virginia.gov>; Grist, Joseph <joseph.grist@deq.virginia.gov>; Brian Mcgurk <brian.mcgurk@deq.virginia.gov>; Smith, Scott (DGIF) <scott.smith@dwr.virginia.gov>; Kulpa, Sarah <Sarah.Kulpa@hdrinc.com>; Ziegler, Ty <Ty.Ziegler@hdrinc.com>; Jonathan M Magalski <jmmagalski@aep.com>; Yayac, Maggie <Maggie.Yayac@hdrinc.com>; Frederick A Colburn <facolburn@aep.com>; Dvorak, Joseph <Joseph.Dvorak@hdrinc.com>; Huddleston, Misty <Misty.Huddleston@hdrinc.com>

**Subject:** Re: [EXTERNAL] Re: Byllesby-Buck Project: Flow and Bypass Reach Aquatic Habitat Study MEETING NOTES

**CAUTION:** [EXTERNAL] This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Hi Liz and team,

From my perspective, I think our discussion and questions on the Byllesby-Buck Project: Flow and Bypass Reach Aquatic Habitat Study conference call were well captured in your summary notes. I am just noticing that there was unfortunately a typo in including our USFWS Fishway Engineer Jessica Pica on this email review routing, so I am including her in my response here. I can't speak for her as to whether the notes captured her thoughts.

Thanks much for these efforts and the study plan ahead of us.

Janet

Janet Norman  
Fish and Wildlife Biologist  
USFWS Chesapeake Bay Field Office  
177 Admiral Cochrane Dr.  
Annapolis, MD 21401  
(O) 410-573-4533  
(Fax) 410-269-0832  
(cell) 410-320-5519

**From:** Smith, Scott <scott.smith@dwr.virginia.gov>

**Sent:** Friday, September 18, 2020 11:09 AM

**To:** Kittrell, William <bill.kittrell@dwr.virginia.gov>; Elizabeth B Parcell <ebparcell@aep.com>

**Subject:** Re: [EXTERNAL] Re: Byllesby-Buck Project: Flow and Bypass Reach Aquatic Habitat Study MEETING NOTES

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None from me, either.

---

**From:** Kittrell, William <bill.kittrell@dwr.virginia.gov>  
**Sent:** Friday, September 18, 2020 10:09 AM  
**To:** Elizabeth B Parcell <ebparcell@aep.com>  
**Cc:** Copeland, John <john.copeland@dwr.virginia.gov>; Grist, Joseph <joseph.grist@deq.virginia.gov>; Norman, Janet <janet\_norman@fws.gov>; Brian McGurk <brian.mcgurk@deq.virginia.gov>; Smith, Scott (DGIF) <scott.smith@dwr.virginia.gov>; jennifer\_pica@fws.gov <jennifer\_pica@fws.gov>; Kulpa, Sarah <Sarah.Kulpa@hdrinc.com>; Ziegler, Ty <Ty.Ziegler@hdrinc.com>; Jonathan M Magalski <jmmagalski@aep.com>; Yayac, Maggie <Maggie.Yayac@hdrinc.com>; Frederick A Colburn <facolburn@aep.com>; Dvorak, Joseph (Joseph.Dvorak@hdrinc.com) <Joseph.Dvorak@hdrinc.com>; Huddleston, Misty <Misty.Huddleston@hdrinc.com>  
**Subject:** Re: [EXTERNAL] Re: Byllesby-Buck Project: Flow and Bypass Reach Aquatic Habitat Study MEETING NOTES

Liz, Thanks for providing the summary of the August 28, 2020 conference call on the Byllesby-Buck Bypass Flow and Aquatic Habitat Study. I have no additional comments/concerns at this time. Thanks. Bill.



## William B. Kittrell, Jr.

*Regional Fisheries Manager*

**P** 276.783.4860 / **M** 276.780.0458

**Virginia Department of Wildlife Resources**

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**A** 1796 Highway Sixteen, Marion, VA 24354

[www.dwr.virginia.gov](http://www.dwr.virginia.gov)

On Thu, Sep 10, 2020 at 4:41 PM Elizabeth B Parcell <[ebparcell@aep.com](mailto:ebparcell@aep.com)> wrote:

All,

Attached please find a meeting summary on the Byllesby-Buck Flow Study scenarios discussion held via conference call on August 28, 2020. Please let us know by the end of next week (9/18) if there are any comments.

Many thanks.

Liz



**ELIZABETH B PARCELL | PROCESS SUPV**  
[EBPARCELL@AEP.COM](mailto:EBPARCELL@AEP.COM) | D:540.985.2441 | C:540.529.4191  
40 FRANKLIN ROAD SW, ROANOKE, VA 24011

**From:** Copeland, John <[john.copeland@dwr.virginia.gov](mailto:john.copeland@dwr.virginia.gov)>  
**Sent:** Tuesday, August 25, 2020 1:11 PM  
**To:** Elizabeth B Parcell <[ebparcell@aep.com](mailto:ebparcell@aep.com)>  
**Cc:** Grist, Joseph <[joseph.grist@deq.virginia.gov](mailto:joseph.grist@deq.virginia.gov)>; Norman, Janet <[janet\\_norman@fws.gov](mailto:janet_norman@fws.gov)>; Kulpa, Sarah

<[Sarah.Kulpa@hdrinc.com](mailto:Sarah.Kulpa@hdrinc.com)>; Yayac, Maggie <[Maggie.Yayac@hdrinc.com](mailto:Maggie.Yayac@hdrinc.com)>; Jonathan M Magalski <[jmmagalski@aep.com](mailto:jmmagalski@aep.com)>; Ziegler, Ty <[Ty.Ziegler@hdrinc.com](mailto:Ty.Ziegler@hdrinc.com)>; Brian McGurk <[brian.mcgurk@deq.virginia.gov](mailto:brian.mcgurk@deq.virginia.gov)>; Kittrell, Bill (DGIF) <[bill.kittrell@dwr.virginia.gov](mailto:bill.kittrell@dwr.virginia.gov)>; John Copeland <[john.copeland@dwr.virginia.gov](mailto:john.copeland@dwr.virginia.gov)>; Smith, Scott (DGIF) <[scott.smith@dwr.virginia.gov](mailto:scott.smith@dwr.virginia.gov)>

**Subject:** [EXTERNAL] Re: Byllesby-Buck Project: Flow and Bypass Reach Aquatic Habitat Study

This is an **EXTERNAL** email. **STOP. THINK** before you **CLICK** links or **OPEN** attachments. If suspicious please click the '**Report to Incidents**' button in Outlook or forward to [incidents@aep.com](mailto:incidents@aep.com) from a mobile device.

Thank you for your email communication with this group about your plans to initiate flow release scenario tests for the Byllesby Buck Project starting Monday, August 31. Most of the agency people copied on your email had a conference call regarding this proposal yesterday. I had a brief discussion and email exchange with Joe Grist (Department of Environmental Quality) yesterday and today.

During our conversation yesterday, we concluded that our questions are numerous enough that we simply could work things out much better in a conference call. I have conferred with all the agency parties: Janet Norman (USFWS), Bill Kittrell (DWR), Scott Smith (DWR instream flow expert), as well as Joe Grist (DEQ - who has appointed Brian McGurk to participate) regarding a conference call this Friday afternoon (August 28). All parties are available.

We hereby request a conference call at your convenience on Friday afternoon, August 28.

**FYI - Please note that our agency email extension has changed from DGIF to DWR, effective July 1, 2020. DGIF still works, but we are requesting use of the DWR extension. This email has the corrected email addresses.**

Respectfully submitted,

## John R. Copeland

*Fisheries Biologist III*

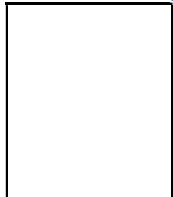
P 540.961.8397 / M 540.871.6064

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[www.dwr.virginia.gov](http://www.dwr.virginia.gov)



On Tue, Aug 18, 2020 at 3:09 PM Elizabeth B Parcell <[ebparcell@aep.com](mailto:ebparcell@aep.com)> wrote:

Good afternoon,

As we discussed in our June 30<sup>th</sup> ILP study update call for Appalachian's Byllesby-Buck Project, HDR has prepared a brief memo describing the flow release range and locations for the upcoming flow tests to be conducted as part of the Flow and Bypass Reach Aquatic Habitat Study. As this fieldwork is presently scheduled to begin as early as August 31, we would greatly appreciate receipt of any questions or comments on the attached by close of business Tuesday, August 25<sup>th</sup>. That will leave us time to schedule a conference call for later next week, if needed to further discuss.

Thank you for your support of this process.

Sincerely,

Liz



**ELIZABETH B PARCELL | PROCESS SUPV**  
[EBPARCELL@AEP.COM](mailto:EBPARCELL@AEP.COM) | D:540.985.2441 | C:540.529.4191  
40 FRANKLIN ROAD SW, ROANOKE, VA 24011

**Yayac, Maggie**

---

**Subject:** FW: [EXTERNAL] Byllesby-Buck Hydroelectric Project (FERC No. 2514) - APE Consultation

**From:** Elizabeth B Parcell <ebparcell@aep.com>

**Sent:** Friday, September 25, 2020 11:24 AM

**To:** Roberts, Timothy <tim.roberts@dhr.virginia.gov>

**Cc:** Kirchen, Roger <roger.kirchen@dhr.virginia.gov>; Jonathan M Magalski <jmmagalski@aep.com>; Kulpa, Sarah <Sarah.Kulpa@hdrinc.com>; Yayac, Maggie <Maggie.Yayac@hdrinc.com>

**Subject:** RE: [EXTERNAL] Byllesby-Buck Hydroelectric Project (FERC No. 2514) - APE Consultation

**CAUTION:** [EXTERNAL] This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Good morning and congratulations on the new job!

The RSP which includes the Cultural Resources Study can be found at [http://www.aephydro.com/Content/documents/2019/ByllesbyBuckProjectPSPFERCNo2514\\_20190621.pdf](http://www.aephydro.com/Content/documents/2019/ByllesbyBuckProjectPSPFERCNo2514_20190621.pdf) (Page 95 of the pdf). Additional information is available at <http://www.aephydro.com/HydroPlant/ByllesbyBuck> or if you have any additional questions, just let us know.

Thanks and please know that we look forward to working with you.

Liz



**ELIZABETH B PARCELL | PROCESS SUPV**  
[EBPARCELL@AEP.COM](mailto:EBPARCELL@AEP.COM) | D:540.985.2441 | C:540.529.4191  
40 FRANKLIN ROAD SW, ROANOKE, VA 24011

**From:** Roberts, Timothy <tim.roberts@dhr.virginia.gov>

**Sent:** Wednesday, September 23, 2020 11:00 AM

**To:** Elizabeth B Parcell <ebparcell@aep.com>

**Cc:** Kirchen, Roger <roger.kirchen@dhr.virginia.gov>

**Subject:** [EXTERNAL] Byllesby-Buck Hydroelectric Project (FERC No. 2514) - APE Consultation

This is an **EXTERNAL** email. **STOP. THINK** before you **CLICK** links or **OPEN** attachments. If suspicious please click the '**Report to Incidents**' button in Outlook or forward to [incidents@aep.com](mailto:incidents@aep.com) from a mobile device.

Good morning Ms. Parcell,

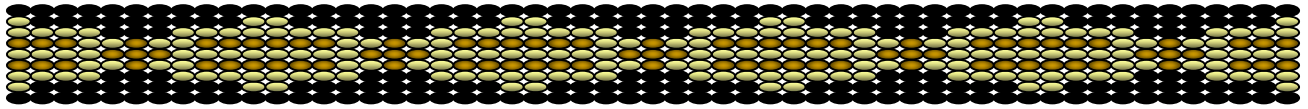
Thank you for initiating consultation with DHR on the proposed project referenced in the subject of this email. I have recently joined VDHR's Review and Compliance Division and have been assigned your request for concurrence regarding the proposed project APE, received by our office on 9/11/2020.

To assist with the review, will you please share with me the Revised Study Plan (RSP) including the proposed Cultural Resource Study document(s) you reference in your request?

Best regards,

*Timothy Roberts, Archaeologist  
Review and Compliance Division  
Department of Historic Resources  
2801 Kensington Avenue  
Richmond, VA 23221  
(804) 482-6103  
[www.dhr.virginia.gov](http://www.dhr.virginia.gov)*





Catawba Indian Nation  
Tribal Historic Preservation Office  
1536 Tom Steven Road  
Rock Hill, South Carolina 29730

Office 803-328-2427  
Fax 803-328-5791

September 28, 2020

Attention: Elizabeth Parcell  
Appalachian Power Company  
P.O. Box 2021  
Roanoke, VA 24022

Re. THPO #	TCNS #	Project Description
2020-1169-1		Byllesby-Buck Hydroelectric Project (FERC No. 2514)

Dear Ms. Parcell,

The Catawba have no immediate concerns with regard to traditional cultural properties, sacred sites or Native American archaeological sites within the boundaries of the proposed project areas. **However, the Catawba are to be notified if Native American artifacts and / or human remains are located during the ground disturbance phase of this project.**

If you have questions please contact Caitlin Rogers at 803-328-2427 ext. 226, or e-mail [Caitlin.Rogers@catawba.com](mailto:Caitlin.Rogers@catawba.com).

Sincerely,

Wenonah G. Haire  
Tribal Historic Preservation Officer



# COMMONWEALTH of VIRGINIA

Matt Strickler  
*Secretary of Natural Resources*

**Department of Historic Resources**  
2801 Kensington Avenue, Richmond, Virginia 23221

Julie V. Langan  
*Director*

Tel: (804) 367-2323  
Fax: (804) 367-2391  
[www.dhr.virginia.gov](http://www.dhr.virginia.gov)

October 2, 2020

Ms. Elizabeth B. Parcell  
American Electric Power Services Corporation  
40 Franklin Road SW  
Roanoke, Virginia 24011

Re: Byllesby-Buck Hydroelectric Project (FERC No. 2514)  
Carroll County, VA  
DHR File No. 2020 - 0436

Dear Ms. Parcell:

The Department of Historic Resources (DHR) has received your request for review of a proposed area of potential effects (APE) for the 30.1-megawatt Byllesby-Buck Hydroelectric Project (Project) located on the New River in Carroll County, Virginia, pursuant to 36 Code of Federal Regulations (CFR) Part 800, Section 106 of the National Historic Preservation Act of 1966, as amended. Appalachian Power Company (Appalachian), a unit of American Electric Power (AEP), is the Licensee, owner, and operator of the project. Appalachian is pursuing a new license for the Project pursuant to the Federal Energy Regulatory Commission's (FERC) Integrated Licensing Process, as described in 18 CFR Part 5. The existing FERC license took effect on March 28, 2020 and will expire February 29, 2024.

As described in your letter received by our office on September 11, 2020

Appalachian preliminarily proposed to define the Study Area/APE to include lands within the FERC-approved Project boundary, and lands outside of the Project boundary where Project operations, Project-related recreation activities or other enhancements, and routine maintenance activities associated with implementation of the license by the Commission could cause changes in the character or use of historic properties, if any such properties exist...

If the results of consultation or studies conducted in support of relicensing indicate that the Project is having a potential effect on lands outside the APE, or if Appalachian proposes to undertake Project-related activities outside of the proposed APE, Appalachian will consult with the parties on the attached Section 106 Consultation Distribution List to refine the geographic extent of the APE and will provide FERC with consultation documentation.

Western Region Office  
962 Kime Lane  
Salem, VA 24153  
Tel: (540) 387-5443  
Fax: (540) 387-5446

Northern Region Office  
5357 Main Street  
PO Box 519  
Stephens City, VA 22655  
Tel: (540) 868-7029  
Fax: (540) 868-7033

Eastern Region Office  
2801 Kensington Avenue  
Richmond, VA 23221  
Tel: (804) 367-2323  
Fax: (804) 367-2391

Based on these statements and our review of the information provided, DHR concurs with the proposed definition of the APE.

Thank you for contacting our office and we look forward to continuing consultation regarding this project. If you have any questions regarding these comments, please do not hesitate to contact me at 804-482-6103 or email [Tim.Roberts@dhr.virginia.gov](mailto:Tim.Roberts@dhr.virginia.gov).

Sincerely,



Timothy Roberts, Archaeologist  
Review and Compliance Division

## Yayac, Maggie

---

**Subject:** FW: AEP Byllesby-Buck Relicensing: Recreation Study Update and Planning for Facilities Site Visit

**From:** Elizabeth B Parcell <ebparcell@aep.com>

**Sent:** Friday, October 2, 2020 2:51 PM

**To:** joseph.grist@deq.virginia.gov; sharon.ewing@dcr.virginia.gov; claytorlakegirl@gmail.com; janet\_norman@fws.gov; rex.hill@carrollcountyva.gov; james.elliott@dcr.virginia.gov; Bill.Kittrell@dgif.virginia.gov; John.Copeland@dgif.virginia.gov; SAM.SWEENEY@DCR.VIRGINIA.GOV

**Cc:** Jonathan M Magalski <jmmagalski@aep.com>; Yayac, Maggie <Maggie.Yayac@hdrinc.com>; Kulpa, Sarah <Sarah.Kulpa@hdrinc.com>

**Subject:** AEP Byllesby-Buck Relicensing: Recreation Study Update and Planning for Facilities Site Visit

**CAUTION:** [EXTERNAL] This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Happy October!

As you may recall from this past spring, the recreational site visit planned under the Byllesby-Buck Project's Revised Study Plan had to be rescheduled due to COVID-19 travel restrictions. Appalachian Power Company would still like to convene a 2020 site visit with interested relicensing participants to discuss existing and potential recreation facilities and enhancements at the Project.

Prior to meeting at the site, we would like to convene a conference call (Webex) with this group. We can use the call to coordinate logistics and safety planning for the site visit, and we will also plan to provide a Recreation Study update, including preliminary trail camera and online survey results. We are looking to block out 2 hours on folks' calendars for this meeting. Please let me know if you have availability at 9-11 a.m. or 2-4 p.m. **Wednesday, October 21<sup>st</sup>** for this call; if this day doesn't work for most we'll find an alternative time.

The site visit will allow time to visit each recreation facility. We propose to begin the day at the VDGIF Boat Launch on river-right at 9 a.m. We will continue to the Byllesby dam and work our way towards the Buck dam to view all six recreation facilities. We are presently targeting **Wednesday, October 28<sup>th</sup>** to complete the site visit, weather permitting. Please let me know at your earliest convenience if you are interested in/available to participate or have any questions, or if you would like to suggest additional potential participants.

Please don't hesitate to contact me with any questions or concerns, and thanks in advance for your participation in this process.

Liz



**ELIZABETH B PARCELL | PROCESS SUPV**  
[EBPARCELL@AEP.COM](mailto:EBPARCELL@AEP.COM) | D:540.985.2441 | C:540.529.4191  
40 FRANKLIN ROAD SW, ROANOKE, VA 24011



## PAMUNKEY INDIAN TRIBE

Terry Clouthier  
Cultural Resource  
Director

TRIBAL GOVERNMENT  
*Tribal Office*

1054 Pocahontas Trail  
King William, VA 23086

(804) 843-2109  
FAX (866) 422-3387

THPO File Number: 2021-21

Date: 10/05/2020

Elizabeth Parcell  
Process Supervisor  
Appalachian Power  
American Electric Power Services Corporation  
PO Box 2021  
Roanoke, VA 24022

**RE: (FERC No. 2514) Byllesby-Buck Hydroelectric Project, Caroline County, Virginia**

Dear Ms. Parcell,

Thank you for contacting the Pamunkey Indian Tribe regarding the proposed undertaking related to reissuing the license for Byllesby-Buck Hydroelectric Project, Caroline County, Virginia. My office offers the following comments.

My office agrees with the delineated area of potential effect (APE) to address cultural and historic properties.

My office looks forward to reviewing these cultural studies once they are completed.

Thank you for considering our cultural heritage in your decision-making process.

Please submit all correspondence via email whenever possible to the email below.

If you have any questions feel free to email me at [terry.clouthier@pamunkey.org](mailto:terry.clouthier@pamunkey.org).

Sincerely,

## Yayac, Maggie

---

**Subject:** FW: New River Update

**From:** Brian Watson <brian.watson@dwr.virginia.gov>

**Sent:** Thursday, October 8, 2020 11:01 AM

**To:** Fleece, Cody <cody.fleece@stantec.com>; Brian Watson <brian.watson@dgif.virginia.gov>

**Cc:** Kulpa, Sarah <Sarah.Kulpa@hdrinc.com>; Huddleston, Misty <Misty.Huddleston@hdrinc.com>; Symonds, Daniel <Daniel.Symonds@stantec.com>; Elizabeth B Parcell <ebparcell@aep.com>; Yayac, Maggie <Maggie.Yayac@hdrinc.com>

**Subject:** RE: New River Update

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Cody,

I can see the notes now that I am back at my computer and not viewing the PDF thru my phone. Since two of the areas include shoal habitat, DWR does recommend surveying the 3 areas that were not surveyed in September due to rain and poor river conditions. Despite a low number of mussels being founds so far, DWR would prefer to see those areas surveyed to get a more complete assessment. If you have any questions, let me know. And if you need any assistance, let me know when you guys do the surveys as I may be able to make it out.

Brian



### Brian T. Watson

*Aquatic Resources Biologist/State Malacologist*

**P** 434.525.7522, x114 / **M** 434.941.5990 / **F** 434.525.7720

---

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**From:** Fleece, Cody <[Cody.Fleece@stantec.com](mailto:Cody.Fleece@stantec.com)>

**Sent:** Tuesday, September 29, 2020 1:05 PM

**To:** Brian Watson <[brian.watson@dgif.virginia.gov](mailto:brian.watson@dgif.virginia.gov)>

**Cc:** Kulpa, Sarah <[Sarah.Kulpa@hdrinc.com](mailto:Sarah.Kulpa@hdrinc.com)>; Huddleston, Misty <[Misty.Huddleston@hdrinc.com](mailto:Misty.Huddleston@hdrinc.com)>; Symonds, Daniel <[Daniel.Symonds@stantec.com](mailto:Daniel.Symonds@stantec.com)>; Elizabeth B Parcell <[ebparcell@aep.com](mailto:ebparcell@aep.com)>; Yayac, Maggie

<[Maggie.Yayac@hdrinc.com](mailto:Maggie.Yayac@hdrinc.com)>

**Subject:** FW: New River Update

Brian

As discussed on the phone we were able to complete surveys in 8 of the 11 planned areas. Heavy rainfall and reduced visibility caused us to abandon the last day of survey (we completed 3 of 4). I attached a map with notes of what we found and how much time was spent searching. Dan Symond's initial survey summary is also presented below.

Based on what we're finding so far we have been wondering about the necessity of re-mobilizing to assess the 3 missing areas. Let us know if you think we need to get back out to finish the work or if the information in hand will suffice to inform decisions in the relicensing process.

Thanks for your time and attention.

Cody

---

**From:** Symonds, Daniel <[Daniel.Symonds@stantec.com](mailto:Daniel.Symonds@stantec.com)>

**Sent:** Monday, September 28, 2020 11:09 AM

**To:** Fleece, Cody <[Cody.Fleece@stantec.com](mailto:Cody.Fleece@stantec.com)>

**Subject:** New River Update

We completed 8 of the 11 target areas on the New River (That's including the Buck Tailrace). We have surveyed at least one area of each type (shallow/deep shoal, pool, side channel). Six of the areas yielded zero mussels, and zero shells. Habitat varied from very poor (80-100% drifting sand) to very good (gravel/sand/cobble riffles) in the areas with no evidence of mussels.

Two live and one shell *C. tuberculata* were found in the most downstream shallow shoal. They were found in the flow refuge behind boulders, where sand/gravel accumulates in small amounts.

Six live *C. tuberculata* were found in the middle deep shoal. Similar story to the shallow shoal, the mussels were found in the silt that accumulated behind larger cobble/boulders.

To summarize, 25.3 people-hours of searching has occurred, with a catch-per-unit-effort of 0.35 mussels/hr and species diversity of one.

**Daniel Symonds**

Aquatic Ecologist

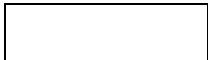
Direct: (614) 282-3215

[Daniel.Symonds@stantec.com](mailto:Daniel.Symonds@stantec.com)

Stantec

1500 Lake Shore Drive Suite 100

Columbus OH 43204-3800



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## Yayac, Maggie

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**Subject:** FW: Notification of Collection of State Threatened Pistolgrip Mussel on AEP Byllesby-Buck project  
**Attachments:** pistolgrips.jpg

**From:** David Foltz [mailto:dafoltz@edge-es.com]

**Sent:** Thursday, October 8, 2020 11:30 PM

**To:** Brian Watson <brian.watson@dwr.virginia.gov>; john\_mccloskey@fws.gov; richard\_mccorkle@fws.gov; janet\_norman@fws.gov; collectionpermits@dgif.virginia.gov; scott.smith@dgif.virginia.gov

**Cc:** John Spaeth <jpspaeth@edge-es.com>; Jon Studio <jastudio@edge-es.com>; Casey Swecker <cdswecker@edge-es.com>; Huddleston, Misty <Misty.Huddleston@hdrinc.com>; Kay, Jenessa <Jenessa.Kay@hdrinc.com>

**Subject:** Notification of Collection of State Threatened Pistolgrip Mussel on AEP Byllesby-Buck project

**CAUTION:** [EXTERNAL] This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

All, Edge and HDR employees conducted benthic macroinvertebrate surveys approximately 1.35 kilometers downstream from the Buck Dam as part of the relicensing project today on 10/8/2020. During the survey efforts multiple freshwater mussels were discovered in the substrates sampled, including Virginia state listed Pistolgrip (*Tritogonia verrucosa*). Mussels were removed from the water briefly for photographic voucher (please see attachment) before being placed back in the substrates.

Please let us know if you need any further information on the animals or site.

Thank you.

