

**REVIEW OF APPLICATION
OF THE SUMMERSVILLE HYDROELECTRIC FACILITY, LIHI #17
FOR RECERTIFICATION
BY THE LOW IMPACT HYDROPOWER INSTITUTE**

Prepared by Diane Barr

30 July 2020

I. INTRODUCTION

This report evaluates the Gauley River Power Partners, LLC's (GRPP, the *Applicant*) Summersville Hydroelectric Project, FERC P-10813 and LIHI Project #17 for LIHI recertification. The Summersville Hydroelectric Project, herein called "Project", is an 80-MW facility originally LIHI Certified in 2005 and recertified in 2009 and 2015. This report therefore represents the Project's third recertification. The Project was purchased in early 2020 by Central Rivers Power, LLC, a subsidiary of Hull Street Energy.

The reviewer's Stage II report for recertifications must address the Project's applicability to the following in determining the level of detail in the report.

1. Is there any information missing from the application?
2. Have there been any material changes at the facility during the term of the previous Certification?
3. Have there been any material changes in the LIHI criteria or certification process since the facility was originally certified?

If there are material changes at the facility as well as material changes in the LIHI criteria, then a detailed reviewer's reporting addressing these changes is necessary. If there are not material changes at the Project and only the LIHI criteria represents the material changes, then a limited reviewers report can be prepared. The Project does not have material changes in the facility since the 2015 recertification. On the other hand, LIHI issued the 2nd Edition LIHI Handbook revising the standards for certification. Since only item (3) above applies to the Project, a limited report is provided. The application package was received on January 10, 2020 and a Stage 1 review was conducted and transmitted to the Applicant on February 24. The Applicant provided requested supplemental information on May 4. The public comment period was opened on May 7, 2020.

Prior LIHI Certification conditions and status:

Condition	Condition Still in Effect?
<i>Provide revised Form 80 on recreational uses of the river no later than July 1, 2015.</i>	<i>No, the condition has been satisfied.</i>
<i>Provide status update on DO deficiencies and associated FERC filings along with their annual compliance letter to LIHI.</i>	<i>Yes, this condition is still in effect.</i>

II. PROJECT'S GEOGRAPHIC LOCATION

The Project is located at a rock-filled U.S. Army Corps of Engineers (USACE) dam that forms Summersville Lake, located in Nicholas and Fayette Counties of West Virginia, about five miles south of the City of Summersville. Summersville Lake is part of the Gauley River system. The lake extends from Summersville dam to the upper boundary of the Gauley River National Recreation Area (GRNRA). The terrain is rugged and characterized by sharp ridges and narrow v-shaped valleys. The dam is located at River Mile 35.7, at Latitude 38.21917 and Longitude -80.890568. The Project is located on land owned by USACE.



Figure 1 – Project Location

III. PROJECT AND IMMEDIATE SITE CHARACTERISTICS

Summersville dam was built on the Gauley River in 1966 in conjunction with two other dams at Bluestone Lake on the New River and Sutton Lake on the Elk River to control flood waters in those rivers as well as in the Kanawha River and the Ohio River. The dams operate as a system, controlling flow releases into the Ohio River. Summersville dam is an earthen structure 393 feet high and 2,280 feet long which impounds Summersville Lake, the largest lake in West Virginia, with over 60 miles of shoreline at its summer pool water elevation of 1,652 feet (NGVD29). The lake has a surface area that varies seasonally with a minimum (winter) pool of 4,280 acres and a seasonal (summer) pool targeted at 2,790 acres.

From its source in the Allegheny Mountains, the Gauley River flows westward approximately 98 miles to Belva, West Virginia, where it turns abruptly toward the south to its junction with the New River at Gauley Bridge, West Virginia. The confluence of the New and Gauley Rivers forms the Kanawha River, which then flows about 97 miles northwesterly to the Ohio River at Point Pleasant, West Virginia (Figure 1). Rapids, cataracts, and large boulders characterize the streambed. Sharp ridges, narrow divides and V-shaped valleys, and nearly vertical cliffs characterize the topography. Watershed area at Summersville dam is 803 square miles. There are no other dams on the Gauley River.

