

South Carolina

Department of Parks, Recreation & Tourism

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March 14, 2008

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

Attn: Mr. William R. Argentieri

RE: FERC Project #516, Comments on Draft Application for New License (12/13/07), Saluda Hydroelectric Project

The South Carolina Department of Parks, Recreation & Tourism (SCPRT) appreciates the opportunity to seek creative solutions to the many issues regarding the Saluda Hydroelectric Project through discussions in Resource Conservation Groups and Technical Working Committees. We look forward to completing these discussions and arriving at mutually acceptable agreements among the many stakeholders.

The Draft Application submitted by South Carolina Electric & Gas Company (SCE&G) substantiates many of the issues we addressed in our Initial Consultation Document Comments of August 10, 2005. It points out that many changes affecting parks, recreation, and tourism have occurred in the Lake Murray/Saluda River area since the current license was awarded. The population growth alone puts significant stress on the existing recreation facilities and further high growth is anticipated. Ten of the 14 existing public recreation sites on Lake Murray are approaching capacity or above capacity. There have also been significant changes in the way people recreate – changes in boating, fishing, hunting, wildlife watching, and numerous other activities. Recreational use of the lower Saluda River has increased substantially for fishing, canoeing/kayaking, swimming (rock hopping), walking for pleasure, and wildlife watching. Tourism has changed too, with shorter, more frequent vacations being the norm, often closer to home, and nature-based tourism is gaining in importance.

There is also an increased awareness of the need to protect open space and natural and cultural resources. Of the Lake Murray shoreline, only 0.2% is currently designated Natural Areas (Conservation), 15.4% is Forest Management, and 5.0% is Public Recreation.

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 relicensing of the Saluda 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. Protection and enhancement of Dreher Island State Recreation Area through the term of the new license and beyond.
2. Protection and recreational development of a new state park property with significant shoreline on the Lexington/Saluda side of the lake, through the term of the new license and beyond.
3. Continuation of the existing recreational resources on Lake Murray and new/ expanded resources where possible and appropriate.
4. Conservation of areas identified as important for recreational, natural, or cultural values.
5. Continued implementation of the Lower Saluda River Corridor Plan and Update, including several additional recreational access areas 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.
8. Maintenance/enhancement of the scenic integrity of Lake Murray and the Saluda River.
9. Safe, predictable hydro flows for wade fishing, swimming, boating, and other downstream uses.
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.

We remain concerned that insufficient project shoreline has been reserved for public recreation, especially shore-oriented recreation such as bank/pier fishing, picnicking, camping, wildlife watching, and hiking/walking. Only 404 acres are currently provided for public recreation and 86% of that is at one park, Dreher Island State Recreation Area. However, we hope this will be resolved through ongoing discussions in the Recreation and/or Lake and Land Management Resource Conservation Groups, and a more balanced allocation for the project will be established to meet the public recreation and natural resource needs over the life of the license and beyond.

Safety and flows suitable for recreation in the Lower Saluda River remain a concern due to unanticipated hydro generation. The river is important for wade fishing, canoeing, kayaking, tubing, swimming, sunbathing, picnicking, wildlife watching, nature study, walking, and hiking. An increase in water level of a few inches can easily knock a wader down and some hydro releases may be measured in feet. Various committees have been working on limited flows for wade fishing and swimming, additional warning devices, earlier warning, and improved information, higher flows for kayaking and canoeing, minimum flows for aquatic habitat, lake level stabilization, and other flow related issues. We hope that ongoing discussions of proposals being considered by the Safety Resource Conservation Group, Downstream Flow Technical Working Committee, Operations Resource Conservation Group, and other committees will resolve these concerns.

Specific Comments on the Draft Application

Section 7.1 Regional Resources – Very little of the Sumter National Forest’s 360,000 acres are near the project. List the SNF acreage in Newberry and Saluda Counties. Crooked Creek Park is in Chapin, not Cayce. Saluda Shoals Park is generally considered a regional park because of its size, visitor make up, and operation by a special purpose district (not a county).

Section 7.2 Project Resources – The discussion and Exhibit E-27 provide different figures for designated swimming areas; Park Site has the only public designated swimming area on the lake. Exhibit E-27 should provide more information (as noted in our ICD comments regarding Section 14.2.3), such as number of boat access lanes, number of parking spaces, number of fishing piers, number of picnic tables/shelters, number of campsites, etc. In the discussion regarding Bundrick Island, the number of acres leased to SCDNR/Lexington County Sheriff’s Department should be noted in relation to the remaining acreage available for recreation use. In the discussions of individual access areas, the year round status of each facility should be noted. Describe if the anticipated designation of Lunch Island as a purple martin sanctuary will alter the unrestricted recreational

use of the island. There is discussion about a lease of land to the Boy Scouts of America but no discussion of leases to other private groups, companies, etc.

Section 7.2.1.2 Commercial Sites – In Exhibit E-28, it would be useful to list numbers of ramp lanes, dry storage units, campsites, and parking.

Section 7.2.1.3 Private Sites – Identify the number of slips associated with Private Marina Sites. Also, it should be noted that there are 9,000 (?) existing private docks associated with residences or lots that provide access to landowners and their friends and relatives.

Section 7.2.2.1 Public Access Sites – In Exhibit E-29, identify the number of fishing docks, picnic tables and shelters, restrooms, and parking spaces and the miles of trails at each site. Discuss the year round status of all the facilities. In the discussion of Saluda Shoals Park, provide the acreage, number/miles of trails (“multiple trails”), and add that the park provides nature and paddling programs.

