

COVER SHEET

**FINAL ENVIRONMENTAL IMPACT STATEMENT FOR
AMENDMENT TO LICENSE**

HOLTWOOD HYDROELECTRIC PROJECT

Docket No. P-1881-050

Cover Letter (and other information before the Table of Contents)

FEIS



**Federal Energy
Regulatory
Commission**

**Office of
Energy
Projects**

November 2008

FERC/EIS-0224F

Final Environmental Impact Statement for License Amendment



**Holtwood Hydroelectric Project
FERC Project No. 1881-050, Pennsylvania**

**Federal Energy Regulatory Commission
888 First Street N.E.
Washington, DC 20426**

FERC/EIS-0224F

**FINAL ENVIRONMENTAL IMPACT STATEMENT
FOR AMENDMENT TO LICENSE**

Holtwood Hydroelectric Project—FERC Project No. 1881-050
Pennsylvania

Federal Energy Regulatory Commission
Office of Energy Projects
Division of Hydropower Administration and Compliance
888 First Street, NE
Washington, DC 20426

November 2008

FEDERAL ENERGY REGULATORY COMMISSION

WASHINGTON, DC 20426

OFFICE OF ENERGY PROJECTS

To the Agency or Individual Addressed:

Reference: Final Environmental Impact Statement

Attached is the final environmental impact statement (EIS) for the Holtwood Hydroelectric Project (FERC Project No. 1881-050), located on the Susquehanna River in Lancaster and York counties, Pennsylvania.

This EIS documents the views of governmental agencies, non-governmental organizations, affected Indian tribes, the public, the license applicant, and the Federal Energy Regulatory Commission (Commission) staff. It contains staff evaluations of the applicant's proposal and the alternatives for an application for a license amendment for the Holtwood Hydroelectric Project.

Before the Commission makes a decision on the amendment application, it will take into account all concerns relevant to the public interest. The EIS will be part of the record from which the Commission will make its decision. The EIS was sent to the U.S. Environmental Protection Agency and made available to the public on or about October 31, 2008. Copies of the EIS are available for review in the Commission's Public Reference Branch, Room 2A, located at 888 First Street, N.E., Washington DC 20426. The EIS also may be viewed on the Internet at www.ferc.gov/ferris.htm. Please call 202-502-8222 or TTY 202-208-1659 for assistance.

Attachment: Final Environmental Impact Statement

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- a. Title: Amending the license to increase the installed capacity of the Holtwood Hydroelectric Project, FERC Project No. 1881-050
- b. Subject: Final Environmental Impact Statement
- c. Lead Agency: Federal Energy Regulatory Commission
- d. Abstract: On December 20, 2007, PPL Holtwood, LLC (PPL or licensee) filed an application for an amendment to its license for the Holtwood Hydroelectric Project located on the Susquehanna River in Lancaster and York counties, Pennsylvania. PPL proposes to redevelop the Holtwood Hydroelectric Project by constructing a new powerhouse, installing new generation, and reconfiguring the project to improve upstream fish passage, particularly for American shad. PPL also requests that the license term be extended by 16 years to August 31, 2030.

PPL proposes to amend the project consistent with the Consent Order and Agreement (COA) between PPL and the Pennsylvania Department of Environmental Protection, dated November 21, 2007. The COA would require PPL to implement various fish passage improvements at the project as well as minimum flow provisions and recreational enhancements. PPL would also implement a settlement agreement with representatives of whitewater boating organizations, dated June 13, 2008.

The staff's recommendation is to amend the project license as proposed, with certain modifications, and additional measures recommended by the agencies.

- e. Contact: **Commission Staff Contact**
Blake Condo
Federal Energy Regulatory Commission
Office of Energy Projects
888 First Street, N.E.
Washington, DC 20426
202-502-8914

- f. Transmittal: This final environmental impact statement prepared by the Commission's staff on the hydroelectric application to amend the license filed by PPL for the existing Holtwood Hydroelectric Project (FERC Project No. 1881-050) is being made available to the public on or about October 31, 2008, as required by the National Environmental Policy Act.¹

¹ National Environmental Policy Act of 1969, as amended (Pub. L. 91-190, 42 U.S.C. § 4321 *et seq.*, January 1, 1970).

FOREWORD

The Federal Energy Regulatory Commission (Commission), pursuant to the Federal Power Act (FPA)² and the U.S. Department of Energy Organization Act³ is authorized to issue licenses for up to 50 years for the construction and operation of non-federal hydroelectric development subject to its jurisdiction, on the necessary conditions:

That the project...shall be such as in the judgment of the Commission will be best adapted to a comprehensive plan for improving or developing a waterway or waterways for the use or benefit of interstate or foreign commerce, for the improvement and utilization of water-power development, for the adequate protection, mitigation, and enhancement of fish and wildlife (including related spawning grounds and habitat), and for other beneficial public uses, including irrigation, flood control, water supply, and recreational and other purposes referred to in section 4(e)...⁴

The Commission may require such other conditions not inconsistent with the FPA as may be found necessary to provide for the various public interests to be served by the project.⁵ Compliance with such conditions during the licensing period is required. The Commission's Rules of Practice and Procedure allow any person objecting to a licensee's compliance or noncompliance with such conditions to file a complaint noting the basis for such objection for the Commission's consideration.⁶

² 16 U.S.C. §791(a)-825r, as amended.

³ Public Law 95-91, 91 Stat. 556 (1977).

⁴ 16 U.S.C. §803(a).

⁵ 16 U.S.C. §803(g).

⁶ 18 C.F.R. §385.206 (1987).