Summersville Lake is primarily managed for flood control by the USACE. In addition, it provides flow augmentation, and recreation. The Project's FERC License Articles 309 and 402 address this respectively. The City of Summersville and the USACE established the Hydro Operating Plan (HOP)¹ on September 9, 2002 that stipulates the Project to operate in a run-of-release mode, with no ability to impound water and no discretion over flow releases, which are dictated by the USACE.

Project structures (Figures 2 and 3) include a powerhouse with two 40-MW hydroelectric turbine-generators for a total installed capacity of 80 MW, a substation, and a transmission line. The powerhouse and substation are located on the right riverbank, downstream of the dam. The transmission line extends across the downstream side of the dam. The Project's powerhouse connects to the USACE discharge tunnel via a penstock.

¹ <http://elibrary.ferc.gov/idmws/common/OpenNat.asp?fileID=9594236>



Figure 2- GRRP and USACE Valve House

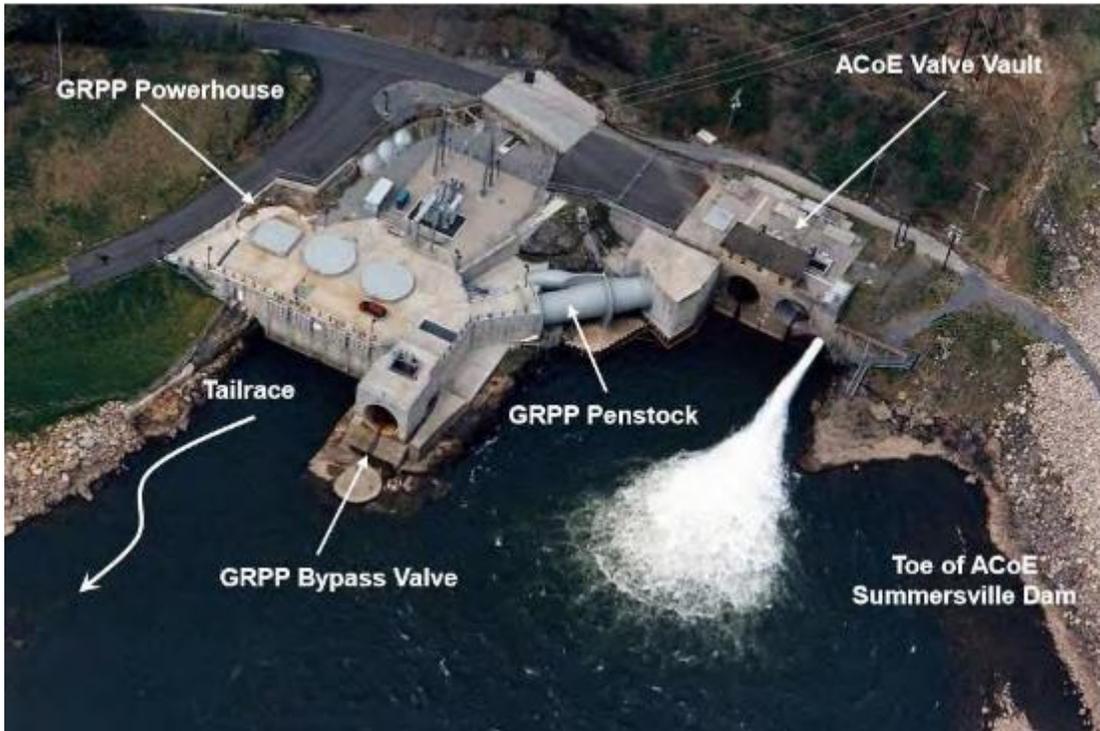


Figure 3 – Project Structures

IV. ZONES OF EFFECT

The Project has only one zone of effect, the tailrace (Figure 4). The Project does not control the Summersville reservoir and there is no bypass reach. As the photo below shows, the tailrace is also significantly influenced by USACE operation of the Summersville reservoir.



Figure 4 - Zone of Effect

The Applicant selected the following standards for each criterion. The reviewer agrees with the selections.

