



2023 Drawdown Report



Claytor Project No. 739 January 2024

**Claytor Project No. 739
Water Management Plan
2023 CLAYTOR LAKE DRAWDOWN REPORT**

The Federal Energy Regulatory Commission (Commission) issued Order Issuing New License on December 27, 2011 (License) to Appalachian Power Company (Appalachian) allowing the continued operation of the Claytor Hydroelectric Project. As part of the approved Water Management Plan (Article 405 of the License), Appalachian may conduct non-emergency reservoir drawdowns for the purpose of minimizing 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.

Friends of Claytor Lake (FOCL) and Pulaski County requested that Appalachian conduct a 5-foot non-emergency drawdown of the Claytor reservoir in the fall of 2023 to enable lakefront property owners to perform shoreline maintenance and construction activities. A draft drawdown plan was provided for comment via email attachment to the Virginia Department of Wildlife Resources, the Virginia Department of Conservation and Recreation, the Virginia Department of Environmental Quality, the U.S. Fish and Wildlife Service, Pulaski and Giles Counties (Virginia), FOCL, Renew the New, and Friends of the New River.

Following consultation and consideration of comments, Appalachian filed with the Commission on July 7, 2023 a proposed drawdown plan for a non-emergency, 5-foot drawdown starting November 1, 2021. On August 17, 2023, the Commission issued Order Approving Reservoir Drawdown Plan Pursuant to Article 405. The purpose of the scheduled drawdown was to allow shoreline property owners to conduct shoreline maintenance activities while minimizing the impact of the drawdown on aquatic resources within the Project boundary.

A non-emergency drawdown of Claytor Lake for shoreline maintenance purposes was last conducted in November 2021. The drawdown plan for 2023 was largely patterned after the 2021 drawdown plan that had also been approved for a 5-foot drawdown. Included were mussel salvage activities to mitigate for impacts to mussels. The following is a report on the implementation of the 2023 drawdown.

Publicity/Education

On September 12, 2023 Appalachian sent a letter to Claytor Lake property owners informing them of the details regarding the drawdown scheduled for November 2023. The letter also contained information about mussel salvage during drawdown, including instructions on returning dewatered mussels to deeper water and photos of mussels commonly found in Claytor Lake. Special instructions were given in the event Pistolgrip mussels (*Tritogonia verrucosa*), a state threatened species, were found. Property owners were also encouraged to report their usage of drawdown and mussel salvage efforts using an enclosed pre-paid return postcard.

FOCL provided information about drawdown and mussel salvage through its website, Facebook page and email blasts. Information provided before, during and after drawdown included details of drawdown, encouragement to salvage mussels, online form to report mussel salvage efforts and drawdown use, and photos and results of mussel salvage.

Drawdown Schedule

The 2023 drawdown began Wednesday, November 1, 2023 at 1:30 p.m. The reservoir was lowered 1.6 feet per day until it reached the 1841 foot contour elevation (for a total of 5 feet below full pond) on Saturday morning, November 4. This was an increase in some previous non-emergency drawdown rates of 1-foot per day to reduce the overall duration of drawdown and further minimize impacts to aquatic species. The reservoir remained 5 feet down until 10 p.m. Sunday, November 12, when refilling began.

Mussel Salvage Event

As with the 2021 drawdown plan, a key component of the 2023 plan was mitigating for impacts to mussels. Mussel mitigation involved recruiting lakeshore property owners and volunteers to return mussels stranded by drawdown to deeper water. In addition to publicity about mussel salvage sent out by Appalachian and

FOCL, a volunteer mussel salvage event was held on Saturday, November 4, 2023. The event was organized by FOCL with generous support and participation by Appalachian, Virginia Department of Wildlife Resources (VDWR), Claytor Lake State Park, FOCL, Pulaski County, local universities, organizations and businesses, and others.

One hundred and twenty individuals participated in the volunteer mussel salvage event on November 4. Volunteers included 4 from Appalachian, 17 from VDWR, 8 FOCL members, 12 from Virginia Chapters of Master Naturalists, 17 from Radford University, 22 from the Virginia Tech, 4 from Claytor Lake State Park, 4 from Pulaski County administration, 2 from the New River Conservancy, and 30 local citizens and visitors. Participants met at one of two meeting sites: Claytor Lake State Park and Pulaski County and Harry DeHaven Park. Drinks and breakfast and lunch foods were provided by FOCL.

