

FEDERAL ENERGY REGULATORY COMMISSION  
WASHINGTON, D.C. 20426  
November 30, 2011

OFFICE OF ENERGY PROJECTS

Project Nos. 1175-013 and 1290-011 –  
West Virginia  
London/Marmet Hydroelectric Project  
and Winfield Hydroelectric Project  
Appalachian Power Company

Teresa P. Rogers, Process Supervisor I  
Appalachian Power Company  
P.O. Box 2021  
Roanoke, VA 24022

**Reference: Comments on Preliminary Licensing Proposal**

Dear Ms. Rogers:

Pursuant to 18 CFR §5.16(e), this letter contains staff comments on your Preliminary Licensing Proposal (PLP) for the London/Marmet and Winfield Projects filed on September 2, 2011.

The Integrated Licensing Process (ILP) regulations, at §§5.16(b)(1) and (2), require that you describe, in the PLP: (a) existing and proposed project facilities, and (b) the existing and proposed project operation and maintenance plan, including measures proposed to protect, mitigate, and enhance environmental resources affected by the project. The ILP regulations, at §5.16(b)(3), also require that the PLP include an environmental analysis, by resource area, of the continuing and incremental effects, if any, of the preliminary licensing proposal, including the results of studies conducted under the approved study plan.

In general, your PLP describes the existing and proposed project facilities and operations. In some instances, however, the description and analysis of proposed measures lacks sufficient detail for Commission staff to conduct its environmental analysis. Our specific comments are discussed in Appendix A.

Finally, when you file your license application, you must present the results of your studies pursuant to §5.18(b)(5)(C)(ii)(B), and cite all materials referenced, including all final study reports pursuant to §5.18(b)(5)(C)(ii)(H). In addition, §5.18(b)(3) of the

Commission's regulations, requires you to document consultation and compliance with section 401 of the Clean Water Act, the Endangered Species Act, the Magnuson-Stevens Fishery Conservation and Management Act, the National Historic Preservation Act, and the Wild and Scenic Rivers and Wilderness Acts in the license application.

If you have any questions, please contact Brandi Sangunett at (202) 502-8393.

Sincerely,

John B. Smith, Chief  
Mid-Atlantic Branch  
Division of Hydropower Licensing

cc: Public Files

Enclosure: Appendix A

Project Nos. 1175-013 and 1290-011 1  
Appendix A

## **Comments on Preliminary Licensing Proposal**

### General

1. Please provide a list of existing environmental measures.
2. Throughout the preliminary licensing proposal (PLP) you discuss the proposed change in operation of the London Development from peaking to run-of-river pending an agreement with the U.S. Army Corps of Engineers (Corps). Please provide information about the status of such a change in the operational agreement with the Corps.

### Project Operations

3. On page 2-6 of the PLP, the Winfield Project is connected to Appalachian Power Company's (Appalachian) transmission grid by a 69-kilovolt (kV) circuit approximately 3.7 miles long connecting the project to Appalachian's Bancroft switching station and a 69-kV circuit approximately 5.7 miles long connecting the project to Appalachian's Teays switching station. Provide an explanation of the need for two switching stations for the Winfield Project. Also, provide the frequency of use for both stations.
4. Existing project operation is discussed on page 2-9 of the PLP. As noted in the PLP the projects are located at Corps' lock and dam facilities. The hydro facility operators are in frequent contact with the lockmaster for each Corps' facility to ensure coordination of hydro generation and lock operations. In general, as long as the stream flow is less than the full discharge of the turbines (approximately 10,000 cfs), maintenance of the pool elevations within the allowable limits for navigation is the responsibility of Appalachian's power system personnel and plant operators. Provide a detailed explanation of how the projects are operated when flow is less than 10,000 cfs and how involved the Corps is with project operation.
5. Please provide a project boundary map of each project with your project boundary description on page 4-78. In your discussion, you mention the Corps owns most of the land, Appalachian Power owns a few acres, and that there are some transmission line right-of-ways. Please provide who owns those right-of-ways, the dimensions of the right-of-ways, and delineate on your project boundary map who owns each piece of land within the project boundary.

Project Nos. 1175-013 and 1290-011 2  
Appendix A

Aquatic Resources

6. On page 4-24 of your PLP, you discuss environmental effects of current project operation on fish movement and passage survival. In addition to the provided discussion of entrainment and turbine survival, please discuss possible impacts to fisheries due to impingement.

Recreation

7. In your discussion of the Recreation Assessment and Angler Use Creel Survey on page 4-71, please provide information regarding how many people were surveyed in total, how the surveys were administered, and at what times the surveys took place including how many weekdays, weekend days, and holidays were surveyed.
8. On page 4-77, you provide percentages of angling access site visitors that were surveyed for the Marmet and Winfield projects. Please also provide the number of people that were surveyed at the tailwater angling access sites.
9. In regards to the London Tailrace Study, once the old bridge could no longer handle vehicle traffic, it was then used as a pedestrian bridge. Please explain why erecting a pedestrian-only bridge has not been considered an option and/or if it is feasible. Please provide information as to how pedestrians previously were able to access the London Tailrace including where recreation users were able to park, how far users had to travel from the parking area to the tailrace, and any safety concerns with a pedestrian-only bridge option.

Cultural Resources

10. On page 4-87, you state that you have consulted with the West Virginia SHPO regarding the area of potential effect and the Cultural Resources Study Plan for both projects. In order to have a more complete record of consultation, please provide the following information:
  - when consultation with the West Virginia SHPO began;
  - documentation of communications between Appalachian Power and the SHPO; and
  - whether or not the SHPO has made any determination of effects.

Project Nos. 1175-013 and 1290-011 3  
Appendix A

License Application Exhibits and Maps

11. The Commission's regulations, at §5.18(a)(5)(iii), require that the relicense application meets the requirements of §4.51. As a reminder, please include, the requisite Exhibits A, B, C, D, F, and G in your final license application.
  
12. The exhibit F and G map(s) included in the license application should conform to 18 C.F.R. §§ 4.39 and 4.41 (2007). Also, the Commission recently removed the Non-Internet Public designation for Exhibit G maps [*see* 121 FERC ¶ 61,107 (issued October 30, 2007)]. Please refer to the following guidelines when preparing Exhibits F and G; [http://www.ferc.fed.us/industries/hydropower/gen-info/guidelines/drawings\\_guide.pdf](http://www.ferc.fed.us/industries/hydropower/gen-info/guidelines/drawings_guide.pdf).

Document Content(s)

P-1175-013Letter2.DOC.....1-5