Criterion		Alternative Standards				
		1	2	3	4	Plus
A	Ecological Flow Regimes	X				
B	Water Quality		X			
C	Upstream Fish Passage	X				
D	Downstream Fish Passage	X				
E	Watershed and Shoreline Protection	X				
F	Threatened and Endangered Species Protection			X		
G	Cultural and Historic Resources Protection	X				
H	Recreational Resources		X			

V. REGULATORY AND COMPLIANCE STATUS

The Federal Energy Regulatory Commission (FERC) issued a 50-year license to the City of Summersville which owned the Project on September 25, 1992 for the development and operation of the Project by Gauley River Power Partners (the LIHI Applicant and subsidiary of Hull Street Energy). On September 25, 1995, the City filed a license amendment for a more economical project that reduced the size of the powerhouse and associated equipment and modified the transmission route to transmit power to Appalachian Power Company for purchase (see Application Appendix 1.2). The amendment did not affect Project capacity. FERC subsequently issued a “Notice of Availability of Final Environmental Assessment” on October 17, 1996; an “Order Amending License, Revising Annual Charges, and Lifting Stay” on October, 18, 1996; an “Order Amending License” on November 5, 1999; and an “Order Approving As-Built Transmission Line Drawing Under Article 315” on October 17, 2001. Since 2001, required FERC inspections, monitoring and reporting has occurred. The Project was issued a Clean Water Act Water Quality Certificate (WQC) in 1991 which was amended in 1997. The FERC e-library research conducted for this review included routine filings for dam safety inspections, public safety plans, and dam safety and surveillance. The required 2019 Annual Dissolved Oxygen (DO) report was filed on December 4, 2019. Review of the report demonstrated that while there were instances of DO dropping below the required 7.00 mg/l, none of the instances exceeded the compliance eight-hour threshold prescribed in the WQC. If such occurs, the Commission and the WV Department of Natural Resources (WVDNR) are required to be notified.

VI. PUBLIC COMMENTS RECEIVED OR SOLICITED BY LIHI

The reviewer reached out directly to Brian Bridgewater of the WV Department of Environmental Protection (WVDEP) via phone and email (on June 10, 2020) to establish their concurrence with the 1991 and amended 1997 WQC as meeting their continued interest in protecting the waters of the state. Mr. Bridgewater responded

via email on July 2nd, 2020 stating that the Summersville Hydro project still meets West Virginia water quality standards. Evidence of this correspondence is contained in Appendix A-Relevant Correspondence. No other public comments were received.

VII. DETAILED CRITERIA REVIEW

A. Ecological Flow Regimes

Goal: The flow regimes in riverine reaches that are affected by the facility support habitat and other conditions suitable for healthy fish and wildlife resources.

The Applicant selected Standard A-1, Not Applicable / De Minimis Effect. There is no bypassed reach and the Project does not control inflow. Project operation is entirely dependent upon the USACE operation of the dam and the hydro project is in effect, run-of-release generating power only with the flows that the USACE releases. Hydroelectric project operations are coordinated with the USACE on a day-to-day and hour-by-hour basis. When water release rates are sufficient, the Project generates electricity.

All water (except for rare spillage flows during extreme floods) is released from Summersville Lake to the Gauley River through low-level outlets near the base of the dam. Releases are controlled through Howell-Bunger Valves (HBVs) that dissipate energy during the release. Changes in discharge rates are scheduled not to exceed 1,500 cubic feet per second (cfs) per hour or not to cause changes in downstream water surface elevations greater than 1 foot per hour. A minimum flow of 100 cfs is required to be discharged from the reservoir at all times. The USACE operates the dam and maintains the reservoir elevation under a Water Control Plan for Summersville Lake Project, the Kanawha River Basin, and the Ohio River Basin. The plan supports the multiple USACE project purposes - namely flood control, lake and downstream recreation, fish and wildlife conservation, water quality control and whitewater recreation. Key provisions of the plan include limits on discharge rates from the Lake to not exceed 1,500 cfs or water levels greater than 1 foot in the downstream reach, low flow augmentation in the downstream basin, minimum reservoir impoundment levels to support aquatic populations and provide adequate space for sediment storage, and the 100-cfs minimum flow to support aquatic habitat and species in the Gauley River below the dam.