Following training and orientation by VDWR and FOCL, volunteers were deployed in teams on foot and by car to mussel salvage sites, and by boats provided by Appalachian, VDWR, FOCL and private citizens. Multiple teams were sent to sites with long stretches of shoreline. In order to compare data from year-to-year, the same sites salvaged in the past were selected for salvage in 2023.

Volunteers were instructed to count and gently toss mussels into deeper water. Teams knowledgeable about mussel species also identified the species of mussels salvaged. Any teams finding what they suspected to be Pistolgrip mussels were instructed to notify Brian Watson, Aquatic Resources Biologist/State Malacologist with VDWR.

Mussel species identified were Paper Pondshell (*Utterbackia imbecillis*)(63.28%), Giant Floater (*Pyganodon grandis*)(18.28%), Eastern Elliptio (*Elliptio complanata*)(13.52%), and Purple Wartyback (*Cyclonaias tuberculata*)(0.037%). No Pocketbook (*Lampsilis ovata*) or state-threatened Pistolgrip (*Tritogonia verrucosa*) mussels were found. The percentage of salvaged mussels whose species were not identified was 4.87%. A total of 8,045 mussels were salvaged during the 2023 mussel salvage event. This compares to 6,536 mussels including 3 Pistolgrips salvaged during the 2021 volunteer event, 7,619 mussels with 3 Pistolgrips during the 2019 event, 6,479 mussels with 24 Pistolgrips during the 2017 event, 1,411 mussels including 20 Pistolgrips during the 2015 event, and 7,063 with 4 Pistolgrip mussels during the 2012 event.

Drawdown Use and Mussel Salvage by Shoreline Property Owners

Shoreline property owners were encouraged to report their use of drawdown and to also return stranded mussels to deeper water during drawdown. A form was provided on FOCL's website and a pre-paid return postcard was included in Appalachian's letter to property owners to report their use of drawdown and the number of mussels salvaged. Forty-six responses were received representing at least 10,441 feet of shoreline.

Of the respondents, the majority reported using drawdown for multiple shoreline maintenance activities. Most (33) reported using it for debris clean up; 20 also reported using drawdown for dock/facilities maintenance and/or inspection, 15 for repair and/or inspection of existing shoreline stabilization, and 1 installed new shoreline stabilization.

Many respondents made note of mussels. Respondents who found mussels salvaged 1,175. When the number of mussels salvaged by property owners is added to the number of mussels salvaged during the volunteer mussel salvage event on November 4, a total of 9,220 mussels were salvaged during the 5-foot 2023 drawdown.

Included with this report:

- AEP letter to Commission requesting approval (contains 2023 drawdown plan)
- Commission Order Approving Reservoir Drawdown Plan
- Appalachian September 12, 2023 letter to property owners
- Photos
- Nov 4 mussel salvage counts by site
- Spreadsheet of property owner responses



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

July 7, 2023

**Re: Appalachian Power Company
Claytor Hydroelectric Project No. 739
License Article 405 – Reservoir Drawdown**

Dear Secretary Bose:

On December 27, 2011, the Federal Energy Regulatory Commission (Commission) issued its *Order Issuing New License* for the Claytor Hydroelectric Project No. 739. Article 405 of the license requires that Appalachian Power Company (Appalachian) file with the Commission, for approval, a reservoir drawdown plan at least three (3) months prior to implementing a non-emergency reservoir drawdown. Friends of Claytor Lake (FOCL) and Pulaski County have requested that Appalachian conduct a non-emergency drawdown of the Claytor reservoir in the fall of 2023 in order to allow lakefront property owners to perform shoreline maintenance and construction activities. Enclosed for Commission approval is a proposed drawdown plan for a non-emergency, 5-foot drawdown starting Saturday, November 4, 2023.

