

South Carolina

Department of Parks, Recreation & Tourism

Recreation, Planning and Engineering Office

August 12, 2005

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

Attn: Mr. William R. Argentieri

RE: Saluda Hydroelectric Project (FERC Project 516)
Initial Consultation Document Comments

Dear Mr. Landreth:

The South Carolina Department of Parks, Recreation and Tourism (SCPRT) has reviewed the *Initial Consultation Document* for South Carolina Electric and Gas (SCE&G) Company's proposed relicensing of the Saluda Hydroelectric Project. We participated in the recent Initial Consultation Meetings. Thank you for seeking information about the relicensing objectives of SCPRT and other agencies.

Many changes that affect parks, recreation, and tourism have occurred in the Lake Murray/Saluda River area since the current license was awarded in 1984. The population growth alone puts a significant stress on the existing facilities and further high growth is anticipated. People in the surrounding region need and expect adequate opportunities for outdoor recreation and growth spurs the demand for additional facilities. During this time period there have also been significant changes in the way people recreate – changes in boating, fishing, hunting, wildlife watching, and numerous other activities. These changes add to the expectations of the public for outdoor recreation opportunities. There has also been an increased awareness of the need to protect open space and natural and cultural resources. Tourism has changed too. Long summer family vacations have evolved into a variety of short excursions on a year round basis. Nature-based tourism has become an expanding interest. In light of all these changes, SCPRT anticipates that the relicensing of the Saluda project will provide opportunities to work cooperatively with South Carolina Electric and Gas Company (SCE&G) to enhance quality of life by conserving and improving the parks, recreation, and tourism resources within the project area.

We offer the following comments and recommendations concerning relicensing of this project:

Authority

SCPRT is the state agency responsible for outdoor recreation planning in the State. The South Carolina General Assembly created the SCPRT in 1967 and reaffirmed its role in 1993 (Title 51, South Carolina Code of Laws, 1976, as amended) to promote the State's tourist attractions; to promote the general health and welfare of the citizens by developing and expanding recreational areas, including state parks; to develop a coordinated plan which best utilizes the State's facilities and resources such as the natural scenery, outdoor sports, and recreational activities; to provide for the preservation and perpetuation of the state's rich historical heritage; to lease or convey lands to local governments for parks and recreation facilities; and to study the State's park and outdoor recreational resources and facilities, the needs for the resources, and the extent to which these needs are being met. SCPRT is also charged with promoting

economic diversity in all areas of the Palmetto State by extending the full benefits of tourism and recreation.

State Comprehensive Plans

Several plans have been completed in the last few years which may impact the relicensing process: *State Parks - The Vision for the 21st Century* (2003); *South Carolina State Comprehensive Outdoor Recreation Plan* (2002); *Expanding the Experience, Trails for South Carolina: The 2002 South Carolina State Trails Plan* (2002); and *The Saluda River Corridor Plan* (1990) and *Lower Saluda Scenic River Corridor Plan Update* (2000). Relicensing activities and new license conditions should be consistent with these plans. The South Carolina State Comprehensive Outdoor Recreation Plan will be updated in the next two years.

Parks, Recreation, and Tourism Values

The natural, cultural, and recreational resources within the project boundary and the surrounding area are both substantial and diverse. Lake Murray provides about 48,000 surface acres and 691 miles of shoreline, including islands. The 11-mile Lower Saluda regulated river section downstream of Lake Murray and Congaree River below that also provides significant resource values. Forested areas, wetlands, islands, river shoals and open waters provide outstanding fish and wildlife habitat, biodiversity, interesting viewsheds, and recreational and tourism opportunities. Current activities in the area include motorboating (including waterskiing, jetskiing), sailing/windsurfing, canoeing/kayaking, fishing (including from boats, banks/piers, and wade fishing), hunting (big game, small game, waterfowl), wildlife watching/nature study, swimming, camping, picnicking, visiting historic/cultural sites and museums, hiking/walking, bicycling, and many types of field sports.

General priority issues identified by state residents in the 2002 State Comprehensive Outdoor Recreation Plan that pertain to this project include:

Issue 1: Protect lands for natural and cultural resources allowing public recreational use.

Issue 2: Manage and expand trail resources.

Issue 3: Maintain and improve existing parks and recreation facilities.

Issue 5: Acquire public open space for recreational use, including urban parks, neighborhood parks, and greenways.

Issue 7: Create partnerships between and among government agencies and the private sector to build, maintain, and promote recreation resources, and to implement existing plans.

Issue 8: Implement existing plans.

Issue 9: Increase opportunities for activities of high recreational demand (walking/running, swimming, driving for pleasure, bicycling, fishing, wildlife watching, golf, motorboating, picnicking, camping, visiting historic sites, gardening, and hiking).

