



DIVISION OF NATURAL RESOURCES

Wildlife Resources Section
PO Box 99, 1110 Railroad Street
Farmington, WV 26571
Telephone (304) 825-6787
Fax (304) 825-6270

Earl Ray Tomblin
Governor

Frank Jezioro
Director

ELECTRONIC FILING

December 1, 2011

Kimberly D. Bose, Secretary
Federal Energy Regulatory Commission
888 First Street, NE
Washington DC 20426

RE: COMMENT, PRELIMINARY LICENCING PROPOSAL,
P-1175 LONDON/MARMET HYDROELECTRIC PROJECT &
P-1290 WINFIELD HYDROELECTRIC PROJECT

Dear Secretary Bose,

The West Virginia Division of Natural Resources, Wildlife Resources Section (WRS) appreciates the opportunity to comment on the Preliminary Licensing Proposal (PLP) filed by Appalachian Power Company (APC), dated September 2, 2011. The PLP pertains to relicensing proceedings for both the London/Marmet Hydroelectric Project (P-1175), and the Winfield Hydroelectric Project (P-1290).

Page 2-10 LONDON SITE ACCESS

APC filed the London Development Tailrace Fishing Access Feasibility Study with the Commission on November 17, 2011. The objectives of the study were to identify, analyze, and compare alternatives for providing public access to the London tailrace fishing area. Options that are being considered at the London Development include an at-grade crossing, or building a bridge over the railroad. Additionally, in light of the complications associated with establishing a right-of-way with CSX, APC is proposing two off-site options instead of angler access at the London Development. The off-site options are, establishing a new fishing access area at APC's property near Cabin Creek, approximately eight miles downstream of the London Dam, and/or enhancing the existing facilities at the Marmet Development. The WRS looks forward to working with APC to establish access at the London Development. The WRS does not concur with either of the off-site options to mitigate for the loss of the London Development Fishing Area. The WRS believes that CSX wants to be a good neighbor in the States and Communities

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where they are located, and we are confident that with a concerted effort, the outstanding issues can be resolved.

It is a general policy of the Commission to evaluate recreational needs of the project area, (18 CFR § 2.7). Order No. 313 includes the intent of the Commission to incorporate license articles that require a recreation plan, provision of public access, and the installation of facilities. Thanks to APC, an outstanding angling facility currently exists at the London Development tailwaters, and we feel that public access to it must be provided. The permanent closure of the London tailwater angler access site is unacceptable to us.

Page 4-80, § 4.3.6.2 ENVIRONMENTAL EFFECTS

Proposed Actions

APC is proposing to install portable restrooms and trash receptacles at both the Marmet and Winfield project sites to accommodate existing and future use. The WRS recommends that the Draft License Application include the London Development angler access site, and include the same accommodations. The WRS also suggests that the Draft License Application include standards for the quality of the proposed portable restroom facilities that will ensure that high quality facilities are provided, and that they will be accessible to the handicapped. Adequate facilities for both males and females should be provided. A regulated maintenance schedule should be included in the Draft License that would describe both managing the solid waste, and the portable restroom facilities at the London and Marmet Developments and the Winfield Project.

In accordance with Title 18 C.F.R. § 5.16 (e), any participant may file a recommendation on whether the Federal Energy Regulatory Commission (Commission) should prepare an Environmental Assessment, with or without a draft Environmental Assessment. The WRS recommends that a draft Environmental Assessment be prepared by the Commission for these two projects.

If you have any questions regarding these comments please feel free to contact me at the letterhead address, phone number, or by the e-mail address below.

Sincerely,



Kerry D. Bledsoe
Hydropower Coordination
kerry.d.bledsoe@wv.gov