A draft drawdown plan (Plan) was provided via email attachment to the Virginia Department of Wildlife Resources (VDWR), the Virginia Department of Conservation and Recreation (VDCR), the Virginia Department of Environmental Quality (VDEQ), Pulaski County and Giles County (Virginia), Friends of Claytor Lake (FOCL), Renew the New, and Friends of the New River on April 24, 2023; and to the U.S. Fish and Wildlife Service (FWS) on June 30, 2023. Replies were received from FWS and FOCL. The comments are summarized below.

FWS comments (email dated July 3, 2021)

The FWS stated that the agency appreciated the adoption of the faster drawdown rate with completion of the drawdown just prior to the mussel salvage event as recommended by the Virginia Department of Wildlife Resources on the 2021 Drawdown Plan. FWS noted that this approach will shorten the exposure time to mussels prior to the mussel salvage event. The USFWS did not have any additional comments on the Plan.

FOCL comments (email dated June 15, 2023)

FOCL expressed the organization's appreciation for the proposed 5-foot drawdown in November 2023 and requested assistance with printing and distribution of survey on mussel findings. Appalachian will assist.

There were no other written comments. The Plan and documentation of consultation are attached. The 2023 drawdown plan was also discussed during the Water Quality/Water Management Technical Review Committee (WQWMTRC) annual meeting held on April 26, 2023.

If there are any questions, please contact the undersigned at 540-985-2441 or ebparcell@aep.com.

Sincerely,



Elizabeth B. Parcell
Process Supervisor

Attachments

Cc: Steve Dolan – American Electric Power (AEP)
Dwain Bever – AEP
Ed Brennan – AEP
Lisa Hammock - AEP
Fred Colburn – AEP
DISTRIBUTION LIST

DISTRIBUTION LIST

George Devlin Ryan Green Matthew Link Jay Roberts Cassie Porter	Virginia Department of Environmental Quality
Brody Havens	Virginia Department of Conservation and Recreation
Jeff Williams Brian Watson	Virginia Department of Wildlife Resource
John McClosky	U.S. Fish and Wildlife Service
Jonathan Sweet	Pulaski County, Virginia
Chris McClarney	Giles County, Virginia
Steve Rapp Ciara Harris Laura Walters Laura Bullard Cheri Strenz	Friends of Claytor Lake
Rick Roth	Friends of the New River
Ann Goette	Renew the New

CLAYTOR LAKE 2023 DRAWDOWN PLAN

Appalachian Power Company
Claytor Project No. 739
2023 Claytor Lake Drawdown Plan
April 24, 2023

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, 2019 and 2021, developed by CLTAC and approved by the Commission, were successfully implemented with 5-foot drawdowns.

2023 Drawdown Proposal

1. Conduct drawdown from Saturday, November 4 through Sunday, November 12, 2023. (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 of 1845.5 NGVD to be drawn down 1.5 feet per day beginning at 1:30 PM on Wednesday, November 1, 2023 to reach 1841 feet NGVD by 9 AM Saturday, November 4, 2023.
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 12, 2023, with targeted return to normal elevation by 10 p.m. Friday, November 17, 2023, 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 20, 2023).
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 2021.) 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. Prior to the day of the event, FOCL will oversee recruitment of volunteers and work with organizers to plan and coordinate the details of the event, including team leader selection and training, salvage site and volunteer selection, transportation, supplies, data collection, and refreshments.

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), Pistolgrip mussels, 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 be 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.

11. Regulatory agencies will have 30 days to comment on the drawdown plan prior to Appalachian's submission to the Commission.

12. Appalachian to file the drawdown plan with the Commission by June 1, 2023 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.

13. 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.

14. A summary report following the drawdown will be prepared through FOCL with assistance from VDWR and others as needed.

15. Future drawdown plans to be based on the prior drawdown results, and revised as appropriate.

184 FERC ¶ 62,091
UNITED STATES OF AMERICA
FEDERAL ENERGY REGULATORY COMMISSION

Appalachian Power Company

Project No. 739-081

ORDER APPROVING RESERVOIR DRAWDOWN PLAN PURSUANT TO ARTICLE 405

(Issued August 17, 2023)

1. On July 7, 2023 and supplemented on August 7, 2023, Appalachian Power Company, licensee for the Claytor Hydroelectric Project No. 739 filed a Reservoir Drawdown Plan, for Commission approval, pursuant to Article 405 of the license.¹ The project is located on the New River, in Pulaski County, Virginia, and does not occupy any federal lands.