**DAVID A. FOLTZ II**

Project Manager/ Senior Malacologist/ Astacologist

Weirton, West Virginia

D: 304.479.3268

[edge-es.com](http://edge-es.com)





## Yayac, Maggie

---

**Subject:** FW: [EXTERNAL] Notification of Collection of State Threatened Pistolgrip Mussel on AEP Byllesby-Buck project

**Attachments:** downstream.jpg; left descending bank.jpg; right descending bank.jpg; substrate.jpg; upstream.jpg

**From:** David Foltz [mailto:dafoltz@edge-es.com]

**Sent:** Friday, October 16, 2020 4:43 PM

**To:** Norman, Janet <janet\_norman@fws.gov>; Watson, Brian (DGIF) <brian.watson@dgif.virginia.gov>; McCloskey, John <john\_mccloskey@fws.gov>; McCorkle, Richard <richard\_mccorkle@fws.gov>; collectionpermits@dgif.virginia.gov; scott.smith@dgif.virginia.gov

**Cc:** John Spaeth <jpspaeth@edge-es.com>; Jon Studio <jastudio@edge-es.com>; Casey Swecker <cdswecker@edge-es.com>; Huddleston, Misty <Misty.Huddleston@hdrinc.com>; Kay, Jenessa <Jenessa.Kay@hdrinc.com>

**Subject:** RE: [EXTERNAL] Notification of Collection of State Threatened Pistolgrip Mussel on AEP Byllesby-Buck project

**CAUTION:** [EXTERNAL] This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Janet, I've compiled an email for you with the items you requested. The site is located between coordinates (36.818297, -80.947929) and (36.816966, -80.947355) as these were the downstream and upstream limits of our benthic sampling area. The site is beyond the confluence of the bypass area and the mixing zone, and located near sample sites identified in the RSP as Buck Downstream 1 and Buck Downstream 2. The area is characterized by bands of uplifted bedrock that span the river forming shoals that range from 1-2' deep. In between these bands are a mix of sand, gravel, and cobble substrates with occasional boulders and pieces of bedrock jutting up. The bedrock, boulders, and cobble have attached fiber-like vegetation that grows in clumps. Flow is light but steady ranging from 0.1 to 0.3 meters per second. Mussels were fairly easy to see as the velocities of the New River tend to wear on the mussels around the umbo, leaving areas of white nacre that is easily noticed in the clear water. Mussel densities were not what I would call bed-level, but they were fairly common although patchy. Some areas would have 0 mussels per square meter while others would have 2-3. This was only 5-20 feet off of the right descending bank. We did not look mid-channel. Purple Wartybacks (*Cyclonaias tuberculata*) were the most abundant live mussel followed by Pistolgrips (*Tritogonia verrucosa*). Additionally, we found three additional species represented through deadshell including fresh-dead Spike (*Eurynia dilitata*) and some very weathered-dead Mucket (*Actinonaias ligamentina*) and Pocketbook (*Lampsilis ovata*). All of these species, except the Mucket, have previously been collected nearby at sample sites identified in the RSP as Buck Downstream 1 and Buck Downstream 2 (Pinder et al. 2002, Alderman 2008, Stantec 2015, 2016, 2017).

A detailed summary of findings will be presented in the benthics report.

I've taken the liberty of attaching our photos for the site. You'll have to excuse the lighting as they were taken early in the morning. They should help give you an idea of the general area and habitat.

If you have any other questions or comments, please feel free to reach out to me and I'll do what I can to be of assistance.

### DAVID A. FOLTZ II

Project Manager/ Senior Malacologist/ Astacologist

Weirton, West Virginia

D: 304.479.3268

edge-es.com



---

**From:** Norman, Janet <janet\_norman@fws.gov>  
**Sent:** Sunday, October 11, 2020 10:15 PM  
**To:** David Foltz <dafoltz@edge-es.com>; Watson, Brian (DGIF) <brian.watson@dgif.virginia.gov>; McCloskey, John <john\_mccloskey@fws.gov>; McCorkle, Richard <richard\_mccorkle@fws.gov>; collectionpermits@dgif.virginia.gov; scott.smith@dgif.virginia.gov  
**Cc:** John Spaeth <jpspaeth@edge-es.com>; Jon Studio <jastudio@edge-es.com>; Casey Swecker <cdswecker@edge-es.com>; Huddleston, Misty <Misty.Huddleston@hdrinc.com>; Kay, Jenessa <Jenessa.Kay@hdrinc.com>  
**Subject:** Re: [EXTERNAL] Notification of Collection of State Threatened Pistolgrip Mussel on AEP Byllesby-Buck project

Hi David,

Thank you very much for this notification about the discovery of Pistolgrip mussels in your sampling below Buck Dam. I would very much like to see an exact location map of this finding and a description of the habitat. Your distance indicated places that mussel location not far from the end of the bypass reach and into the confluence area? I'd like to know exactly what flow and water quality conditions that mussel bed is experiencing from the various input sources.

Thanks for helping me understand with any data you can share.  
Janet

Janet Norman  
Fish and Wildlife Biologist  
USFWS Chesapeake Bay Field Office  
177 Admiral Cochrane Dr.  
Annapolis, MD 21401  
(O) 410-573-4533  
(Fax) 410-269-0832  
(cell) 410-320-5519

---

**From:** David Foltz <[dafoltz@edge-es.com](mailto:dafoltz@edge-es.com)>  
**Sent:** Thursday, October 8, 2020 11:30 PM  
**To:** Watson, Brian (DGIF) <[brian.watson@dgif.virginia.gov](mailto:brian.watson@dgif.virginia.gov)>; McCloskey, John <[john\\_mccloskey@fws.gov](mailto:john_mccloskey@fws.gov)>; McCorkle, Richard <[richard\\_mccorkle@fws.gov](mailto:richard_mccorkle@fws.gov)>; Norman, Janet <[janet\\_norman@fws.gov](mailto:janet_norman@fws.gov)>; [collectionpermits@dgif.virginia.gov](mailto:collectionpermits@dgif.virginia.gov) <[collectionpermits@dgif.virginia.gov](mailto:collectionpermits@dgif.virginia.gov)>; [scott.smith@dgif.virginia.gov](mailto:scott.smith@dgif.virginia.gov) <[scott.smith@dgif.virginia.gov](mailto:scott.smith@dgif.virginia.gov)>  
**Cc:** John Spaeth <[jpspaeth@edge-es.com](mailto:jpspaeth@edge-es.com)>; Jon Studio <[jastudio@edge-es.com](mailto:jastudio@edge-es.com)>; Casey Swecker <[cdswecker@edge-es.com](mailto:cdswecker@edge-es.com)>; Huddleston, Misty <[Misty.Huddleston@hdrinc.com](mailto:Misty.Huddleston@hdrinc.com)>; Kay, Jenessa <[Jenessa.Kay@hdrinc.com](mailto:Jenessa.Kay@hdrinc.com)>  
**Subject:** [EXTERNAL] Notification of Collection of State Threatened Pistolgrip Mussel on AEP Byllesby-Buck project

This email has been received from outside of DOI - Use caution before clicking on links, opening attachments, or responding.

All, Edge and HDR employees conducted benthic macroinvertebrate surveys approximately 1.35 kilometers downstream from the Buck Dam as part of the relicensing project today on 10/8/2020. During the survey efforts multiple freshwater mussels were discovered in the substrates sampled, including Virginia state listed Pistolgrip (*Tritogonia verrucosa*). Mussels were removed from the water briefly for photographic voucher (please see attachment) before being placed back in the substrates.

Please let us know if you need any further information on the animals or site.

Thank you.

**DAVID A. FOLTZ II**

Project Manager/ Senior Malacologist/ Astacologist

Weirton, West Virginia

D: 304.479.3268

[edge-es.com](http://edge-es.com)



## Yayac, Maggie

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**Subject:** FW: [EXTERNAL] Re: AEP Byllesby-Buck Relicensing: Recreation Study Update and Planning for Facilities Site Visit

**From:** Kulpa, Sarah <Sarah.Kulpa@hdrinc.com>

**Sent:** Tuesday, October 20, 2020 11:41 AM

**To:** John Copeland <john.copeland@dwr.virginia.gov>; Elizabeth B Parcell <ebparcell@aep.com>

**Cc:** William Kittrell <bill.kittrell@dwr.virginia.gov>; Jonathan M Magalski <jmmagalski@aep.com>; Yayac, Maggie <Maggie.Yayac@hdrinc.com>

**Subject:** RE: [EXTERNAL] Re: AEP Byllesby-Buck Relicensing: Recreation Study Update and Planning for Facilities Site Visit

Hi John,

Thanks for your efforts to connect these additional stakeholders with this relicensing process. We (AEP and HDR) had a chance to catch up and compare past stakeholder notes today and here's where we landed:

- (1) Wythe County was not originally included on the FERC mailing list since the Project Boundary is not within that County. We can add a Wythe County contact (supervisor?) if you have a suggested point of contact.
  - a. On a somewhat related note, we have added Dr. Beth Taylor (Mayor of the Town of Wytheville) at her request, and she will receive email correspondence moving forward.
- (2) Rex Hill/Carroll County is in our contact database/ mailing list and Rex did receive the invitation to the call this Wednesday and next week's site visit. We have not yet received a response from Rex. We will send a follow-up note regarding next week's site visit after the call tomorrow. We will also send Rex a follow-up note today to confirm he received the invitation to tomorrow's call.
- (3) Re: your conversation with/questions about David Taylor's and Angie Grooms' participation – we are definitely interested in hearing from stakeholders/neighbors throughout the relicensing process, and we can add contacts upon their request to the formal mailing/email list to receive future communications regarding study progress and meetings (including the upcoming Initial Study Results meeting in late January). Stakeholders can also provide comments via email or letter to AEP's PM (Liz Parcell) at any point in this process, and are encouraged to complete the online recreation survey. We would, however, like to keep this week's meeting and next week's site visit to as focused a group as possible (i.e., agency and local organization contacts who represent larger stakeholder groups), because we have a lot of ground to cover and also to keep our numbers small for alignment with COVID precautions for AEP and HDR personnel. Of course you're more than welcome to canvas the individuals to identify any concerns or suggestions and share them during the upcoming meetings.

Please let us know if there's anything else and we look forward to speaking with you tomorrow morning. Thanks again for your support of this process.

**Sarah Kulpa**

**D** 704.248.3620 **M** 315.415.8703

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**From:** John Copeland <john.copeland@dwr.virginia.gov>

**Sent:** Tuesday, October 20, 2020 8:48 AM

**To:** Elizabeth B Parcell <ebparcell@aep.com>

**Cc:** William Kittrell <bill.kittrell@dwr.virginia.gov>; Jonathan M Magalski <jmmagalski@aep.com>; Kulpa, Sarah <Sarah.Kulpa@hdrinc.com>; Yayac, Maggie <Maggie.Yayac@hdrinc.com>; Copeland, John

<john.copeland@dwr.virginia.gov>

**Subject:** RE: [EXTERNAL] Re: AEP Byllesby-Buck Relicensing: Recreation Study Update and Planning for Facilities Site Visit

**CAUTION:** [EXTERNAL] This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Two citizens (landowners downstream from Buck Dam) have asked me about being involved in the Recreation meetings, both tomorrow and next Wednesday.

**I'm asking if they can be sent the email invitations.**

Both of them have residences on Van Lue Road, Austinville, VA

David Taylor – [jkfloat@embarqmail.com](mailto:jkfloat@embarqmail.com)

Angie Grooms - [angie.grooms750@gmail.com](mailto:angie.grooms750@gmail.com)

I also saw that Rex Hill was not on the invitation list. He is Chairman of the Carroll County Board of Supervisors. [rex.hill@carrollcountyva.gov](mailto:rex.hill@carrollcountyva.gov) .

---

**From:** John Copeland <[john.copeland@dwr.virginia.gov](mailto:john.copeland@dwr.virginia.gov)>

**Sent:** Thursday, October 15, 2020 12:25 PM

**To:** Elizabeth B Parcell <[ebparcell@aep.com](mailto:ebparcell@aep.com)>

**Cc:** William Kittrell <[bill.kittrell@dwr.virginia.gov](mailto:bill.kittrell@dwr.virginia.gov)>; Jonathan M Magalski <[jmmagalski@aep.com](mailto:jmmagalski@aep.com)>; Kulpa, Sarah <[Sarah.Kulpa@hdrinc.com](mailto:Sarah.Kulpa@hdrinc.com)>; Yayac, Maggie <[Maggie.Yayac@hdrinc.com](mailto:Maggie.Yayac@hdrinc.com)>; Copeland, John <[john.copeland@dwr.virginia.gov](mailto:john.copeland@dwr.virginia.gov)>

**Subject:** RE: [EXTERNAL] Re: AEP Byllesby-Buck Relicensing: Recreation Study Update and Planning for Facilities Site Visit

I just fielded a phone call from a downstream landowner near Buck Dam that is working with a group of citizens in the area with a high interest level in the relicensing, but they have not had good information about how to be involved. Is it possible that this landowner can attend the October 21 and 28 meetings to express his interest and get involved in the process? His name is David Taylor. He lives at 977 Van Lue Road, Austinville, which is located less than 2 river miles from the Buck Dam tailrace on the same side of the river. This landowner is in Wythe County. He advised me that Wythe County has not been informed about the relicensing process as well.

I also noticed that a previous meeting attendee at the FERC Scoping was not included in these emails. His name is Rex Hill. He is Chairman of the Carroll County Board of Supervisors. Carroll County has a vested interest in the recreational aspects of this project. I would think Rex Hill would appreciate being invited as well.

Please advise whether these meetings are intended solely for agency people or can be opened up to a broader audience.

---

**From:** Elizabeth B Parcell <[ebparcell@aep.com](mailto:ebparcell@aep.com)>

**Sent:** Saturday, October 3, 2020 8:25 AM

**To:** Copeland, John <[john.copeland@dwr.virginia.gov](mailto:john.copeland@dwr.virginia.gov)>

**Cc:** Kittrell, Bill (DGIF) <[bill.kittrell@dwr.virginia.gov](mailto:bill.kittrell@dwr.virginia.gov)>; David Keene <[david.keene@dwr.virginia.gov](mailto:david.keene@dwr.virginia.gov)>; Hampton, Tom (DGIF) <[tom.hampton@dwr.virginia.gov](mailto:tom.hampton@dwr.virginia.gov)>; Jonathan M Magalski <[jmmagalski@aep.com](mailto:jmmagalski@aep.com)>; Kulpa, Sarah <[Sarah.Kulpa@hdrinc.com](mailto:Sarah.Kulpa@hdrinc.com)>; Yayac, Maggie <[Maggie.Yayac@hdrinc.com](mailto:Maggie.Yayac@hdrinc.com)>

**Subject:** RE: [EXTERNAL] Re: AEP Byllesby-Buck Relicensing: Recreation Study Update and Planning for Facilities Site Visit

Thank you John for the quick response and the email addresses. We'll be sure to include Tom and Sgt Keene.

Have a great weekend!

Liz

540-529-4191

**From:** Copeland, John <[john.copeland@dwr.virginia.gov](mailto:john.copeland@dwr.virginia.gov)>

**Sent:** Saturday, October 3, 2020 5:12 AM

**To:** Elizabeth B Parcell <[ebparcell@aep.com](mailto:ebparcell@aep.com)>

**Cc:** Kittrell, Bill (DGIF) <[bill.kittrell@dwr.virginia.gov](mailto:bill.kittrell@dwr.virginia.gov)>; David Keene <[david.keene@dwr.virginia.gov](mailto:david.keene@dwr.virginia.gov)>; Hampton, Tom (DGIF) <[tom.hampton@dwr.virginia.gov](mailto:tom.hampton@dwr.virginia.gov)>; John Copeland <[john.copeland@dwr.virginia.gov](mailto:john.copeland@dwr.virginia.gov)>

**Subject:** [EXTERNAL] Re: AEP Byllesby-Buck Relicensing: Recreation Study Update and Planning for Facilities Site Visit

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I forgot to mention additional parties you should invite to participate.

Please also notify Tom Hampton, our Regional Lands and Facilities Manager, and Sgt. Adam Keene, District Law Enforcement supervisor. Tom Hampton can either attend or designate Toby McClanahan, our Regional Boat Access person, to attend. Sgt. Keene can either attend or designate a local conservation police officer to attend.

I copied Tom Hampton and Sgt. Keene here.

## John R. Copeland

*Fisheries Biologist III*

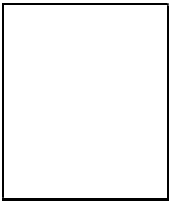
**P** 540.961.8397 / **M** 540.871.6064

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**A** 2206 South Main Street, Suite C, Blacksburg, VA 24060

[www.dwr.virginia.gov](http://www.dwr.virginia.gov)



On Sat, Oct 3, 2020 at 5:05 AM Copeland, John <[john.copeland@dwr.virginia.gov](mailto:john.copeland@dwr.virginia.gov)> wrote:

Liz:

Both of the times on October 21 work for me, as well as a site visit on October 28. Thanks for getting this one in before November!

# John R. Copeland

*Fisheries Biologist III*

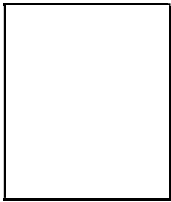
P 540.961.8397 / M 540.871.6064

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On Fri, Oct 2, 2020 at 2:50 PM Elizabeth B Parcell <[ebparcell@aep.com](mailto:ebparcell@aep.com)> wrote:

Happy October!

As you may recall from this past spring, the recreational site visit planned under the Byllesby-Buck Project's Revised Study Plan had to be rescheduled due to COVID-19 travel restrictions. Appalachian Power Company would still like to convene a 2020 site visit with interested relicensing participants to discuss existing and potential recreation facilities and enhancements at the Project.

Prior to meeting at the site, we would like to convene a conference call (Webex) with this group. We can use the call to coordinate logistics and safety planning for the site visit, and we will also plan to provide a Recreation Study update, including preliminary trail camera and online survey results. We are looking to block out 2 hours on folks' calendars for this meeting. Please let me know if you have availability at 9-11 a.m. or 2-4 p.m. **Wednesday, October 21<sup>st</sup>** for this call; if this day doesn't work for most we'll find an alternative time.

The site visit will allow time to visit each recreation facility. We propose to begin the day at the VDGIF Boat Launch on river-right at 9 a.m. We will continue to the Byllesby dam and work our way towards the Buck dam to view all six recreation facilities. We are presently targeting **Wednesday, October 28<sup>th</sup>** to complete the site visit, weather permitting. Please let me know at your earliest convenience if you are interested in/available to participate or have any questions, or if you would like to suggest additional potential participants.

Please don't hesitate to contact me with any questions or concerns, and thanks in advance for your participation in this process.

Liz



**ELIZABETH B PARCELL | PROCESS SUPV**  
[EBPARCELL@AEP.COM](mailto:EBPARCELL@AEP.COM) | D:540.985.2441 | C:540.529.4191  
40 FRANKLIN ROAD SW, ROANOKE, VA 24011



## Yayac, Maggie

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**Subject:** FW: Byllesby-Buck Recreation Study Update - Meeting Notes and Presentation  
**Attachments:** AEP Byllesby-Buck Recreation Stakeholder Virtual Mtg\_10212020.docx; AEP Recreation Stakeholder Presentation.pdf

**From:** Yayac, Maggie

**Sent:** Friday, October 23, 2020 12:35 PM

**To:** ben.boyette@dwr.virginia.gov; Kittrell, Bill (DGIF <bill.kittrell@dwr.virginia.gov>); Hampton, Tom (DGIF <tom.hampton@dwr.virginia.gov>); John Copeland <john.copeland@dwr.virginia.gov>; sam.sweeney@dcr.virginia.gov; joseph.grist@deq.virginia.gov; claytorlakegirl@gmail.com; janet\_norman@fws.gov; rex.hill@carrollcountyyva.gov; james.elliott@dcr.virginia.gov

**Cc:** David Keene <david.keene@dwr.virginia.gov>; sharon.ewing@dcr.virginia.gov; Kulpa, Sarah <sarah.kulpa@hdrinc.com>; Elizabeth B Parcell <ebparcell@aep.com>; Jonathan M Magalski <jmmagalski@aep.com>; Tristan Cleveland <tristan@lpda.net>

**Subject:** Byllesby-Buck Recreation Study Update - Meeting Notes and Presentation

Good afternoon,

Thank you to those of you who joined us on the conference call on Wednesday. Attached are the meeting notes from the call, please let us know if you have any comments. Additionally, the presentation is included as an attachment for those of you who were unable to make it.

We look forward to seeing some of you next Wednesday, October 28<sup>th</sup> for the site visit. If you have not RSVP'd to the meeting invitation please do so at your earliest convenience.

Have a great weekend!

**Maggie Yayac**

*Regulatory Specialist*

**HDR**

440 South Church Street, Suite 900

Charlotte, NC 28202

**D** 704.248.3666 **M** 610.299.0959

Maggie.Yayac@hdrinc.com

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# Meeting Summary

Project: Byllesby-Buck Hydroelectric Project (FERC No. 2514) - Relicensing

Subject: Byllesby-Buck Recreation Study Update and Site Visit Planning

Date: Wednesday, October 21, 2020

Location: WebEx

Attendees: Laura Walters (New River Conservancy)      Jon Magalski (AEP)  
Janet Norman (USFWS)      Liz Parcell (AEP)  
Bill Kittrell (VDWR)      Tristan Cleveland (LPDA)  
Ben Boyette (VDWR)      Sarah Kulpa (HDR)  
Tom Hampton (VDWR)      Maggie Yayac (HDR)  
John Copeland (VDWR)  
Sam Sweeney (New River Trail State Park)  
Joe Grist (VDEQ)

- **Introductions/welcome/meeting purpose**
- **Recreation Study Plan** – Maggie (HDR) provided overview of the Recreation Study Plan as described in the Revised Study Plan (Tasks 1 through 4).

Throughout the meeting general questions about the Recreation Study methods were discussed and are summarized below:

- **Quantifying recreational use:** Discussion of the relationship between number of respondents and number of users. Appalachian/HDR are unable to develop any statistical relationship to compare to similar comparable studies, but there does appear to be a relationship and themes that have emerged (i.e., Byllesby Boat Ramp had highest number of visitors and survey respondents).
- **Online Survey:** The Online Survey was advertised primarily via signage at the Project recreation facilities (QR Code not included; only full link). This is a potential limitation of this study, though Appalachian/HDR expect that sufficient input was captured from motivated visitors and visitors who frequent the area. Demographic information about survey respondents (age and gender) was collected in the Online Survey and will include additional information in the study report.
- **Trail cameras:** Trail cameras provide better information than the online survey about the number of users during representative periods. The number of photos is related to the how often a site is visited, but not a direct indication of how many people visited (because multiple images may be captured of the same user or other motions can activate the camera). The intent of the study was not to inventory and count recreation users over a continuous period, but rather to characterize usage levels, identify recreation patterns, and develop estimates for representative periods. Maggie (HDR) explained that the trail cameras are motion activated and set to record a next motion after 5 minutes (default setting). The cameras are

not recording every 5 minutes if no motion is detected. Data was from trail cameras collected from November 2019 through present, unless otherwise noted as there are minor data gaps at specific locations due to issues with individual trail cameras. The methodology, data gaps, and results will be presented in the study report.

- **Review of Recreation Facilities** – Maggie (HDR) provided an overview of the Recreation Study Area and the formal recreation facilities it encompasses. Sarah (HDR) noted the Study Area encompasses the full reach of the river between Byllesby and Buck Dams, although the FERC Project boundary does not encompass the entire contiguous area. Additional informal facilities, as well as facilities associated with the New River Trail State Park, may occur in or near the FERC Project boundary.

John Copeland (VDWR) raised question about Loafer's Rest area and noted that it may not be encompassed by the online survey. Land on the right bank of the Buck tailrace is leased by VDWR from Appalachian Power Company (lease extends through 2023). VDWR noted that in the past many anglers did access the Buck tailrace, but security and public safety concerns now prohibit and discourage access in that area. There is a no trespassing sign currently posted and this likely discourages tailrace fishing. Maggie (HDR) explained this was consistent with the results of the trail camera data facing the Buck tailrace, as there were only two instances of recreational activity at this location. No trail cameras or other monitoring have focused on Loafer's Rest (downstream of Buck tailrace), but this site can be added to the facility inventory and discussed during the site visit as requested.

- **Overview of Preliminary Study Results by Location** – Maggie (HDR) and Tristan (LPDA) reviewed results and findings of the Recreation Study tasks (Recreation Facilities Inventory and Condition Assessment, Online Survey, Trail Camera Monitoring) to date, for each facility. Refer to attached PowerPoint presentation for additional information and details.

- **Byllesby VDWR Boat Launch** – Based on the online survey and trail camera monitoring, this site receives high volume of use relative to the other facilities, primarily from local residents/regional visitors. Individuals who completed the survey provided generally favorable feedback about this facility.

Boating appears to be dominant use from trail camera, while online survey respondents indicated fishing as the primary activity. Bill (VDWR) noted that he expect the primary use is fishing, and boating is the means of doing so.

- **Byllesby Canoe Portage** - This site was anomalous in that only one online survey response was received. Trail camera monitoring indicates that portage of canoe/kayak is not common, though the parking area is busy and provides access to the New River Trail, particularly for biking.
- Janet (USFWS) asked whether trashed fishing lines are a concern at any of the sites and whether there is a need to consider signage and disposal facilities. Janet noted USFWS has good signage to encourage responsible disposal, if helpful.
- **New River Canoe Launch** - Visitors to this site are primarily from local area and considered themselves regular visitors. Fishing and canoeing/kayaking were

reported as the primary activities in the online survey, which the trail camera data confirmed, however fishing was more likely to be observed than use of the portage.

