



United States Department of the Interior

FISH AND WILDLIFE SERVICE
176 Croghan Spur Road, Suite 200
Charleston, South Carolina 29407

August 1, 2005

Mr. James M. Landreth
Vice President
Fossil & Hydro Operations
South Carolina Electric & Gas
111 Research Drive
Columbia, South Carolina 29203

Re: First Stage Consultation Comments and Request for Studies, Saluda Hydroelectric Project, FERC No. 516, Richland, Lexington, Newberry, Saluda Counties, South Carolina

Dear Mr. Landreth,

The U.S. Fish and Wildlife Service (Service) has reviewed the May 20, 2005, Initial Consultation Document (ICD) for the Saluda Hydroelectric Project, FERC No. 516. This document identifies our information needs and study requests for the first stage consultation for the relicensing of the project. The following comments are submitted in accordance with the provisions of the Fish and Wildlife Coordination Act, as amended (16 U.S.C. §§ 661-667e); Section 7 of the Endangered Species Act of 1973, as amended (16 U.S.C. §§ 1531-1543); the Federal Power Act (16 U.S.C. § 791 et seq.); the Migratory Bird Treaty Act (16 U.S.C. §§ 1536, 1538); the National Environmental Policy Act (42 U.S.C. § 4321 et seq.); the Clean Water Act (33 U.S.C. § 1251 et seq.); and the Electric Consumers Protection Act of 1986 (Pub. L. No. 99-495, 100 Stat. 1243).

I. Saluda Hydroelectric Project

The Saluda Hydroelectric Project, FERC No. 516, constructed in 1930, consists of Lake Murray, the Saluda Dam, the new back-up Saluda Berm, spillway, powerhouse, intakes, and penstocks. Lake Murray is a large reservoir, approximately 41 miles in length and 14 miles at its widest point. It contains a surface water area of 48,000 acres and 691 shoreline miles. The Saluda Dam is approximately one and a half miles in length. The south side of the dam contains a spillway

with six Tainter gates and a 2,900 foot long man-made spillway channel. In 2002 the applicant began a seismic remediation resulting in the Saluda Berm, a Roller Compacted Concrete and Rock Fill Dam along the downstream toe of the existing dam. The remediation was necessary to stabilize the dam during a seismic event. The Saluda powerhouse contains four generators with a fifth exterior unit, and five intakes and five penstocks. The hydraulic capacity of all five units at normal gate opening is 18,000 cubic feet per second (cfs). Units 1 through 4 contain a hydraulic capacity of 3,000 cfs and unit 5 contains a hydraulic capacity of 6,000 cfs. The project has a licensed capacity of 202.6 MW.

II. Project Resources

The Saluda River joins the Broad River to form the Congaree River which flows to the Santee-Cooper Hydroelectric Project and on to the Santee River. The Saluda sub-basin is one of four basins that form the Santee Basin which encompasses most rivers within South Carolina. The Saluda sub-basin includes over 220 miles of river and 63,000 surface acres, and contains more than 13 dams. The Saluda Hydroelectric Project impounds approximately 41 miles of the Saluda River and its associated tributaries, inundating significant shoals and riffles complexes, and associated riparian and floodplain habitats. It is the first dam encountered on the Saluda River by upstream migrating fish. Below the Saluda Dam there is a 10 mile regulated reach to its confluence with the Broad River. This reach of river is located within the fall zone and is characterized by bedrock and rocky shoal habitat. Currently this 10 mile reach is the only rocky shoal habitat accessible in the Saluda River by migrating fish. Rocky shoal habitats are unique, considering the majority in the Santee Basin has been impounded by hydroelectric projects. Rocky shoals provide habitat for shoal-dependent species including the rocky shoal spider lily, a federal species of concern, and spawning habitat for anadromous fishes such as the American shad, hickory shad, and shortnose and Atlantic sturgeon.

The Saluda Hydroelectric Project and the other twelve projects within the Saluda basin have cumulatively affected and significantly fragmented the river system, altered flows, bedload movements, water chemistry, and aquatic and upland habitat. The Saluda Dam impedes the upstream migration of migratory fish and separates these fish from important spawning and rearing habitats. The water temperature and flow below the Saluda Dam have been altered by the hypolimnetic releases and varied discharges.