Background

2. Article 404 of the license approved and modified the Water Management Plan filed June 29, 2009, consistent with the provisions contained within Part I, Special Conditions, sections D and E of the section 401 Virginia Water Protection Permit (WQC), issued February 14, 2011, by the Virginia Department of Environmental Quality (Virginia DEQ). Article 404 also incorporated the Water Management Plan into the license and requires the licensee to implement the plan. The Water Management Plan and the WQC, in part, require the licensee to operate the project, during normal operations from April 1 through November 30, in a levelized flow mode, with the reservoir elevations maintained between 1,845 feet National Geodetic Vertical Datum (NGVD) and 1,846 feet NGVD.

3. 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 effect 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.

4. Article 405 requires the licensee to prepare the plan after consulting with the U.S. Fish and Wildlife Service (FWS), Virginia Department of Wildlife Resources (Virginia DWR, formerly Virginia Department of Game and Inland Fisheries), Virginia Department of Conservation and Recreation (Virginia DCR), Virginia DEQ, Pulaski County, New River Valley Regional Commission (formerly New River Valley Planning District Committee), 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.

¹ *Appalachian Power Company*, 137 FERC ¶ 62,258 (2011).

5. The licensee must notify the public and property owners along the shoreline by mail of the drawdown 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, and term of the drawdown. 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.

6. In 2017,² 2019,³ and 2021,⁴ Commission staff approved drawdown plans that were implemented with a five-foot drawdown.

Licensee's Proposed Plan

7. The FOCL and Pulaski County requested that the licensee conduct a non-emergency drawdown of the Claytor reservoir in the fall of 2023 to allow lakefront property owners to perform shoreline maintenance and construction activities. In response, the licensee proposes a reservoir drawdown of five feet from the lake level of 1,846 feet NGVD. The drawdown would begin by lowering the lake level of 1,845.5 feet NGVD by 1.5 feet per day starting on November 1, 2023, at 1:30 p.m., and continuing until the reservoir reaches 1,841 feet NGVD, by November 4, 2023, at 9:00 a.m. The duration of the drawdown would be nine days, including two weekends. The licensee would begin refilling the reservoir on November 12, 2023, at 10:00 p.m., and return to the normal impoundment elevation by November 17, 2023, at 10:00 p.m., depending on inflow. The plan allows for changes to the proposed drawdown, such as the dates and duration, for unforeseen circumstances such as high inflows. The licensee would inform the public about the drawdown at least 45 days prior to its implementation, as required by Article 405.

8. The licensee proposes to monitor and reduce impacts to mussels within Claytor Lake potentially caused by the drawdown. The licensee would work with the FOCL to encourage participation, and to provide information about the drawdown and the importance of mussel salvage. This information would educate the public about mussel salvage through media, mailings, phone calls, and the internet. In addition, FOCL would gather information about the drawdown usage and mussel salvage, by means of sending a questionnaire card to landowners and volunteers prior to the drawdown.

9. The licensee proposes to assess the impact to mussels based on the information collected during the drawdown. A mussel salvage event would take place on the first Saturday after the reservoir is lowered five feet to increase the number of dewatered mussels returned to the water. Prior to the day of the event, the FOCL would oversee recruitment of volunteers and work with organizers to plan and coordinate the details of the event. The licensee and cooperating agencies would select and prioritize sites based on likely mussel habitat and previous mussel findings. The licensee, the FOCL, the Virginia DWR, the Claytor Lake State Park, Pulaski County, and others would provide volunteers and team leaders, boat transportation, materials, meeting locations, and refreshments.

² *Appalachian Power Company*, 159 FERC ¶ 62,271 (2017).

³ *Appalachian Power Company*, 169 FERC ¶ 62,020 (2019).

⁴ *Appalachian Power Company*, 176 FERC ¶ 62,142 (2021).

10. The Virginia DWR would provide volunteer training on Saturday morning prior to deployment in teams with team leaders. The Virginia DWR would provide up to three teams experienced in mussel identification to identify and tally mussels by species. In addition, other volunteer teams would focus on counting and salvaging total numbers of mussels.