The minimum flow was based on rule curves to ensure minimum releases for downstream fish habitat and maximum utilization of storage for pollution abatement in the downstream Kanawha River, by increasing dissolved oxygen and reducing water temperature if needed. During April and May, an outflow of 200 cfs is maintained below Summersville Lake, subject to flood control and reservoir filling requirements. During the spring filling period, if the rate of rise in the reservoir falls below the ability to release 200 cfs, an outflow of 150 cfs is maintained. If the rate of rise falls below the ability to release 150 cfs, a minimum outflow of 100 cfs is maintained. The seasonal storage at Summersville and Sutton lakes is utilized to maintain a minimum flow of 3,540 cfs in the Kanawha River from June through September, and 2,670 cfs during October.

The hydro operation is guided by an operating plan and a Memorandum of Agreement with USACE that are reviewed periodically. Over time the plan has been refined to operate at water flows between 600 and 4,300 cfs. Flows within this range are released through one or both of the turbines. Flows below 600 cfs are controlled by USACE and released through one or more of the HBVs, as are flows in excess of the 4,300 cfs combined maximum hydraulic capacity of turbine flows. For hydro operation, flows are diverted from the HBVs to the turbines whose operating mechanisms are controlled automatically, with operations monitored remotely. These

controls ensure that minimum flows in the river are automatically maintained in the event of an unscheduled turbine shut down. The USACE operational control of the dam and the flows released from the dam are not altered or adversely impacted by operation of the hydroelectric Project.

Based on the review of the application and supporting documentation, the Project continues to satisfy the Ecological Flow Regime criterion.

B. Water Quality

Goal: Water quality is protected in waterbodies directly affected by the facility, including downstream reaches, bypassed reaches, and impoundments above dams and diversions.

The Applicant selected Standard B-2, Agency Recommendation, although Standard B-3, Site-Specific Studies is also appropriate. The Applicant provided the most recent WQC, amended in 1997. Since it is over 10 years old the Applicant contacted the WVDEP on December 27, 2019 for concurrence that the existing WQC still addresses the Department's requirements. The WVDEP did not respond to the Applicant's inquiry. The reviewer reached out to WVDEP on June 10, 2020. WVDEP responded on July 2, 2020 stating that the Summersville Project's existing certification still meets the requirements under West Virginia's water quality standards. See Appendix A-Relevant Correspondence.

The Project operates under an approved Dissolved Oxygen (DO) monitoring plan under FERC license Article 404 and the WQC. The powerhouse is equipped with devices capable of automatically monitoring and recording DO and water temperature. The devices monitor the water quality prior to being discharged through the turbines, and in the river at the Gauley River Gage Station downstream of the dam. In accordance with the WQC and Article 404, GRPP provides means to enhance the DO of the powerhouse discharge to meet water quality requirements in the months of June through October. The Project's turbines are designed to aspirate or allow oxygen injection to enhance DO levels if needed. The aspiration and oxygen injection systems are manually regulated by the powerhouse operator, based on the level of flow being discharged and the water quality data from the DO monitoring equipment.

The Gauley River is a High Quality Stream within the Gauley River National Recreation Area boundary and the state designates it for water quality purposes as a National Resource Water – which means that the Gauley River is subject to the state's anti-degradation policy. The river in the vicinity of the Project is listed as impaired for pH and acid deposition and is subject to a TMDL for those constituents.² The Project does not contribute to or exacerbate these impairments.

The 1999 License Amendment, Article 404, required the licensee to submit an annual report on DO monitoring and mitigation and to identify any potential impacts to water quality and aquatic habitat due to low dissolved oxygen concentrations from Project operation. GRPP has provided copies of these annual filings to LIHI to certify compliance with certificate conditions for the current LIHI certificate term.

The Applicant filed with FERC their most recent DO annual report in December 2019. In review of the report, and prior year reports submitted to LIHI with annual compliance statements, there were occasional incidences of the recorded DO dropping below the required 7 mg/l minimum for short periods; however, there were no periods of low DO for 8 hours or more while the Project was operating that would trigger reporting to the state

²

https://dep.wv.gov/WWE/watershed/TMDL/grpc/Documents/Gauley%202008/_Gauley_Final_TMDL_Report_03_27_08.pdf

and FERC. During all of these incidents the facility altered its operation to offset the DO in accordance with the monitoring plan. The FERC record did not contain any other exceedance reporting or required notifications to the state. The application provided support that the Project has remained in compliance with DO requirements under the license and WQC.