SCPRT Objectives

As the agency responsible for outdoor recreation planning in the State and as a manager of public lands on Lake Murray, SCPRT provides a long-term commitment to the stewardship of significant natural and cultural resources and to quality recreational service. Supporting this resource-management approach, SCPRT recognizes the following important issues as being high priority needs regarding the Saluda Relicensing Project:

1. Ensure that recreational facilities and opportunities are protected and enhanced for current and future users, on and near the lake and river.
2. Provide sufficient recreation and nature-based tourism opportunities to support the growing population of the region throughout the license period.
3. Provide safe and enjoyable recreation experiences for the boating and non-boating public including state residents and visitors.
4. Conserve natural, cultural, and recreational resources for future generations to enjoy.
5. Include enough land in the project boundary to assure optimum development of recreational resources afforded by the project.

Specific interests include the following:

1. Permanent protection for Dreher Island State Recreation Area.
2. Permanent protection of a new state park property with significant shoreline on the Lexington/Saluda side of the lake.
3. Continuation of existing recreational resources on Lake Murray and new/expanded resources where possible and appropriate.
4. Conservation of areas identified as important during interagency review of shoreline management maps.
5. Continued implementation of the Lower Saluda River Corridor Plan & Update, including additional recreational access at “Sandy Beach”, I-20, I-26, take out above Mill Race Rapids, and development of the Saluda River greenway and Three Rivers Greenway.
6. Continuation of existing recreational resources on the Saluda River.
7. Improved water quality for the lake and river to meet recreational needs (suitable for propagation of aquatic life and primary and secondary recreational contact and coldwater trout fishery).
8. Maintenance/enhancement of the scenic integrity of Lake Murray and the Saluda River.
9. Safe, predictable hydro flows for waders, boaters, and other downstream users.
10. Identification and enhancement of paddling opportunities in the tributaries and tributary arms of the lake.
11. Interactive process to periodically review recreation needs and adjust resources associated with the project.

Study Recommendations and Information Needs

The Saluda project (lake and regulated river) offers tremendous opportunities for parks, recreation, and tourism now and in the future. We are concerned that insufficient project shoreline has been set aside for public recreation, especially shore-oriented recreation such as bank/pier fishing, picnicking, camping, wildlife watching, and hiking/walking. As the population of this area grows and as this resource becomes more attractive to potential visitors from other areas, more shoreline and adjacent properties will be needed to serve the recreational and natural resource needs of the public. In the current Shoreline Management Plan (SMP), very little of the shoreline on the lake has been set aside for current or future public recreation. Some of this recreational shoreline includes the islands which are generally inaccessible except by boat. Approximately 75 percent of the shoreline is developed or planned for future development. We believe that this development has impacted recreation use, visual aesthetics, fish and wildlife habitat, and water quality. We request that SCE&G review the current allocation for the project in consultation with resource agencies and stakeholders and identify a more balanced allocation that will meet the public recreation and natural resource needs over the life of the license. To accomplish this, an

updated classification of the existing use of the property, acreage, and shoreline mileage associated with each classification should be completed and the shoreline management plan should be updated.

The ICD reports that only 404 acres are provided for public recreation on Lake Murray which includes the 348 acre Dreher Island State Park. The access areas listed are small - from 1.1 acre to 17.9 acres - with most under 10 acres (excluding the state park and three sites that did not list acreage). On the Saluda River, Saluda Shoals Park is 240 acres and the other three access areas are small (Gardendale acreage not identified). We suggest acreage be added to all small sites to the extent possible to allow for future expansion as recreational needs change and to provide options for shore based recreation. The recreation information provided in the ICD does not describe the number, size, or other specifics for facilities provided in the various access areas. For instance, Table E-15 should describe such items as the number of picnic tables/shelters, miles of hiking trails, number of campsites, number of lodge units, feet of swim beach, feet of bank fishing shoreline or piers, number of boat ramps, number of marina slips, amount of dry storage, tournament facilities, and number of trailer and car parking spaces.

In addition to this inventory, current users, adjacent (including off water common dock) property owners, and area residents should be interviewed to determine recreational use (including frequency, volume, and type of use) and potential use and needs in the future. Furthermore, future recreational use for the term of the new license should be estimated based on population projections and recommended adjustments provided by the State Office of Research and Statistics and adopted state and local plans. This study should identify where and what type of additional public recreation facilities are needed at Lake Murray and the Lower Saluda River. This should address fishing (including wading, banks/piers, and boats), boating (including waterskiing, jetskiing), canoeing/kayaking, sailing/windsurfing, wildlife watching/nature study, picnicking, camping, hiking/walking, bicycling, hunting (big game, small game, waterfowl), visiting historic/cultural sites, parking, and restroom facilities. A portion of the study should also identify longer term “future recreation” opportunities and needs.

A boat carrying capacity study should be performed for Lake Murray to identify concerns with current or future over-crowding and safety. As part of the process, include an inventory of current and future residential docks, public and private marinas, dry storage, and other boat access opportunities. Project related accidents during the current license period should be identified for use in addressing safety needs. This study will identify areas to target or avoid for new boating facilities.

A “build out” scenario should be used to identify the volume of use based on future development proposed in the shoreline management plan. This should help identify areas to avoid or target for new recreational access and may also identify areas that should be addressed for amendments to the shoreline management plan. Information is needed on how the “build out” will affect boating carrying capacity, water quality, and fish and wildlife habitat.