Consultation

11. The licensee provided a copy of the draft plan to the Virginia DWR, Virginia DCR, Virginia DEQ, Pulaski County, and the FOCL on April 24, 2023, and to the FWS on June 30, 2023. The licensee provided 30 days for agency comments. The licensee received replies from the FWS, and the FOCL. The drawdown was also discussed at the Water Quality/Water Management Technical Review Committee annual meeting held on April 26, 2023.

12. On May 15, 2023, the FOCL expressed appreciation for the proposed 5-foot drawdown in November 2023 and requested assistance with printing and distribution of the survey on mussel findings. On July 3, 2023, the FWS stated that the agency appreciated the adoption of the faster drawdown rate with completion of the drawdown just prior to the mussel salvage event as recommended by the Virginia DWR on the 2021 Drawdown Plan. FWS noted that this approach would shorten the exposure time to mussels prior to the mussel salvage event.

13. On August 7, 2023, the licensee filed a supplement documenting its consultation with the New River Valley Regional Commission. By letter dated August 2, 2023, the New River Valley Regional Commission stated that staff reviewed the project and determined that the proposal is not in conflict with the regional plans, policies, and goals.

Historic Properties

14. On December 27, 2011, the Commission approved the Historic Properties Management Plan (HPMP) implemented pursuant to the project's Programmatic Agreement and Article 415 of the project's license. The HPMP addresses management of historic properties for the project, which includes the following sites eligible for the National Register of Historic Places: the Claytor project facilities, the Peak Creek Rockshelter, and two archaeological sites that were identified in the surveys conducted between 2008-2009.

15. Although, the licensee did not conduct consultation regarding historic properties specific to this proposal, section 4.4 of the HPMP identifies routine maintenance activities that have been determined not to have an effect on historic resources developed in consultation with the Virginia State Historic Preservation Office (SHPO). The maintenance of existing recreational facilities and construction of new facilities on previously disturbed land is listed as part of those activities that do not require consultation from the Virginia SHPO.

16. Section 5.3 of the approved HPMP requires the licensee, upon inadvertent discovery of a potential historic property during ground-disturbing activities, to conduct the following actions: (1) stop work in the area of concern and stabilize the area, if necessary; (2) notify the project's Shoreline Management Group and provide the details of the discovery; and (3) notify the Virginia SHPO within 3 days of discovery. The licensee would then, in coordination with a qualified professional and the Virginia SHPO complete the following actions: (1) identify and confirm the potential significance of the historic property; (2) plan and perform any field investigation and analysis; (3) document the investigations and analysis in a report to be submitted to the Virginia SHPO and the Eastern Band of Cherokee Indians; and (4) manage any artifacts that are collected in accordance with the standards established in *The Secretary of Interior's Archaeological Standards and Guidelines*.

Review

17. The licensee's Reservoir Drawdown Plan is necessary to allow property owners to perform shoreline maintenance and construction activities. The licensee provided the agencies and stakeholders 30 days to comment on the draft Drawdown Plan as required under Article 405. The proposed drawdown and refill rate of the reservoir would minimize adverse effects to aquatic resources. In addition, performing the drawdown during the month of November, when temperatures are cooler and vegetative and animal activities reduced, would minimize the effects on recreation and on biological resources. The licensee, in cooperation with the resource agencies and stakeholders, would take measures to reduce effects to mussels within Claytor Lake caused by the drawdown. The licensee has adequately consulted and involved the resource agencies, local governments, stakeholders, and residents along the Claytor reservoir, and the parties involved are in support of the proposal. Additionally, Commission staff finds with the provisions included in the project's approved HPMP, any affects to historic properties would be mitigated. Based on Commission staff's review, the licensee's plan to drawdown the Claytor reservoir by as much as five feet for a period of nine days during November 2023 should be approved.

The Director orders:

(A) Appalachian Power Company's Reservoir Drawdown Plan, filed on July 7, 2023 and supplemented on August 7, 2023, for the Claytor Hydroelectric Project No. 739, pursuant to Article 405 of the license, to allow a drawdown of Claytor reservoir by as much as five feet, for a period of nine days during November 2023, in order to allow property owners to perform shoreline maintenance and construction activities is approved. The temporary drawdown is approved until November 12, 2023.