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**FINAL ENVIRONMENTAL IMPACT STATEMENT FOR
AMENDMENT TO LICENSE**

HOLTWOOD HYDROELECTRIC PROJECT

Docket No. P-1881-050

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ACRONYMS AND ABBREVIATIONS

APE	area of potential effects
cfs	cubic feet per second
COA	Consent Order and Agreement of November 21, 2007
Commission	Federal Energy Regulatory Commission
Corps	U.S. Army Corps of Engineers
cy	cubic yards
dBA	decibel on the A-weighted scale
DC	direct current
DO	dissolved oxygen
EIS	environmental impact statement
El.	elevation
EPA	U.S. Environmental Protection Agency
EPRI	Electric Power Research Institute
ESA	Endangered Species Act
°F	degrees Fahrenheit
FERC	Federal Energy Regulatory Commission
FOP	fishway operating plan
FPA	Federal Power Act
fps	feet per second
FWS	U.S. Fish and Wildlife Service
Interior	U.S. Department of the Interior
kV	kilovolt
licensee	PPL Holtwood, LLC
mg/L	milligram per liter
MSFOP	Minimum Stream Flow Operating Procedures
MW	megawatt
MWh	megawatt-hour
NAAQS	National Ambient Air Quality Standards
National Register	National Register of Historic Places
NAVD	North American Vertical Datum
PEM	palustrine emergent wetland
Pennsylvania DCNR	Pennsylvania Department of Conservation and Natural Resources
Pennsylvania DEP	Pennsylvania Department of Environmental Protection
Pennsylvania FBC	Pennsylvania Fish and Boat Commission
PFO	palustrine forested
PIT	passive integrated transponder tag
PJM	Pennsylvania-New Jersey-Maryland
PPL	PPL Holtwood, LLC

Reliability <i>First</i>	Reliability <i>First</i> Corporation
RM	river mile
SHPO	Pennsylvania State Historic Preservation Officer
SRBC	Susquehanna River Basin Commission
USGS	U.S. Geological Survey
whitewater agreement	Settlement agreement among PPL and Recreational Stakeholders of June 13, 2008
WQC	water quality certification

COVER SHEET

**FINAL ENVIRONMENTAL IMPACT STATEMENT FOR
AMENDMENT TO LICENSE**

HOLTWOOD HYDROELECTRIC PROJECT

Docket No. P-1881-050

Executive Summary
Pages xix through xxii

FEIS

EXECUTIVE SUMMARY

PPL Holtwood, LLC (PPL or licensee) proposes to increase the installed capacity, increase the hydraulic capacity, and improve upstream fish passage at the Holtwood Hydroelectric Project (FERC Project No. 1881-050) (Holtwood Project or project), located on the lower Susquehanna River in Lancaster and York counties, Pennsylvania. The project primarily is used to meet the peak power demands within the Pennsylvania-New Jersey-Maryland Interconnection, with limitations on peaking generation set by natural inflows of the Susquehanna River, operations of the upstream Safe Harbor Hydroelectric Project, and available storage, as governed by seasonal recreational demands. The project does not occupy any federal lands.

Proposed Action

The Holtwood Project currently consists of a 3,075-foot-long and 55-foot-high dam that impounds 8 miles of the Susquehanna River and a powerhouse with 10 turbines having a combined installed capacity of 107.2 megawatts (MW). The existing project is described in more detail in section 2.1.1.

PPL proposes to construct a new powerhouse, install new turbines, construct a new skimmer wall and larger forebay, and reconfigure the project facilities to enhance upstream fish passage through modification of existing facilities and excavations in the tailrace channel. The licensed installed capacity at the project would increase from 107.2 MW to a proposed 195.5 MW. To improve migratory fish passage at the project, PPL would (1) modify the existing fish lift; (2) reroute the discharge of Unit 1 in the existing powerhouse; and (3) excavate in the project tailrace and Piney Channel. PPL also proposes to provide minimum flows, perform studies and evaluations of the effectiveness of the fish passage improvements and flow releases, improve existing and construct new recreational facilities, and protect special status plants and wildlife and cultural resources during construction. The proposed action and environmental measures are described in more detail in section 2.2. Because of the substantial costs associated with the proposed modifications, PPL requests a 16-year extension of the current license term through August 31, 2030.

Alternatives Considered

This final environmental impact statement (EIS) analyzes the effects of the proposed reconfiguration of the project and recommends conditions for a license amendment for the project. In addition to PPL's proposal, we consider two alternatives: (1) PPL's proposal with staff modifications, and (2) no action—continued operation of the project with no changes.

Under PPL's proposal with staff modifications, the project would be reconfigured as proposed by PPL, but would include defining the extent of in-water blasting prior to the initiation of construction activities that involve blasting; developing and implementing a recreational use monitoring plan; adding provisions to the land and

shoreline management plan; and requiring the filing of a sediment and erosion control plan, final excavation plan, bald eagle monitoring plan, and the final historic properties management plan with the Federal Energy Regulatory Commission (Commission) for approval prior to the commencement of construction.

Public Involvement and Areas of Concern

Before filing its license amendment, PPL conducted pre-filing consultation with resource agencies. This consultation resulted in a Consent Order and Agreement between Pennsylvania Department of Environmental Protection and PPL, executed on November 21, 2007, that would allow reconfiguring the project to increase the installed and hydraulic capacities and require the implementation of fish passage improvements. After PPL filed the application for amendment, we, the Commission staff, conducted scoping to determine what issues and alternatives should be addressed in the EIS. We issued a scoping document to interested parties on March 17, 2008, and conducted two scoping meetings on April 17, 2008, in Holtwood and Lancaster, Pennsylvania. On February 21, 2008, we requested terms and conditions in response to the notice that the application was ready for environmental analysis. On April 16, 2008, Exelon Corporation and PPL jointly requested the comment date be extended an additional 2 weeks. We extended the deadline for filing comments to May 5, 2008, and the deadline for filing reply comments to June 19, 2008. On June 13, 2008, PPL and Recreational Stakeholders representing local boating organizations reached an agreement on whitewater boating issues.