- **New River Trail Picnic Area** – Recreation site has two parts, an upper and lower, so there are two trail cameras at this location. The upper is consistently used for biking and picnicking and the lower for fishing.
- Ben (VDWR) noted he was surprised only one camera was stolen and explained the cameras generated a lot of curiosity and questions from the public.
- Ben (VDWR) asked whether any formal or informal usage monitoring had been focused on the area on the opposite bank of the river and Maggie (HDR) confirmed none to date. Sam Sweeney (New River Trail State Park) noted that the area Ben mentioned is relatively popular for fishing and camping. Group discussed that this area does attract a different user base than the other recreation facilities and they see a higher percentage of illegal activities. This area (Laurel/Woodlawn) is informally referred to as Fowlers Ferry, and Fowlers Ferry Road provides access.
- **Buck Dam Picnic Area (off the Buck bypass)** - VDWR noted surprised that online survey respondents indicated canoeing/kayaking and fishing as primary activities since banks are steep and access is limited. Maggie agreed as there are no formal canoeing/kayaking or fishing recreational access points at this recreational facility. It was assumed respondents may have been visitors to the broader Project area/downstream of recreation site.
- **Buck Dam Canoe Portages** – Online survey responses were higher than expected for an area that is only accessed by canoe/kayak. This area had a higher percent of respondents who were not satisfied with the recreational facilities, likely attributed to a high interest in fishing but no formal angling facilities on Mountain Island. Trail camera observations and recreational use were low.
- **Buck Dam Fishing Access (informal)** – A trail camera was added to this informal recreation spot as a result of agency request/interest in the area for fishing in the tailrace. A time-lapse video was used instead of motion-activated at this site only. Only two instances of bank fishing in this area were recorded.

Ben (VDWR) noted this area has a high degree of interest by the public. Bill (VDWR) noted that primary access is at the end of the island and anglers are crossing from the other side of the island via wading or canoe/kayak or users access the area downstream of Buck and travel up in boat/canoe/kayak. If the camera had been pointed downriver, additional activity may have been captured. Safety is a concern to AEP in this area (high flows as units come on, access across bypass reach, deep water, and steep banks).
- **Site Visit Planning for Wednesday October 28<sup>th</sup>** – Maggie (HDR) reviewed plan and agenda for Wednesday's site visit, including meeting time by 9:30 a.m. at VDWR Byllesby Boat Ramp. If practical and individuals are comfortable doing so, it may be necessary to consolidate cars at points along the way due to limited parking on the New River Trail side.

Based on VDWR's suggestion and discussion by this group, we will plan to visit (drive by/hop out of vehicles to view site/take photos) the Fowlers Ferry area after the Byllesby Boat Ramp.

**Action Items**

<b>Owner</b>	<b>Action Item</b>	<b>Target Date</b>
HDR/AEP	Send copy (pdf) of the PowerPoint presentation to the group on this call or post to public relicensing website, in advance of the site visit.	10/26/2020
VDWR	Ben to send photographs of Fowlers Ferry area to (Maggie) for distribution to this group	10/26/2020
HDR	Send confirmation email day before site visit confirming site visit is a go (or providing alternative plan if bad weather is forecasted)	10/27/2020
All	Accept/decline meeting invite for next Wednesday 10/28 to provide HDR and AEP with an expected participant list and headcount	10/27/2020
HDR	Provide participants with summary of online survey respondents' comments on specific areas, during site visit	10/28/2020
HDR/AEP	Send reminder with link to Online Survey and notice of survey period close/deadline approaching to group on this call to share on Social Media or other outlets (and AEP post to Claytor Lake social media).	10/23/2020



# Byllesby-Buck Hydroelectric Project Relicensing

## Recreation Study

Virtual Check-In: October 21, 2020

Site Visit: October 28, 2020



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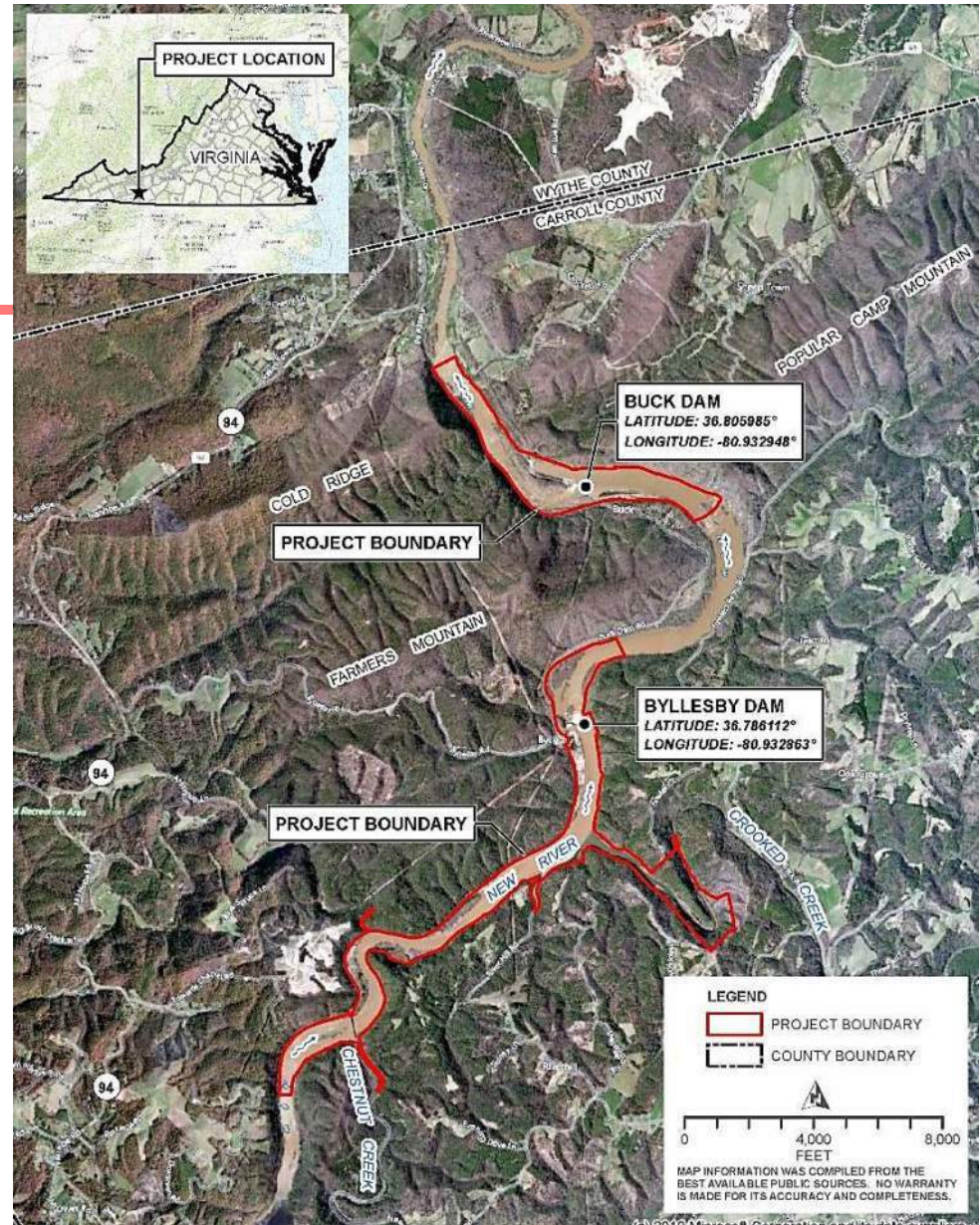
# Project Overview

- Licensee is Appalachian, a unit of American Electric Power (AEP).
- The Byllesby-Buck Hydroelectric Project (FERC No. 2514) is a 30.1-MW, two-development Project on the upper New River in Carroll County, Virginia.
- Project constructed in 1912.
- Current FERC license expires February 29, 2024.
- Upcoming dates:
  - Appalachian to file Initial Study Report (ISR) on January 18, 2021
  - ISR Meeting by February 2, 2021



# Project Location

- The Byllesby dam is approximately 8 river miles downstream of the Fries dam.
- The Buck dam is approximately 3 river miles downstream of Byllesby and 43.5 river miles upstream of Claytor dam.





# Agenda

- Recreation Study Plan
- Review of Recreation Facilities
- Review Recreation Inventory, Online Survey, Trail Camera Results for the following:
  - Byllesby VDWR Boat Launch
  - Byllesby Canoe Portage
  - New River Canoe Launch
  - New River Trail Picnic Area
  - Buck Dam Picnic Area
  - Buck Dam Canoe Portages
  - Buck Dam Fishing Access (informal)
- Site Visit Planning for Wednesday October 28<sup>th</sup>

# Recreation Study Plan: Goals and Objectives

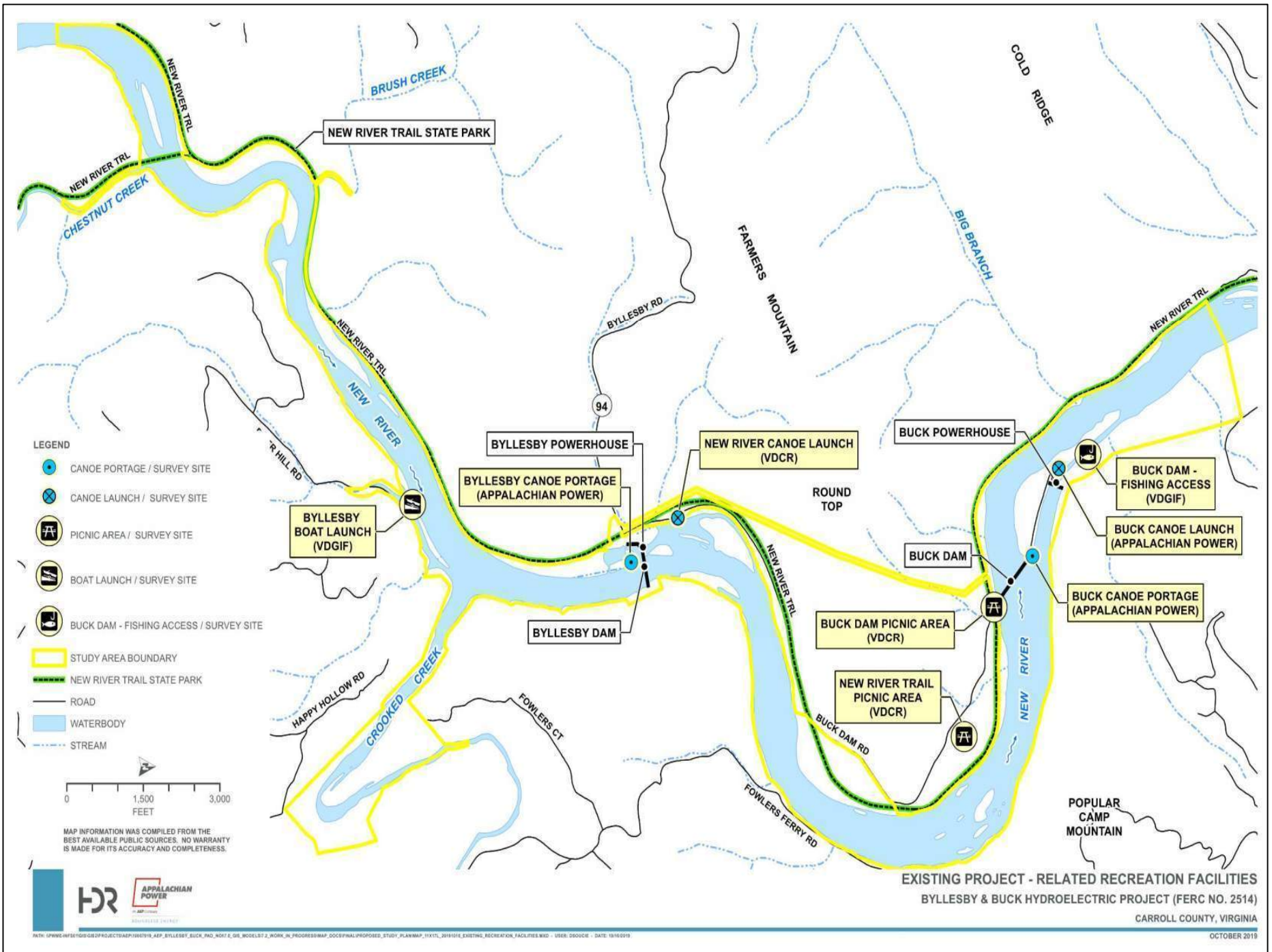
- **Study Goal:** Determine the need for enhancement to existing recreation facilities, or additional recreational facilities, to support the current and future demand for public recreation in the Project area.
- **Specific Objectives:**
  - Gather information on the condition of six Project-related public recreation facilities and identify any need for improvement
  - Characterize current recreational use of the study area and estimate future demand
  - Solicit comments from stakeholders regarding potential enhancement opportunities
  - Analyze effects of continued Project operation on recreation facilities



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# Formal Recreation Facilities

Recreation Facility	Owner / Operator	Amenities	Relationship to Project Boundary
<b>Byllesby Development</b>			
Byllesby VDGIF Boat Launch	Leased and Operated VDGIF	Provides single-lane boat concrete boat launch with gravel parking area.	Within
Byllesby Canoe Portage	Owned and operated by Appalachian	Provides approximate 1,500-foot portage trail. Site consists of a hand-carry canoe take-out and an information trailhead kiosk for the New River Trail State Park.	Within
New River Canoe Launch	Owned and operated by VDCR	Provides small, gravel parking area with short trail leading to a hand-carry boat launch (also serves as put-in for the Byllesby Canoe Portage).	Adjacent to
<b>Buck Development</b>			
Buck Dam Picnic Area	Owned and operated by VDCR	Provides gravel parking for vehicles, information kiosk, and access to New River Trail. Also provides a picnic area with picnic table, trash can, portable restroom facility, and a hitching post for equestrian trail users.	Adjacent to
New River Trail Picnic Area	Owned and operated by VDCR	Provides upper and lower recreation areas that include benches, picnic tables, bike rack, trash can, grill, and informal angling access to the Buck reservoir.	Adjacent to
Buck Dam Canoe Portage	Owned and operated by Appalachian	Provides crushed stone hand-carry take out and a hand-carry put in.	Within



MAP INFORMATION WAS COMPILED FROM THE BEST AVAILABLE PUBLIC SOURCES. NO WARRANTY IS MADE FOR ITS ACCURACY AND COMPLETENESS.





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# Recreation Study: Task 1

Task 1	
Recreation Facility Inventory and Condition Assessment	Field inventory: <ul style="list-style-type: none"><li>• Recreation site type and location</li><li>• Length and type of trails</li><li>• Existing facilities, signage, and sanitation</li><li>• Type of vehicular access and parking (if any)</li><li>• Compliance with Americans with Disabilities Act standards</li><li>• Photographic documentation</li></ul>
	Qualitative condition assessment: <ul style="list-style-type: none"><li>• Each recreation facility will be rated with condition criteria, and explanations provided</li></ul>

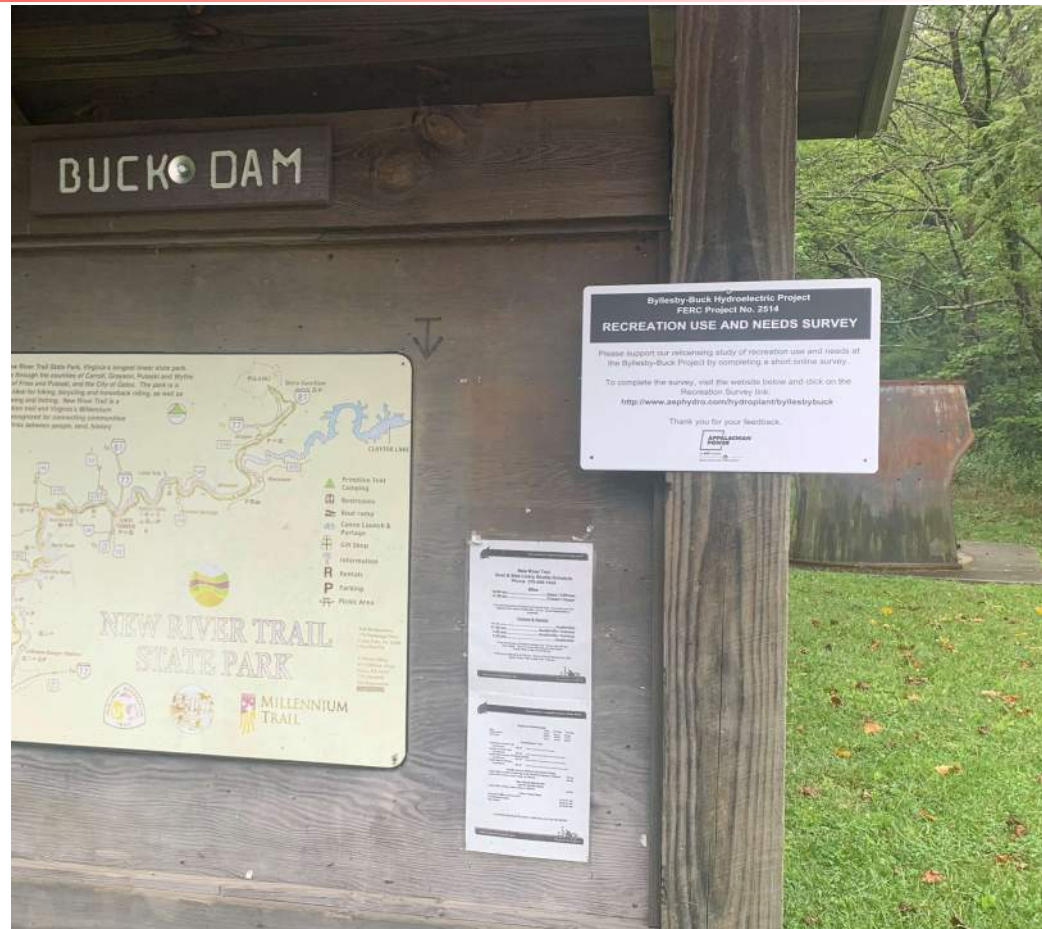
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# Recreation Study: Task 2 and 3

<b>Task 2</b>	
<p>Site Visit with Stakeholders to Discuss Existing and Future Recreational Opportunities</p>	<ul style="list-style-type: none"> <li>• Appalachian and primary stakeholders will visit the existing Project-related recreation facilities</li> <li>• Discuss potential conceptual-level enhancement and improvements</li> </ul>
<b>Task 3</b>	
<p>Recreation Visitor Use Online Survey</p>	<ul style="list-style-type: none"> <li>• Provide online survey information to stakeholders as well as recreationists who do not frequent the Project regularly</li> </ul>

# Online Survey

- Online survey notice posted at recreation facilities
- 73 visitors completed the survey, as of October 12, 2020
- Boating and bank fishing have been documented as the primary activities
- Survey live from April – October 2020





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# Recreation Study: Task 4

Task 4	
Recreational Use Documentation	<p><i>Trail camera installation</i></p> <ul style="list-style-type: none"><li>• Eight cameras placed at the six Project-related public recreation facilities</li><li>• November 2019 – November 2020</li><li>• Motion activated, date and time stamped</li></ul>

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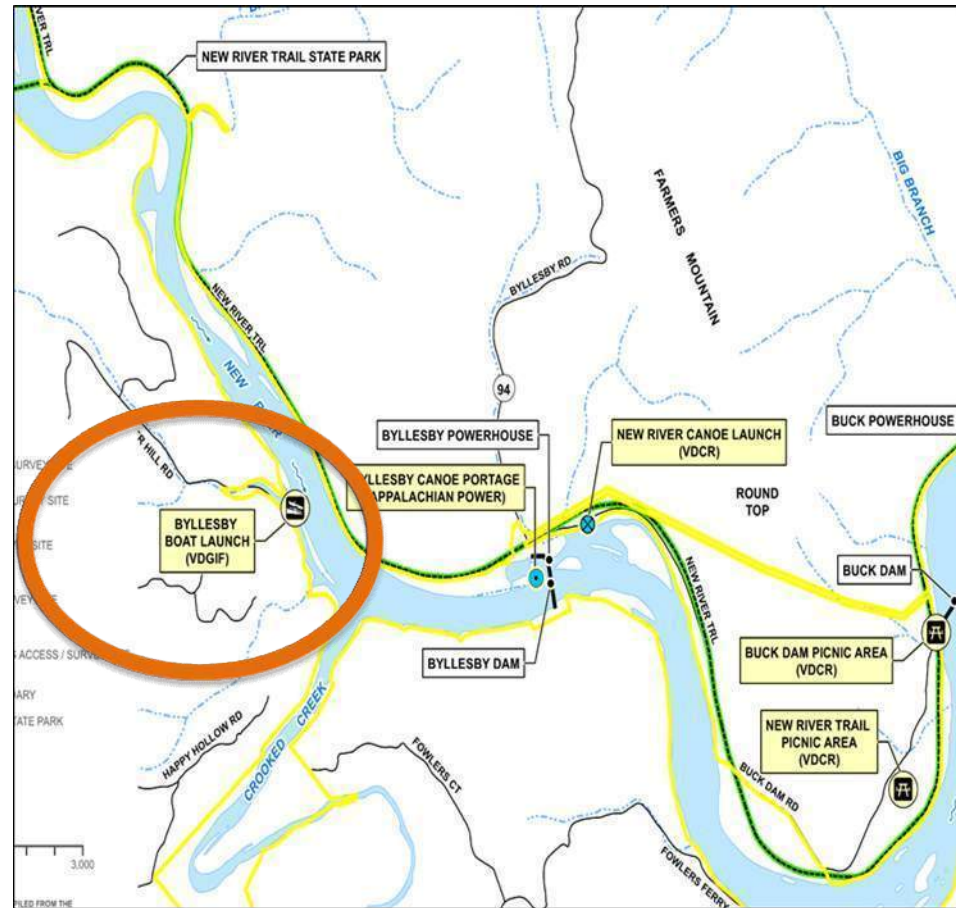
# Recreation Study: Analysis and Reporting

An analysis of the current and future recreational facilities usage and needs



# Byllesby VDWR Boat Launch

- Leased and Operated by VDGIF (now VDWR) and located within the Project Boundary
- Provides single-lane concrete boat launch with gravel parking area.

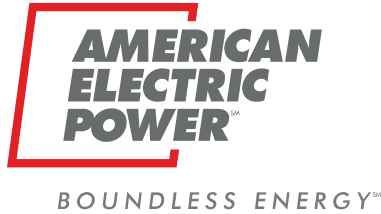


# Byllesby VDWR Boat Launch: Inventory Conditions Assessment

## Condition:

- Boat launch/ramp in good condition
- Site is clean
- Gravel parking surface
- Undefined parking
- No site furnishings (i.e. picnic tables, trash cans) or restroom facilities
- Varying site and directional signage.
- No ADA facilities

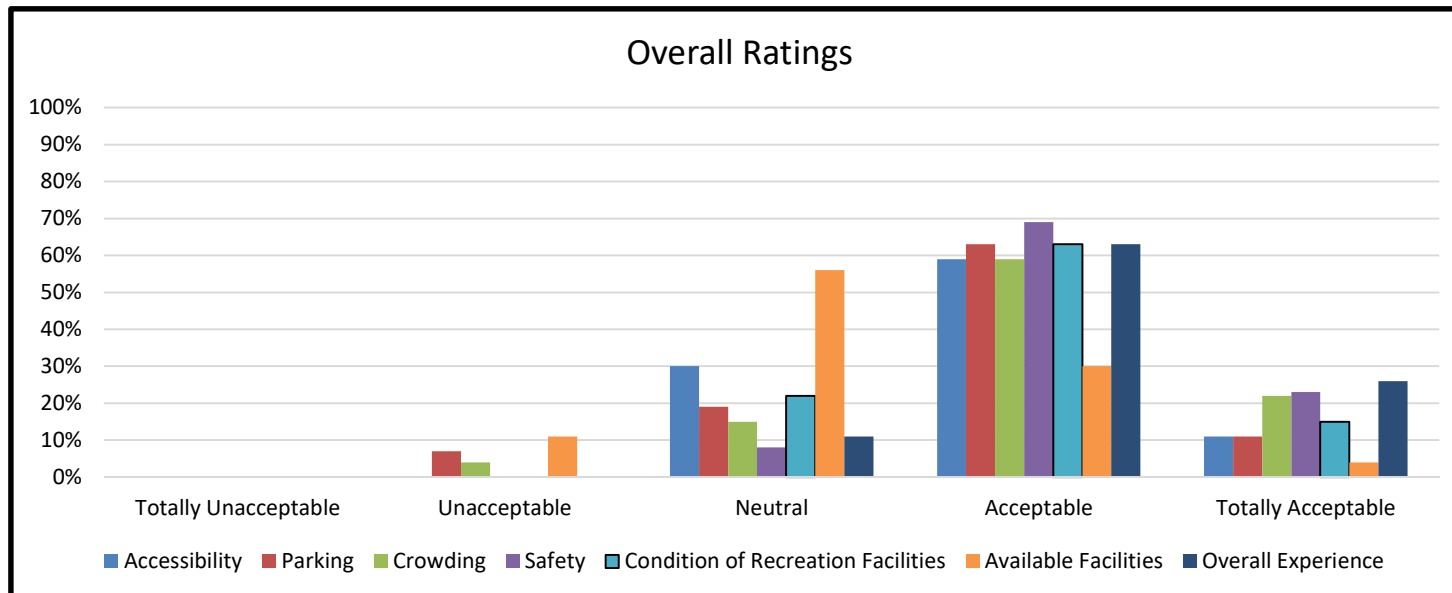




# Byllesby VDWR Boat Launch: Online Survey

- Between May 2020 to September 2020 there have been 37 visitors from Byllesby Boat Launch that responded to this survey.
- 22 miles is the average traveled by visitors as day trips (frequently from zipcodes 24330, 24333 & 24381).
- 93% of respondents consider themselves to be regular visitors to the area with at least 3 or more times a year with an average length of stay being 5 hours.