(B) This order constitutes final agency action. Any party may file a request for rehearing of this order within 30 days from the date of its issuance, as provided in section 313(a) of the Federal Power Act, 16 U.S.C. § 825l, and the Commission's regulations at 18 C.F.R. § 385.713 (2022). The filing of a request for rehearing does not operate as a stay of the effective date of this order, or of any other date specified in this order. The licensee's failure to file a request for rehearing shall constitute acceptance of this order.

Kelly Houff
Chief, Engineering Resources Branch
Division of Hydropower Administration
and Compliance



Appalachian Power
Hydro Generation
P O Box 2021
Roanoke, VA 24022-2121
aep.com

September 12, 2023

Re: Claytor Project No. 739
Water Management Plan
2023 Drawdown of Claytor Lake

Dear Resident:

In cooperation with Friends of Claytor Lake (FOCL) and Pulaski County, Appalachian Power Company (Appalachian) requested and received approval from the Federal Energy Regulatory Commission (Commission) for a temporary drawdown of the Claytor reservoir during November 2023. The purpose of the drawdown is to provide property owners an opportunity to perform cleanup and other maintenance related activities along the shoreline. Permits are required for many activities so if you have not obtained your permits or started the process, please do so now so that the permits can be issued prior to the drawdown¹. Vegetation removal from within the Project boundary (generally the 1850-foot elevation contour and below) is prohibited unless prior approval is obtained from Appalachian.

The 2023 drawdown is scheduled to begin Wednesday, November 1, 2023 at 1:30 PM. The reservoir will be lowered approximately 1.5 feet per day to reach an elevation of approximately 1841 feet (for a total of 5 feet) by 9 AM on Saturday morning, November 4, 2023. The reservoir will start refilling at 10 PM on Sunday, November 12, 2023, with a targeted return to normal elevation by 10 PM on Friday, November 17, 2023, depending upon inflow. Note that water levels may fluctuate during the drawdown period.

Commission approval was based on a drawdown plan² developed in consultation with the Friends of Claytor Lake (FOCL), Pulaski County and various state agencies. The drawdown plan includes proposed mitigation for impacts to mussels and we need your help. Mitigation for 2023 includes efforts to increase mussel salvage during the drawdown. This means we need your help in returning mussels (pictures attached) to the water if they are stranded along your shoreline during the drawdown. If you see mussels along the shoreline, please pick them up and gently toss them into the water. Please complete and mail the enclosed pre-paid postcard to document your use of drawdown and mussel salvage efforts. Appalachian will provide the returned postcards to FOCL. If you do not receive the postcard, wish to respond online, or would like additional information regarding mussel salvage efforts during the drawdown, including the volunteer mussel salvage event on November 4, 2023, please visit FOCL's website, www.focl.org.

For those who participate in mussel salvage, please note that Asian clams do not have to be returned to the reservoir. A picture of an Asian clam is attached.

BOUNDLESS ENERGYSM

Please note that the drawdown may be cancelled or reduced on short notice if inflows are insufficient to refill the reservoir in a timely manner or if a flood event occurs. The public will be notified via a press release if the drawdown is extended or cancelled.