The primary issues associated with the license amendment are whether the reconfiguration of the project would improve the success rate for upstream fish passage and whether existing whitewater boating opportunities would be preserved or enhanced.

Project Effects

Aquatic Resources

Excavation and blasting would result in a decrease in aquatic habitat and an increase in fish mortality, while some fish would avoid important habitat areas and alter migration patterns in the short term. Over the long term, the improvements in the efficiency of the existing upstream fish passage would allow more American shad and other target species, including resident species, to move upstream of the project during the spring migration period.

Terrestrial Resources

The proposed action would permanently disturb 1.24 acres (54,000 square feet) of wetlands and 6 acres (261,360 square feet) of upland forest and could temporarily disturb bald eagles and osprey. Replacing wetlands at a suitable location, such as along Landis Run, and sequencing construction would minimize these effects. The proposed reconfigured flow release from Unit 1 could affect special status plants in the bypassed

reach. Proposed seasonal flow releases to the bypassed reach would affect some special-status plant species, and proposed monitoring would evaluate the effects of the new flow releases on these aquatic plants.

Recreation

Increasing the installed and hydraulic capacities at the project would reduce existing flows over the spillway and reduce existing whitewater boating opportunities downstream of the dam. The agreement on whitewater boating would provide for whitewater boating flows that would replace comparable days of boating opportunities that would likely be lost under the proposed operations and add two new whitewater features that would replace features where use would be diminished by the reduced flows over the spillway. In addition the proposed whitewater boating agreement includes measures to ensure that potential adverse effects of the proposed action on the whitewater boating feature Storm Hole downstream of the project would be mitigated.

The proposed action would temporarily restrict access to some existing recreational facilities during construction. Water surface levels in Lake Aldred could fall below existing late summer levels during drought conditions under the proposed action. Extending new and existing boat ramps on Lake Aldred would allow continued access to the reservoir during drought conditions. Construction of new recreational facilities and improvement of existing facilities would enhance recreation opportunities and use.

Cultural Resources

The proposed action could disturb archaeological sites and would change physical features of the Holtwood dam and powerhouse complex. A Memorandum of Agreement to implement a historic properties management plan would include procedures to protect archaeological sites in the project's area of potential effects and to ensure that the physical changes to the dam and powerhouse do not affect the characteristics that qualify these structures for listing in the National Register of Historic Places.

Land Use and Visual Resources

The new powerhouse and expanded forebay would occupy land previously used for the production of energy and therefore would not affect current land uses; however, the ash basins proposed for the disposal of excavated materials would take up to 43 acres of land out of current agricultural use. Construction activities would introduce noise, air emissions, and night lighting in the project area, but these effects would be limited to the 3-year construction period. Designing the new and reconfigured features to be compatible with the existing dam and powerhouse would also avoid effects on the project's visual resources following construction.

Under the no-action alternative, the project's installed and hydraulic capacities would not change, the project's environmental conditions would remain the same, the

enhancements of fish passage and recreational facilities would not occur, and the license term would not change.

Conclusions

Based on our analysis, we recommend approving the amendment as proposed by PPL with some staff modifications and additional measures. The recommended staff modifications include, or are based in part on, recommendations made by the federal and state resource agencies that have an interest in the resources that may be affected by the reconfiguration of the project. These modifications and additional measures include (1) defining the extent of in-water blasting prior to construction activities that involve blasting, (2) operating the project fish lifts for upstream passage of resident species from September 1 to October 15 for 5 years following commencement of amended project operations, (3) including specific provisions for mitigation of construction effects on fish passage efficiency of shad in the plan to maintain uninterrupted fish migration during construction, (4) developing and implementing a recreational use monitoring plan, (5) adding provisions to the land and shoreline management plan, and (6) requiring that final plans be filed with the Commission for approval prior to the commencement of construction.

In section 4.0 of the EIS, we estimate the annual net benefits of operating and maintaining the project under the three alternatives identified above. Our analysis shows that the annual net benefit would be about \$9 million for both the proposed action to amend the license and the staff alternative to the proposed action, and about \$35 million for the no-action alternative.

Constructing the new powerhouse and improved fish passage facilities, with our recommended measures, would (1) involve ground disturbance that would result in unavoidable short-term effects on sedimentation and turbidity in the Susquehanna River immediately upstream and downstream of the project during construction; (2) result in unavoidable fish entrainment and mortality; (3) temporarily limit access for fishing immediately upstream and downstream of the project; and (4) disturb 1.24 acres (54,000 square feet) of wetlands. Our recommended measures would ensure that state water quality standards are met. Project operation would improve upstream fish passage.

We chose the staff alternative as the preferred alternative because (1) the project would provide about 361,000 megawatt-hours annually of additional dependable electrical energy for the region; (2) the additional capacity would save the equivalent amount of fossil-fueled generation and capacity, thereby continuing to help conserve non-renewable energy resources and reduce atmospheric pollution, and (3) the recommended environmental measures proposed by PPL, as modified by staff, would enhance upstream fish passage and adequately protect environmental resources affected by the project. The overall benefits of the staff alternative to energy production and fish passage would be worth the cost of the proposed and recommended environmental measures.