III. Fish and Wildlife Service Management Goals

The Service's general management goals and objectives for the Saluda River and Lake Murray are to protect and enhance a balanced, diverse fish community and the diversity of aquatic habitats on which that community depends, as well as to restore habitats for diadromous fish, migratory and riverine game and non-game fish species, and freshwater mussels. Further goals include the recovery of diadromous fish populations of the Santee Basin (which includes the Saluda sub-basin) to levels that provide enhanced economic, social and ecological values and the protection and recovery of endangered species. An Interagency *Santee-Cooper Basin*

Diadromous Fish Passage and Restoration Plan which identifies these resource goals has been accepted by the FERC as a Comprehensive Plan under Section 10(a)(2)(a) of the Federal Power Act and FERC Order No. 481-A. The Saluda Hydroelectric Project and other hydroelectric projects have disproportionately eliminated and cumulatively affected riffle and shoal habitats in the Saluda River watershed. Therefore, restoration, protection and/or enhancement of certain habitats types (i.e., riffles and shoals) are priority goals for the Service. Identification of opportunities for the protection and enhancement of valuable wildlife habitat and enhancing potential use of public trust waters for recreation are additional resource goals of the Service.

IV. Studies Requests for Relicensing

1. Comprehensive Habitat Assessment

Provide quantitative and qualitative data in GIS format of the available and potential spawning, rearing and foraging habitats (i.e., riffles/shoals, open water habitat, shallow cove areas, littoral zones) in Lake Murray, Saluda River, and Lower Saluda River below the project, including tributaries for diadromous and resident fish species.

Justification. Information is needed on the existing available diadromous and resident fisheries spawning, rearing, and foraging habitat and candidate areas for restoration upstream, downstream and within the project. This information will aid in the assessment of project impacts on aquatic resources, determination of the need for fish passage, possible development of fish species target numbers, potential habitat restoration areas, and alternative mitigation alternatives.

2. Instream Flow Study

The Service is concerned about the effects of project operation on downstream flows in terms of water quantity (timing and delivery) and water quality (dissolved oxygen, pH, temperature, nutrients, suspended solids). We recommend a comprehensive instream flow study in the lower Saluda River.

- (1) The study should utilize standard methods including Instream Flow Incremental Methodology, Physical Habitat Simulation (PHABSIM), Indicators of Hydrologic Alteration (IHA), and/or others to evaluate the project effects on aquatic and riparian communities. The Service is looking forward to participating in an interagency team to determine detailed study plans which consider target species and/or habitat guilds, habitat suitability indices, location of study reaches and placement of transects.
- (2) Explore and analyze potential operational scenarios involving ramping of discharges to dampen the affects of peaking and load following operations on downstream habitats.

- (3) Evaluate the affects of project operations on sediment transport and riparian erosion in the 10 mile reach of the lower Saluda River.

Justification. An instream flow study is needed to determine the affects of project operations at the Saluda Dam on the aquatic habitat and resources in the downstream 10 mile reach of the lower Saluda River. This reach consists of rocky shoal habitat important to a variety of species including a put-grow-and-take trout fishery, and resident and shoal-dependent species. It is also potential high quality anadromous fish spawning habitat. This information is necessary to develop potential enhancement and mitigation measures.

3. Mussel Surveys

Survey the reservoir, the upper Saluda River and lower Saluda River and significant tributaries for freshwater mussels to document the distribution, relative abundance, and reproductive success of populations. Additional targeted surveys should determine the presence/absence of federally listed mussels and federal species of concern.

Justification. The license application is required to discuss fish, wildlife, and botanical resources in the vicinity of the project and the impact of the project on those resources § 4.51(f)(3). Information is needed regarding the identification and status of mussel populations at the project. The Saluda Hydroelectric Project impounds a significant portion of the Saluda River which has effectively reduced the amount of free-flowing reaches and has significantly fragmented habitats. This information is necessary to develop potential enhancement and mitigation measures.

4. Macroenthic Invertebrate Study

Identify and evaluate macroenthic invertebrate assemblages in the lower and upper Saluda River including crayfish and EPT's (*Ephemeroptera*, *Plecoptera*, *Trichoptera*) to describe and evaluate project related effects on benthic resources. Sampling should occur in spring and summer and sites should be located directly below the dam, downstream of the dam, major tributaries, and in Saluda River above the reservoir.

Justification. Basic information regarding the identification of project related fish and wildlife resources is required under 18CFR4.51. Macroenthic invertebrates due to their sedentary nature provide basic information on local long term and short term conditions such as potential affects from project operations or other environmental stressors. Status of macroenthic populations can also provide information on fish communities. These study results will provide information on the health and status of invertebrates and fisheries communities at the project.