Primary Activity	Percent
Fishing	69%
Canoeing/Kayaking	23%
Boating	4%
Picnicking	4%





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# Byllesby VDWR Boat Launch: Trail Camera Results

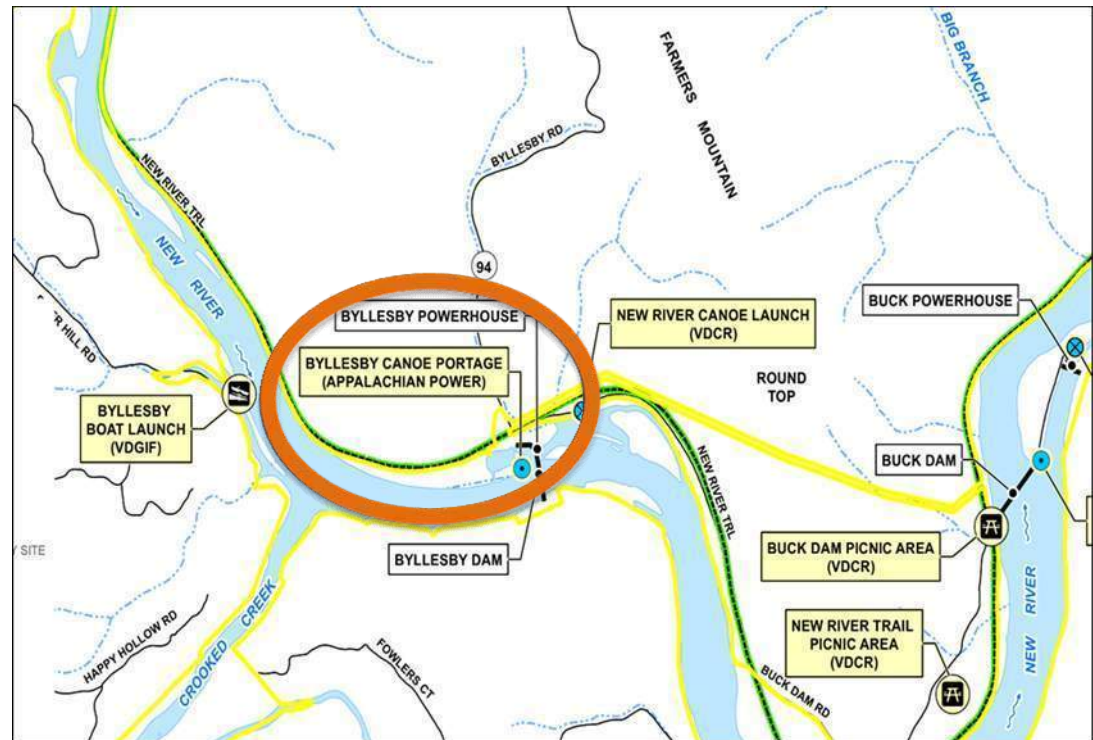
- As of September 9, 2020, Appalachian has gathered approximately 10,000 photos.
- Significant uptick in recreation activities between the end of May and early August.
- Out of the recreation facilities this one sees the most traffic and generally consistent throughout the week (small uptick on weekends/holidays).
- Boating and bank fishing are the most popular recreational activities.



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# Byllesby Canoe Portage

- Owned and operated by Appalachian within the Project Boundary
- Provides approximate 1,500-foot portage trail. Site consists of a hand-carry canoe take-out and an information trailhead kiosk for the New River Trail State Park by a gravel parking area.



# Byllesby Canoe Portage: Inventory Conditions Assessment

- Rustic portage take-out; large and level for easy transfer
- Portage is 775 ft from parking lot
- Trashcan at parking lot is aged but functional and is regularly serviced
- Varying site and directional signage
- No ADA amenities

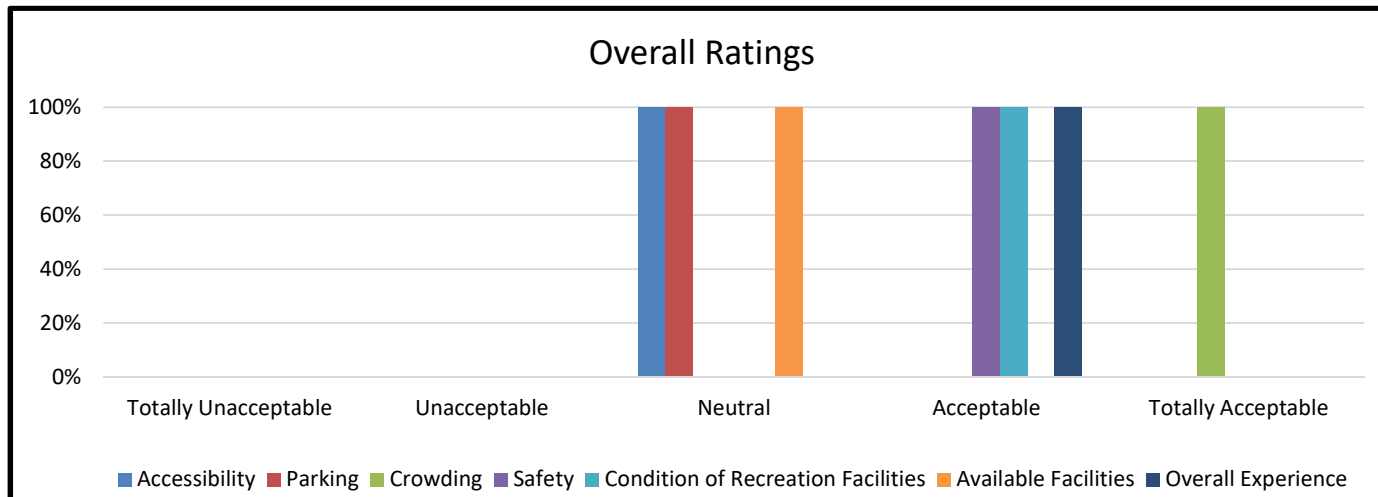




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# Byllesby Canoe Portage: Online Survey

- Between May 2020 to September 2020 there has been 1 visitor from Byllesby Canoe Portage that responded to this survey.
- 200 miles is the estimated distance traveled by this visitor and as day trips.
- Considers himself to be regular visitors to the area with at least 3 or more times a year with an average length of stay being 4 hours.
- The months visited are May, July, and August primarily to canoe.



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# Byllesby Canoe Portage Trail Camera Results

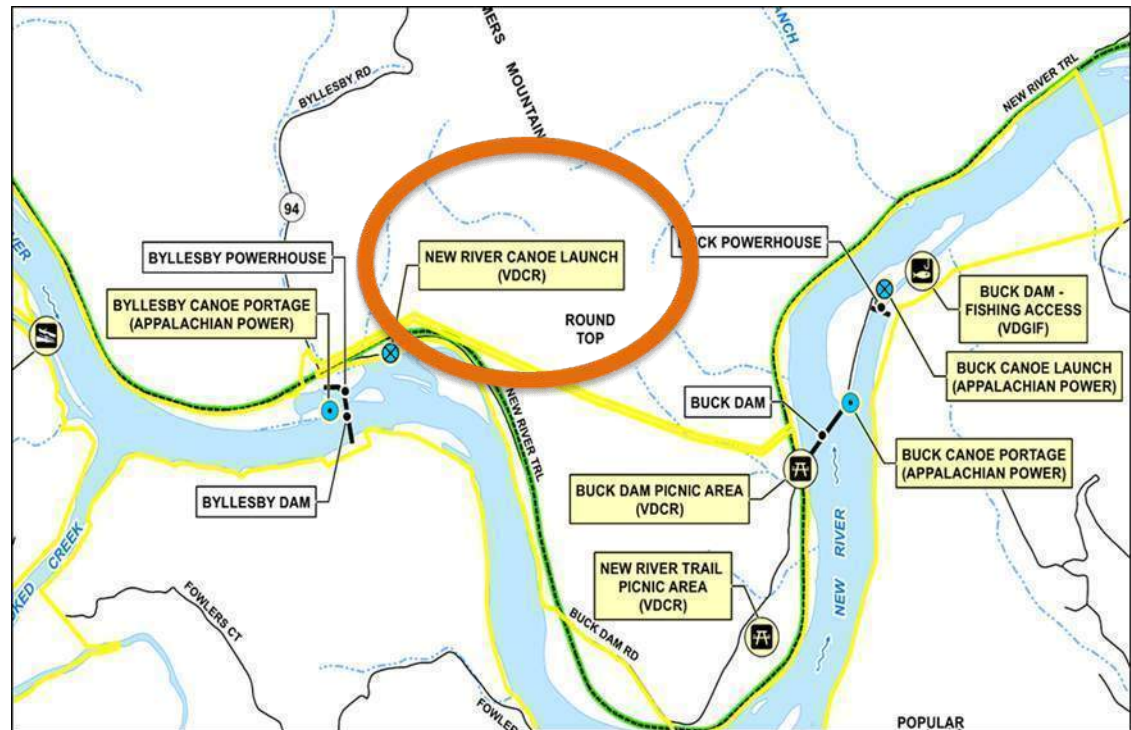
- As of September 9, 2020, Appalachian has gathered approximately 10,000 photos.
- Parking at this location to bike, hike, or walk are the most popular recreational activities.



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# New River Canoe Launch

- Owned and operated by VDCR adjacent to the Project Boundary
- Provides small, gravel parking area with short trail leading to a hand-carry boat launch (also serves as put-in for the Byllesby Canoe Portage).





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# New River Canoe Launch: Inventory Conditions Assessment

- Rustic portage put-in is functional
- Large level sandy surface at portage makes transfer easy
- Gravel parking area for approximately 10 cars
- Canoe put-in is 125 ft from parking area and 1,175 ft (0.22 miles) from take-out
- Clear directional signage
- No site furnishings
- No ADA amenities

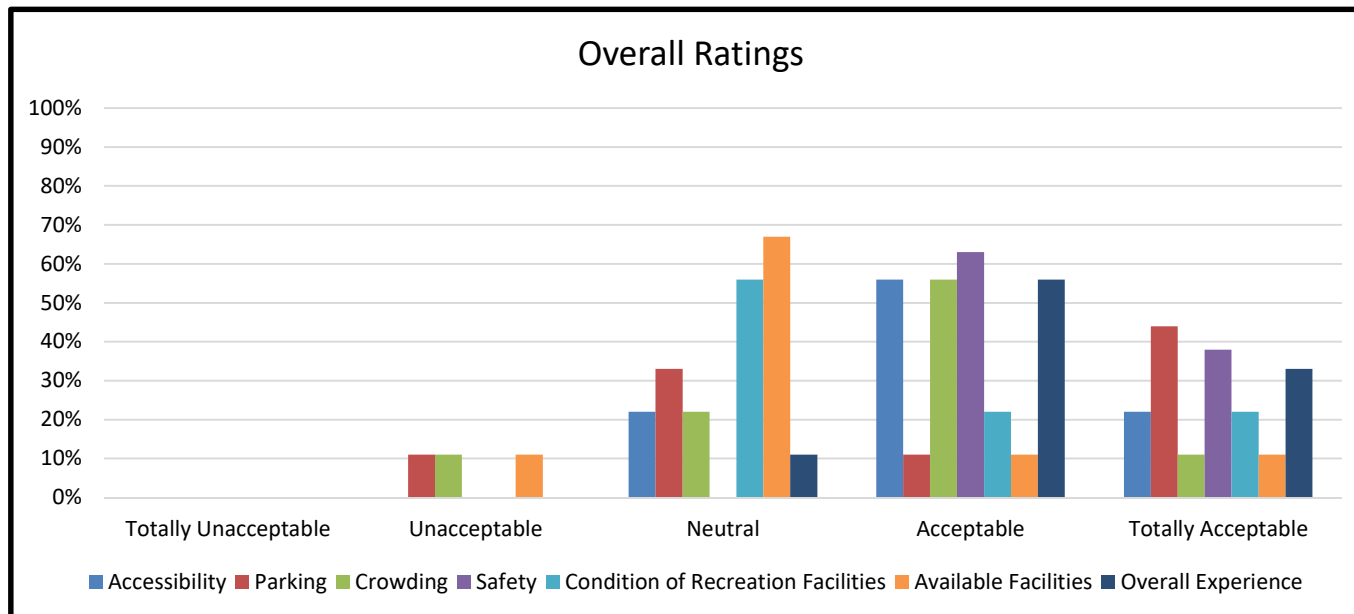


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# New River Canoe Launch: Online Survey

- Between May 2020 to September 2020 there have been 14 visitors from New River Canoe Launch that responded to this survey.
- 7.5 miles is the average traveled by visitors (frequently from zipcodes 24330 & 24333).
- 100% of respondents consider themselves to be regular visitors to the area with at least 3 or more times a year with an average length of stay being 4.5 hours.

Primary Activity	Percent
Fishing	67%
Canoeing/kayaking	22%
Sight-seeing	11%





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# New River Canoe Launch: Trail Camera

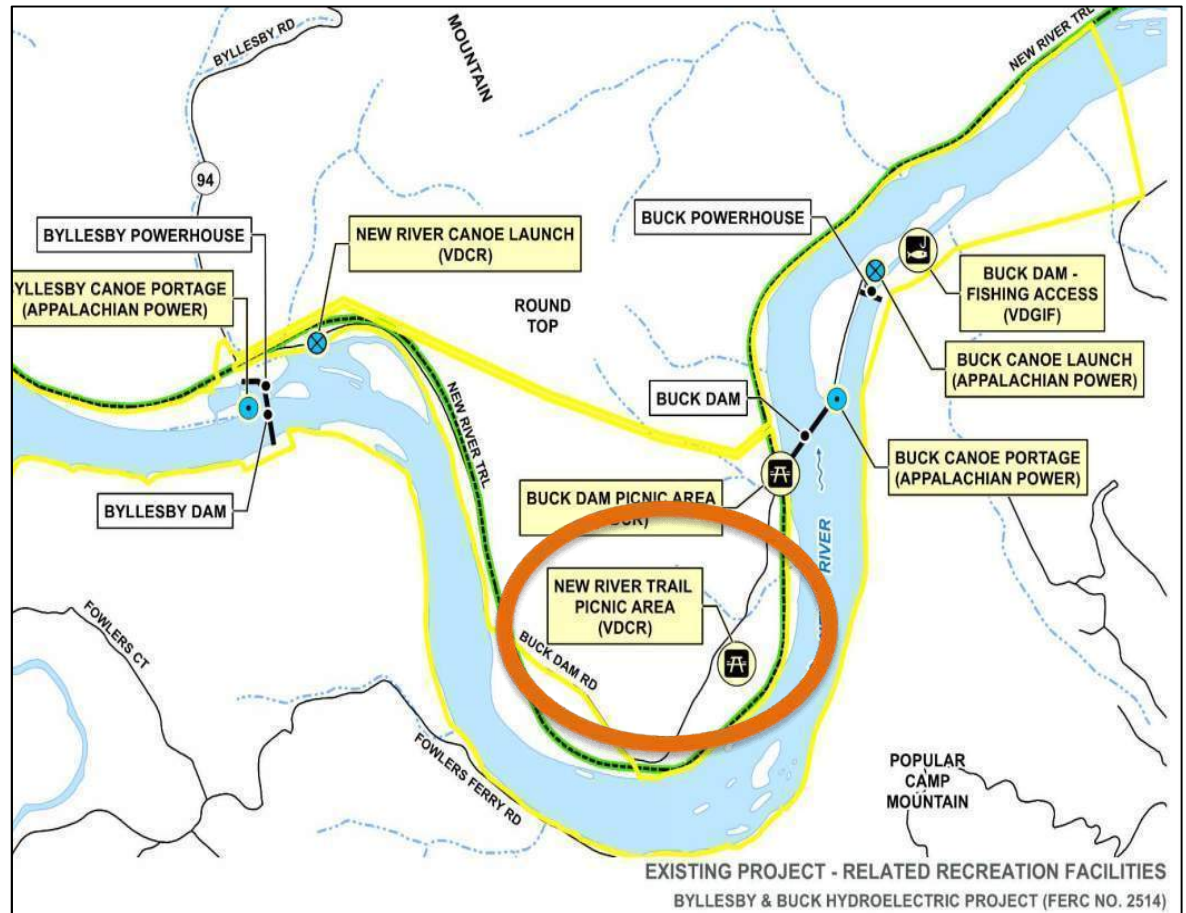
- As of September 9, 2020, Appalachian has gathered approximately 2,800 photos.
- Bank fishing and relaxing (i.e. chairs, cooler, hanging out for the day) are the most common.



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# New River Trail Picnic Area

- Owned and operated by VDCR adjacent to the Project Boundary
- Provides upper and lower recreation areas that include benches, picnic tables, bike rack, trash can, grill, and informal angling access to the Buck reservoir



# New River Trail Picnic Area: Inventory Conditions Assessment

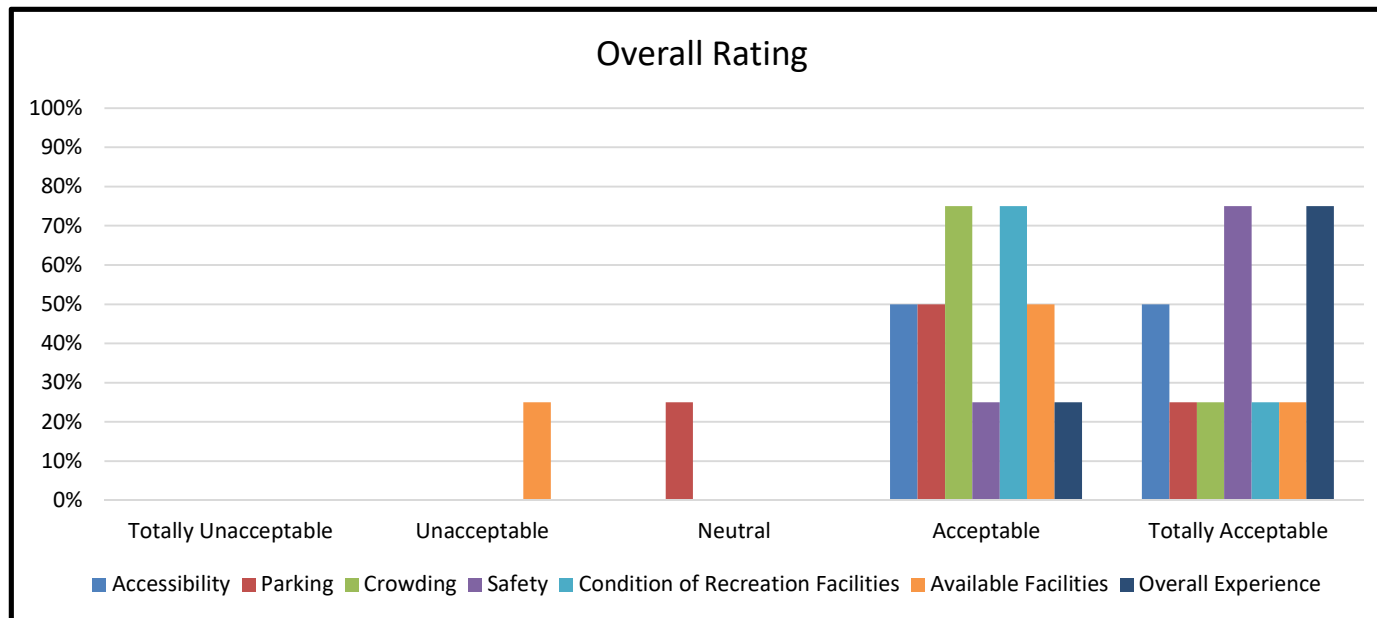
- Informal parking on shoulder off of road.
- Informal unsigned path leads down hill to upper picnic area off New River trail.
- Upper picnic area amenities are in good/serviceable condition. Picnic table is ADA accessible.
- Lower picnic area furnishings (bench, trash can) require maintenance. Grill is older and could be replaced.
- Some degree of site and directional signage.



# New River Trail Picnic Area: Online Survey

- Between May 2020 to September 2020 there have been 8 visitors from the New River Trail Picnic Area that responded to this survey.
- 12 miles is the average traveled by visitors (frequently from zipcodes 24330).
- 75% of respondents consider themselves to be regular visitors to the area with at least 3 or more times a year with an average length of stay being 3.5 hours.

Primary Activity	Percent
Biking	75%
Fishing	25%





## New River Trail Picnic Area: Trail Camera (Upper)

- As of September 9, 2020, Appalachian has gathered approximately 5,930 photos.
- Consistent use of recreation features (picnic shelter, bike rack and hitching post).



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# NR Trail Picnic Area (Upper)





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## New River Trail Picnic Area: Trail Camera (Lower)

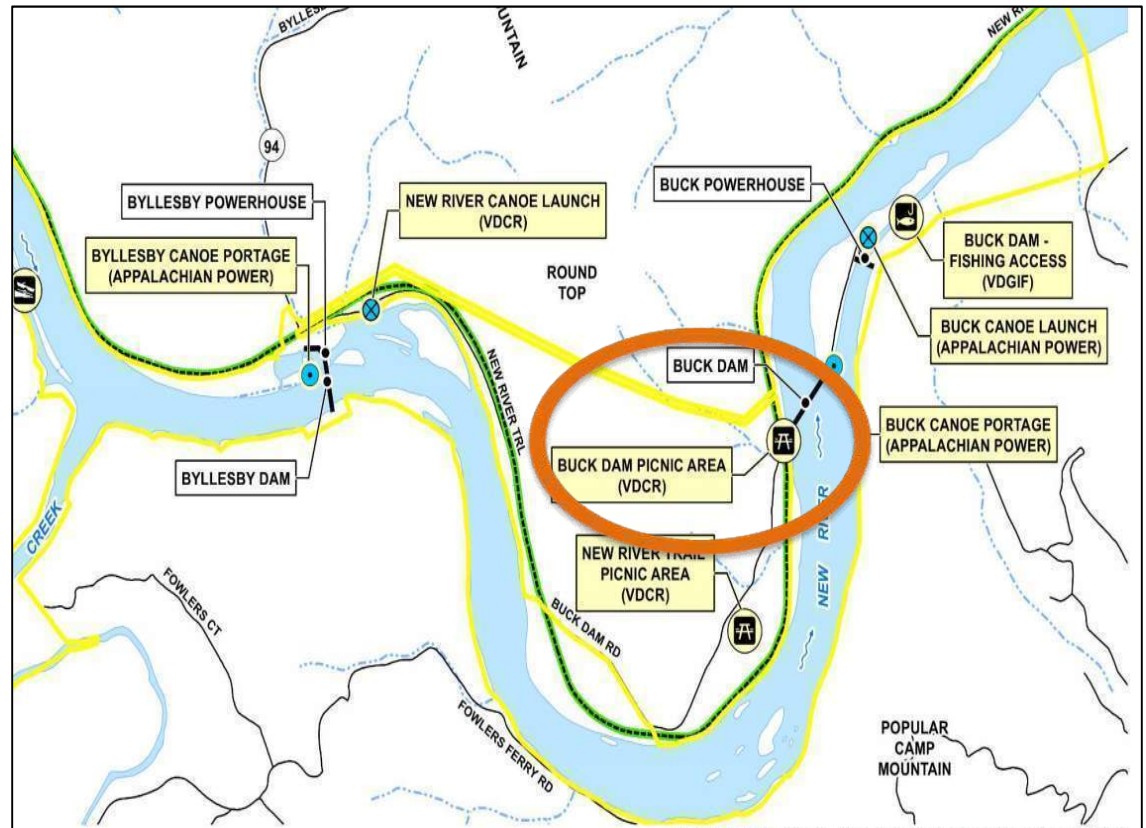
- As of September 9, 2020, Appalachian has gathered approximately 3,220 photos.
- This trail camera was stolen and then replaced. Data was lost from May 27 – July 28<sup>th</sup>.
- Bank fishing and relaxing (i.e. using picnic tables, setting up chairs/tents for the day) are also common.
- Recreational users also enjoy this as a stop off the New River trail for sight-seeing.



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# Buck Dam Picnic Area

- Owned and operated by VDCR adjacent to the Project Boundary
- Provides gravel parking for vehicles, information kiosk, and access to New River Trail. Also provides a picnic area with picnic table, trash can, portable restroom facility, and a hitching post for equestrian trail users.



## Buck Dam Picnic Area: Inventory Conditions Assessment

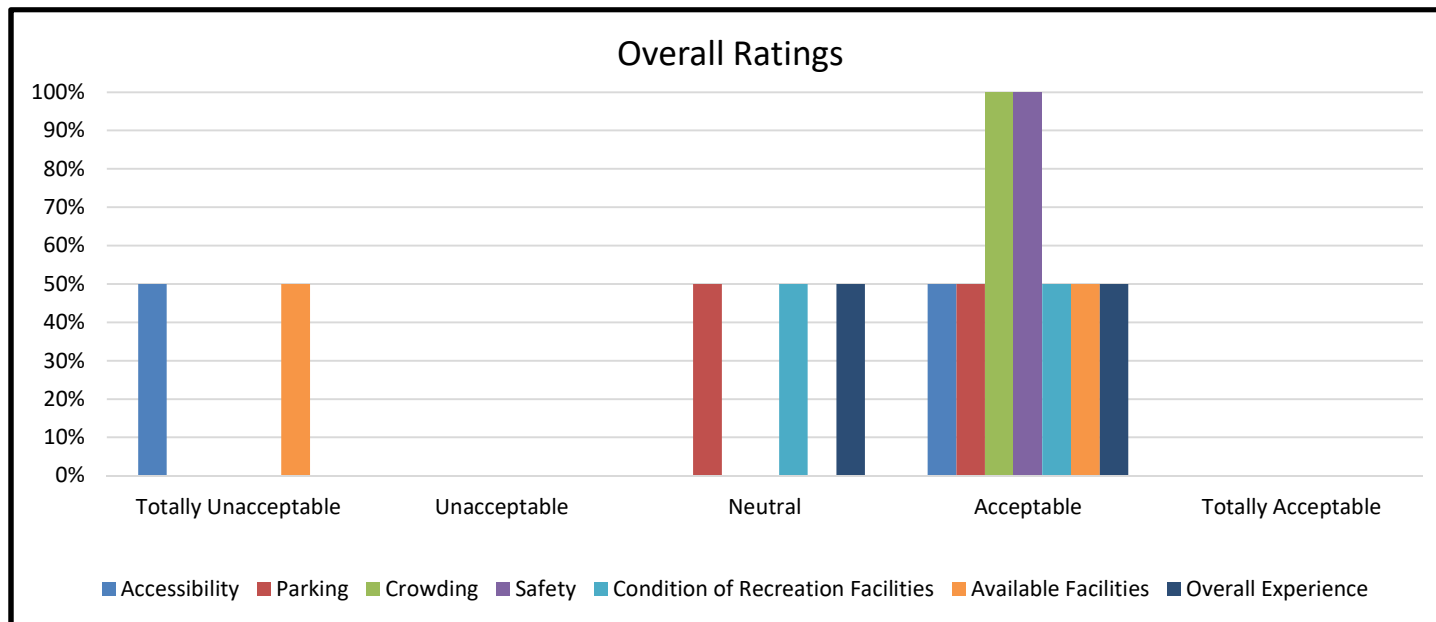
- Picnic site along the New River Trail, approx. 650 ft from parking area.
- Gravel parking for approx. 5 cars, needs light maintenance.
- Portable restroom is ADA accessible.
- An industrial artifact is located by parking area.
- Some degree of site and directional signage, in varying conditions.