COVER SHEET

**FINAL ENVIRONMENTAL IMPACT STATEMENT FOR
AMENDMENT TO LICENSE
HOLTWOOD HYDROELECTRIC PROJECT
Docket No. P-1881-050**

Section 1
Introduction
Pages 1 through 12

FEIS

FINAL ENVIRONMENTAL IMPACT STATEMENT

Federal Energy Regulatory Commission
Office of Energy Projects
Division of Hydropower Administration and Compliance
Washington, DC

Holtwood Hydroelectric Project FERC Project No. 1881-050-PA

1.0 INTRODUCTION

1.1 APPLICATION

Application Type: Amendment of license to increase installed capacity
Date Filed: December 20, 2007, and supplemented January 4, February 20, June 19, 2008, and October 3, 2008
Applicant's Name: PPL Holtwood, LLC (PPL or licensee)
Water body: Susquehanna River
County and State: Lancaster and York counties, Pennsylvania
Federal Lands: The project does not occupy any federal lands

1.2 PURPOSE OF ACTION AND NEED FOR POWER

1.2.1 Purpose of Action

The Holtwood Hydroelectric Project (Holtwood Project or project) is one of five hydroelectric projects on the lower Susquehanna River (figure 1). The 107.2-megawatt (MW) project has the lowest hydraulic capacity among the existing hydropower plants and almost half the hydraulic capacity of the upstream Safe Harbor Project. Fish passage facilities constructed in 1997 as a result of a 1993 agreement⁷ among the upstream

⁷ *The 1993 Settlement and Agreement for the Development of Fish Passage Facilities at the Holtwood, Safe Harbor, and York Haven Projects in the Susquehanna River* was executed on June 1, 1993, among the Pennsylvania Power & Light Company, Safe Harbor Water Power Corporation, and York Haven Power Company, and U.S. Fish and Wildlife Service, U.S. Department of the Interior, Pennsylvania Fish and Boat Commission, Pennsylvania Department of Environmental Resources, Maryland Department of Natural Resources, Susquehanna River Basin Commission, Upper Chesapeake Bay Watershed Association, and the Pennsylvania Federation of Sportsmen's Clubs. The Commission approved the Settlement Agreement on June 30, 1994. See 67 FERC ¶ 62, 291 (1994).

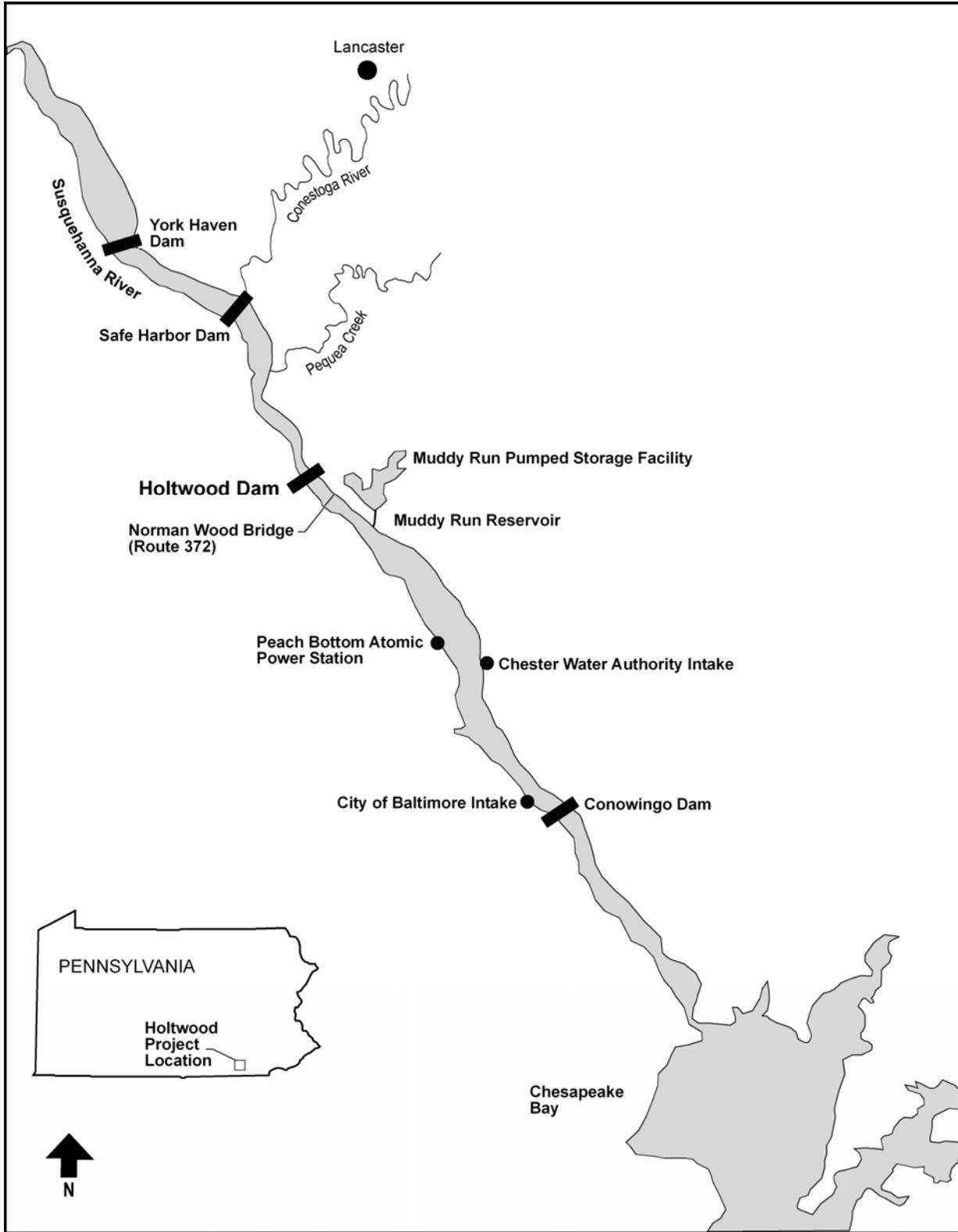


Figure 1. Location of the Holtwood Project and other facilities on the lower Susquehanna River. (Source: Rand McNally, 1999, as modified by staff).