5. Water Quality

The Services' goal is to insure that water quality of the reservoir, and tailwater meet all standards set by the State for the designated surface water classification. The Service is also interested in ensuring that project operations do not cause the concentration of toxic and other deleterious substances in fish to rise above State standards, Food and Drug Administration action levels, or U.S. Environmental Protection Agency screening values for the protection of human health. We seek to ensure that project operations such as cleaning of trashracks, does not create water quality problems. We are interested in optimizing water quality for selected target species, and want to assist in the design of appropriate mitigation for project impacts.

Water quality information concentrating on dissolved oxygen and temperature in the reservoir, tailrace, and downstream area is necessary. Available existing water quality data should be reviewed to determine the need for additional sampling. If additional sampling is necessary, seasonal samples should be taken diurnally (early morning and late afternoons) and should adequately cover the water column.

Justification. Adequate water quality conditions are necessary for the continual existence of aquatic biota. Historically, water quality concerns have been in the lower Saluda River, tributaries, and in the area of the thermocline near the dam. The lower Saluda River has had a history of low dissolved oxygen levels from project discharges, tributaries to the project have been major contributors of pollutants, and low dissolved oxygen conditions near the dam have resulted in fish kills. Water quality reports including the enhancement measure that address these issues should be updated for the project.

6. Entrainment and Out-migration Study

An evaluation of existing and potential resident and diadromous fish out-migration and entrainment/mortality at the dam is needed to assess project-related factors influencing fish populations. Out-migration (spillway and turbine passage) may be significant in terms of recruitment for river basin populations. An understanding of existing and potential out-migration and turbine passage is needed in connection with diadromous fish passage feasibility analyses at the project. The status of entrainment relative to striped bass, blueback herring, the catadromous American eel, and potential anadromous species needs to be evaluated.

The out-migration study should include the frequency and characteristics of spillway water releases with respect to potential out-migration by target resident and diadromous fish species at the project dams. Limnological studies should be included that document monthly changes in dissolved oxygen, temperature, conductivity, turbidity, thermocline development and overturn under normal hydropower operations. This study element should include multiple years of data to help provide an understanding of limnology and

habitat conditions likely to be encountered by out-migrating adult, juvenile, and egg/larval fish life stages at the project dams.

A literature-based study summarizing entrainment mortality studies on similar projects should be conducted. It is conceivable that a sufficient database exists on similar sites with similar turbines from which to draw reasonable conclusions relative to entrainment and mortality in lieu of conducting a site-specific study. The Service is amenable to exploring the possibility of this approach however there is a distinct possibility that site-specific studies utilizing recovery netting and appropriately designed mortality studies may be necessary. The top and bottom elevation of the trashracks, the width of the trashracks, or the clear spacing for all of the trashracks should be described. Also, provide the mean velocities in front of the intakes across the full range of operating conditions. These are the minimum data needed to determine if fish impingement and entrainment may be considered a problem at the project.

Justification. The cumulative loss of fish from entrainment and mortality at the project is a concern. An estimate of these losses at this project is necessary to determine the type and extent of mitigation (avoidance, minimization, compensation) necessary to off-set loss of public trust resources. Additionally, an analysis of the potential entrainment of diadromous species (adults and juvenile out-migrants) is necessary for the Service's evaluation of potential fish passage at the project.

7. Land Use and Shoreline Management Plan

The Land Use and Shoreline Management Plan (LUSMP) should be updated and revised in concert with the state and federal natural resource agencies as required in the Federal Energy Regulatory Commission Orders of June 23, 2004, and October 28, 2004. We request a thorough analysis of land use at the project, particularly including determination of the amount of land developed in the lower, middle, and upper areas of the reservoir.

Justification. The Service is interested in collaboratively working to resolve issues surrounding the Land Use and Shoreline Management Plan as expressed in our numerous correspondences to SCEG in the last decade. It is imperative that issues including shoreline buffers, fringeland sales, environmentally sensitive areas, erosion areas, woody debris, and rebalancing of land use designations be resolved in the new license.

8. Rare, Threatened, and Endangered Species

Provide a comprehensive list and location map of all rare species, and federally threatened and endangered species within the project area. Develop management plans for all federally protected species that occur within the project to be included with the license application.

Rare species that may occur in the project area include the robust redhorse sucker, Carolina redhorse, and the highfin carpsucker. Additionally, the Service recently was petitioned to consider listing the American eel under the Endangered Species Act (ESA). A 90 Day Finding period has determined that substantial evidence exists to warrant further consideration. You should be aware that the American eel could potentially be listed under the ESA in the near future.