# Buck Dam Picnic Area: Online Survey

- Between May 2020 to September 2020 there have been 4 visitors from the New River Trail Picnic Area that responded to this survey.
- 12.5 miles is the average traveled by visitors (frequently from zipcodes 24330).
- 100% of respondents consider themselves to be regular visitors to the area with at least 3 or more times a year with an average length of stay being 4 hours.

Primary Activity	Percent
Canoe/Kayaking	50%
Fishing	50%



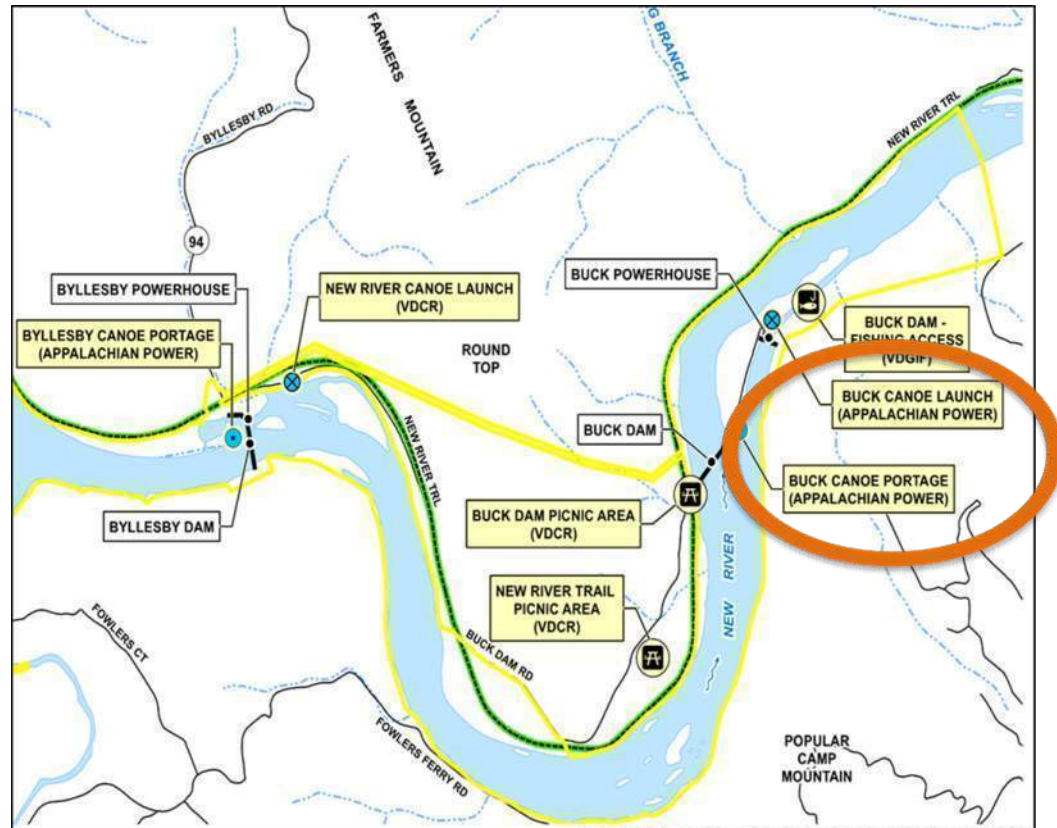
## Buck Dam Picnic Area: Trail Camera Results

- As of September 9, 2020, Appalachian has gathered approximately 3,120 photos.
- The tree this trail camera was located on fell down, but was re-installed in a similar location. Data was lost from May 18 – July 28<sup>th</sup>.
- Consistent use of recreation features (picnic shelter, bike rack and hitching post).



# Buck Dam Canoe Portage and Launch

- Owned and operated by Appalachian within the Project Boundary.
- Provides crushed stone hand-carry take out and a hand-carry put in above and below the dam.





## Buck Dam Canoe Portage and Launch: Inventory Conditions Assessment

- Sites accessible to public by water only.
- Crushed stone portage take-out, in good condition.
- Rustic put-in; small area with drop off to water surface.
- Portage route is 1,440 ft (0.27 miles). Surface type varies, some sections are eroded.
- Informal trash can.
- Some degree of site and directional signage, in varying conditions.
- No ADA amenities.



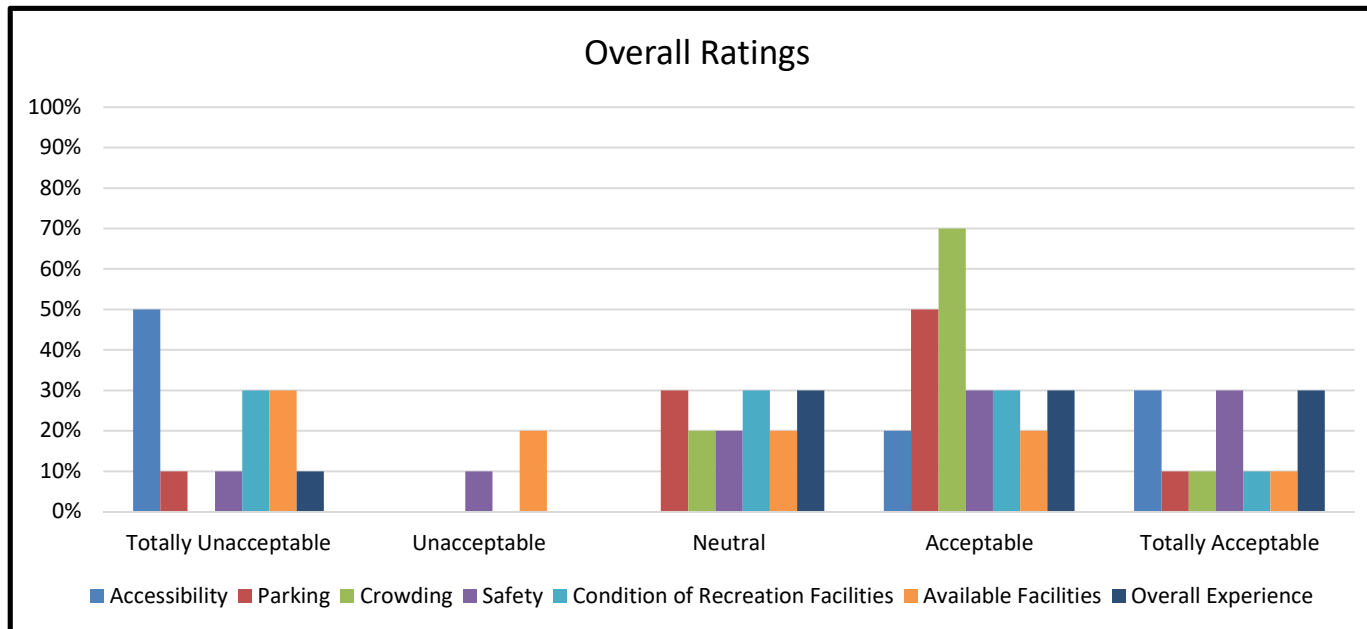


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# Buck Dam Canoe Portage and Launch: Online Survey

- Between May 2020 to September 2020 there have been 13 visitors from Buck Dam Canoe Portage that responded to this survey.
- 42 miles is the average traveled by visitors with 40% noting they were staying overnight (frequently from zipcodes 24333, 24348 & 24350).
- 100% of respondents consider themselves to be regular visitors to the area with at least 3 or more times a year with an average length of stay being 2.6 hours.

Primary Activity	Percent
Fishing	38%
Biking	25%
Canoeing/kayaking	25%
Kayak Fishing	13%



# Buck Dam Canoe Portage and Launch: Trail Camera Results

- As of September 9, 2020, Appalachian has gathered approximately 100 photos.
- Low recreational usage compared to other sites
- Bank fishing, canoe/kayaking, and motorized boat fishing into tailrace are the only activities observed.







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# Buck Dam – Fishing Access Trail Camera Results

- As requested by stakeholders during the preparation of the Revised Study Plan, Appalachian added a 7<sup>th</sup> location for the trail cameras to determine bank fishing at Loafer's Rest.
- Two occurrences of recreational activity.



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# Site Visit Planning

Wednesday, October 28<sup>th</sup>

9:30a.m. – 3:00 p.m

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A reminder that cell phone service is limited at these sites. My cell phone number is 610-299-0959. Please plan to be outside all day and dress accordingly.

Also, bring a face covering or mask, as these will be required throughout the site visit.

## Tentative agenda:

- 9:30am – 10:30am – Meet at VDWR Byllesby Boat Ramp on river-right for a safety briefing and to discuss the recreation site.
- 10:30am – 11:15am – Drive to Byllesby dam and meet in parking lot. Can follow HDR/Appalachian to Byllesby or directions provided.
- 11:30am-12:30pm – Drive to and discuss Buck Canoe Portage and Buck Canoe Launch/Fishing Access
- 12:30pm-1:30pm – Have lunch and discuss recreation site at the Buck Dam Picnic Area. We ask that you bring your own lunch, snacks, and water.
- 1:30pm-2:00pm – Drive to and discuss New River Trail Picnic Area
- 2:00pm-2:30pm – Drive to and discuss New River Canoe Launch
- 2:30pm-3:00pm – Drive to and discuss Byllesby Canoe Portage

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# Closing



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

October 27, 2020

***VIA ELECTRONIC FILING***

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)  
Second Quarterly Study Progress Report**

Dear Secretary Bose:

Appalachian Power Company (Appalachian or Applicant), a unit of American Electric Power (AEP) is the Licensee, owner, and operator of the 30.1 megawatt (MW) Byllesby-Buck Hydroelectric Project No. 2514) (Project or Byllesby-Buck Project), located on the New River in Carroll County, Virginia. The Project is currently undergoing relicensing following the Federal Energy Regulatory Commission's (FERC's or Commission's) Integrated Licensing Process (ILP).

On July 27, 2020, Appalachian filed with FERC the First Quarterly Study Progress Report, an Updated ILP Study Schedule, and a Request for Extension of Time to file the Initial Study Report (ISR). On August 10, 2020, FERC approved this request. As established by the Updated ILP Study Schedule filed on July 27, 2020, the Wetland, Riparian, and Littoral Habitat Characterization, Terrestrial Resources and Shoreline Stability Assessment Studies are scheduled for 2021.

As proposed in Appalachian's October 18, 2019 Revised Study Plan (RSP) and approved in the Commission's November 18, 2019 Study Plan Determination (SPD), Appalachian hereby files the Second Quarterly Study Progress Report for the Project. This progress report describes the activities performed since the First Quarterly Study Progress Report and in quarter 3 (Q3) of 2020, as well as ILP activities generally expected to be conducted in quarter 4 (Q4) of 2020. Unless otherwise described, all relicensing studies are being conducted in conformance with the approved RSP and the Commission's SPD, as subsequently modified by Order on Rehearing dated February 20, 2020.



## **General Updates**

- The Q3 field sampling efforts were impacted by periodic heavy storm events which resulted in prevailing high base flow conditions in the New River watershed. This was further influenced by Hurricane Sally. The study-specific protocols for sampling fish, mussels, and benthic macroinvertebrate communities (referenced in the RSP) provide guidance on establishing the appropriate target flow scenarios to support sampling efforts in a way that is safe and that will result in quality, representative data. The timing and frequency of the storm events resulted in high flow scenarios delaying field crews. Any deviations to the individual studies are discussed below in the study-specific Q3 progress updates.
- Damaged flashboards in a section of the main spillway at Byllesby Dam resulting in a continuous flow release into the bypass reach impacted field efforts at Byllesby, as noted in the specific study sections below. The flashboards are anticipated to be repaired in Q4 2020 or as soon as practicable given field conditions.
- In Q4 2020, data from the on-going field work and studies will be analyzed and summarized in support of the ISR to be filed with FERC January 18, 2021.

## **Flow and Bypass Reach Aquatic Habitat Study**

### **Buck Bypass Reach**

- A GIS-based desktop aquatic habitat assessment (i.e., mapping) was completed in August 2020 and subsequent mesohabitat field verification was completed in the Buck bypass reach in September 2020.
- Level loggers were installed at multiple locations throughout the Buck bypass reach on August 17, 2020 to collect depth and travel time information during the controlled test flow events. While deployed, the level loggers were downloaded three times prior to removal of the equipment on October 7-8, 2020 (after completion of the controlled test flow events).
- Appalachian consulted with the applicable agencies on August 28, 2020 to discuss the proposed test flow scenarios for the Byllesby and Buck bypass reaches. The proposed test flows were approved and the associated field data collection activities (including flow measurements, point depth and velocity measurements, water surface elevations, and particle size data) were completed in the Buck bypass reach from September 9-17, 2020.
- Hydraulic model development progress:
  - The terrain mesh has been developed for the Buck bypass reach.

- Field data collected in the Buck bypass reach will be compiled in Q4 2020 for incorporation into the model. An initial comparison of field data to preliminary model results (at the test flow scenarios) indicates good agreement and the field data will be used to help calibrate and validate model results.
- Habitat Suitability Index curves and information for the guilds have been compiled for future incorporation into the Buck model.

### **Byllesby Bypass Reach**

- A GIS-based desktop aquatic habitat assessment was completed for the Byllesby bypass reach in August 2020.
- Field verification of the mesohabitat conditions, installation of level loggers, test flow scenarios, and particle size data collection have not been performed due to relatively high flow conditions in the Byllesby bypass reach. This is related to higher than normal inflows to the Byllesby reservoir from the upstream New River watershed, as well as damaged flashboards on the main spillway. As a result, Appalachian is planning to delay these field activities until the flashboards are repaired and field and flow conditions allow. This may not occur until early-summer 2021 given higher flow conditions which typically occur over the winter and early-spring months. Model development for this study is then expected to be completed in Q3 2021.
- Hydraulic model development progress:
  - The terrain mesh has been developed for the Byllesby bypass reach.
  - Habitat Suitability Index curves and information for the guilds have been compiled for future incorporation into the Byllesby model.

## **Water Quality Study**

### **Buck Project**

- Water quality instruments (i.e., dissolved oxygen [DO] and water temperature sondes) were deployed at Buck the week of August 17, 2020. A data download from these instruments was completed September 8 - 10, 2020, and again on October 7 – 8, 2020, after which the instruments were removed per the schedule in the RSP. These water quality data will be analyzed and summarized in Q4 2020.
- During instrument download events, instantaneous water quality data were collected using a handheld multi-parameter data sonde (i.e., hydrolab) to compare with data collected by the continuous water quality monitoring instruments deployed at the Project. The instantaneous water quality data will be used to corroborate and/or adjust data collected by

the continuous data sondes in the event of anomalous results due to biofouling or other instrument malfunction.

### **Byllesby Project**

- Due to high flow conditions and continuous flow release at the dam through the damaged flashboard section throughout Q3 2020, water quality instrumentation was deployed at only the Byllesby tailrace location the week of August 17, 2020. Data will be analyzed and summarized in Q4 2020. Appalachian expects to evaluate the need for additional data collection at Byllesby in 2021 in the ISR and at the ISR meeting.
- Lower flow conditions are necessary to evaluate potential changes in turbidity levels that are the result of Project operations (i.e., and not caused by high background turbidity levels associated with rainfall runoff events and high baseflow conditions). Due to higher than normal Project inflows from the New River watershed in Q3 2020, the turbidity study is postponed to Q3 2021 which will allow data collection efforts to target conditions that are more representative of typical station operations during lower flows.

### **Aquatic Resources Study**

#### **Fish Community Study**

- Field data collection for the general fish community study was initially scheduled in September 2020 but was delayed due to high stream flows resulting from heavy storms events. Target stream flows are required to be at or close to base flow conditions to allow for the collection of representative samples and to support safe field data collection. At the request of the Virginia Department of Wildlife Resources (VA DWR), field sampling was rescheduled for mid-October to allow for a targeted sampling effort for Walleye. Backpack and boat electrofishing and gillnet sampling activities are currently scheduled to occur at Buck and Byllesby from October 24 - 31, 2020 providing weather and stream flow conditions remain favorable.
- Additional fish community sampling is planned for spring 2021. Preliminary results of the fall 2020 sampling effort will be provided with the ISR.

#### **Impingement, Entrainment, and Bladestrike Analysis Study**

- Data compilation is underway for the desktop impingement and entrainment evaluation.
- On October 7, 2020, intake velocities were measured at Buck under two different operating scenarios: 1) three units each operating at approximately 25 percent capacity and 2) Unit 2 operating at approximately 60 percent capacity. This data will be summarized in Q4 2020 and incorporated into the Study Report and ISR. Appalachian anticipates that additional

intake velocity measurements at Buck will be made at higher unit capacities as weather and field conditions allow.

- Intake velocity measurements have not yet been conducted at Byllesby due to units undergoing repair. Once repairs have been completed (scheduled for Q4 2020), intake velocity measurements will be scheduled as soon as practicable, targeting Q2 2021. Intake velocities will be analyzed and support the final impingement and entrainment evaluation.
- Appalachian will initiate the Blade Strike Analysis for Buck and Byllesby using the most recent version of the model provided by U.S. Fish and Wildlife Service (USFWS), and will also incorporate available historical information. The analysis and reporting will be performed in Q4 and incorporated into the Study Report and ISR as available site-specific data is gathered, processed, and verified. A tentative list of species collected at the site and that will be used in the analysis will be presented in the ISR. The final results and report will be provided in 2021 once all site-specific data is gathered, processed, and verified.

#### **Macroinvertebrate and Crayfish Community Study**

- Field data collection for the macroinvertebrate and crayfish community study was initially planned for September 2020 but was delayed due to high stream flows. Once flows returned to a normal or more acceptable range (allowing for safe in stream work and collection of representative samples), sampling was rescheduled. Field sample collection was completed for Buck and Byllesby from October 6 - 9, 2020. Samples are currently being processed for taxonomic identification. The study report will present preliminary data from the field efforts and taxonomy information as available. Additional sampling is planned for spring 2021 and the final results will be presented in the final study report and Updated Study Report in 2021.

#### **Mussel Community Study**

- Field data collection for the mussel community study was performed for 8 of the 11 sites from September 24 - 26, 2020. Heavy rainfall and reduced visibility conditions (turbidity of 50 NTUs) forced the field crew to demobilize from the field and prevented completion of sample collection for the remaining three sites proposed in the RSP. Preliminary survey results were submitted to VA DWR.
- Field sampling for the remaining three sites occurred the week of October 19, 2020, completing the mussel community study.
- Eight live and two shell purple wartyback (*Cyclonaias turberculata*) were collected over the course of the mussel survey. Six live *C. turberculata* were collected in the middle deep shoal and were found in the silt that accumulated behind larger cobble/boulders. Additional

details regarding the specimens and the habitats where they were collected will be provided in the ISR.

- Additional mussels were collected during macroinvertebrate sampling efforts (discussed above) on October 8, 2020, at sample sites located 1.35 kilometers downstream of Buck dam. During those efforts, two specimens of the Virginia state listed pistolgrip (*Tritogonia verrucosa*) were collected and photographed. Notification of this collection event was provided via email to VA DWR and the USFWS on October 8, 2020. The pistolgrip were collected at or near sample sites identified in the RSP as Buck Downstream 1 and Buck Downstream 2, where pistolgrip have previously been collected.

### **Recreation Study**

- The Recreation Visitor Use Online Survey and the Recreational Use Documentation via trail cameras are on-going and will continue into Q4 2020.
  - From April to September 2020 there have been 73 visitors at recreation sites within Byllesby-Buck Recreation Project Area who completed this survey, with a decrease in response rates over the past few months. Boating and bank fishing have been documented as the primary activity.
  - The trail cameras captured upticks in recreational usage during the summer months, especially at the VA DWR Byllesby boat launch. Bank fishing, boating, and parking to hike or bike on the New River Trail were commonly captured recreational activities within the Project boundary.
  - Camera #5 at the lower New River Trail Picnic Area was stolen and data was lost from May 27 through July 28. Appalachian reinstalled a trail camera at the same location as required in the RSP.
  - Due to equipment malfunction, data for the trail camera at the VA DWR Byllesby boat launch and the Buck dam canoe portage put-in was not captured between July 28 and September 9, 2020.
- Appalachian has coordinated a conference call and site visit with representatives from agencies, organizations, and localities currently scheduled for October 21 and October 28, 2020 respectively to discuss existing and future recreational opportunities.

### **Cultural Resources Study**

- Consultation letters requesting concurrence from the Virginia State Historic Preservation Officer (SHPO), Advisory Council on Historic Preservation, Indian Tribes, and other parties to determine and document the Area of Potential Effects (APE) for Project relicensing. The Area of Potential Effects Consultation letter was transmitted via email and

mail on September 1, 2020 with responses requested with 30 days of receipt. To date, Appalachian has received responses from the Virginia SHPO, Catawba Indian Nation and Pamunkey Indian Tribe who concurred with the definition of the APE.

- The Archeological Phase I Reconnaissance Survey (field effort) of the APE was substantively completed the week October 19, 2020.

If there are any questions regarding this progress report, please do not hesitate to contact me at (540) 985-2441 or via email at [ebparcell@aep.com](mailto:ebparcell@aep.com).

Sincerely,

A handwritten signature in black ink, appearing to read 'E. Parcell', with a long horizontal flourish extending to the right.

Elizabeth Parcell  
Process Supervisor  
American Electric Power Services Corporation

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

## **Federal Agencies**

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

## Yayac, Maggie

---

**Subject:** FW: Byllesby-Buck Hydroelectric Project (VA) -- Filing of ILP Study Progress Report  
**Attachments:** ByllesbyBuck Second Quarterly Study Progress Report.pdf

**From:** Kulpa, Sarah <Sarah.Kulpa@hdrinc.com>

**Sent:** Tuesday, October 27, 2020 5:23 PM

**To:** ACHP - John Eddins <jeddins@achp.gov>; American Whitewater - Kevin Colburn <kevin@americanwhitewater.org>; Appalachian Trail Conservancy - Andrew Downs <adowns@appalachiantrail.org>; Carroll County - Rex Hill <rex.hill@carrollcountyva.gov>; Carroll County Administrator - Steve Truitt <steve.truitt@carrollcountyva.gov>; Cherokee Nation - Elizabeth Toombs <elizabeth-toombs@cherokee.org>; Fish and Wildlife Conservation - Caitlin Carey <cscarey@vt.edu>; Fish and Wildlife Conservation - Donald J. Orth <dorth@vt.edu>; Friends of the Rivers of VA - Bill Tanger <bill.tanger@verizon.net>; Harold Peterson <harold.peterson@bia.gov>; New River Conservancy - George Santucci <george@newriverconservancy.org>; New River Conservancy - Laura Walters <claytorlakegirl@gmail.com>; New River Outdoor Adventures - Tim Dixon <newriveroutdooradventures@yahoo.com>; New River Trail State Park - Sam Sweeney <Sam.Sweeney@dcr.virginia.gov>; Town of Fries - Scott McCoy <townoffries@friesva.com>; USFWS Chesapeake Bay Field Office - Janet Norman <janet\_norman@fws.gov>; USGS - Mark Bennett <mrbenet@USGS.gov>; VADCR - Jimmy Elliott <james.elliott@dcr.virginia.gov>; VADCR - Lynn Crump <lynn.crump@dcr.virginia.gov>; VADCR - Robbie Ruhr <Robbie.Rhur@dcr.virginia.gov>; VADCR - Sharon Ewing <sharon.ewing@dcr.virginia.gov>; VADEQ <eir@deq.virginia.gov>; VADEQ - Bettina Rayfield <Bettina.rayfield@deq.virginia.gov>; VADEQ - Joe Grist <joseph.grist@deq.virginia.gov>; VADEQ - Matthew Link <matthew.link@deq.virginia.gov>; VADEQ - Scott Kudlas <scott.kudlas@deq.virginia.gov>; VADEQ - Tony Cario <anthony.cario@deq.virginia.gov>; Virginia Council on Indians - Emma Williams <emma.williams@governor.virginia.gov>; Virginia Department of Conservation and Recreation - Rene Hypes <rene.hypes@dcr.virginia.gov>; Virginia Department of Game and Inland Fisheries - John Copeland <John.Copeland@dgif.virginia.gov>; Virginia Department of Game and Inland Fisheries - William Kittrell <bill.kittrell@dgif.virginia.gov>; beth.taylor@wytheville.org

**Cc:** Jonathan M Magalski <jmmagalski@aep.com>; Elizabeth B Parcell <ebparcell@aep.com>; Yayac, Maggie <Maggie.Yayac@hdrinc.com>

**Subject:** Byllesby-Buck Hydroelectric Project (VA) -- Filing of ILP Study Progress Report

Byllesby-Buck Hydroelectric Project Stakeholders:

Appalachian Power Company (Appalachian), a unit of American Electric Power (AEP), is the licensee, owner and operator of the Byllesby-Buck Hydroelectric Project (FERC No. 2514) (Project) located on the New River in Carroll County, Virginia. The Project is operated under a license issued by the Federal Energy Regulatory Commission (FERC). The existing FERC license for the Project expires on February 29, 2024. Appalachian is pursuing a new license for the continued operation of the Project in accordance with FERC's Integrated Licensing Process (ILP).

Pursuant to the ILP, Appalachian filed the second ILP Study Progress Report with the Commission today. We are notifying stakeholders and distributing an electronic copy of this submittal (attached). The filing can also be viewed online at FERC's eLibrary and will be added to the Project's public relicensing website (<http://www.aephydro.com/HydroPlant/ByllesbyBuck>) in the coming days.