Section 7.2.2.3 Private Sites – Trout Unlimited has arranged access by permit through the residential neighborhood, River’s Edge Estates, but not exclusive use since the neighborhood residents may also access the river through their common property.

Section 7.3.1 Existing Recreation Uses – It is interesting to note that Bundrick Island receives 94,580 recreation days or 20% of total recreation use on the project, with no facilities. We also note that use data for the Mill Race sites on the Lower Saluda River reflect the need to provide additional access for safe ingress and egress along the river.

7.3.2 Future Recreation Use – Population growth was projected for 25 years, yet the proposed license is for 30 to 50 years. What adaptive management technique will be used to accommodate recreation needs beyond 2030?

7.4 Adequacy of Existing Recreation Sites to Accommodate Existing and Future Recreational Use: Usage at 10 of the 14 public recreation sites are reported at or above the design capacity on many days of the year and Larry Koon and Shull Island (the only public access on the South side of the Lake in Lexington County) exceed capacity on all weekends. Additional access and expanded facilities are needed in many areas. Also, non-boating access for fishing, picnicking, swimming, and other shore-based activities would accommodate those persons not currently served by boat ramp parks.

7.5 Recreation Management – In the discussion regarding hunting, point out that “State law excludes waterfowl hunting within 350 yards of a dwelling or marina in Lexington and Richland counties and 250 yards in Newberry and Saluda counties.

7.6.1 Initial Stage Consultation – In the discussion regarding recreational flows, note that the Downstream Flows Technical Working Committee has developed a draft schedule of flows since the Draft Application was submitted. This proposed schedule provides flows for boating and wade fishing/swimming periodically throughout the year and includes a request to remove the Saluda Hydro from “reserve operations” on some specific recreational flow days to improve safety. We support this effort and acknowledge that recreation flows should be modified for drought management, and anticipate that SCE&G can implement some agreed upon flows soon. We also recommend that hydro unit startup is phased in slowly and warning systems are activated early to allow recreation users sufficient time to realize water is rising and to egress from the river. In the discussion regarding periodic review of recreation needs, we encourage developing an interactive process to periodically review recreation needs and adjust resources associated with the project. This could be a review by the end of the first 10 years, and a complete recreation plan update by the 20th year.

7.7.2 The Lower Saluda River Corridor Plan and Update – Note that the plans recommended additional access at “Sandy Beach”, I-20, I-26, Twelvemile Creek, take out above Mill Race Rapids as well as the Saluda River greenway and Three Rivers Greenway. The Saluda River greenway included connections between Dam Site

park and Saluda Shoals Park, and extending the Saluda Shoals trail system to the Saluda Riverwalk portion of the Three Rivers Greenway below I-26.

7.8 Measures or Facilities Recommended by Agencies – In the discussion of the Lower Saluda River Corridor Plans, include the proposed Twelvemile Creek park and access to Sandy Beach. Designated waterfowl hunting areas should not be limited to just one site if sufficient undeveloped areas can be identified and protected from new dwellings or marinas to meet state requirements. In the discussion about how any proposed improvements may or may not redistribute use on the lake/river, point out that significant population growth in the four-county area is anticipated to continue and existing use capacities are already exceeded on peak weekends on many of the public recreation sites.

7.9 Existing Measures to be Continued and New Measures Proposed by the Applicant – This section notes that the draft Recreation Plan is being developed. SCPRT participated in several meetings held since the Draft Application was issued and proposed recreation facilities and enhancements were discussed. The draft Public Recreation Sites proposed by SCE&G on 3/3/08 are all needed improvements for the lake and river. Further discussions should address additional recreational needs that should be considered, a timing schedule, and a periodic review/plan update process

8.1.2 Aesthetics – In the discussion about views of the Saluda River from the Dam, the aesthetic quality of the downstream area may be considered to be moderate from the road, however, the aesthetic quality of the river and its shoreline are quite pleasing in most places when viewed from the river (wading, boating, or viewing across the river).

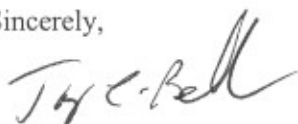
8.3 Applicant Proposed Mitigation – This section notes the ongoing discussion of potential mitigation. SCPRT has been active in meetings regarding the revised Shoreline Management Plan and Guidelines and “rebalancing” of project lands. Much of the land and shoreline around the lake and river has been developed resulting in the loss of recreational and natural resource value, especially for passive recreational use. Further discussions should focus on conservation of much of the remaining project lands.

8.4 Applicant’s Policy Regarding Shoreline Development – Discuss the vegetation clearing limits and restrictions on clearing in the 75 foot setback area which greatly improves the scenic value and aesthetic quality of the lake, as well as providing wildlife habitat and aids water quality. Has the “high water mark” changed from 360?

Whole Document – In many cases throughout the document, Lower Saluda River is abbreviated “LSR” while Lake Murray is never abbreviated.

Thank you for the opportunity to comment on the Draft Application. SCPRT looks forward to continuing work and close communication with SCE&G and other stakeholders in the relicensing process. If there are any questions, please contact me at tbegger@scprt.com or 803-734-0189.

Sincerely,



Tony L. Bebber, AICP
Planning Manager

cc: ✓ The Secretary – FERC
BJ Willoughby and Phil Gaines - SCPRT

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