Safe Harbor (FERC Project No. 1025) and York Haven (FERC Project No. 1888) projects and the Holtwood Project have not been effective in passing American shad upstream, especially during high flow periods, and are inhibiting the ability of other upstream projects from achieving the American shad restoration goals envisioned in the 1993 agreement. PPL has been engaged in discussions with resource agencies during the past 3 years to develop an agreement that would allow redevelopment of the project to increase the installed capacity and hydraulic capacity and reconfigure the project to improve the upstream fish passage. On November 21, 2007, Pennsylvania Department of Environmental Protection (Pennsylvania DEP) issued a Consent Order and Agreement (COA). The COA would require the implementation of various fish passage improvements at the project, as well as the provision of minimum flows and certain recreational facilities. The COA includes an appendix with partial preliminary water certification conditions as summarized in appendix A, table A-2, of this document.

The amendment requests that the Federal Energy Regulatory Commission (Commission or FERC): (1) increase the installed capacity of the project from 107.2 MW to 195.5 MW⁸; (2) increase the hydraulic capacity from 31,500 cubic feet per second (cfs) to 62,100 cfs; and (3) extend the license term by 16 years to August 31, 2030. The extension of license term would be set to expire at the same time as the upstream Safe Harbor Project. The existing Holtwood Project license will expire on September 1, 2014.

In this environmental impact statement (EIS) we assess the environmental effects of continuing to operate the project: (1) as proposed in the licensees' amendment application and (2) as currently licensed, which is the no-action alternative. Although the primary issue that we address is to provide improved upstream fish passage, particularly for American shad, we also consider other issues, such as aquatic and terrestrial habitat, cultural resources, and recreational use and access.

1.2.2 Need for Power

The Holtwood Project is located within what is now the Reliability*First* Corporation (Reliability*First*) region of the North American Electric Reliability Corporation region. Prior to the consolidation of several North American Electric

⁸ The Commission issued an original license for the Holtwood Project on July 3, 1951. See Pennsylvania Power and Water Co., 10 FPC 1163 (1951). The authorized capacity when the project was re-licensed on August 14, 1980, was 107.2 MW. See Pennsylvania Power and Light Co. 21 FERC ¶ 61, 429 (1980). Since that time, the runners on six units were replaced with newer, more efficient designs, the generators on three units were rewound to higher ratings, and the two water-driven exciters were retired. The net result of these modifications increased the capacity of the project from 107.2 to 108.44 MW. The proposed project modifications would further increase the capacity of the project from 108.44 to 195.5 MW.

Reliability Corporation regions into the Reliability*First* region, the Holtwood Project was located within the Mid-Atlantic Area Council region.

Reliability*First* estimates that summer demand in the region will increase at an equivalent compound growth rate of 1.6 percent per year (29,300 MW) from 2007 to 2016 (Reliability*First*, 2006). The Reliability*First* region is heavily dependent on fossil-fueled generation, with 47 percent fueled by coal, 28 percent fueled by gas, and 7 percent fueled by oil. Nuclear power provides about 14 percent, with only 1 percent attributed to conventional hydroelectric facilities and about 2 percent provided by pumped storage hydroelectric facilities. The remaining 1 percent comes from a variety of other renewable and non-renewable fuel sources. Although some older facilities will be retired during the next 10 years and new facilities are expected to come online, the fuel-source mix percentages for the Reliability*First* region are not expected to change.

Pennsylvania's new Alternative Energy Portfolio Standards (PPUC, 2008) require that increasing amounts of power sold in Pennsylvania come from renewable resources (e.g., solar, hydro, wind). The power from the proposed expansion of the Holtwood Project may qualify as Tier 1 power under those standards. Of the projects currently expected to come online during the period 2007–2010, approximately 14 percent (2,116 MW) of the capacity will be from wind turbines (renewable energy), while the remainder will be from fossil-fuel facilities (non-renewable energy).

The proposed expansion of the Holtwood Project would increase current installed capacity by 87.06 MW and increase average annual generation by about 361,000 megawatt-hours (MWh), which would help the state of Pennsylvania achieve its renewable resource goals and provide needed energy that might otherwise be provided by fossil-fueled generation.

1.3 STATUTORY AND REGULATORY REQUIREMENTS

A capacity amendment for the Holtwood Project is subject to numerous requirements under the Federal Power Act (FPA) and other applicable statutes. We summarize the major regulatory requirements in table 1 and describe them below.

Table 1. Major statutory and regulatory requirements for the Holtwood Project.

Requirement	Agency	Status
Section 18 of the Federal Power Act (fishway prescription)	U.S. Department of the Interior	Interior filed a preliminary fishway prescription under section 18.
Section 10(j) of the Federal Power Act	U.S. Department of the Interior, Pennsylvania Fish and Boat Commission	Interior and Pennsylvania Fish and Boat Commission filed recommendations under section 10(j).

Requirement	Agency	Status
Clean Water Act	Pennsylvania Department of Environmental Protection	Appendix A of the Consent Order includes partial preliminary water quality certification conditions.
Clean Water Act	U.S. Army Corps of Engineers	PPL filed an application for a section 404 permit
Endangered Species Act	U.S. Fish and Wildlife Service	This draft EIS concludes that no threatened or endangered species are located in the project area.

1.3.1 Federal Power Act

1.3.1.1 Section 18 Fishway Prescription

Section 18 of the FPA states that the Commission is to require construction, operation, and maintenance by a licensee of such fishways as may be prescribed by the Secretaries of Commerce or the U.S. Department of the Interior (Interior). On April 16, 2008, Interior filed a fishway prescription for the project. Interior's prescription is described under section 2.2.6, *Modifications to Applicant's Proposal—Mandatory Conditions*.

