

August 11, 2005

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

Attn: William R. Argentieri

**Subject: Comments on First Stage (Initial) Consultation Document
Saluda Hydroelectric Project, FERC Project No. 516**

Dear Mr. Landreth:

I have reviewed the *Initial Consultation Document* prepared by South Carolina Electric and Gas Company (SCE&G) for the proposed relicensing of the Saluda Hydroelectric Project, FERC No. 516, on behalf of the City of Columbia's Parks and Recreation Department, and submit the following comments and recommendations. We appreciate the good will shown by SCE&G to undertake this relicensing process in a cooperative manner. The public will surely benefit from the continued open exchange of ideas regarding the valuable resources comprised in the Saluda Hydro Project.

Through our Whitewater Kids Club kayaking program, our department utilizes sections of the Lower Saluda River frequently. With our involvement in the development of the Three Rivers Greenway, we look forward to the day when we have a presence on the banks of this State Scenic River. It is indeed a unique and valuable natural resource.

We support the Lower Saluda River Advisory Council in the recommendations made through their corridor plans concerning the management of the Lower Saluda River, and urge SCE&G to utilize the plans' recommendations in the relicensing process. They represent a "comprehensive plan for improving, developing, and conserving the waterway" (as described in the Federal Power Act, 16 USC Section 803) and should be used by the FERC and SCE&G to define conditions for the operation and management of Project 516. Both the plans represent a consensus among a diverse population of the river's recreational users, citizens, landowners and resource managers.

Issues of Importance in the Relicensing the Saluda Hydro Project

The Parks and Recreation Department believes the following issues are of importance in the management of this river, and therefore the relicensing of the Saluda Hydro Project.

- Improvements for recreational users, including access/egress points and predictable release levels. While our primary concern is river recreation, we also encourage enhanced public lake access points.
- Scheduled event releases.
- Improvements to assure public safety, including warning systems near Shannon and other heavily used locations in the river corridor. Additional signage combined with an ongoing public information campaign regarding the hazards of hydropower releases.
- The designation of undeveloped land in the riparian corridor and project boundary for conservation, and the protection of water quality, wildlife habitat and environmentally sensitive areas and species.
- Water quality conditions in the Lower Saluda River will meet state standards and support existing uses of the river.
- Instream flows will protect and support aquatic life, navigation, recreational boating and fishing and migratory fish populations in the Saluda and Congaree Rivers.

Comments on the Initial Consultation Document

The following comments are provided to address the information presented in the Initial Consultation Document (ICD).

7.3.1.1 Typical Operations state that meeting reserve capacity during an outage requires reaching full output within 15 minutes. While this ability is integral to SCE&G's mission, it can also endanger people on and around the river when water rises quickly. In accordance with 7.4 Project Safety and 7.4.3 Warning Systems we recommend that improvements be made to warning systems and procedures.

8.5 Climate Consideration should be made, in the design and application of hydrologic models, of possible climate change, and its effects on flow regimes within the timeframe of this license.

9.0 Water Quality We support the recommendations made in the LSRAC's corridor management plan, and will largely defer to the expertise of regulatory agencies in the specifics of this issue while noting that population pressures in the watershed continue to have an adverse effect on water quality in the river, from non-point and phosphorous issues in lake coves to heavy sedimentation in river tributaries.

12.1 T&E Wildlife Species A pair of Bald Eagles has nested at the confluence of the Saluda and Broad Rivers for the past two years.

14. 2.2 Recreation, Saluda River Recreational visits to the river by user group are not well documented, but are steadily increasing. Besides fishermen and non-motorized boaters, there are growing numbers of motor boaters using the river. Studies may be helpful in assessing current use and planning for access/egress and user safety.

Additionally, plans for trails and greenways on river left will bring greater numbers of visitors to the river corridor. It is worth noting that SCE&G's undeveloped riparian corridor land has conserved large portions of the river to date. Plans for riparian trails by the Irmo Chapin Recreation Commission and the River Alliance may help to conserve much of this land in years to come, and the good will shown by SCE& G to assist with these plans to date is greatly appreciated.

Recommended Studies

Recreation Flow Study This study should determine minimum flow needed for boat navigation as well as desirable levels for wade fishing, bank fishing, competitive paddling events, and river safety training as required by fire and rescue operations. While the River Alliance did conduct a recreational flow analysis on the Saluda, more detail is needed to identify optimal levels.

Recreation Flow and Safety Communication Study This study should survey practices in other metropolitan tailrace areas subject to similar release conditions to find the best practices for public safety and communication when full power generation of the Saluda Hydro is necessary within a short timeframe. This study should assess the practice of ramping flows. Additionally, the study should identify the best source for dissemination of information to the public about expected release levels on a daily basis.

Recreation Use and Needs Study There is a need to assess current recreational use of river and lake resources, define any necessary improvements for those users, including trails, boating and fishing access points and other associated facilities, and set future carrying capacities for lake and river recreation.

Available Lands for Recreation and Protection of Environmental Resources Land in and around the project boundary should be inventoried to best determine future management of parcels available. As open land is developed, it is imperative to identify remaining properties that are important for habitat and water quality protection and public recreation.

Low Inflow/Drought Protocol Study This study should define protocol that best meets the combined requirements of power generation, minimum river flows, natural resource protection, optimal lake levels and necessary water withdrawals during periods of drought. This study may be part of a larger Hydrologic/Hydraulic Operations Model This model should simulate project operation variables, including inflow, evaporation and withdrawals, hydropower generation, minimum and maximum flow levels, and the effects of possible climate change on operations. Combined flow levels with the Broad River should be considered from the confluence through the Congaree National Park. This model can provide a tool to determine practices and protocol that best balances the varied interests and requirements of stakeholders and user groups.

Reservoir Level Study Evaluate potential seasonal target elevations for lake Murray along with minimum and maximum levels based on historical data.

Water Quality Study As population on and around the lake and the river increases, water quality worsens. A study is needed to assess current water quality issues, and evaluate operating procedures that would improve or enhance water quality in the lake and on the river. SCE&G's efforts to boost DO on the river are commendable.

Effect of Flow on Aquatic Life in the Lower Saluda River Because project operations affect aquatic life and natural communities in the river corridor, especially in the upper reaches of the river, we recommend an assessment of various flow levels for river segments to the confluence with the Broad River. Consideration should be given to habitat requirements during various life stages of aquatic biota, as well as optimal migratory flow requirements.

The above are of particular interest to the City of Columbia Parks and Recreation Department as current recreational users of the Lower Saluda River and future potential managers of a proposed section of the Three Rivers Greenway on the Saluda River. As stated before, we support the Lower Saluda River Advisory Council's recommendations on the management of the river corridor. We endorse the LSRAC's recommendations for further studies, including the Rare, Threatened and Endangered Species and Habitat Survey, Floodplain Vegetation Assessment, Diadromous Fish Study, Macrobenthic Survey, Cultural Resources Survey, and Mussel Survey.

We appreciate this opportunity to comment and the open spirit of cooperation in which SCE&G has begun this process. We realize that there is much work to be done in clarifying all commentary, and in eventually reaching consensus among all involved parties. Please feel free to call or e-mail me regarding this letter.

Sincerely,



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