Enclosed is a list of species from Richland, Lexington, Newberry, and Saluda Counties in South Carolina, that are on the *Federal List of Endangered and Threatened Wildlife and Plants* or constitutes species of Federal concern that may occur in the project impact area. We recommend surveying the project area for these species prior to any further planning. The Services recognize that species of Federal concern are not legally protected under the Act and are not subject to any of its provisions, including Section 7, unless they are formally proposed or listed as endangered or threatened. We are including these species in our response to give you advance notification. The presence or absence of these species in the project boundary and the area of effect of the project operation should be addressed in any environmental document prepared for this project.

County	Common Name	Scientific Name	Status	Occurrence
Lexington	Bald eagle	<i>Haliaeetus leucocephalus</i>	T	Known
	Carolina heelsplitter	<i>Lasmigona decorata</i>	E	Possible
	Red-cockaded woodpecker	<i>Picoides borealis</i>	E	Known
	Shortnose sturgeon	<i>Acipenser brevirostrum*</i>	E	Possible
	Smooth coneflower	<i>Echinacea laevigata</i>	E	Possible
	Schweinitz's sunflower	<i>Helianthus schweinitzii</i>	E	Known
	Southern Dusky Salamander	<i>Desmognathus auriculatus</i>	SC	Possible
	Dwarf aster	<i>Aster mirabilis</i>	SC	Possible
	Shoal's spider-lily	<i>Hymenocallis coronaria</i>	SC	Known
	Prairie birdsfoot-trefoil	<i>Lotus purshianus</i> var. <i>helleri</i>	SC	Possible
	Piedmont cowbane	<i>Oxypolis ternata</i>	SC	Known
	Wire-leaved dropseed	<i>Sporobolus teretifolius</i>	SC	Known
	Pickering's morning-glory	<i>Stylisma pickeringii</i> var. <i>pickeringii</i>	SC	Known
	Rayner's blueberry	<i>Vaccinium crassifolium</i> ssp. <i>sempervirens</i>	SC	Known
	Bachman's sparrow	<i>Aimophia aestivalis</i>	SC	Known
Henslow's sparrow	<i>Ammodramus henslowii</i>	SC	Known	

American kestrel	<i>Falco sparverius</i>	SC	Possible
Loggerhead shrike	<i>Lanius ludovicianus</i>	SC	Possible
Painted bunting	<i>Passerina ciris ciris</i>	SC	Possible
Southern hognose snake	<i>Heterodon simus</i>	SC	Possible
Robust Redhorse Sucker	<i>Moxostoma robustum</i>	SC	Possible

Newberry

Bald eagle	<i>Haliaeetus leucocephalus</i>	T	Known
Carolina heelsplitter	<i>Lasmigona decorata</i>	E	Possible
Butternut	<i>Juglans cinerea</i>	SC	Possible
Prairie birdsfoot-trefoil	<i>Lotus purshianus</i> var. <i>helleri</i>	SC	Possible
Biltmore green briar	<i>Smilax biltmoreana</i>	SC	Known
Sweet pinesap	<i>Monotropsis odorata</i>	SC	Known
Bachman's sparrow	<i>Aimophia aestivalis</i>	SC	Known
Henslow's sparrow	<i>Ammodramus henslowii</i>	SC	Known
American kestrel	<i>Falco sparverius</i>	SC	Possible
Loggerhead shrike	<i>Lanius ludovicianus</i>	SC	Possible
Saluda crayfish	<i>Distocambarus youngineri</i>	SC	Known

Richland

Bald eagle	<i>Haliaeetus leucocephalus</i>	T	Known
Red-cockaded woodpecker	<i>Picoides borealis</i>	E	Known
Shortnose sturgeon	<i>Acipenser brevirostrum</i> *	E	Known
Smooth coneflower	<i>Echinacea laevigata</i>	E	Known
Rough-leaved loosestrife	<i>Lysimachia asperulaefolia</i>	E	Known
Canby's dropwort	<i>Oxypolis canbyi</i>	E	Known
Carolina heelsplitter	<i>Lasmigona decorata</i>	E	Possible
Georgia aster	<i>Aster georgianus</i>	C	Known
Southern Dusky Salamander	<i>Desmognathus auriculatus</i>	SC	Possible
Sandhills milk-vetch	<i>Astragalus michauxii</i>	SC	Known
Purple balduina	<i>Balduina atropurpurea</i>	SC	Known
Shoals spider-lily	<i>Hymenocallis coronaria</i>	SC	Known
Creeping St. John's wort	<i>Hypericum adpressum</i>	SC	Known
Bog spicebush	<i>Lindera subcoriacea</i>	SC	Known
Prairie birdsfoot-trefoil	<i>Lotus purshianus</i> var. <i>helleri</i>	SC	Possible
Carolina bogmint	<i>Macbridea caroliniana</i>	SC	Known
Algae-like pondweed	<i>Potamogeton confervoides</i>	SC	known
False coco	<i>Pteroglossaspis ecristata</i>	SC	Known
Awed meadowbeauty	<i>Rhexia aristosa</i>	SC	Known

Reclined meadow-rue	<i>Thalictrum subrotundum</i>	SC	Known
White false-asphodel	<i>Tofieldia glabra</i>	SC	Known
Rayner's blueberry	<i>Vaccinium crassifolium</i> ssp. <i>empervirens</i>	SC	Known
Bachman's sparrow	<i>Aimophia aestivalis</i>	SC	Known
Henslow's sparrow	<i>Ammodramus henslowii</i>	SC	Known
American kestrel	<i>Falco sparverius</i>	SC	Known
Loggerhead shrike	<i>Lanius ludovicianus</i>	SC	Known
Painted bunting	<i>Passerina ciris ciris</i>	SC	Possible
Carolina darter	<i>Etheostoma collis</i>	SC	Known
Rafinesque's big-eared bat	<i>Corynorhinus rafinesquii</i>	SC	Known
Southern hognose snake	<i>Heterodon simus</i>	SC	Known

Saluda

Bald eagle	<i>Haliaeetus leucocephalus</i>	T	Known
Red-cockaded woodpecker	<i>Picoides borealis</i>	E	Known
Carolina heelsplitter	<i>Lasmigona decorata</i>	E	Possible
Piedmont bishop-weed	<i>Ptilimnium nodosum</i>	E	Known
Little amphianthus	<i>Amphianthus pusillus</i>	T	Known
Dwarf burhead	<i>Echinodorus parvulus</i>	SC	Known
Creeping St. John's wort	<i>Hypericum adpressum</i>	SC	Known
Prairie birdsfoot-trefoil	<i>Lotus purshianus</i> var. <i>helleri</i>	SC	Possible
Bachman's sparrow	<i>Aimophia aestivalis</i>	SC	Known
Henslow's sparrow	<i>Ammodramus henslowii</i>	SC	Known
American kestrel	<i>Falco sparverius</i>	SC	Possible
Loggerhead shrike	<i>Lanius ludovicianus</i>	SC	Possible
Savannah lilliput	<i>Toxolasma pullus</i>	SC	Known
Southern hognose snake	<i>Heterodon simus</i>	SC	Known

We recommend that surveys be conducted by comparing the habitat requirements for these species with available habitat types within the action area of the project. "Action area" is defined at 50 CFR § 402.02 as "...all areas to be affected directly or indirectly by the Federal action and not merely the immediate area involved in the action." Field surveys for the species should be performed if habitat requirements overlap with that available at the project site. Surveys for protected plant species must be conducted by a qualified biologist during the flowering or fruiting period(s) of the species. We welcome the opportunity to assist with the design of studies, sampling schemes, methodology, and target areas for the above species, as well as analysis of the "effects of the action," (as

defined by 50 CFR § 402.02) on any listed species including consideration of direct, indirect, and cumulative effects.

We also recommend contacting the S.C. Department of Natural Resources (SCDNR), Data Manager, Wildlife Diversity Section, Columbia, S.C. 29202 concerning known populations of federal and/or state endangered or threatened species, and other sensitive species in the project area. Additional habitat information may also be available from SCDNR. NOAA Fisheries endangered species office in St. Petersburg, Florida should be contacted relative to shortnose sturgeon which may occur in the action area.

9. Migratory Bird Surveys

Evaluate the effects of the project on migratory bird use at Lake Murray and the Saluda River and riparian ecosystems. Surveys of migratory birds and their habitats should begin in the Fall of 2005 to provide baseline information on populations.

Continue aerial surveys for potential roosting, nesting, and foraging sites for the federally endangered woodstork.

Justification. Migratory birds, particularly neo-tropical migrants, utilize the Saluda River ecosystem for wintering habitat. These species have potentially been adversely affected by the project by the decrease in available wetlands and floodplain habitat, loss of foraging habitat, and alteration of riparian habitat. Information on population estimates and habitat utilization are needed to determine potential enhancement measures.

10. Fish Community Surveys

Conduct fish community surveys including small non-game species in the Saluda River above and below the reservoir as well as in Lake Murray, to supplement existing fish community data and/or replace dated information. Specific sampling focused on determining presence or absence of the rare robust redhorse sucker, Carolina sucker, and the highfin carpsucker should be conducted in the lower Saluda River.

Justification. Information is needed on the status of fish communities in the reservoir as well as the Saluda River above and below the reservoir for game and non-game fish species. River impoundments and reservoirs fragment fisheries communities and impede migration patterns. The inundation of project tributaries in conjunction with such a large reservoir also fragments populations within the reservoir and tributaries. Data gathered as part of relicensing should be compared to historically gathered data for comparison. These study results will provide information on the status of reservoir and riverine communities.

11. Temperature Analysis – Downstream Affects

Provide an analysis of the effects of the temperature of discharges from the Saluda Dam on downstream habitats including: (1) An analysis that determines the travel distance downstream to effectuate completion of temperature mixing in the Congaree River; (2) an evaluation of the affects to species and habitats within the downstream Congaree National Park; (3) an evaluation of the affects to upstream migrating diadromous fish.

Justification. The Saluda Dam typically discharges hypolimnetic water which is cooler than water in adjacent watersheds. We are interested in determining how far the cooler water travels before completely mixing with the ambient water temperatures from the Broad and Congaree Rivers, and how these cooler temperatures may affect downstream habitats, particularly in the Congaree National Park. We are also interested as to how these cooler discharges affect diadromous species during their upstream migration from the Santee-Cooper Hydroelectric Project.

12. Striped Bass Evaluations

Provide and evaluation project operations on the reservoir striped bass population, particularly regarding: (1) the effectiveness of current turbine operations, (2) potential additional enhancements in association with the summer thermocline near the powerhouse; and (3) determine if striped bass migrate upstream of the project within the Saluda River during the spring spawning season, and if and where spawning activities occur.

Justification. The reservoir striped bass fishery is an important recreational fishery at Lake Murray. The status of the fishery needs to be described and any potential enhancements identified.

13. Diadromous Fish Surveys

Continue diadromous fish surveys in the lower Saluda River during the spring 2006 spawning migrations as outlined in the *2005 Diadromous Fish Studies* study plan. This plan was developed in the fall of 2004 in concert with state and federal natural resource agencies as an “early start” study for project relicensing.

Justification. There are 10 miles of riverine reach below Saluda Dam to its confluence with the Broad and Congaree Rivers. Currently, diadromous fish are passed upstream of the Santee Cooper Hydroelectric Project and migrate up the Congaree, Broad, and Wateree Rivers. The 10 miles below the Saluda project contains potential high quality spawning habitat for American shad, hickory shad, blueback herring, shortnose sturgeon and Atlantic sturgeon. The shortnose sturgeon is a federally listed endangered species and all federal agencies (including the FERC) are responsible for undertaking actions toward its recovery under Section 7(a)(1) of the Endangered Species Act (16 U.S.C. 1531-1543). These surveys will determine if diadromous fish are utilizing the lower Saluda River. This information will aid the Service in developing potential enhancement measures for the lower Saluda and/or determining if fish passage is warranted at the project. We believe it is necessary to conduct sampling for two seasons at a minimum to accurately identify the status of diadromous fish utilization in the lower Saluda River.

V. Information Requests for Relicensing

1. Existing Studies and Data

Please provide copies of the existing environmental studies conducted at the Saluda Hydroelectric Project by SCE&G contractors and the South Carolina Department of Natural Resources that are referenced in the literature cited section of the Initial Consultation Document. These may be provided as hard copies or via CD (preferable).

2. Project Operations

Provide a detailed description of current and past project operations pursuant to existing license conditions. This analysis should include the frequency, magnitude, and duration of turbine discharges, spills, and reservoir drawdowns.

3. Dissolved Oxygen Concentrations in Lower Saluda River

Provide an updated report on the status of dissolved oxygen concentrations in the lower Saluda River and the efficacy of existing enhancement measures.

We appreciate the opportunity to comment on the Initial Consultation Document for the relicensing of the Saluda Hydroelectric Project. We look forward to further coordination throughout the relicensing process. If you have any questions or need further information please contact Ms. Amanda Hill of my staff at (843) 727-4707 ext. 303.

Sincerely,

Timothy N. Hall
Field Supervisor

TNH/AKH