Thank you for your continued attention to this Project and for your understanding as we navigated through a very challenging field season. Should you have any questions regarding this filing, please contact Liz Parcell with AEP at (540) 985-2441 or [ebparcell@aep.com](mailto:ebparcell@aep.com).

Thank you,

**Sarah Kulpa**  
Project Manager

**HDR**

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## Yayac, Maggie

---

**Subject:** FW: Fish Community Study at Byllesby/Buck Project (FERC No. 2514)

**From:** Copeland, John <john.copeland@dwr.virginia.gov>

**Sent:** Monday, November 9, 2020 8:32 AM

**To:** Huddleston, Misty <Misty.Huddleston@hdrinc.com>

**Cc:** Jonathan M Magalski <jmmagalski@aep.com>; Elizabeth B Parcell <ebparcell@aep.com>; jon Studio (jastudio@edge-es.com) <jastudio@edge-es.com>; John Spaeth <jpspaeth@edge-es.com>; Kulpa, Sarah <Sarah.Kulpa@hdrinc.com>; Yayac, Maggie <Maggie.Yayac@hdrinc.com>; John Copeland <john.copeland@dwr.virginia.gov>; Kittrell, Bill (DGIF) <bill.kittrell@dwr.virginia.gov>; Pinder, Mike (DGIF) <mike.pinder@dwr.virginia.gov>

**Subject:** Re: Fish Community Study at Byllesby/Buck Project (FERC No. 2514)

**CAUTION: [EXTERNAL]** This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

I understand your planned course of action for gill net sampling. If that sampling cannot be completed this week, it is acceptable to target Walleye with your gill net sampling as late as early December. Walleye will continue to move around when the water temperatures drop into the 50 degree range. Catch of other species (Catfish and other species) will likely not be as high if you delay into early December.

Regarding backpack electrofishing, deciding to postpone that work until August/September of 2021 is acceptable to us. The boat electrofishing and gill net sampling are targeting the reservoir habitat so the lack of overlap in sampling periods with the lotic areas sampled by backpack electrofishing is acceptable.

## John R. Copeland

*Fisheries Biologist III*

**P** 540.961.8397 / **M** 540.871.6064

### Virginia Department of Wildlife Resources

*CONSERVE. CONNECT. PROTECT.*

**A** 2206 South Main Street, Suite C, Blacksburg, VA 24060

[www.dwr.virginia.gov](http://www.dwr.virginia.gov)



On Wed, Nov 4, 2020 at 12:49 PM Huddleston, Misty <[Misty.Huddleston@hdrinc.com](mailto:Misty.Huddleston@hdrinc.com)> wrote:

Good afternoon John,

I wanted to follow up with you regarding the status of the data collection efforts for the Byllesby/Buck (FERC No. 2514) Fish Community Study and to request your input on the path forward for completing the study.

As Jon Studio (Edge Engineering) has previously discussed with you, the boat shocking portion of the study has been completed, but weather and high flows have prevented the field crews from completing the gillnet or backpack electrofishing samples at the site. Based on your conversations with Jon Studio, I understand that you support the collection of gillnet data in November as the target organism (Walleye) will still be mobile at that time.

Can you confirm that this is still acceptable and provide any additional criteria or threshold where you believe the collected data would no longer be valid?

Regarding backpack electrofishing efforts, recent weather forecasts indicate additional precipitation and cooler temps are present or moving into the watershed this week. Based on the predicted flows and colder temperatures, we believe that it is appropriate to move this sampling effort to August/September 2021. As a result, we will have boat electrofishing and gillnet samples (likely) collected in fall 2020 and backpack electrofishing samples collected in August/September 2021.

Do you foresee any issues or concerns with the proposed revised approach and the use of these data to support the relicensing effort at Byllesby-Buck?

Let us know if you have any other recommendations or concerns or if you would prefer to have a call to discuss this issue in further detail.

Thanks,

Misty

**Misty Huddleston**, PhD

Associate, SR. Environmental Scientist

**HDR**

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*The Delaware Nation*  
**Historic Preservation Department**  
31064 State Highway 281  
Anadarko, OK 73005  
Phone (405)247-2448

November 9, 2020

To Whom It May Concern:

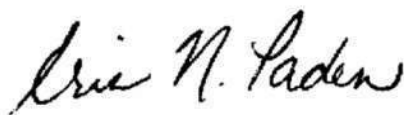
The Delaware Nation Historic Preservation Department received correspondence regarding the following referenced project(s).

**Project(s): Bylesby-Buck Hydroelectric Project (FERC No. 2514)**

Our office is committed to protecting tribal heritage, culture and religion with particular concern for archaeological sites potentially containing burials and associated funerary objects.

The Lenape people occupied the area indicated in your letter prior to European contact until their eventual removal to our present locations. According to our files, the location of the proposed project does not endanger cultural, or religious sites of interest to the Delaware Nation. **Please continue with the project as planned** keeping in mind during construction should an archaeological site or artifacts inadvertently be uncovered, all construction and ground disturbing activities should immediately be halted until the appropriate state agencies, as well as this office, are notified (within 24 hours), and a proper archaeological assessment can be made.

Please note the Delaware Nation, the Delaware Tribe of Indians, and the Stockbridge Munsee Band of Mohican Indians are the only Federally Recognized Delaware/Lenape entities in the United States and consultation must be made only with designated staff of these three tribes. We appreciate your cooperation in contacting the Delaware Nation Historic Preservation Office to conduct proper Section 106 consultation. Should you have any questions, feel free to contact our offices at 405-247-2448 ext. 1403.



Erin Paden  
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Delaware Nation  
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epaden@delawarenation-nsn.gov

## Yayac, Maggie

---

**Subject:** FW: Byllesby-Buck Recreation Site Visit Meeting Summary  
**Attachments:** AEP Byllesby-Buck Recreation Stakeholder Site Visit Summary\_10282020.pdf

**From:** Yayac, Maggie

**Sent:** Wednesday, November 18, 2020 9:20 AM

**To:** Kittrell, Bill (DGIF <bill.kittrell@dwr.virginia.gov>; John Copeland <john.copeland@dwr.virginia.gov>; sam.sweeney@dcr.virginia.gov; rex.hill@carrollcountyva.gov; Boyette, Benjamin <benjamin.boyette@dwr.virginia.gov>; toby.mcclanahan@dwr.virginia.gov; james.elliott@dcr.virginia.gov

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**Subject:** Byllesby-Buck Recreation Site Visit Meeting Summary

Good morning,

Attached is the meeting summary documenting the recreation site visit at Byllesby-Buck. I've also cc'd the stakeholders that weren't able to make the trip so they would have the latest summary. Please let me know if you have any questions or comments. I hope you all have enjoyable, safe holidays if we don't talk before!

Thanks,

**Maggie Yayac**  
*Regulatory Specialist*

**HDR**  
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# Meeting Summary

Project: Byllesby-Buck Hydroelectric Project (FERC No. 2514) - Relicensing

Subject: Byllesby-Buck Recreation Site Visit

Date: Wednesday, October 28, 2020

Location: Byllesby-Buck

Attendees:

Bill Kittrell (VDWR)	Liz Parcell (AEP)
Ben Boyette (VDWR)	Tristan Cleveland (LPDA)
Toby McClanahan (VDWR)	Sarah Kulpa (HDR)
John Copeland (VDWR)	Maggie Yayac (HDR)
Sam Sweeney (New River Trail State Park - VDCR)	
Jimmy Elliott (New River Trail State Park - VDCR)	
Rex Hill (Carroll County)	

## General Comments:

- At each recreation facility, HDR reviewed the trail camera findings, online survey results and presented the recreation features that were studied in support of the Recreation Study Plan.
- Virginia Department of Wildlife Resources (VDWR) explained their recreation goals are to support fishing, hunting, boating, and wildlife viewing. VDWR does not promote primitive camping on its lands.
- Tom Hampton is the VDWR lead for the Memorandum of Agreement with Appalachian that governs the land lease and terms of the Byllesby Boat Launch.
- Thompson Campground site – Sam Sweeney explained that the New River Trail State Park is still very interested in acquiring, re-developing, maintaining, and operating the former Thompson Campground, located between Byllesby and Buck Dams. Previous efforts (1990s and as recently as two years ago with an attempt to reach terms of a 99-year lease) by the State Park to acquire the land from USFS were unsuccessful, reportedly due to unresolvable USFS interests pertaining to liability and insurance. This area is the most suitable area for a campground near the Project and has existing picnic areas, horse facilities, and general campground infrastructure. While there is still widespread interest in this development, the project currently lacks a champion at the federal level (legislative or agency).
- Primitive camping is not encouraged on State Park or VDWR lands but is known to occur. There is little to no posted signage about whether and where camping is allowed.
- Posting a 911 address at formal recreation sites could aid in emergency response. Lack of cell phone coverage is also a safety concern at nearly all of the recreation areas at the project.

- Global comments and recommendations for improved signage regarding intended use, restricted access areas (e.g. tailrace areas, dams), and consistent FERC, regulatory, and identification signage.
- Photos of each recreation facility discussed in this meeting summary are included.

### **Recreation Facilities (in order of visitation)**

- **Byllesby Boat Launch** – VDWR noted that the only approved use of this facility is for boating and fishing. The site is also used for duck hunting access in the winter months. All other use is technically considered trespass. Site is open at all hours for these recreation activities only.
  - VDWR performs site maintenance once a month at a minimum. VDWR contracts with a vendor for regular mowing and trash pickup.
  - The access road to the site is on the list (i.e., Carroll County 6-year plan) to be paved by Virginia Department of Transportation. VDWR noted that they do not control the fabrication or placement of the “trailblazer” signs on public roads.
  - The boat ramp is not usable when the reservoir is drawn down (e.g., for dam maintenance). Appalachian pointed out that the frequency of drawdowns has and is expected to continue to decrease due to operation of the inflatable crest gates preventing flashboard failure.
  - The facility is generally subject to flooding during periods of high inflow.
    - VDWR reported that the area appears to be subject to larger and more frequent flood events over recent years (due to precipitation events).
    - Because of flood siltation deposits, the parking area must be regularly scraped and new aggregate placed.
  - Concerns: Unauthorized uses (including nighttime parking not for fishing access), congestion along the bank (greatest fishing pressure is summer months), and flooding. Other resident comments to VDWR include request for lighting and restrooms. It was noted that any amenities such as lighting, restrooms, benches, etc. would be difficult to maintain due to the flooding. The existing paved walkway near the bank is sloped (shifted) to the extent that it may not conform to ADA requirements for grade.
    - VDWR noted it is common not to have restroom facilities at remote sites such as this.
    - The site may not have a 911 address (Rex Hill to confirm).
  - Potential improvements: concrete paving of parking lot (though significant cost) and/or paved accessible parking spot, extension of bank fishing (if feasible due to floodplain development and wetland impacts), solar-powered dusk to dawn light (near main sign), and facilities to promote wildlife viewing.

- **Fowlers Ferry (informal):** Appalachian owns the land on the river side of the road (confirmed on Carroll County GIS map). There are a few informal recreation spots along the river, but one larger area unseen from the road. Ben Boyette explained that known/observed uses include picnicking, primitive camping, ATV, fishing, wildlife viewing wading, and canoe/kayaking. A large informal road through the area creates a loop, and there are numerous informal road/trail spurs. Ben also confirmed that this area saw the highest usage of illegal activity within/adjacent to the Project Boundary. The site provides a unique viewing perspective and reservoir access for this side of the river. The County Sheriff Deputy patrols the area but relies heavily on VDWR Conservation Officers to do so.
  - Concerns:
    - Illegal uses, trash, unauthorized and uncontrolled vehicle access.
    - Lack of signage regarding land ownership or authorized uses (if any).
    - ATV use is not compatible with VDWR site uses but would be difficult to prevent.
    - Large area that is largely out of sight from the road.
  - Opportunities:
    - The agencies would like to control (or at a minimum have grounds to enforce) usage and access.
    - Bill mentioned that VDWR has a grant to lease land from private owners for long term fishing and boating access that may apply to a site such as this. VDWR has interest in acquiring the site from Appalachian.
    - Potential to serve as (hand) launch area for canoes and kayaks (although not much river reach to paddle before Buck dam).
    - Barriers could be placed to prevent vehicle access and a designated parking area established near the road.
    - Potential to formalize foot path.
- **Buck Dam Picnic Area:** Users access the Buck bypass via the New River trail informally to bank fish around this facility. The State Park maintains the site and the restroom (portable toilet, not ADA accessible). The New River Trail State Park right of way is 40 ft from the center of the trail (in both directions). Agencies noted it is unclear how far away users are required to stay from the dam.
  - Opportunities:
    - Clear signage below the dam demarcating point at which access is prohibited (difficult for VDWR to enforce no access to the dam without this).

- Additional signage and audible alarm warning of dam operations and rising water levels.
- **Buck Dam Canoe Portage/Downstream Fishing Access:**
  - Canoe portage is not heavily used. Put-in to the tailrace below the dam and powerhouse is steep and the current is swift, making it hard to put a canoe in. Canoe take-out commonly accumulates debris and is also relatively steep. This portage is unlikely to be widely used because the user base/craft type is very different for the reservoir and the downstream river reach. Use would likely be to connect the reservoir and downstream reach for continuity by very motivated paddlers.
  - Agencies noted that access to the island across the bypass reach for fishing is by boat (traveling upstream) or wading (less often due to challenging terrain and flows).
  - VDWR noted that they have not issued as many tickets to trespassers near the Buck powerhouse/tailrace channel in recent years and No Trespassing signage has likely deterred users. Usage has gone down over the recent years, however from an angler perspective it is still a desirable fishing location because the tailrace channel attracts fish.
    - Discussion of origins of 200-yard setback from dam or powerhouse rule (Appalachian and VDWR to confirm this)<sup>1</sup>.
  - Opportunities:
    - Agencies suggest a more level portage or a step-down launch, though noted that installed at Foster Falls would likely receive much more use than this site.
    - Installation of clear usage signage below the dam and emergency contact signage should a user access the portage outside of station work hours and need help.
    - There is little signage on the island between the dam and powerhouse, including for trespassing or fishing setbacks making it difficult for VDWR to enforce use of the area.
  - HDR/LPDA investigated other portage opportunities on river-left in the bypass off the New River trail. Upstream of the dam is a large wetland blocking access and below the dam has geology unsuitable to canoeing or kayaking.
- **Loafer's Rest (informal area)** – Group did not visit Loafer's Rest, but discussed it from Buck Dam Put-In. Parcels of land in this area are presently leased from Appalachian to VDWR

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<sup>1</sup> Based on further review after the site visit, the 200-yard setback is not universal/state-wide but applicable only to Kerr Dam and Leesville Dam. 4VAC15-370-40. Vessels prohibited within certain areas below John H. Kerr Dam and Leesville Dam. Appalachian to evaluate appropriate public safety setback requirement(s) and implement related measures as appropriate.

under a separate agreement from 2000. VDWR noted that this area provides the best river access downstream of Buck Dam and supports a broad user base.

- Opportunity:
  - Formalize as a VDWR river access, improve unmaintained trail to Buck tailrace, install signage, locate parking area closer to river (especially to improve access for senior citizens).
- **New River Trail Picnic Area** – VDCR maintains the area and noted the amenities (grill, benches, picnic table, etc.) have likely been there for well over 10 years. There is a trash can at this location (trash pickup done by State Park). They do not maintain the trail from Buck Dam Rd or the informal parking area. Does not appear the parking area could be expanded immediately adjacent to the picnic area (currently space for 2 vehicles). The road and shoulder is U.S. Forest Service land.
  - Opportunities:
    - Additional identifying signage and posted rules for use
    - Repair/update existing amenities such as bench and fire pit.
- **New River Canoe Launch (downstream of Byllesby Dam)** – Discussion of the temporary access road Appalachian periodically replaces for vehicle/equipment access to the lower level of the powerhouse and whether it will become permanent in the future. Bill expressed concern that the temporary access road washes away and deposits culverts and other materials downstream and noted that if the road is to be made permanent a bottomless culvert may be necessary. No specific recreational improvements were noted or discussed at this site. There is clear signage denoted trespassing and fishing access boundaries along the bank, though no formal FERC recreation sign. There is also no boating/fishing boundary signage from the water. The group discussed that the area is used more for fishing/river access than canoe or kayak launch.
- **Byllesby Canoe Portage** - VDWR noted that the portage take-out used to be along the left bank close to the parking area. However, when the wetland was created following dredging in the late 90's, the portage was moved to the current location. VDWR is concerned that the linear distance to walk between the take-out and parking lot is far and creates a barrier to use. The group discussed the potential of cutting a channel through the wetland or adding a boardwalk, but these may not be feasible due to wetland impacts and the probability of the channel silting in during frequent flood events.
  - VDWR noted that in the past they've tried to use the portage for emergency boat access to Byllesby reservoir (significantly reduces travel time if don't have to drive to the opposite side of the river to launch), but they were only able to launch the boat near the buoy line since the portage was heavily silted and the water depth was nearly too shallow. VDWR inquired about the potential for an emergency-use only boat access in the Byllesby reservoir to allow them to gain access to the river faster.

- HDR/LPDA walked the New River trail upstream of the site to assess potential for portage take-out above the wetland, however the portage route would be even longer if that was implemented. Desktop estimates of trail length are provided:
  - Portage take-out to access gate: 775 feet
  - Access gate to parking lot: 460 feet
  - Top of wetland to parking lot: 2,400 feet
- **Closing** – Brief discussion/recap of major observations at each site. Appalachian/HDR to develop meeting summary and distribute to this group for review (copy others invited to meeting but who were unable to attend, for awareness). Meeting participants agreed that the trail camera monitoring had proven effective with only one camera lost to vandalism/theft and had captured data from a peak recreation season. The group supported removal of the trail cameras at the end of the month, in accordance with the schedule proposed in the approved Revised Study Plan.



**Photos of Recreation Facilities**

**Byllesby VWDR Boat Launch**



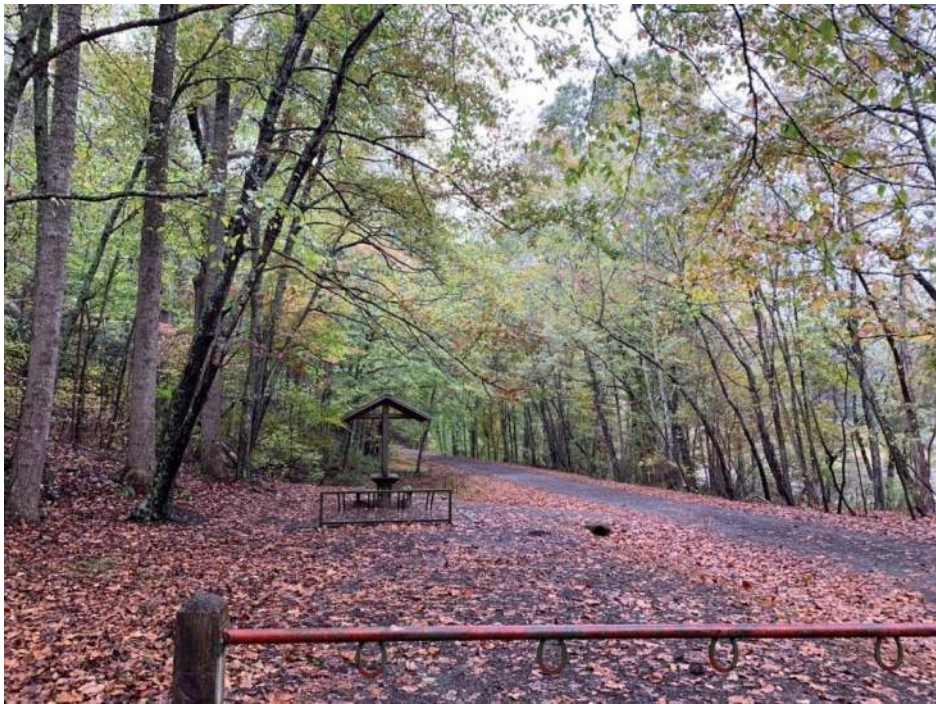
**Byllesby VWDR Boat Launch Parking Area**



**Fowlers Ferry (informal)**



**Buck Dam Picnic Area**



### Buck Dam Canoe Portage Take-Out



### Buck Dam Canoe Portage Put-In



**Interested Buck Angler Access from Loafer's Rest**



**New River Trail Picnic Area Lower Area**



**New River Trail Picnic Area Upper Area**



**New River Canoe Launch**



**Byllesby Canoe Portage Take-Out**



**Byllesby Canoe Portage Parking Lot**



Thompson Campground site



## Yayac, Maggie

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**Subject:** FW: Byllesby-Buck Hydroelectric Project - Proposed Date for ISR Meeting

**From:** Kulpa, Sarah

**Sent:** Friday, December 4, 2020 5:24 PM

**To:** USFWS Chesapeake Bay Field Office - Janet Norman <janet\_norman@fws.gov>; VADCR - Lynn Crump <lynn.crump@dcr.virginia.gov>; New River Trail State Park - Sam Sweeney <Sam.Sweeney@dcr.virginia.gov>; John Copeland (John.Copeland@dgif.virginia.gov) <John.Copeland@dgif.virginia.gov>; Bill Kittrell (Bill.Kittrell@dgif.virginia.gov) <Bill.Kittrell@dgif.virginia.gov>; Jessica\_Pica@fws.gov; Grist, Joseph <joseph.grist@deq.virginia.gov>; Brian Mcgurk <brian.mcgurk@deq.virginia.gov>

**Cc:** 'ebparcell@aep.com' <ebparcell@aep.com>; 'jmmagalski@aep.com' <jmmagalski@aep.com>; Jon Studio <jastudio@edge-es.com>; John Spaeth <jpspaeth@edge-es.com>; 'Allyson Conner (allyson.conner@ferc.gov)' <allyson.conner@ferc.gov>

**Subject:** Byllesby-Buck Hydroelectric Project - Proposed Date for ISR Meeting

Good evening,

I hope you all had a restful and safe Thanksgiving holiday...feels like too long ago already. Pursuant to the ILP schedule, on or by January 18, 2021 Appalachian Power Company plans to file the Byllesby-Buck Project Initial Study Report (ISR). Within 15 days of filing the ISR, Appalachian Power Company is required to have a ISR meeting. We are planning to virtually host the Byllesby-Buck ISR meeting on Thursday, January 28, 2021 from 10:00 a.m. - 3:00 p.m. (approx.) with a 30 minute break for lunch. As key stakeholders, we would like to confirm your availabilities so that we can consider making any scheduling adjustments. Once the date is confirmed a more detailed schedule including proposed times for individual studies will be distributed with the ISR.

Please let me know if you have any unavoidable conflicts with the proposed day or timeframe by December 11<sup>th</sup>, so we can try to adjust.

Thank you,

**Sarah Kulpa**

*Project Manager*

**HDR**

440 S. Church Street, Suite 900

Charlotte, NC 28202-2075

**D** 704.248.3620 **M** 315.415.8703

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FEDERAL ENERGY REGULATORY COMMISSION

Washington, DC 20426

December 23, 2020

OFFICE OF ENERGY PROJECTS

Project No. P-2514-186 – Virginia  
Byllesby-Buck Hydroelectric Project  
Appalachian Power Company

VIA FERC Service

**Subject: Scoping Document 3 for the Byllesby-Buck Hydroelectric Project,  
P-2514-186**

To the Party Addressed:

The Federal Energy Regulatory Commission (Commission) is currently reviewing the Pre-Application Document submitted by Appalachian Power Company (Appalachian) for relicensing the Byllesby-Buck Hydroelectric Project (FERC No. 2514) (Byllesby-Buck Project). The project consists of two developments, Byllesby and Buck, and is located on the New River in Carroll County, Virginia. The project does not occupy federal land.

Under the Integrated Licensing Process, Appalachian must file its preliminary licensing proposal or draft license application by October 1, 2021. The final license application must be filed with the Commission by February 28, 2022, two years before the license expires.

Pursuant to the National Environmental Policy Act (NEPA) of 1969, as amended, Commission staff intends to prepare an environmental assessment (EA) or an environmental impact statement (EIS), which will be used by the Commission to determine whether, and under what conditions, to issue a new license for the project. To support and assist our environmental review, we are conducting scoping to ensure that all pertinent issues are identified and analyzed, and that the NEPA document is thorough and balanced.

Our preliminary review of the scope of environmental issues associated with the proposed relicensing of the Byllesby-Buck Project was described in Scoping Document 1 (SD1), issued March 8, 2019. We requested comments on SD1, conducted an environmental site review, and held scoping meetings on April 10 and 11, 2019, to hear the views of all interested agencies and entities on the scope of issues that should be

addressed in the NEPA document. Based on the meetings and the submission of written comments, we updated SD1 and issued SD2 on June 21, 2019.

The Council on Environmental Quality (CEQ) issued a final rule on July 15, 2020, revising the regulations under 40 C.F.R. Parts 1500 – 1518 that federal agencies use to implement NEPA (*see* Update to the Regulations Implementing the Procedural Provisions of the National Environmental Policy Act, 85 Fed. Reg. 43,304). The Final Rule became effective on and applies to any NEPA process begun after September 14, 2020. An agency may also apply the regulations to ongoing activities and environmental documents begun before September 14, 2020, which includes the Byllesby-Buck Project. Commission staff intends to conduct its NEPA review in accordance with CEQ's new regulations. Therefore, we have updated SD2, accordingly. SD3 reflects our current view of issues and alternatives to be considered in the NEPA document. ***Key changes from SD2 to SD3 are identified in bold and italicized type.***

SD3 is being distributed to the Commission's official mailing list (see section 7.0 of the attached SD3). If you wish to be added to, or removed from, the Commission's official mailing list, please send your request by email to [ferconlinesupport@ferc.gov](mailto:ferconlinesupport@ferc.gov). In lieu of an email request, you may submit a paper request. Submissions sent via the U.S. Postal Service must be addressed to: Kimberly D. Bose, Secretary, Federal Energy Regulatory Commission, 888 First Street, N.E., Room 1A, Washington, DC, 20426. Submissions sent via any other carrier must be addressed to: Kimberly D. Bose, Secretary, Federal Energy Regulatory Commission, 12225 Wilkens Avenue, Rockville, Maryland, 20852. All written or emailed requests must specify your wish to be removed from or added to the mailing list and must clearly identify the following on the first page: **Byllesby-Buck Hydroelectric Project No. 2514-186.**

You may also register online at <http://www.ferc.gov/docs-filing/esubscription.asp> to be notified via email of new filings and issuances related to this or other pending projects. For assistance, please contact FERC Online Support at [ferconlinesupport@ferc.gov](mailto:ferconlinesupport@ferc.gov).