Due to state laws affecting Lake Murray, each new building or marina on the lake further restricts waterfowl hunting. An estimate of remaining legal waterfowl hunting areas should be mapped for consideration of designated waterfowl hunting areas.

A plan should be developed to protect islands in the lake and river while allowing recreational use. Population growth and increasing boat use may severely affect these recreational resources over the term of the license.

Safety in the Lower Saluda River is a concern due to unanticipated and unannounced hydro generation. A review of operations, project information, and warning devices is needed to provide adequate safety to waders, boaters, and other recreational users. Recent operations have provided false impressions to users that the high water is going down, only to go up significantly again, sometimes within the hour. Wading anglers are particularly affected. An increase in water level of a few inches can knock a wader down and often these releases can be measured in feet. These flows are also dangerous for beginning and intermediate boaters. Hydro flows that can be anticipated through posted flow schedules, gradual ramping that fluctuates less severely, and additional warning devices and information methods should be considered.

Recreational flow studies are needed to test the suitability of various releases for the various users at different locations throughout the regulated river. Volunteers from paddling and angling groups may be available to assist. The concerns of Congaree National Park to receive adequate flows during proper seasons should be addressed as well.

Trout and striped bass fishing are existing recreational uses in the Lower Saluda River. The water quality concerns of other agencies and recreational anglers should be considered.

There are many known and unknown cultural resources located within the project boundary. A plan should be developed in coordination with appropriate resource agencies to identify and protect these valuable resources.

Specific Comments on ICD

Section 14.1 Regional Resources – Include Saluda Shoals Park as a regional resource. It offers boat, canoe, and kayak access, picnicking, walking and bicycling trails, nature programs, and bank and wade fishing access to the Lower Saluda River. The Three Rivers Greenway should also be noted as a regional resource and described.

Section 14.2.1 Lake Murray – More information should be provided on locations of public access and number of facilities provided. Estimates of fishing tournaments and guide services should be provided. Describe the change in hunting and other activities since the current license was issued.

Section 14.2.2 Saluda River – The discussion of the Lower Saluda River should note that the active recreational fishery is only active during part of the year due to water quality. Also, safety is a concern to anglers, boaters, paddlers, and other users due to hydro flows.

Section 14.2.3 Recreation Sites – Provide more information on number of facilities in public and private sites. In the discussion regarding islands, note that access is only available to those users with boats. The property leased to the Boy Scouts of America is not open to the general public and the SCANA Pine Island Site is strictly private and should not be listed under public sites. Under private sites, enumerate the hundreds(?) of private docks that provide access to private landowners and their guests.

Section 14.3.2 Existing Use and Activities – Boat registrations have increased 44% in the seven years up to the year 2000. Please provide current estimates of boating and non-boating use of the project for fishing, walking, camping, wildlife watching, picnicking, etc., including the regulated river.

Section 15 – Land Use and Aesthetics – Discuss the Lower Saluda State Scenic River and its associated corridor management plan (Lower Saluda River Corridor Plan, 1990, and Lower Saluda Scenic River Corridor Plan Update, 2000). These community based planning documents recommend significant strategies for the river and associated lands.

Section 16 – Socioeconomics – Provide projections and discuss trends regarding the future of the next license period. Much of the data provided here is from 2000 or earlier.

Figure E-15 and E-16 – Updated boat registrations and boat counts should be provided. Data on non-boating use of the project should be provided.

G-3 (Project Map) – Current maps with sufficient detail to determine project boundary, recreational sites, etc. should be provided.

Conclusion

SCPRT looks forward to working with SCE&G in the relicensing process. We recommend that all study activities be closely coordinated with our staff and other relevant resource agencies. We should be provided the opportunity to participate in all scoping activities, study design and review processes, and field studies. All data collections, data analyses, as well as all draft and final reports should be provided to the SCPRT in both printed and electronic formats for review and verification. Besides myself, please include the following on your mailing list for copies of items related to the FERC license: Mr. Phil Gaines (pgaines@scprt.com, 803-734-0345) and Mr. Irvin Pitts (ipitts@scprt.com, 803-734-0153), both at the following address: SCPRT, 1205 Pendleton Street, Columbia, SC 29201, and Mr. Mark Davis (mdavis@scprt.com, 803-364-4152), Dreher Island State Recreation Area, 3677 State Park Road, Prosperity, SC 29127.

The Initial Consultation process has provided many positive results. We believe that the additional research that is ongoing or suggested in our comments is appropriate for a project with the scale of the Saluda Project and the state significance of its natural, cultural, and recreational resources. Our staff looks forward to continued close communication during this relicensing process. Please contact me (tbebber@scprt.com, 803/734-0189) should you wish to discuss this relicensing project.

Sincerely,



Tony Bebber
Planning Manager

cc: Gina Kirkland - SCDHEC
Amanda Hill - USFWS
Dick Christie – SCDNR
The Secretary – FERC
BJ Willoughby – SCPRT
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