1.3.1.2 Section 10(j) Conditions

Under section 10(j) of the FPA, each hydroelectric license issued by the Commission must include conditions based on recommendations provided by federal and state fish and wildlife agencies for the protection, mitigation, or enhancement of fish and wildlife resources affected by the proposed project. On April 16, 2008, and May 2, 2008, respectively, Interior and the Pennsylvania Fish and Boat Commission (Pennsylvania FBC) filed recommendations under section 10(j), as summarized in table 25 in section 5.2, *Recommendations of Fish and Wildlife Agencies*. In section 5.2, we also discuss how we address the agency recommendations and comply with section 10(j).

1.3.2 Clean Water Act

Under section 401 of the Clean Water Act, a licensee applying for a capacity-related license amendment must obtain certification from the appropriate state pollution control agency verifying compliance with the Clean Water Act. Appendix A of the COA between Pennsylvania DEP and PPL includes partial preliminary water quality certification (WQC) conditions for the Holtwood Project. The COA specifies that if the final WQC contains conditions that are substantially the same as the proposed conditions in Appendix A, PPL will not challenge any of those conditions in any appeal of the final

WQC. These proposed conditions include three standard conditions applicable to all WQC conditions and specific conditions for fish passage operating procedures for upstream and downstream passage of diadromous and resident fish species, and minimum streamflows operating procedures for minimum flow releases in the bypassed reach, Piney Channel, tailrace, and from Lake Aldred. The preliminary water quality conditions are described in section 2.2.6, *Modifications to Applicant's Proposal—Mandatory Conditions*. PPL jointly applied to Pennsylvania DEP for a WQC and the U.S. Army Corps of Engineers (Corps) for a section 404 fill and dredge permit on January 30, 2008. The Pennsylvania DEP requested additional information from PPL to complete its application for a WQC on August 8, 2008, and filed a copy of its letter to PPL with the Commission.

1.3.3 Section 404 Permit

Section 404 of the Clean Water Act requires that anyone proposing to deposit or discharge dredged or fill material into waters of the United States, including wetlands, must receive authorization for such activities. These discharges include return water from dredged material disposed on upland property and generally any fill material like rock, sand, or dirt. Activities in wetlands for which permits may be required include, but are not limited to:

- placement of fill material;
- ditching activities when the excavated material is sidecast;
- levee and dike construction;
- mechanized land clearing;
- land leveling;
- most road construction; and
- dam construction.

Since the proposed construction of the new powerhouse and reconfiguration of the fish passage facilities are to take place within the project floodplain and wetlands, the proposed project may result in fill material being deposited in waters or wetlands of the United States or any activity in waters of the United States. PPL jointly applied to Pennsylvania DEP for a WQC and the Corps for a section 404 fill and dredge permit on January 30, 2008. The Corps received the section 404 permit application on February 12, 2008.

The Corps filed comments on September 9, 2008, and supplemented its comments on September 30, 2008. The comments, which included updated information on the status of several proposed measures that would affect wetlands and provided additional detail on potential effects on wetlands, are incorporated into the final EIS.

1.3.4 Essential Fish Habitat

Pursuant to the amended Magnuson-Stevens Fishery Conservation and Management Act, the U.S. Congress mandated the identification of habitats essential to federally managed commercial fish species and the implementation of measures to conserve and enhance their habitat (Public Law 104-297). In the amended Act, Congress defined essential fish habitat for federally managed fish species as “those waters and substrate necessary to fish for spawning, breeding, feeding, or growth to maturity.” Essential Fish Habitat is applicable to federally managed commercial species that live out at least one component of their lifecycle in marine waters (such as anadromous species). The state of Pennsylvania and the Susquehanna River are under the jurisdiction of the Mid-Atlantic Fishery Management Council, related to federally managed commercial fish species. There are, however, no federally managed species that use the freshwater habitat of the Susquehanna River in Pennsylvania, so there is no Essential Fish Habitat in the vicinity of the Holtwood Project (NMFS, 2008).

1.3.5 Endangered Species Act

Section 7 of the Endangered Species Act (ESA) requires federal agencies to ensure that their actions are not likely to jeopardize the continued existence of endangered or threatened species or result in the destruction or adverse modification of the critical habitat of such species. No federally listed threatened or endangered aquatic, plant, or wildlife species or critical habitat for listed species has been identified in the project area.

1.3.6 Coastal Zone Management Act

Under section 307(c)(3)(A) of the Coastal Zone Management Act, 16 U.S.C. §1456(3)(A), the Commission cannot issue a capacity amendment to a license for a project within or affecting a state’s coastal zone unless the state’s Coastal Zone Management Act agency concurs with the license applicant’s certification of consistency with the state’s Coastal Zone Management Act program, or the agency’s concurrence is conclusively presumed by its failure to act within 180 days of its receipt of the applicant’s certification. On May 2, 2008, Pennsylvania DEP determined that the proposed action is located outside of Pennsylvania’s coastal zones and would not affect them. Therefore, the proposed action is consistent with Pennsylvania’s Coastal Zone Management Program.⁹

1.3.7 National Historic Preservation Act

Section 106 of the National Historic Preservation Act requires that every federal agency “take into account” how each of its undertakings could affect historic properties, and provide the Advisory Council on Historic Preservation a reasonable opportunity to

⁹ Letter from L.J. Toth, Environmental Planner, Coastal Resources Management Program, Pennsylvania DEP, to the Commission, dated May 2, 2008.