The enclosed SD3 supersedes SD2. SD3 is issued for informational use by all interested parties; no response is required. If you have any questions about SD3, the scoping process, or how Commission staff will develop the NEPA document for this project, please contact Allyson Conner at [allyson.conner@ferc.gov](mailto:allyson.conner@ferc.gov) or (202) 502-6082. Additional information about the Commission's licensing process and the Byllesby-Buck Project may be obtained from our website ([www.ferc.gov](http://www.ferc.gov)) or Appalachian's licensing website, [www.aephydro.com](http://www.aephydro.com).

Enclosure: Scoping Document 3

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SCOPING DOCUMENT 3  
BYLLESBY-BUCK HYDROELECTRIC PROJECT  
VIRGINIA  
PROJECT NO. 2514-186



Federal Energy Regulatory Commission  
Office of Energy Projects  
Division of Hydropower Licensing  
Washington, DC

DECEMBER 2020

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# SCOPING DOCUMENT 3

## Byllesby-Buck Hydroelectric Project, No. 2514-186

### 1.0 INTRODUCTION

The Federal Energy Regulatory Commission (Commission or FERC), under the authority of the Federal Power Act (FPA),<sup>1</sup> may issue licenses for terms ranging from 30 to 50 years for the construction, operation, and maintenance of non-federal hydroelectric projects. On January 7, 2019, Appalachian Power Company (Appalachian) filed a Pre-Application Document (PAD) and Notice of Intent to seek a new license for the Byllesby-Buck Hydroelectric Project, FERC Project No. 2514 (Byllesby-Buck Project or project).<sup>2</sup>

The Byllesby-Buck Project consists of two developments, Byllesby and Buck, and is located on the New River in Carroll County, Virginia. The average annual generation from 2012 to 2016 of the Byllesby Development was 36,906 megawatt-hours (MWh) and of the Buck Development was 30,874 MWh.

A detailed description of the project is provided in section 3.0. The location of the project is shown on figure 1. The Byllesby-Buck Project does not occupy federal land.

The National Environmental Policy Act (NEPA) of 1969,<sup>3</sup> the Commission's regulations, and other applicable laws require that we independently evaluate the environmental effects of relicensing the Byllesby-Buck Project as proposed, and also consider reasonable alternatives to the licensee's proposed action.<sup>4</sup> *We will prepare*

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<sup>1</sup> 16 U.S.C. § 791(a)-825(r) (2012).

<sup>2</sup> The current license for the Byllesby-Buck Project was issued on March 28, 1994, and expires on February 29, 2024.

<sup>3</sup> National Environmental Policy Act of 1969, 42 U.S.C. §§ 4321-4370(f) (2012).

<sup>4</sup> *The Council on Environmental Quality (CEQ) issued a final rule on July 15, 2020, revising the regulations under 40 C.F.R. Parts 1500 – 1518 that federal agencies use to implement NEPA (see Update to the Regulations Implementing the Procedural Provisions of the National Environmental Policy Act, 85 Fed. Reg. 43,304). The Final Rule became effective on and applies to any NEPA process begun after September 14, 2020. An agency may also apply the regulations to ongoing activities and environmental documents begun before September 14, 2020, which includes the West Canada Creek Project. Commission staff intends to conduct its NEPA review in accordance with CEQ's new regulations.*

*either* an environmental assessment (EA) *or an environmental impact statement (EIS)* that describes and evaluates the probable effects, if any, of the proposed action and alternatives. The *Commission's* scoping process will *help determine the required level of analysis and* satisfy the NEPA scoping requirements, irrespective of whether the Commission *prepares* an EA or an EIS.

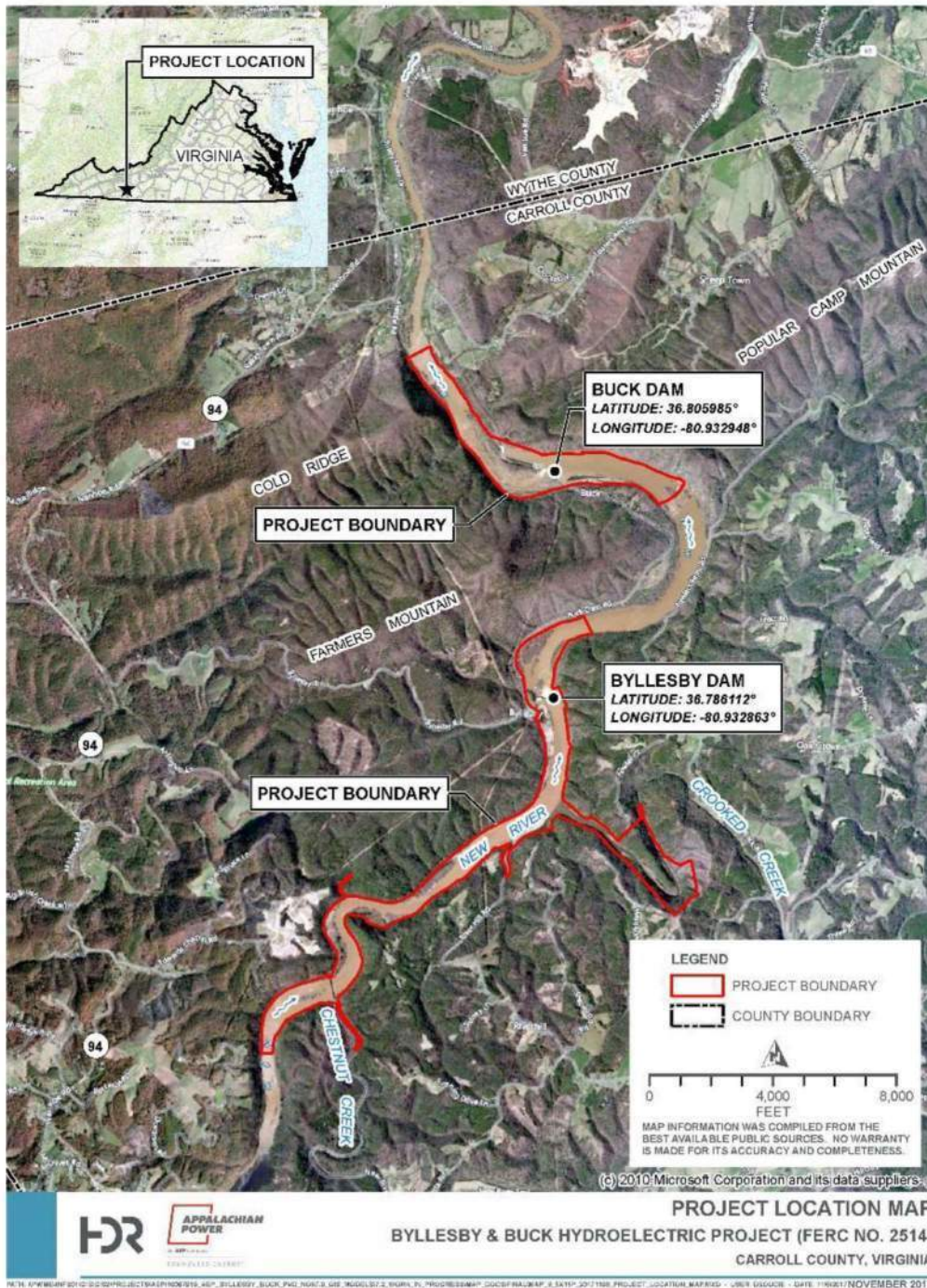


Figure 1. Location of the project. (Source: Appalachian).

## 2.0 SCOPING

Scoping Document 3 (SD3) is intended to advise all participants as to the proposed scope of the *NEPA document*. This document contains: (1) a description of the scoping process and *current processing* schedule for the *license application*; (2) a description of the proposed action and alternatives; (3) a preliminary identification of environmental issues; and (4) a preliminary list of comprehensive plans that are applicable to the project.

### 2.1 PURPOSES OF SCOPING

Scoping is the process used to identify issues, concerns, and opportunities for enhancement or mitigation associated with a proposed action. In general, scoping should be conducted during the early planning stages of a project. The purposes of the scoping process are as follows:

- invite participation of federal, state, and local resource agencies, Indian tribes, non-governmental organizations (NGOs), and the public to identify significant environmental and socioeconomic issues related to the proposed project;
- determine the resource issues, depth of analysis, and significance of issues to be addressed in the *NEPA document*;
- identify reasonable alternatives to the proposed action that should be evaluated in the *NEPA document*;
- solicit, from participants, available information on the resources at issue, including existing information and study needs; and
- determine the resource areas and potential issues that do not require detailed analysis during review of the project.

### 2.2 COMMENTS, SCOPING MEETINGS, AND ENVIRONMENTAL SITE REVIEW

Commission staff issued Scoping Document 1 (SD1) on March 8, 2019, to enable resource agencies, Indian tribes, NGO's, and the public to more effectively participate in and contribute to the scoping process. In SD1, we requested clarification of the preliminary issues concerning the project and identification of any new issues that needed to be addressed in the *NEPA document*. We revised SD1 following the scoping meetings, environmental site review, and review of written comments filed during the scoping comment period, which ended May 8, 2019.

We conducted scoping meetings in Galax, Virginia on April 10 and 11, 2019, and an environmental site review was conducted on April 10, 2019, to identify potential resource issues associated with the Byllesby-Buck Project. The scoping meetings and environmental site review were noticed in local newspapers and the Federal Register. A court reporter recorded and transcribed oral comments made during both scoping meetings.

In addition to oral comments received at the scoping meetings, written comments were filed by the following entities:

<u>Commenting Entity</u>	<u>Filing Date</u>
Don Orth, Virginia Tech	March 15, 2019
Bureau of Indian Affairs	April 2, 2019
Arlene Warren, Virginia Department of Health	April 30, 2019
National Park Service	May 7, 2019
U.S. Fish and Wildlife Service	May 7, 2019
Virginia Department of Game and Inland Fisheries	May 7, 2019
Virginia Department of Environmental Quality	May 7, 2019
Caitlin Carey, Virginia Tech	May 8, 2019
New River Conservancy	May 8, 2019
Virginia Department of Conservation and Recreation	May 8, 2019

***On June 21, 2019, we issued SD2, which presented our view of issues and alternatives to be considered in the NEPA document based on comments received during scoping.***

***As discussed above, CEQ subsequently issued a final rule on July 15, 2020, revising the regulations under 40 C.F.R. Parts 1500 – 1518 that federal agencies use to implement NEPA. The revised regulations repealed the definition of cumulative effects and provided a new definition for effects to be considered in the environmental analysis. Accordingly, we have revised SD2 to address comments related to cumulative impacts and removed the discussion of cumulative effects from section 4.0, consistent with CEQ’s revised regulations.***

All comments received are part of the Commission’s official record for the project. ***Information in the official file is available for review on the Commission’s website at <http://www.ferc.gov> using the “eLibrary” link. At this time, the Commission has suspended access to the Commission’s Public Reference Room due to the proclamation declaring a National Emergency concerning the Novel Coronavirus Disease (COVID-19) issued by the President on March 13, 2020. For assistance,***



*please contact FERC at [FERCOnlineSupport@ferc.gov](mailto:FERCOnlineSupport@ferc.gov), (866) 208-3676 (toll free), or (202) 502-8659 (TTY).*

## **2.2.1 Issues Raised During Scoping**

The issues raised by participants in the scoping process are summarized below. The summaries do not include every oral or written comment made during the scoping process.

### General Comments

*Comment:* Virginia Department of Game and Inland Fisheries (Virginia DGIF), U.S. Fish and Wildlife Service (FWS), and the New River Conservancy (NRC) state that a potentially lower (e.g., 1 foot) winter pool elevation (to minimize ice damage to project facilities) could result in bank erosion at the project in areas where there is a limited riparian buffer and could inhibit recreational access to the impoundments. Virginia DGIF also comments that lower winter pool elevations could impact waterfowl hunting. In addition, FWS states that lower winter pool elevations could affect wetlands and bog turtle habitat.

*Response:* In the PAD, Appalachian states that it is evaluating the feasibility of operating the developments with 1-foot lower reservoir levels during the winter months of December through March, which would reduce the risk of overtopping project structures when ice jams occur. No other changes in project operation are proposed. Should Appalachian formally propose to lower the impoundments during winter in its final license application, we would analyze the effects of the proposed measure on potentially affected resources in our Environmental Assessment (EA) for the project.

### Project Boundary

*Comment:* Numerous commenters suggest that the project boundary should include the approximately 1.2-mile-long stretch of river between the two dams of the project, which is not currently enclosed in the existing project boundary. The commenters recommend including this stretch of river due to direct effects of project operation on multiple resources.

*Response:* The geographic scope of analysis for project effects on a given resource is not limited to the existing project boundary, which is an administrative area that includes all project works, lands, and facilities that are necessary for project operation and/or serve a project purpose. At this time, creating a single, continuous project boundary, encompassing the dams at both developments and the 1.2-mile-long stretch of the New River between those dams, would not affect any studies to be

conducted or staff's analysis of the effects of project operation on environmental resources, which is not limited to the project boundary.

### Cumulative Effects

*Comment:* In SD1, staff did not identify any resources that could be cumulatively affected by the continued operation and maintenance of the Byllesby-Buck Project in combination with other hydroelectric projects and activities in the New River Basin. FWS states that the project, in conjunction with other dams and hydropower projects on the New and Kanawha Rivers, contributes to cumulative effects on fish and freshwater mussel populations by: forming barriers to migration and dispersal, causing entrainment impacts, reducing riverine (riffle) habitats and increasing lacustrine habitats where sediments accumulate, causing fish stranding in bypassed reaches with insufficient minimum flows, reducing the transport of suitable spawning substrate, and increasing water temperatures.

Virginia DGIF recommends the following resources could be cumulatively affected: (1) sedimentation impacts to reservoir habitat; (2) downstream sediment transport due to project operation with multiple ecological and recreational effects; (3) temperature and other water quality parameters affected by the existence of the project; and (4) riverine habitat and biota altered by the project reservoirs and in the bypassed reaches.

*Response: In SD2, we stated that, "should data collected during the required studies demonstrate that project effects extend beyond the immediate vicinity of the project and interact with other projects and activities in the New River Basin in a manner that could elicit cumulative effects, the scope of our analyses will be re-evaluated at that time." As discussed above, however, we have removed the discussion of cumulative effects from section 4.0, Scope of Resource Issues, of SD3 to be consistent with CEQ's revised NEPA regulations. Commission staff will consider and evaluate effects from the proposed action and alternatives that are reasonably foreseeable and have a reasonably close causal relationship to the proposed action or alternatives.*

### Geologic and Soil Resources

*Comment:* Several commenters state that sedimentation and sediment transport (including the potential re-mobilization of PCBs<sup>5</sup> due to project operation and

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<sup>5</sup> PCBs, or polychlorinated biphenyls, are an industrial contaminant whose use was banned in 1979, but are still present as legacy contaminants in some aquatic systems, where they associate with, and are bound to, sediments.

maintenance dredging) have significant effects on habitats at the project and that such effects need to be assessed.

*Response:* We have added a bullet to section **4.1** of this document to indicate that our environmental analysis will evaluate the effects of continued project operation and maintenance (including localized maintenance dredging via the project's drag rake<sup>6</sup> and more infrequent impoundment-wide dredging after large storm events) on sedimentation in the project impoundments and sediment transport through each development, including the potential for the re-mobilization of PCBs.

### Aquatic Resources

*Comment:* Virginia DGIF, FWS, and NRC state that, in addition to water temperature (already included in SD1), water quality issues need to include a consideration of the effects of project operation and maintenance on turbidity and chlorophyll a levels.

*Response:* While turbidity could be affected by project operation and maintenance (e.g., by releasing sediment collected by the drag rake through the project intakes), it is unclear, nor do the commenters specify, how chlorophyll a levels could be affected by project operation. Accordingly, we modified a bullet in section **4.2** of this document to indicate that our environmental analysis will include the effects of project operation and maintenance on turbidity levels, but did not add chlorophyll a, at this time, as a resource that will be considered in our environmental analysis.

*Comment:* Don Orth, FWS, Virginia DGIF, and Caitlin Carey comment that staff's analysis should include the effect of project operation on Eastern hellbender, New River crayfish, and freshwater mussels, including green floater and pistolgrip.

*Response:* Eastern hellbender were included in section 4.2.2 of SD1 as a species of special concern. We modified this bullet *in section 4.2* to also include the effects of project operation on freshwater mussels (including green floater and pistolgrip) and New River crayfish.

*Comment:* Virginia DGIF and NRC state the analysis of the existing 360-cubic foot per second (cfs) minimum flow for aquatic resources (referenced in SD1) needs to include an examination of how power generation flow fluctuations affect aquatic resources in terms of effects on fish and mussel spawning.

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<sup>6</sup> The trash rake systems at the project were upgraded in 1997 to include a drag rake that extends into the forebays and scrapes along the bottom of the impoundments to remove built-up sediments that are then passed downstream through the intakes.

Response: In section 4.2.2 of SD1, we included a bullet indicating that our environmental analysis will consider the adequacy of the existing 360-cfs minimum flow at each development. Regarding potential flow fluctuations, Appalachian proposes to continue operating the project in a run-of-river mode, whereby outflow from the project approximates inflow. Therefore, flow fluctuations downstream of the tailraces associated with power generation that could affect fish and mussel spawning are not expected at the Byllesby-Buck Project due to the proposed run-of-river operation. Consequently, no changes have been made to this document.

### Terrestrial Resources

Comment: During the scoping meetings, Virginia DGIF noted that the Wetland and Riparian Habitat Characterization study proposed in the PAD was not included in the list of proposed studies provided in SD1.

Response: The list of proposed studies in **SD2 included** the Wetland and Riparian Habitat Characterization study that was proposed in the PAD. ***However, because the studies are either completed or underway, the list of proposed studies has been removed from SD3.***

Comment: Don Orth, FWS, Virginia DGIF, and Caitlin Carey comment that an analysis of continued project operation and maintenance on riparian and wetland habitat needs to include consideration of emergent and submerged aquatic vegetation beds (e.g., hornleaf riverweed and water willow) and the importance of these beds to terrestrial and aquatic species.

Response: We have added emergent and submerged aquatic vegetation beds, including hornleaf riverweed and water willow, to the bulleted list of resources in section 4.3 as terrestrial resources that could be affected by project operation and maintenance.

### Threatened and Endangered Species

Comment: FWS and Virginia DGIF comment that the candy darter, which occurs in the upper New River watershed, was federally listed as endangered in November 2018 and is known to occur in Cripple Creek, a tributary that enters the New River approximately 5 river miles downstream from the Buck Development.

Response: Due to the potential for this listed species to occur in the project area, we have added the candy darter to the bulleted list in section 4.4, of federally listed species that could be affected by project operation and maintenance.

*Comment:* FWS states that the potential 1-foot winter drawdown at both developments could impact the federally listed threatened bog turtle (*Glyptemus muhlenbergii*), which is dependent on wetland habitat for all of its life stages.

*Response:* We have added the bog turtle to the bulleted list in section 4.4, as a federally listed species that could be affected by project operation and maintenance.

### Recreation Resources

*Comment:* Numerous commenters state that project tailraces tend to be popular locations for fishing and that Appalachian does not provide access to such desirable fishing locations.

*Response:* We have modified a bullet in section 4.5 to include evaluation of fishing opportunities in the project developments' tailraces.

*Comment:* Virginia DGIF states the analysis of the existing 360-cfs minimum flow for aquatic resources needs to include an examination of how power generation flow fluctuations impact recreational use.

*Response:* In section 4.2.5 of SD1, we included a bullet on the effects of project operation on recreation in the project area. Appalachian proposes to continue operating the project in a run-of-river mode, whereby outflow from the project approximates inflow. Therefore, flow fluctuations downstream of the tailraces associated with power generation that could affect recreation are not expected at the Byllesby-Buck Project due to the proposed run-of-river operation. Consequently, no changes have been made to this document.

### 3.0 PROPOSED ACTION AND ALTERNATIVES

In accordance with NEPA, the environmental analysis will consider the following alternatives, at a minimum: (1) the no-action alternative, (2) the applicant's proposed action, and (3) alternatives to the proposed action.

#### 3.1 NO-ACTION ALTERNATIVE

Under the no-action alternative, the Byllesby-Buck Project would continue to operate as required by the current project license (i.e., there would be no change to the existing environment). No new environmental protection, mitigation, or enhancement measures would be implemented. We use this alternative to establish baseline environmental conditions for comparison with other alternatives.

##### 3.1.1 Existing Project Facilities

The Byllesby Development consists of: (1) a 64-foot-high, 528-foot-long concrete dam and main spillway section topped with four sections of 9-foot-high flashboards, five sections of 9-foot-high inflatable Obermeyer crest gates, and six bays of 10-foot-high Tainter gates; (2) an auxiliary spillway including six sections of 9-foot-high flashboards; (3) a 239-acre impoundment with a gross storage capacity of 2,000 acre-feet; (4) a powerhouse containing four generating units with a total authorized installed capacity of 21.6 megawatts (MW); and (5) appurtenant facilities.

The Buck Development consists of: (1) a 42-foot-high, 353-foot-long concrete dam; (2) a 1,005-foot-long, 19-foot-high spillway section topped with 20 sections of 9-foot-high flashboards, four sections of 9-foot-high inflatable Obermeyer crest gates, and six bays of 10-foot-high Tainter gates; (3) a 66-acre impoundment with a gross storage capacity of 661 acre-feet; (4) a powerhouse containing three generating units with a total authorized installed capacity of 8.5 MW; and (5) appurtenant facilities

Each development is undergoing modification, as approved by an order amending license issued by the Commission on May 18, 2017,<sup>7</sup> to replace several sections of existing wooden flashboards with inflatable Obermeyer crest gates. Once installed and operational, the available Obermeyer crest gates will serve to smooth project operation by reducing instances of inadvertent flow to the bypassed reaches and the frequency of maintenance drawdowns associated with wooden flashboard failure and replacement.

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<sup>7</sup> 159 FERC ¶ 62,187.

### 3.1.2 Existing Project Operations

The Byllesby-Buck Project operates in a run-of-river mode under all flow conditions. Because the Buck Development is only about 3 miles downstream from the Byllesby Development, the operation of the two developments is closely coordinated. Buck Development operation is dependent on flows through the Byllesby Development. Under normal operating conditions, Appalachian operates the project to use available flows for powerhouse generation, and maintains the elevation of the Byllesby impoundment between 2,078.2 feet and 2,079.2 feet<sup>8</sup> and the Buck impoundment between 2,002.4 feet and 2,003.4 feet. Under article 403 of the current license, Appalachian is also required to release a minimum flow of 360 cubic feet per second (cfs) or inflow to the project, whichever is less, downstream of the project powerhouses.

When inflow to either development exceeds the maximum hydraulic capacity of the turbines (5,868 cfs for Byllesby and 3,540 cfs for Buck), the Tainter gates are opened to pass the excess flow. Gate openings are planned and based on monitoring of the upstream U.S. Geological Survey (USGS) gage at Galax (#03164000) and Byllesby and Buck forebay elevations. If inflows exceed the capacity of the Tainter gates, the inflatable Obermeyer crest gates are operated to pass additional flow, followed by manual tripping of the wooden flashboards, if required. The wooden flashboards must be subsequently re-installed during a period when the impoundment is drawn down to the spillway crest elevation. During flood-stage flows, all generating units at the powerhouse may need to be shut down due to the loss of operating head. The Byllesby auxiliary spillway is operated after release of all available inflatable crest gate and wooden flashboard sections, typically at flows in excess of 46,690 cfs.

Ramping rates are required under Article 406 of the current license for the protection of fish resources downstream of the Buck spillway. The gradual reduction of flow allows fish to progressively leave the bypassed reach, versus possible stranding at sudden flow discontinuation. Following periods of spill from the Buck spillway when a spillway gate has been opened 2 feet or more, Appalachian is required to discharge flows through a 2-foot-wide gate opening for at least 3 hours. Appalachian is then required to reduce the opening to 1 foot for at least an additional 3 hours, after which Appalachian may close the gate.

Tainter gate operation and electricity generation at both Byllesby and Buck is remotely controlled from Appalachian's 24-hour control center located in Columbus, Ohio. Operators are stationed at the control center 24 hours per day, 7 days per week. Plant personnel are present at the Byllesby-Buck Project during normal working hours (8 hours per day during weekday mornings and afternoons) to perform routine maintenance.

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<sup>8</sup> All elevations refer to National Geodetic Vertical Datum of 1929 (NGVD 29).

## **3.2 APPLICANT'S PROPOSAL**

The proposed action is to continue the existing operation and maintenance of the Byllesby-Buck Project. The current license for the project expires on February 29, 2024.

### **3.2.1 Proposed Project Facilities and Operation**

Appalachian is presently evaluating the feasibility and benefits of operating the developments with 1-foot-lower impoundment levels (i.e., still a 1-foot operating band, but with 1-foot lower normal maximum and minimum impoundment elevations) during the winter months (e.g., December through March). The purpose of the lower winter impoundment level would be to reduce the risk of overtopping project structures (and the resultant risks to the project, downstream areas, and personnel and public safety) due to ice jams on the New River, such as those that occurred at the project in January 2010. Should Appalachian propose this modification in its license application it is not expected to significantly affect project generation. No other changes to project operation or facilities are proposed at this time.

### **3.2.2 Proposed Environmental Measures**

Appalachian proposes to continue the existing operation and maintenance of the Byllesby-Buck Project which includes the protection, mitigation, and enhancement (PM&E) measures required by the current license and subsequent amendments. These measures are described below.

