

2021 CLAYTOR LAKE DRAWDOWN PLAN

Background

On December 27, 2011, the Federal Energy Regulatory Commission (Commission) issued *Order Issuing New License* (License) authorizing Appalachian Power Company (Appalachian) to continue to maintain and operate the Claytor Hydroelectric Project, on the New River in Pulaski County, Virginia. License Article 405, Water Management Plan (Final - June 2009) allows for non-emergency drawdowns. Specifically, Article 405 of the license requires the licensee to file, for Commission approval, a reservoir drawdown plan at least three months prior to implementing a non-emergency reservoir drawdown. The purpose of the plan is to minimize the impact of any project maintenance activity requiring a reservoir drawdown on aquatic resources in the project reservoir and downstream of the project, and to allow shoreline property owners sufficient time to plan shoreline maintenance activities.

Further, Article 405 requires the licensee to prepare the plan after consulting with the U.S. Fish and Wildlife Service (FWS), the Virginia Department of Game and Inland Fisheries [subsequently renamed the Virginia Department of Wildlife Resources (VDWR)], the Virginia Department of Conservation and Recreation (VDCR), the Virginia Department of Environmental Quality (VDEQ), Pulaski County, the New River Valley Planning District Committee (New River Valley), and the Friends of Claytor Lake (FOCL). The licensee must include with the plan documentation of consultation, copies of comments, and recommendations on the completed plan after it has been prepared and provided to the agencies, and specific descriptions of how the plan accommodated the agencies' comments. The licensee must allow a minimum of 30 days for the agencies to comment, and make recommendations before filing the plan with the Commission. If the licensee does not adopt a recommendation, the filing must include the licensee's reasons based on project-specific information.

Prior to the drawdown, the licensee must notify the public and property owners along the shoreline by mail 45 days prior to implementing the drawdown to allow property owners sufficient time to plan shoreline maintenance activities. The notification must include rate (feet per day), limit in feet, term of the drawdown, and any provisions. The Commission reserves the right to require changes to the plan. Upon Commission approval of the plan, the licensee must implement it, including any changes required by the Commission.

Efforts began in 2011, through Pulaski County's Claytor Lake Technical Advisory Committee (CLTAC), to modify previous non-emergency drawdown plans in order to decrease impacts to mussels. (The CLTAC includes representatives from a majority of the above referenced agencies.) Modified drawdowns for shoreline maintenance were held in 2011 and 2012 according to plans developed in consultation with the CLTAC. A 2014 drawdown plan was developed with the CLTAC and approved by the Commission. However, prior to implementation, the drawdown was cancelled at the request of Pulaski County due to siltation problems with the County's water intake in the lake. A 2015 drawdown plan was also developed and approved by the Commission. However, full implementation was impacted by rain and higher flows. Drawdown plans for 2017 and 2019, developed by CLTAC and approved by the Commission, were successfully implemented with a 5-foot drawdown.

2021 Drawdown Proposal

1. Conduct drawdown from November 6 through November 14, 2021. (Drawdown scheduled during mid-November to avoid freezing temperatures, and to minimize the impact to recreation.)
2. Depth of drawdown to be 5 feet from full pond elevation of 1846 feet NGVD.

3. Lake level to be drawn down 1 foot per day starting 8 a.m. on November 1, 2021 to reach 1841 feet NGVD by 8 a.m. Saturday, November 6, 2021.
4. Duration of the drawdown to be nine days, including two weekends.
5. Lake to be allowed to begin refilling at 10 p.m. Sunday, November 14, 2021, with targeted return to normal elevation by 10 p.m. Friday, November 19, 2021, depending upon inflow.
6. Should the drawdown duration of nine days be impacted by high inflows that prohibit Appalachian from achieving the full 5-foot drawdown, then the drawdown period may be extended as necessary to provide nine consecutive days at the lake level of 1841 feet.
7. Appalachian will inform the public of the drawdown at least 45 days prior to implementation (no later than September 17, 2021).
8. FOCL will encourage participation and publicize information about the drawdown and mussel salvage through media, mailings, phone calls and internet. Information will include distinction between Asian Clams, pistolgrip mussels and other mussels, and the importance of mussel salvage.
9. FOCL will gather information about drawdown usage and mussel salvage from landowners and volunteers. (Send drawdown questionnaire card just prior to drawdown.)
10. A volunteer mussel salvage event will be conducted on the first Saturday of the full drawdown to increase the number of dewatered mussels returned to the water. (Event will be similar to that conducted in 2019.) Team leaders, boat transportation, materials, meeting locations, volunteers and volunteer recruitment, refreshments and organization to be provided by FOCL, VDWR, Appalachian, Claytor Lake State Park, Pulaski County and others. Additional details include:
 - a. FOCL will conduct meetings for organizers and team leaders prior to the event, and on Saturday morning prior to the arrival of volunteers, organize the event, and train and coordinate team leaders in mussel identification, location (GPS) and data collection, site and volunteer selection, and distribution of materials and logistics of the event.
 - b. Volunteer training will be provided by VDWR prior to deployment of teams of volunteers with team leaders Saturday morning. Volunteers will be trained in returning mussels to the water and be provided information with which to distinguish between Asian Clams (not to be salvaged), and pistolgrips and other mussels. Volunteers to be provided information prior to the event on what to expect and how to come prepared.
 - c. VDWR to provide up to three teams experienced in mussel identification to identify and tally mussels by species; other volunteer teams to focus on counting and salvaging total numbers of mussels. (Volunteers to identify only pistolgrip mussels.)
 - d. Appropriate data collection sheets will provided.
 - e. Mussel salvage sites will be selected and prioritized based on likely mussel habitat and previous mussel findings.
 - f. Hours of event will be organized to optimize volunteer time.
 - g. Adequate food and drink will be provided.

- h. Coordination with mussel salvage by other entities, such as the Claytor Lake State Park, will be continued.
10. Regulatory agencies will have 30 days to comment on the drawdown plan prior to Appalachian's submission to the Commission.
 11. Appalachian to file the drawdown plan with the Commission by June 1, 2021 to allow for the Commission's required three month review period. Included with the filing will be documentation of consultation with stakeholders as required in Appalachian's license.
 12. Changes may be made to drawdown, including but not limited to, dates and duration if unforeseen circumstances (such as occurred in 2015) warrant it at the time. Agencies, stakeholders and the public will be notified as soon as practicable of any changes.
 13. A summary report following the drawdown will be prepared through the FOCL with assistance from VDWR and others as needed.
 14. Future drawdown plans to be based on the prior drawdown results, and revised as appropriate.