Sincerely,

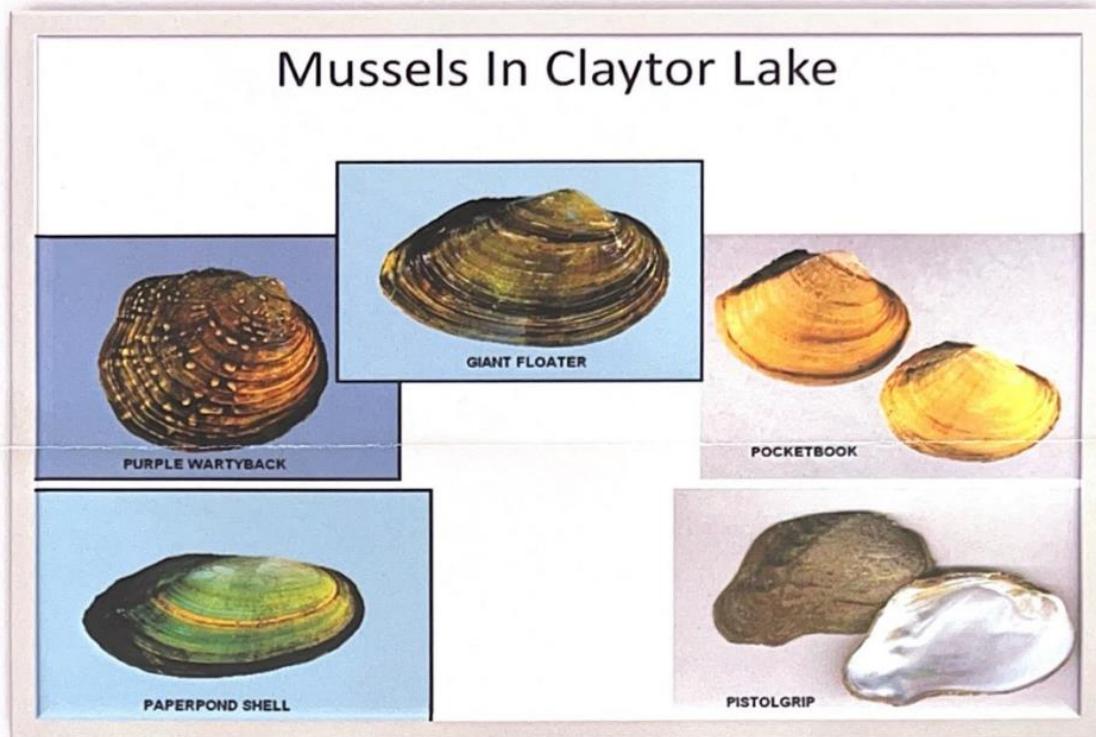


Elizabeth B. Parcell
Process Supervisor

¹ A permit is required from Appalachian for new shoreline stabilization projects or dock modifications or expansions. Vegetation may not be removed from within the Project boundary (generally the 1850-foot elevation contour) unless authorized by Appalachian. Permit applications are available online at www.claytorhydro.com. Please contact Lisa Hammock at lhammock@aep.com or 540-489- 2556 if you have questions. A Pulaski County building permit is also required for dock expansions. Permission is needed from the Corps of Engineers (COE) for shoreline stabilization (NW13 for bank stabilization) or dredging (Regional Permit 40). Contact Pulaski County at eholeton@pulaskicounty.org or 540-980-7710 or COE at Chester.C.Bigelow@usace.army.mil if you have questions regarding their permit requirements.

² A copy of the drawdown plan can be found on www.claytorhydro.com.

Additional information regarding mussels:



There are five species found in Claytor Lake: Typical Size*

- Giant Floater (*Pyganodon grandis*) 70 – 110 mm
- Pocketbook (*Lampsilis ovata*) 70 – 110 mm
- Pistolgrip (*Tritogonia verrucosa*) 70 – 100 mm
- Paper Pondshell (*Utterbackia imbecillis*) 40 – 70 mm
- Purple Wartyback (*Cyclonaias tuberculata*) 70 – 90 mm

The pistolgrip is currently listed as a state threatened species. If you find a suspected pistolgrip mussel, please take a digital photograph, call Brian Watson immediately at (434) 941-5990, and return the pistolgrip to the water. Photographs should be texted to Brian Watson at (434) 914-5990. Please limit the number of photographs of each mussel to a maximum of two and limit the size of each photo to 1 MB.

* Smaller or larger individuals may still be found.

Asian Clams (do not need to be returned to the reservoir):



Drawdown Work: **Very important to complete!**

Document of drawdown work is important. Please provide the following:

Name: (optional) _____

Lake Address: (optional) _____

Total Lake Frontage: _____ **feet. Feet of Shoreline Accessible:** _____

Work completed during the drawdown:

- Shoreline stabilization (new) _____ ft _____ Type
- Dock Maintenance _____ ft _____ Type
- Shoreline stabilization repair _____ ft _____ Type
- Shoreline cleanup of debris _____ ft _____ (amount/type)
- Other: _____

Mussels:

Please pick up mussels encountered during the drawdown and gently toss them into deeper water.

Let us know about your efforts:

_____ # Mussels found _____ # Mussels relocated _____ feet of shoreline

Email address: _____

2023 Mussel Salvage	Giant	Paper	Eastern	Purple	Pocket-	Pistol-	Not	Sub	
(5' drawdown)	Floater	Pondshell	Elliptio	Wartybk	book	grip	ID'd	Total	TOTALS
Sprakers/Fintels									
Caitlin Carey, VT	2	8						10	
3 colleagues									
TOTALS	2	8							10
DeHaven									
Dave Stevenson (Lakeview)	42	86						128	
4 (2 from VT TWS)									
Kayla Howard, DWR (DeHaven)	21	243	59					323	
5 (2 friends & 3 VT TWS)									
Steve Rapp (DeH, CL Estates)	2	244						<u>246</u>	
4 (3 VT, 1 FOCL)									
TOTALS	65	573	59						697
Claytor Lake State Park									
Dr. Karen Powers (west end)	337	332						669	
6 RU TWS									
Cheri Strenz (Beach)	59	272						331	
9 (River Church Youth Grp)									
Erin Quesenberry (Marina)	26	613	26					665	
10 (families)									
Yohtaro, Emily & Hana (VT)							225	225	
Dr Jamie Lau (east end)	<u>96</u>	<u>560</u>	<u>25</u>					<u>681</u>	
9 RU TWS									
TOTALS	518	1,777	51				225		2,571
Mallard Pt	69	316	345					730	
Island	79	500	69					<u>648</u>	
Brian Watson									
9 (4 AEP, 2 VT TWS,									
2 DWR CWF)									
TOTALS	148	816	414						1,378



2023 DRAWDOWN - Property Owners' Use of Drawdown and Mussel Salvage Efforts

<u>New</u>	<u>Stabilization</u>	<u>Dock</u>			<u># Mussels</u>	<u>Total Feet</u>	<u>Comments/Notes</u>
<u>Stabilization</u>	<u>Repair</u>	<u>Maint.</u>	<u>Clean-up</u>	<u>Other</u>	<u>Salvaged</u>	<u>Shoreline</u>	
	62'						grateful for the opporunity to do much needed repair
245'			X		21	245'	Thank you for the drawdown!
	X				24	100'	Thank you for doing the draw down!!
	X	X	X				
			X		23		
			X	also inspected seawall			The is a time that MUST remain to clean & do repairs.
		X	100'				
			X				
		X	100'			100'	
					210	2500'	
		X	X				THANK YOU FOR THIS OPPORTUNITY!
			X				
	X	X			21	65'	
			X		96	400'	
	X	X	X		165	140'	
					40	100'	
					16	1000'	
	40'	4'	35'			100'	60' accessible
			80'		76	80'	
			25'		38	25'	
	420'		X				
	260'		X		1		
	5'					100'	
				reworked pump intake		170'	
	20'	X	X		40	140'	
		X	300'		127	180'	
			X			300'	
	80'		50'			180'	
		X				100'	
	25'					125'	wakeboats on Peak Creek are tearing up the shore
			300'		1	200'	
			100'		4	100'	

2023 DRAWDOWN - Property Owners' Use of Drawdown and Mussel Salvage Efforts

<u>New</u>		<u>Dock</u>			<u># Mussels</u>	<u>Total Feet</u>	
<u>Stabilization</u>	<u>Repair</u>	<u>Maint.</u>	<u>Clean-up</u>	<u>Other</u>	<u>Salvaged</u>	<u>Shoreline</u>	<u>Comments/Notes</u>
			X			1400'	
		X	200'		37	200'	
			50'			210'	
		X			5	100'	
		X	60'		5	60'	
			130'		116	130'	
	20'	X	X			141'	
		X			41	80'	
	10'	X	100'			200'	
			X		68	300'	
		X				100'	
			400'			400'	
	X	X	540'			570'	
			100'			100'	
<u>Totals</u>							
1	15	18	33	2	1,175	10,441'	46 responses