#### Geologic and Soil Resources

- There are no existing or proposed PM&E measures related to geology and soils for the Byllesby-Buck Project. The potential need for PM&E measures will be evaluated during the relicensing process.

#### Aquatic Resources

- Continue operating the project in a run-of-river mode, maintaining elevation of the Byllesby impoundment between 2,078.2 feet and 2,079.2 feet and the elevation of the Buck impoundment between 2,002.4 feet and 2,003.4 feet (Article 401).
- Continue providing a minimum flow of 360 cfs, or inflow to the project, whichever is less, to the New River downstream of each powerhouse (Buck and Byllesby) to protect aquatic resources (Article 403).



- Continue implementing the existing ramping rate<sup>9</sup> for the Buck bypassed reach; whereby, following periods of spill when a spillway gate has been opened 2 feet or more, water will continue to be released into the bypassed reach through a 2-foot-gate opening for at least 3 hours, then the gate opening will be reduced to 1 foot for 3 hours before closing the gate.

#### Terrestrial Resources

- Continue to follow a Commission-approved Wildlife Management Plan that includes provisions to annually inspect undeveloped land within the project boundary for evidence of increased human disturbance, consult with Virginia Virginia DGIF about activities that affect these lands and notify Virginia DGIF of any unanticipated impacts within these lands, and monitor bank erosion (Article 408).

#### Threatened and Endangered Species

- There are no existing or proposed PM&E measures related to threatened and endangered species for the Byllesby-Buck Project. The potential need for PM&E measures will be evaluated during the relicensing process.

#### Recreation and Land Use

- Continue to follow a Commission-approved recreation plan and continue to provide project recreation access, monitor recreation use and demand, consult with interested stakeholders on potential recreation enhancement measures, and update the recreation plan as needed (Article 411).

#### Aesthetic Resources

- There are no existing or proposed PM&E measures related to aesthetic resources for the Byllesby-Buck Project. The potential need for PM&E measures will be evaluated during the relicensing process.

#### Cultural Resources

- Continue to follow a Commission-approved cultural resources management plan (CRMP) and to update the CRMP with the filing of its final license

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<sup>9</sup> 70 FERC ¶ 62,130 (1995). Order Modifying and Approving Ramping Rate Assessment Plan.

application. Appalachian does not anticipate any adverse effects to cultural resources (Article 409).

### **3.3 DAM SAFETY**

It is important to note that dam safety constraints may exist and should be taken into consideration in the development of proposals and alternatives considered in the pending proceeding. For example, proposed modifications such as the potential 1-foot-lower impoundment levels during winter, could impact the integrity of the dam structure. As the proposal and alternatives are developed, the applicant must evaluate the effects and ensure that the project would meet the Commission's dam safety criteria found in Part 12 of the Commission's regulations and the Engineering Guidelines (<http://www.ferc.gov/industries/hydropower/safety/guidelines/eng-guide.asp>).

### **3.4 ALTERNATIVES TO THE PROPOSED ACTION**

Commission staff will consider and assess all alternative recommendations for operational or facility modifications, as well as PM&E measures identified by the Commission, the agencies, Indian tribes, NGOs, and the public.

### **3.5 ALTERNATIVES CONSIDERED BUT ELIMINATED FROM DETAILED STUDY**

At present, we propose to eliminate the following alternatives from detailed study in the *NEPA document*.

#### **3.5.1 Federal Government Takeover**

In accordance with § 16.14 of the Commission's regulations, a federal department or agency may file a recommendation that the United States exercise its right to take over a hydroelectric power project with a license that is subject to sections 14 and 15 of the FPA.<sup>10</sup> We do not consider federal takeover to be a reasonable alternative. Federal takeover of the project would require congressional approval. While that fact alone would not preclude further consideration of this alternative, there is currently no evidence showing that federal takeover should be recommended to Congress. No party has suggested that federal takeover would be appropriate, and no federal agency has expressed interest in operating the project.

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<sup>10</sup> 16 U.S.C. §§ 791(a)-825(r).

### 3.5.2 Non-power License

A non-power license is a temporary license the Commission would terminate whenever it determines that another governmental agency is authorized and willing to assume regulatory authority and supervision over the lands and facilities covered by the non-power license. At this time, no governmental agency has suggested a willingness or ability to take over the project. No party has sought a non-power license, and we have no basis for concluding that the Byllesby-Buck Project should no longer be used to produce power. Thus, we do not consider a non-power license a reasonable alternative to relicensing the project.

### 3.5.3 Project Decommissioning

*As the Commission has previously held, decommissioning is not a reasonable alternative to relicensing in most cases.<sup>11</sup> Decommissioning can be accomplished in different ways depending on the project, its environment, and the particular resource needs.<sup>12</sup> For these reasons, the Commission does not speculate about possible decommissioning measures at the time of relicensing, but rather waits until an applicant actually proposes to decommission a project, or a participant in a relicensing proceeding demonstrates that there are serious resource concerns that cannot be addressed with appropriate license measures and that make decommissioning a reasonable alternative.<sup>13</sup> Appalachian does not propose decommissioning, nor does the record to date demonstrate there are serious resource concerns that cannot be mitigated if the project is relicensed; as such, there is no reason, at this time, to include*

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<sup>11</sup> See, e.g., *Eagle Crest Energy Co.*, 153 FERC ¶ 61,058, at P 67 (2015); *Public Utility District No. 1 of Pend Oreille County*, 112 FERC ¶ 61,055, at P 82 (2005); *Midwest Hydro, Inc.*, 111 FERC ¶ 61,327, at PP 35-38 (2005).

<sup>12</sup> *In the unlikely event that the Commission denies relicensing a project or a licensee decides to surrender an existing project, the Commission must approve a surrender “upon such conditions with respect to the disposition of such works as may be determined by the Commission.”* 18 C.F.R. § 6.2 (2020). *This can include simply shutting down the power operations, removing all or parts of the project (including the dam), or restoring the site to its pre-project condition.*

<sup>13</sup> See generally *Project Decommissioning at Relicensing; Policy Statement, FERC Stats. & Regs., Regulations Preambles (1991-1996)*, ¶ 31,011 (1994); see also *City of Tacoma, Washington*, 110 FERC ¶ 61,140 (2005) (*finding that unless and until the Commission has a specific decommissioning proposal, any further environmental analysis of the effects of project decommissioning would be both premature and speculative*).

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*decommissioning as a reasonable alternative to be evaluated and studied as part of staff's NEPA analysis.*

## 4.0 SCOPE OF RESOURCE ISSUES

In this section, we present a preliminary list of environmental issues to be addressed in the *NEPA document*.<sup>14</sup> We identified these issues, which are listed by resource area, by reviewing the PAD and the Commission's record for the Byllesby-Buck Project. This list is not intended to be exhaustive or final, but contains the issues raised to date. After the scoping process is complete, we will review the list and determine the appropriate level of analysis needed to address each issue in the *NEPA document*.

### 4.1 Geologic and Soils Resources

- Effects of continued project operation and maintenance on shoreline erosion in the impoundments at each development (Buck and Byllesby).
- Effects of continued project operation and maintenance (including localized maintenance dredging via the project's drag rakes and more infrequent impoundment-wide dredging after large storm events) on sedimentation in the project impoundments and sediment transport through each development, including the potential for the re-mobilization of PCBs.

### 4.2 Aquatic Resources

- Effects of continued project operation and maintenance on water quality, including dissolved oxygen (DO), water temperature, and turbidity upstream and downstream of each development, including the Buck bypassed reach.
- Adequacy of the existing 360-cfs minimum flow for aquatic resources, including resident fish species, downstream of each development (Buck and Byllesby).
- Whether there is a need for a minimum flow (beyond leakage) in the Buck bypassed reach.
- Effects of continued project maintenance (periodic impoundment drawdowns to replace flashboards and periodic dredging to remove

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<sup>14</sup> *Per CEQ's final rule (July 15, 2020), Commission staff will consider and evaluate effects that are reasonably foreseeable and have a reasonably close causal relationship to the proposed action.*

sediments from the impoundments) on aquatic resources, particularly freshwater mussels and fish spawning habitat in the impoundments of each development.

- Effects of continued project operation on aquatic resources, including entrainment and impingement mortality of resident fishes, such as walleye, smallmouth bass, and spotted bass at each development.
- Effects of continued project operation and maintenance on species of special concern such as Eastern hellbender, freshwater mussels (including green floater and pistolgrip), and New River crayfish.
- Adequacy of the existing ramping rate to prevent fish stranding in the Buck bypassed reach.

#### **4.3 Terrestrial Resources**

- Effects of continued project operation and maintenance, on riparian and wetland habitat, emergent and submerged aquatic vegetation beds (including hornleaf riverweed and water willow), and associated wildlife.
- Effects of continued project operation and maintenance on upland wildlife habitat and associated wildlife such as bald eagles.

#### **4.4 Threatened and Endangered Species**

- Effects of continued project operation and maintenance on the federally listed Indiana bat, northern long-eared bat, bog turtle, candy darter, and Virginia spiraea.

#### **4.5 Recreation, Land Use, and Aesthetic Resources**

- Effects of continued project operation and maintenance on recreation, land use, and aesthetics within the project area.
- Adequacy of existing recreational facilities and public access to the project, such as fishing in the project developments' tailraces, to meet current and future recreational demand.

#### **4.6 Cultural Resources**

- Effects of project operation and maintenance on historic properties and archeological resources that are included in, eligible for listing in, or potentially eligible for inclusion in the National Register of Historic Places.
- Effects of project operation and maintenance on any previously unidentified historic or archeological resources or traditional cultural properties that may be eligible for inclusion in the National Register of Historical Places.

#### **4.7 Developmental Resources**

- Economics of the project and the effects of any recommended environmental measures on the project's economics.

## 5.0 CURRENT PROCESSING SCHEDULE

*The decision on whether to prepare an EA or EIS will be determined after the license application is filed and we fully understand the scope of effects and measures under consideration.*

A copy of Appalachian's process plan, which has a complete list of relicensing milestones for the Byllesby-Buck Project, including those for developing the license application, is attached as Appendix A to this **SD3**.



## 6.0 COMPREHENSIVE PLANS

Section 10(a)(2) of the FPA, 16 U.S.C. section 803(a)(2)(A), requires the Commission to consider the extent to which a project is consistent with federal and state comprehensive plans for improving, developing, or conserving a waterway or waterways affected by a project. The staff has preliminarily identified and reviewed the plans listed below that may be relevant to the Byllesby-Buck Project. Agencies are requested to review this list and inform the Commission staff of any changes. If there are other comprehensive plans that should be considered for this list that are not on file with the Commission, or if there are more recent versions of the plans already listed, they can be filed for consideration with the Commission according to 18 CFR 2.19 of the Commission's regulations. Please follow the instructions for filing a plan at <http://www.ferc.gov/industries/hydropower/gen-info/licensing/complan.pdf>.

The following is a list of comprehensive plans currently on file with the Commission that may be relevant to the Byllesby-Buck Project.

National Park Service. The Nationwide Rivers Inventory. Department of the Interior, Washington, D.C. 1993.

Ohio River Basin Commission. 1977. Kanawha River Basin comprehensive coordinated joint plan. Cincinnati, Ohio. July 1977.

U.S. Fish and Wildlife Service. Canadian Wildlife Service. 1986. North American waterfowl management plan. Department of the Interior. Environment Canada. May 1986.

U.S. Fish and Wildlife Service. n.d. Fisheries USA: the recreational fisheries policy of the U.S. Fish and Wildlife Service. Washington, D.C.

U.S. Forest Service. 1978. Mount Rogers National Recreation Area final management plan. Department of Agriculture. Roanoke, Virginia.

U.S. Forest Service. 2004. Revised Land and Resource Management Plan for the Jefferson National Forest. Management Bulletin R8-MB 115A. Department of Agriculture. Roanoke, Virginia.

U.S. Forest Service. 1993. George Washington National Forest revised land and resource management plan. Department of Agriculture, Harrisonburg, Virginia.

Virginia Department of Conservation and Recreation. The 2007 Virginia outdoors plan (SCORP). Richmond, Virginia.

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Virginia Department of Environmental Quality. 2015. Commonwealth of Virginia State Water Resources Plan. Richmond, Virginia. October 2015.

Virginia State Water Control Board. 1986. Minimum instream flow study – final report. Annadale, Virginia. February 1986.

## 7.0 MAILING LIST

The list below is the Commission's official mailing list for the Byllesby-Buck Project (FERC No. 2514). If you want to receive future mailings for the Byllesby-Buck Project and are not included in the list below, please send your request by email to [FERCOnlineSupport@ferc.gov](mailto:FERCOnlineSupport@ferc.gov) or by mail. **Submissions sent via the U.S. Postal Service must be addressed to: Kimberly D. Bose, Secretary, Federal Energy Regulatory Commission, 888 First Street, N.E., Room 1A, Washington, DC, 20426. Submissions sent via any other carrier must be addressed to: Kimberly D. Bose, Secretary, 12225 Wilkens Avenue, Rockville, Maryland, 20852.** All written and emailed requests to be added to the mailing list must clearly identify the following on the first page: **Byllesby-Buck Project No. 2514-186.** You may use the same method if requesting removal from the mailing list below.

Register online at <https://ferconline.ferc.gov/FERCOnline.aspx> to be notified via email of new filings and issuances related to this or other pending projects. For assistance, please contact FERC Online Support at [FERCOnlineSupport@ferc.gov](mailto:FERCOnlineSupport@ferc.gov) or toll free at 1-866-208-3676, or for TTY, (202) 502-8659.

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County of Grayson  
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Independence, VA 24348-0217

Town of Hillsville  
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Hillsville, VA 24343-0545

Historic Landmarks Commission  
2801 Kensington Ave  
Richmond, VA 23221-2470

Jonnie B. Deel Memorial Library  
Shelia Phipps, Librarian  
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Clintwood, VA 24228-0650

Mt. Rogers Planning District Commission  
1021 Terrace Dr  
Marion, VA 24354-4137

NOAA National Marine Fisheries Service  
Office of Program Planning & Integration  
NEPA Coordinator  
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Fairfax Station, VA 22039-1022

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U.S. Army Corps of Engineers  
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Project No. 2514-186

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**APPENDIX A  
BYLLESBY-BUCK PROJECT PROCESS PLAN AND SCHEDULE**

Shaded milestones are unnecessary if there are no study disputes. If the due date falls on a weekend or holiday, the due date is the following business day. Early filings or issuances will not result in changes to these deadlines.

<b>Responsible Party</b>	<b>Pre-Filing Milestone</b>	<b>Date</b>	<b>FERC Regulation</b>
Appalachian	File Initial Study Report	1/18/2021	5.15(c)(1)
All Stakeholders	Initial Study Report Meeting	2/2/2021	5.15(c)(2)
Appalachian	File Initial Study Report Meeting Summary	2/17/2021	5.15(c)(3)
All Stakeholders	File Disagreements/Requests to Amend Study Plan	3/19/2021	5.15(c)(4)
All Stakeholders	File Responses to Disagreements/Amendment Requests	4/18/2021	5.15(c)(5)
FERC	Issue Director's Determination on Disagreements/Amendments	5/18/2021	5.15(c)(6)
Appalachian	Second Study Season	Spring - Fall 2021	5.15(a)
Appalachian	File Preliminary Licensing Proposal (or Draft License Application)	10/1/2021	5.16(a)-(c)
All Stakeholders	File Comments on Preliminary Licensing Proposal (or Draft License Application)	12/30/2021	5.16(e)
Appalachian	File Updated Study Report	11/17/2021	5.15(f)
All Stakeholders	Updated Study Report Meeting	12/2/2021	5.15(f)
Appalachian	File Updated Study Report Meeting Summary	12/17/2021	5.15(f)
Appalachian	File Final License Application	2/28/2022	5.17
All Stakeholders	File Disagreements/Requests to Amend Study Plan	1/16/2022	5.15(f)
Appalachian	Issue Public Notice of Final License Application Filing	3/14/2022	5.17(d)(2)



<b>Responsible Party</b>	<b>Pre-Filing Milestone</b>	<b>Date</b>	<b>FERC Regulation</b>
All Stakeholders	File Responses to Disagreements/Amendment Requests	2/15/2022	5.15(f)
FERC	Issue Director's Determination on Disagreements/Amendments	3/17/2022	5.15(f)



Via Electronic Filing

January 18, 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)  
Filing of Initial Study Report and Schedule for Virtual ISR Meeting**

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.

Appalachian developed a Revised Study Plan (RSP) for the Project that was filed with the Commission and made available to stakeholders on October 18, 2019. On November 18, 2019 FERC issued the Study Plan Determination (SPD). On December 18, 2019, Appalachian filed a request for rehearing of the SPD. The SPD was subsequently modified by FERC by an Order on Rehearing dated February 20, 2020.

On July 27, 2020, Appalachian filed an updated ILP study schedule and a request for extension of time to file the Initial Study Report (ISR) to account for Project delays resulting from the COVID-19 pandemic. These delays pushed the start of the 2020 field season into early August 2020 and resulted in some of the spring and summer 2020 field work being rescheduled for 2021. The request was approved by FERC on August 10, 2020, and the filing deadline for the ISR for the Project was extended from November 17, 2020 to January 18, 2021.


During the restricted 2020 field season, Appalachian has conducted studies in accordance with 18 CFR §5.15, as provided in the RSP and as subsequently modified by FERC's SPD. In accordance with 18 CFR §5.15, Appalachian is hereby filing the ISR with the Commission. The ISR describes the Licensee's overall progress in implementing the study plan and schedule, summarizes available data, and describes any variances from the study plan and schedule approved by the Commission.

The Commission's regulations at 18 CFR §5.15(c) require Appalachian to hold a meeting with participants and FERC staff within 15 days of filing the ISR. **Accordingly, Appalachian will hold an ISR Meeting via Webex from 10 AM to 3 PM on Thursday, January 28, 2020.** An agenda for the ISR Meeting is provided in Attachment 2. Participants are free to join the meeting in part based on interests or availability, but please note that the agenda is intended as an approximation and more or less time may be spent on individual studies, as needed.

**Appalachian respectfully requests that the stakeholders interested in participating in the Virtual ISR Meeting contact Maggie Yayac at [maggie.yayac@hdrinc.com](mailto:maggie.yayac@hdrinc.com) on or before close of business Tuesday, January 26, 2021 to obtain instructions to join the virtual meeting.**

If there are any questions regarding this progress report, please do not hesitate to contact me at (540) 985-2441 or via email at [ebparcell@aep.com](mailto: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)**

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---

**Subject:** FW: Byllesby-Buck Hydroelectric Project (VA) -- Filing of Initial Study Report  
**Attachments:** AEP to FERC ByllesbyBuck ISR Transmittal\_01.18.2021.pdf

**From:** Kulpa, Sarah <Sarah.Kulpa@hdrinc.com>

**Sent:** Tuesday, January 19, 2021 1:47 PM

**To:** ACHP - John Eddins <jeddins@achp.gov>; American Whitewater - Kevin Colburn <kevin@americanwhitewater.org>; Angie Grooms <angie.grooms750@gmail.com>; Appalachian Trail Conservancy - Andrew Downs <adowns@appalachiantrail.org>; Carroll County - Rex Hill <rex.hill@carrollcountyva.gov>; Carroll County Administrator - Steve Truitt <steve.truitt@carrollcountyva.gov>; Catawba Indian Nation - Caitlin Rogers <caitlin.rogers@catawba.com>; Cherokee Nation - Elizabeth Toombs <elizabeth-toombs@cherokee.org>; David Taylor <jklfloat@embarqmail.com>; Delaware Nation - Erin Paden <epaden@delawarenation-nsn.gov>; Fish and Wildlife Conservation - Caitlin Carey <cscarey@vt.edu>; Fish and Wildlife Conservation - Donald J. Orth <dorth@vt.edu>; Friends of the Rivers of VA - Bill Tanger <bill.tanger@verizon.net>; Harold Peterson <harold.peterson@bia.gov>; New River Conservancy - George Santucci <george@newriverconservancy.org>; New River Conservancy - Laura Walters <claytorlakegirl@gmail.com>; New River Outdoor Adventures - Tim Dixon <newriveroutdooradventures@yahoo.com>; New River Trail State Park - Sam Sweeney <Sam.Sweeney@dcr.virginia.gov>; Pamunkey Indian Tribe - Terry Clouthier <terry.clouthier@pamunkey.org>; Town of Fries - Scott McCoy <townoffries@friesva.com>; Town of Wytheville - Dr. Beth Taylor, Mayor <beth.taylor@wytheville.org>; USFWS Chesapeake Bay Field Office - Janet Norman <janet\_norman@fws.gov>; USGS - Mark Bennett <mrbennet@USGS.gov>; VADCR - Jimmy Elliott <james.elliott@dcr.virginia.gov>; VADCR - Lynn Crump <lynn.crump@dcr.virginia.gov>; VADCR - Robbie Ruhr <Robbie.Rhur@dcr.virginia.gov>; VADCR - Sharon Ewing <sharon.ewing@dcr.virginia.gov>; VADEQ <eir@deq.virginia.gov>; VADEQ - Bettina Rayfield <Bettina.rayfield@deq.virginia.gov>; VADEQ - Joe Grist <joseph.grist@deq.virginia.gov>; VADEQ - Matthew Link <matthew.link@deq.virginia.gov>; VADEQ - Scott Kudlas <scott.kudlas@deq.virginia.gov>; VADEQ - Tony Cario <anthony.cario@deq.virginia.gov>; VADHR - Timothy Roberts <tim.roberts@dhr.virginia.gov>; Virginia Council on Indians - Emma Williams <emma.williams@governor.virginia.gov>; Virginia Department of Conservation and Recreation - Rene Hypes <rene.hypes@dcr.virginia.gov>; Virginia Department of Game and Inland Fisheries - John Copeland <John.Copeland@dgif.virginia.gov>; Virginia Department of Game and Inland Fisheries - William Kittrell <bill.kittrell@dgif.virginia.gov>; Wythe County Admin - Stephen Bear <sdbear@wytheville.org>

**Cc:** 'ebparcell@aep.com' <ebparcell@aep.com>; Jonathan M Magalski <jmmagalski@aep.com>; Yayac, Maggie <Maggie.Yayac@hdrinc.com>

**Subject:** Byllesby-Buck Hydroelectric Project (VA) -- Filing of Initial Study Report

Byllesby-Buck Hydroelectric Project Stakeholders:

Appalachian Power Company (Appalachian), a unit of American Electric Power (AEP), is the licensee, owner and operator of the Byllesby-Buck Hydroelectric Project (FERC No. 2514) (Project) located on the New River in Carroll County, Virginia. The Project is operated under a license issued by the Federal Energy Regulatory Commission (FERC). The existing FERC license for the Project expires on February 29, 2024. Appalachian is pursuing a new license for the continued operation of the Project in accordance with FERC's Integrated Licensing Process (ILP). Pursuant to the ILP, Appalachian filed the Initial Study Report (ISR) for the Project on January 18, 2021. The ISR describes the Licensee's overall progress in implementing the study plan and schedule, summarizes available data, and describes any variances from the study plan and schedule approved by the Commission.

On behalf of Appalachian, we are notifying stakeholders of the availability of the ISR. For your convenience, a copy of the cover letter filed with the ISR is attached. Appalachian encourages stakeholders to view the complete filing online at FERC's eLibrary at [https://elibrary.ferc.gov/eLibrary/filelist?accession\\_num=20210119-5057](https://elibrary.ferc.gov/eLibrary/filelist?accession_num=20210119-5057). Appalachian will also be adding the ISR to the Project's public relicensing website (<http://www.aephydro.com/HydroPlant/ByllesbyBuck>) in the coming days.

The Commission's regulations at 18 CFR §5.15(c) require Appalachian to hold a meeting with participants and FERC staff within 15 days of filing the ISR. **Accordingly, Appalachian will hold an ISR Meeting via Webex from 10 AM to 3 PM on Thursday, January 28, 2020.** Appalachian requests that the stakeholders interested in participating in the Virtual ISR Meeting contact Maggie Yayac at [maggie.yayac@hdrinc.com](mailto:maggie.yayac@hdrinc.com) on or before close of business Tuesday, January 26, 2021 to obtain instructions to join the virtual meeting.

Should you have any questions regarding this filing, please contact Liz Parcell with AEP at (540) 985-2441 or [ebparcell@aep.com](mailto:ebparcell@aep.com).

On behalf of AEP and the Byllesby-Buck Project relicensing team, thank you for your interest in the Byllesby-Buck Project, and I hope that the start of the new year finds you well.

**Sarah Kulpa**  
*Project Manager*

**HDR**  
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---

**Subject:** FW: Byllesby-Buck Hydroelectric Project (VA) -- Filing of ISR/Prelim Cultural Resources (Sensitive Information)  
**Attachments:** AEP to FERC ByllesbyBuck ISR Transmittal\_01.18.2021.pdf; Appendix E - Cultural Resources Rpt\_PRIV.pdf.pdf

**From:** Green, William G <Bill.Green@terracon.com>  
**Sent:** Thursday, January 21, 2021 8:19 AM  
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**Subject:** Byllesby-Buck Hydroelectric Project (VA) -- Filing of ISR/Prelim Cultural Resources (Sensitive Information)

**CAUTION: [EXTERNAL]** This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Good morning, Everyone,

Please find attached some information for American Electric Power's Byllesby-Buck Hydroelectric Project located in Carroll County, Virginia (FERC No. 2514). If you have any questions or concerns about the attached information, please do not hesitate to email me at [bill.green@terracon.com](mailto:bill.green@terracon.com) or you can reach me by phone at 803-403-1256.

Respectfully Yours,

**Bill Green, M.A., RPA # 10387**  
**Principal**  
**Department Manager | Cultural Resources**

**Terracon**  
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Terracon provides environmental, facilities, geotechnical, and materials consulting engineering services delivered with responsiveness, resourcefulness, and reliability.

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*Private and confidential as detailed here ([www.terracon.com/disclaimer](http://www.terracon.com/disclaimer)). If you cannot access the hyperlink, please e-mail sender.*