Based on the review of the application and supporting documentation, the Project continues to satisfy the Water Quality criterion and improves water quality from pre-hydro conditions. The reviewer also recommends removing the previous condition for DO reporting as the Applicant through their operations plan, is required to adjust operations to remain within DO limits. The Applicant has demonstrated their capacity to meet this requirement and is further required to file both noncompliance events and annual reports with FERC and the state. The LIHI annual compliance report requires the Applicant to indicate if there were any compliance events, therefore a stand-alone condition is not necessary.

C. Upstream Fish Passage

Goal: The facility allows for the safe, timely, and effective upstream passage of migratory fish. This criterion is intended to ensure that migratory species can successfully complete their life cycles and maintain healthy populations in areas affected by the facility.

The Applicant selected Standard 1, Not Applicable/ De Minimis Effect. To date, no fish passage prescriptions have been required and there are no known anadromous fish in the Project vicinity. The 1996 FERC Final Environmental Assessment (FEA) noted the presence of American eel in the Gauley River. As stated by the WVDNR in 2005 during consultation for the initial LIHI application³, the Gauley River is within the historic range of the American eel, but passage was blocked around the turn of the last century by construction of navigation dams on the Mississippi and Ohio Rivers in the early 1900's that were constructed much earlier than this Project.

Based on the review of the application and supporting documentation, the Project continues to satisfy the Upstream Passage criterion.

D. Downstream Fish Passage

Goal: The facility allows for the safe, timely, and effective downstream passage of migratory fish. For riverine (resident) fish, the facility minimizes loss of fish from reservoirs and upstream river reaches affected by facility operations. All migratory species can successfully complete their life cycles and to maintain healthy populations in the areas affected by the facility.

The Applicant selected Standard 1, Not Applicable/ De Minimis Effect. Per the application, the reservoir's fishery is diverse due to WVDNR stocking efforts, but the overall population size is small. The Gauley River supports a diversity of warm water and cool water fish species including in Summersville Reservoir: largemouth bass, smallmouth bass, channel catfish, flathead catfish, black crappie, walleye, rainbow trout, bluegill and yellow perch.⁴ These species do not require passage to complete their life cycles.

Releases from the lower levels of the lake provide for continuous cold-to-cool water temperatures that enable the establishment of a year-round cold water fishery for trout and walleye from the dam to the confluence with the Meadow River approximately 5 miles downstream. Through stocking, the WVDNR has established a put-and-take trout fishery downstream of the dam in the Gauley River.

³ [https://lowimpacthydro.org/assets/files/lihi-cert-app-files/LIHICertificationReportSummersville\(Final\)011805.pdf](https://lowimpacthydro.org/assets/files/lihi-cert-app-files/LIHICertificationReportSummersville(Final)011805.pdf)

⁴ <https://www.aa-fishing.com/wv/wv-fishing-lake-summersville.html>

The FERC FEA noted that without the hydro project, USACE's Howell-Bunger valves result in 100% mortality of fish (due to pressure differences and mechanical passage constraints) but with the hydro project mortality would be less, although not quantified. The WQC noted that the potential for fish mortality due to entrainment was a concern but agreed that mortality would decrease with installation of the hydro project. Neither agency required entrainment studies at the time of licensing, so it appears that the concerns were not substantial enough to warrant a specific agency recommendation.

Based on the review of the application and supporting documentation, the Project continues to satisfy the Downstream Passage criterion.

E. Shoreline and Watershed Protection

Goal: The facility has demonstrated that sufficient action has been taken to protect, mitigate or enhance the condition of soils, vegetation and ecosystem functions on shoreline and watershed lands associated with the facility.

The Applicant selected Standard 1, Not Applicable/ De Minimis Effect. The Applicant stated that the USACE owns and manages the Project's shoreline and adjacent lands separately from the Project. There are 60 miles of shoreline around Summersville Lake, some consisting of vertical rocky cliffs (Figure 5). USACE manages lands around the lake under a Master Plan (currently being updated). The immediate shoreline is subject to the water control plan that manages reservoir elevations in the summer for recreation, and in the spring for fish spawning by adjusting the relationship between reservoir elevation and discharge flows, subject to required storage capacity needs and constraints.