comment. Historic properties are districts, sites, buildings, structures, traditional cultural properties, and objects significant in American history, architecture, engineering, and culture that are eligible for inclusion in the National Register of Historic Places (National Register). By letter dated April 11, 2006, the Commission designated PPL as the Commission's non-federal representative to consult with the Pennsylvania State Historic Preservation Officer (SHPO) under section 106. The SHPO reviewed the results of archaeological studies and concluded by letter dated January 22, 2007, that the proposed action would not require further archaeological survey. PPL submitted documentation of the historic significance of the Holtwood dam and powerhouse complex to the SHPO on May 22, 2008. The SHPO by letter dated July 30, 2008, reiterated that the proposed project would not affect any archaeological resources and stated that the project would have no adverse effect on the National Register-eligible Holtwood Hydroelectric Project. Subsequently, PPL conducted archaeological surveys at the locations of proposed ground-disturbing activities associated with additional recreational areas and new wetland mitigation sites. The findings and SHPO review have not as yet been provided to the Commission. However, PPL and the SHPO are currently developing a historic properties management plan to ensure the protection of archaeological and historic resources in the project area. To meet the requirements of section 106, the Commission will execute a Memorandum of Agreement that would require implementation of the final historic properties management plan.

1.4 PUBLIC REVIEW AND CONSULTATION

The Commission's regulations (18 CFR, section 4.38) require that applicants consult with appropriate resource agencies, tribes, and other entities before filing an application for a capacity amendment to a license. This consultation is the first step in complying with the Fish and Wildlife Coordination Act, ESA, National Historic Preservation Act, and other federal statutes. Pre-filing consultation for a capacity amendment must be complete and documented according to the Commission's regulations.

1.4.1 Scoping

Before preparing this EIS, we conducted scoping to determine what issues and alternatives should be addressed. We distributed a scoping document to interested agencies and others on March 17, 2008, with a request to provide written comments within 30 days. We held two publicly noticed scoping meetings on April 17, 2008, in the towns of Holtwood and Lancaster. The scoping document was noticed in the Federal Register on March 23, 2008. The scoping meetings, which were recorded by a court reporter, allowed individuals an opportunity to submit oral or written comments to the relicensing record. A total of 36 individuals and 48 representatives of agencies and non-governmental organizations attended the afternoon and evening scoping meetings. The following entities filed written comments:

Commenting Entity	Date of Filing
American Rivers	May 2, 2008
Pennsylvania Department of Conservation and Natural Resources	May 2, 2008
U.S. Fish and Wildlife Service	May 2, 2008
Susquehanna River Basin Commission	May 2, 2008
Pennsylvania Fish and Boat Commission	May 2, 2008

Staff carefully considered and addressed the stakeholder comments and questions within the scope of the current proceeding, examining the proposed development of the Holtwood Project, to focus the content of this document. Comments were raised about following issues, within the scope of this proceeding:

- Concern that extending the license term would preclude a cumulative effects analysis of minimum flows, fish passage, and effects on American eels and mussels.
- Concern that sufficient minimum stream flows be released to address low flow into the Chesapeake Bay.
- Requests that the EIS include assessments of the change in pattern of frequency, location, and duration of releases and spills to predict and mitigate negative impacts to wildlife and recreational users.
- Concern that there would be performance measures and triggers to determine the need for additional studies and improvements to allow adaptive management of minimum flows and fish passage.
- Concern that the fish passage improvement could raise the water level in the bypassed reach and inundate state-designated plant species.
- Concern that the new features developed as mitigation for lost whitewater boating opportunities be maintained throughout the remainder of the period of the license.
- Concern that the proposed blasting activities would affect river wildlife and could have long-term effects on the riverbed.
- Concern that the EIS consider the relative costs of operational efficiencies and conservation measures, such as demand efficiencies to meet additional power needs, and also consider alternative power generation sources to meet demand.

1.4.2 Comments on the License Application and Interventions

On February 21, 2008, the Commission issued a notice that PPL's application for amendment of license had been accepted for filing and solicited motions to intervene and comments, recommendations, terms, and conditions, and fishway prescription. This notice set April 21, 2008, as the deadline for filing protests and motions to intervene and comments and terms and conditions, and May 5, 2008, as the deadline for reply comments. On April 16, 2008, Exelon Corporation and PPL jointly requested the comment date be extended an additional 2 weeks. On April 18, 2008, the Commission extended the comment deadline date to May 5, 2008, and the reply comment deadline date until June 19, 2008.

Entity	Date of Filing	Type of Filing
U.S. Department of the Interior	February 21, 2008	Intervention
American Whitewater	March 5, 2008	Comment
Elizabeth Lynch	March 7, 2008	Comment
Pennsylvania Fish and Boat Commission	March 21, 2008	Intervention
Exelon Corporation	April 4, 2008	Intervention
Maryland Department of Natural Resources	April 15, 2008	Intervention
U.S. Department of the Interior	April 16, 2008	Comment
Pennsylvania Department of Environmental Protection	April 17, 2008	Intervention
American Whitewater/Greater Baltimore Canoe Club	April 18, 2008	Intervention
Nature Conservancy of Pennsylvania	April 18, 2008	Intervention
York Haven Power Company, LLC	April 21, 2008	Intervention
American Rivers	April 21, 2008	Intervention/Comment
Stewards of the Lower Susquehanna	April 21, 2008	Intervention/Comment
Pennsylvania Department of Conservation and Natural Resources	April 21, 2008	Comment
Pennsylvania Fish and Boat Commission	May 2, 2008	Comment

PPL filed reply comments on June 19, 2008.

1.4.3 Comments on the Draft Environmental Impact Statement

The Commission issued its draft EIS for the application for amendment for the Holtwood Project on July 18, 2008. In appendix B, we summarize the comments, provide responses to those comments, and indicate, where appropriate, how we modified the text of this final EIS.

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COVER SHEET

**FINAL ENVIRONMENTAL IMPACT STATEMENT FOR
AMENDMENT TO LICENSE
HOLTWOOD HYDROELECTRIC PROJECT
Docket No. P-1881-050**

Section 2
Proposed Action and Alternatives
Pages 13 through 28

FEIS

2.0 PROPOSED ACTION AND ALTERNATIVES

2.1 NO-ACTION ALTERNATIVE

The no-action alternative is amendment denial. Under the no-action alternative, the new powerhouse would not be constructed, the new turbines would not be installed, the fish passage and recreational improvements would not be implemented, the license term would not be extended to 2030, and relicensing would begin in 2009.

2.1.1 Existing Project Facilities

Dam

The Holtwood dam is an overflow-type structure that consists of a 2,392-foot-long by 55-foot-high, low-hazard, concrete gravity dam with a spillway crest at elevation (El.) 165.0 feet,¹⁰ and a 24-foot-wide pier and fish lift exit channel at its eastern end. The remaining 2,368-foot-long spillway section of the dam is raised to an effective El. of 169.75 feet via the use of wooden flashboards and inflatable rubber dam. The inflatable rubber dam sections include a 40-foot-long by 10-foot-high section on the east side of the dam near the fish lift exit and a 300-foot-long by 4.75-foot-high section installed adjacent to the 10-foot-high segment and separated by an intermediate pier. Two additional 387-foot-long by 4.75-foot-high sections and an additional intermediate pier were installed in 2001. All of these rubber dam sections are used for limited control of project spills. Since 2004, PPL has been installing 200 feet of 6-foot-high flashboards from the York County abutment as a public safety measure. The remaining 1,054 linear feet of dam crest has 4.75-foot-high steel pin-supported wooden flashboards. Currently, rubber dam sections 2 and 3 have failed and are not repairable. Flashboards have been installed in front of these sections to maintain reservoir elevations. This increases the amount of flashboards by another 687 feet. At the western end of the dam, there is a non-functional fish ladder that was constructed in 1914 and abandoned in 1920.

Powerhouse

The Holtwood powerhouse is a manned station that is locally operated by PPL. The powerhouse contains 10 similarly sized vertical Francis turbines with a current licensed capacity of 107.2 MW. PPL has replaced the runners and shafts for 6 of the 10 units (Units 3, 5, 6, 8, 9, and 10) and has rewound the generators on Units 3, 8, and 9, which resulted in an overall increase of 1.24 MW. Upgraded units operate with efficiencies in the range of 87 to 92 percent. The four remaining units are estimated to have efficiencies in the 70 to 75 percent range. The replacement of runners and shafts

¹⁰ All elevations in this EIS are in PPL's Powerhouse datum = North American Vertical Datum (NAVD) 88 + 0.06 feet.

on the remaining units, which is scheduled during the 2009 to 2011 timeframe, is not expected to increase the units' nameplate ratings. The hydraulic capacity of the existing powerhouse is 31,500 cfs, but the units typically operate at a lower rate of release. The minimum operating discharge of each unit ranges from approximately 1,200 cfs to 2,500 cfs.

Historically, station electrical use was provided by two water-driven direct-current exciter units. These units were replaced in 1994 with static excitation systems. New direct-current rectifier units were installed in 2001 to provide the remaining small direct-current electric energy requirements within the plant.

Lake Aldred

Lake Aldred was formed by the construction of Holtwood dam and extends up the Susquehanna River for approximately 8 miles to the base of the upstream Safe Harbor Project. The reservoir is managed to maintain a minimum operating level of El. 167.5 feet from May 15 through September 15 to support reservoir recreational uses and access. The minimum operating level during the balance of the year is El. 163.5 feet, which is based on the hydroelectric station's fire protection water intake requirements. The reservoir's maximum useable storage capacity is 15,224 acre-feet between the top of dam flashboards (El. 169.75 feet) and El. 163.5 feet. This is equivalent to approximately 184,000 cfs-hours of stored water that is enough to support approximately 6 hours of operation of the existing generating station at full capacity.

Project Lands

The total land area within the project boundary is approximately 6,320 acres, including 2,400 acres of lakebed under Lake Aldred, which is almost entirely owned and managed by PPL. PPL owns flooding rights on 4,100 acres within the project boundary. The downstream Conowingo Hydroelectric Generating Station, FERC Project No. 405 (Conowingo Project), owned by the Exelon Corporation, backs up to project area downstream of the dam and powerhouse, and as a result, those areas are also included within the Conowingo Project boundary. PPL has developed and manages recreational access and has been responsible under its existing license for the management of lands and waters within this area included in both projects' boundaries, except for limited adjacent lands owned by the Exelon Corporation, as part of the Conowingo Project.

2.1.2 Existing Project Operation

As noted above, the Holtwood powerhouse is manned and locally operated by PPL. Operations are scheduled on the basis of releases from the upstream Safe Harbor Project in response to available river flow. The project primarily is used to meet the peak power demands within the Pennsylvania-New Jersey-Maryland (PJM) Interconnection, with limitations on peaking generation set by releases from the Safe Harbor Project, runoff from the natural drainage area below Safe Harbor, and available

project storage, as governed by seasonal recreational demands. Project operations are coordinated through the PJM Interconnection with the operation of PPL's other power generating resources and those of other generators within the PJM grid. Project reservoir levels are scheduled seasonally in accordance with the existing operating license and power and non-power operations as discussed below.

In accordance with the existing operating license, the project is generally operated on a daily peaking basis using its limited reservoir storage to collect inflows from the upstream Safe Harbor Project and from the 686-square-mile drainage between the Safe Harbor and Holtwood dams and to release this water during the peak electrical demand periods during the day. