

August 15, 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 Vice President Landreth:

Comments on the Saluda Hydro ICD

Purpose

The purpose of this document is to address issues affecting the Lake Murray shoreline that are relevant to the Federal Energy Regulatory Commission's (FERC) relicensing of the Saluda/Lake Murray Hydroelectric Project (FERC Project No. 516) and define desired outcomes that represent a consensus view among people and organizations associated with the use of Lake Murray for birding, boating, camping, and other recreational and residential activities.

Introduction

The South Carolina Wildlife Federation (SCWF) facilitates effective habitat conservation and respect for outdoor traditions for current and future generations through statewide leadership, education, advocacy and partnerships

The Saluda/Lake Murray Hydroelectric Project is a facility managed by South Carolina Electric and Gas Company (SCE&G). The project includes Lake Murray Dam, electric generating facilities at the dam, a 48 to 50,000-acre lake, shoreline lands of the lake, and lands along the lower Saluda River.

The Federal Energy Regulatory Commission (FERC) requires a license for all private dams built and managed for the production of electricity. SCE&G holds the license for the Saluda/Lake Murray Project, which is referred to as FERC Project No. 516. The license for this project expires August 31, 2010 and the process for relicensing the project should begin five year prior to the expiration date, which would be August 2005.

The relicensing process will allow the entire Saluda/Lake Murray Project to be evaluated by the public for the purpose of defining the terms and conditions of a new license. The new license will regulate how the project is operated and managed for the next 30 to 50 years.

Comments

The Federation supports the comments of the Lower Saluda River Advisory Council (SCWF members participate in this broad-based group) and endorses the Department of Natural Resources and the Fish and Wildlife Service recommendations and comments regarding the Initial Consultation Document.

As importantly, and a new issue for the Federation, is that a comprehensive model be developed to assist all interested parties in the understanding and management of water- and habitat-related issues. This model should offer insight related to seasonal habitat issues in the Lower Saluda and Congaree National Park, draught, high- and low- flow conditions - basically a cumulative model to assist all involved in understanding the relationship of generating issues to environmental and recreational issues. It is our understanding that such a model might indicate that a somewhat higher winter lake level, as advocated by homeowners and Lake Murray Association, could generally allow more flexibility during spring releases, most particularly by avoiding too-low and too-high flows and providing for flows somewhat more consistent with the run of the river, and advanced publication of planned releases. The Federation is hopeful that such a model might lead to properly scheduled events such as Canoeing for Kids and Kayak Rodeos when water conditions and Lake levels are permissible.

Another new issue for the Federation is the monitoring and comparison of water quality in developed, buffered, and undeveloped coves, and a subsequent analysis of how higher priority to shoreline management could improve water quality. Real Estate development is part of the Project Operation, and part of future development.

The Federation is concerned that the Initial Consultation Document does not include high natural resource values issues which have been discussed over the years, such as:

Environmentally sensitive areas (ESAs), where they have been identified, how to protect them, monitoring plans, and strategies for compelling redress when misuse of ESAs occurs; ESA NO-dock policies, importance of continuous ESAs, perennial stream protection, setbacks, etc.

Future access sites and other land use designations. Because this relicensing must anticipate the nature of the lake for decades into the future, previously identified sites and future access sites should be included.

Including wildlife habitat considerations when assessing how much natural space should be set aside for the public use. Lake Murray and the Lower Saluda have a diversity of flora and fauna to include rare, threatened and endangered species. Areas with high natural resource values should be set aside and protected for the conservation of wildlife and their natural habitat.

A public safety plan, particularly for persons using the Lower Saluda. For the last several years there have been numerous instances requiring rescue and approximately one death per year on the Lower Saluda. Obviously more and different signs, sounds, and horns are required along official and less official access points. Although the Federation is concerned about safe habitat for critters, we also wish to protect recreational users and their rescuers, who are too often put in harms way. Better notice and more gentle releases and less abrupt action at the end of release are appropriate. Research and follow-through regarding management and notice at other sites, some as close as Hopes Ferry, should improve local safety.

The Federation appreciates this opportunity to comment.

Sincerely,

Angela Viney
Executive Director