WVDNR manages nearly 5,390 acres of the 9,346 acres of USACE lands within the Summersville Lake Wildlife Management Area. The state also operates Carnifex Ferry Battleground State Park downstream of the Lake that overlooks the river from the top of cliffs.



Figure 5 - Summersville Lake (source: Wikipedia)

Project lands are very limited and include only about two acres immediately surrounding Project facilities. Resource agencies have not issued any recommendations, nor required the Project to prepare any Shoreline Management Plans specific to the tailrace zone of effect. The Applicant demonstrated watershed protection through their FERC license commitments. These included watershed protection related primarily to implementing a sedimentation and erosion control plan prior to construction and locating the transmission line so that it would span identified wetlands and avoid wetland habitat. Visual impacts of the transmission corridor were reduced by using wood poles that tend to blend more with the surrounding forest and narrowing the cleared corridor through sensitive areas. Neither FERC nor the resource agencies have required additional watershed protection measures.

Based on the review of the application and supporting documentation, the Project continues to satisfy the Shoreline Projection criterion.

F. Threatened and Endangered Species Protection

Goal: The facility does not negatively impact federal or state listed species.

The Applicant selected Standard 3, Recovery Planning and Action. The Applicant reported on the Virginia spiraea, a federally listed threatened plant species. It is found below the dam along the Gauley River in the vicinity of the transmission line corridor and downstream along the reach of the Meadow River. The US Fish and Wildlife Service (USFWS) developed a recovery plan for Virginia spiraea in 1992. The Applicant created an avoidance plan that USFWS approved in August of 1995. Furthermore, FERC granted relief in 1998 from the

requirements of License Article 407 which required monitoring of endangered species vegetation.⁵ Construction of the transmission line avoided populations of Virginia spiraea. Additionally, no incidental take permits have been required.

LIHI staff conducted a USFWS IPaC online data check on June 18, 2020 to confirm species that might be present. The report lists the following species:

- Indiana bat, endangered with critical habitat outside of the Project area
- Virginia big-eared bat, endangered with critical habitat outside of the Project area
- Northern long-eared bat, threatened with no critical habitat
- Candy darter, endangered fish with critical habitat in the tailwaters of the dam where they are abundant. This is the only candy darter population remaining in the Lower Gauley watershed.⁶
- Five species of freshwater mussels, all endangered with no critical habitats

West Virginia does not have a state list of threatened and endangered species. The federally-listed species are unlikely to be impacted by the Project or its operations. Since USACE controls virtually all of the land, the bat species and Virginia spiraea could be impacted by USACE operations or maintenance; however, not by Project operations. Similarly, the fish and mussel species would not be impacted by the Project since USACE controls all water flows from the dam and into the downstream reach.

Based on the review of the application and supporting documentation, the Project continues to satisfy the Threatened and Endangered Species criterion.

G. Cultural and Historic Resource Protection

Goal: The facility does not unnecessarily impact cultural or historic resources that are associated with the facility's lands and waters, including resources important to local indigenous populations, such as Native Americans.

The Applicant selected Standard 1 Not Applicable/ De Minimis Effect. The Applicant stated that the FERC FEA concluded that there are no known historic or archeological sites within the amended Project boundaries including the transmission line corridor. The corridor had been surveyed for cultural and historic resources prior to construction. The FEA referenced a 1996 letter from the West Virginia Division of Culture and History (the SHPO) confirming "no effect" from the transmission line. USACE manages their lands in accordance with the facility's Master Plan that includes consideration of cultural and historic resources. There are no structures listed on the National Register of Historic Places although the dam is now old enough to be considered for listing if considered a significant resource. There is no information on archaeological resources although the former village of Gad was flooded to create the reservoir with reports of submerged remnants of the village still remaining.

License Article 408 requires the licensee to consult with the SHPO before any land clearing or land disturbing activities, or if previously unidentified archaeological or historic resources are discovered in the future. No new issues have been raised by agencies with regard to cultural or historic resources since the previous certification per the FERC e-library research.

⁵ <https://elibrary.ferc.gov/idmws/common/opennat.asp?fileID=10808883>

⁶ <https://www.govinfo.gov/content/pkg/FR-2018-11-21/pdf/2018-25315.pdf>

Based on the review of the application and supporting documentation, the Project continues to satisfy the Cultural and Historic Resources criterion.

H. Recreational Resources

Goal: The facility accommodates recreation activities on lands and waters controlled by the facility and provides recreational access to its associated lands and waters without fee or charge.

The Applicant selected Standard 2, Agency Recommendation. The Applicant referenced FERC License Article 410 and 411 requirements and the Project's compliance with them. License Article 410 required the licensee to implement the recreation measures contained in a Memorandum of Understanding (MOU) executed among the National Park Service (NPS), the Town (now City) of Summersville, and the Applicant's predecessor. The MOU covers implementation by GRPP of a Mitigation, Compensation and Enhancement Plan. The MOU was dated July 27, 1991 and filed with the Commission on August 9, 1991. The MOU was amended in 1998 and another amendment has been pending for over a year, which would require fish and wildlife mitigation in the form of funding to the state for fish and wildlife activities in the Project vicinity.

A supplemental recreation plan filed on November 18, 1999, pursuant to Article 410, was approved by FERC. License Article 411 required that a plan for monitoring recreation use post-construction be developed in consultation with the USACE, and the NPS as the administrator of the Gauley River National Recreation Area⁷ which extends from just below the dam about 25 miles downstream. Recreation area users were surveyed from 2001-2004 and were generally satisfied with the Project recreation facilities. The WQC required GRPP to construct or improve access roads and paths, create low water stepping stone bridges, install fish attraction structures, and create a boat launch facility in Summersville Lake.

The MOU required GRPP to install a new whitewater raft launching facility downstream of the dam, install an off-site handicap fishing platform and upgrade the access trail to the existing kayak launching area. GRPP also installed a new restroom and changing facility, picnic tables, and interpretive and informational signs.

The required facilities were constructed in accordance with the license, WQC and MOU. FERC conducted the last environmental inspection in 2006 which documented compliance with recreational requirements.⁸

At Summersville Lake, USACE maintains a large campground, a marina, three boat ramps and two winter boat launches, picnic shelters, a swimming area, hiking trails⁹, and fishing access in the lake and tailwaters. Hunting, rock climbing, and scuba diving also occur. USACE reports lake levels and flow conditions online.¹⁰ USACE is also required to provide 20 days of whitewater rafting flows in the fall, in five four-day periods. American Whitewater organizes an annual "Gauley Fest", reportedly the world's largest paddling festival, held there every September. It attracts thousands of paddlers from across the country and is the largest fundraiser for American Whitewater.¹¹

Based on the review of the application and supporting documentation, the Project continues to satisfy the Recreational Resources criterion.

⁷ <https://www.nps.gov/gari/index.htm>

⁸ <https://elibrary.ferc.gov/idmws/common/opennat.asp?fileID=11208781>

⁹ <https://www.lrh.usace.army.mil/Portals/38/docs/recreation/Summersville%20Trail%20Map.pdf>

¹⁰ <http://www.lrh-wc.usace.army.mil/wm/?basin/kan/sug>

¹¹ <https://www.timesfreepress.com/news/getout/departments/story/2019/sep/01/gauley-fest-101/502286/>

VIII. GENERAL CONCLUSIONS AND REVIEWER RECOMMENDATION

Based on this review, the Summersville Hydroelectric Project continues to meet the LIHI criteria for certification as a Low Impact Hydropower facility and a 5-year term is recommended. It is further recommended to remove the previous LIHI Condition 2 for DO reporting, as the Applicant has demonstrated their capacity to meet the DO requirement and is also required to file noncompliance events and annual reports with FERC and WVDEP. LIHI annual compliance reporting also requires the owner to report on any compliance events, therefore a stand-alone condition is not necessary.

Appendix A-Relevant Correspondence

Date:	Agency	Communication
6/10/20	WVDEP	Email to B. Bridgewater/WVDEP requesting confirmation of Water Quality Certificate current conformance with state standards.
7/2/20	WVDEP	Email from B. Bridgewater/WVDEP response from 6/10 request stating that Summersville Hydro project meets the current state standards under their original Water Quality Certificate. (See attached)

Email communication with WV Department of Environmental Protection attached.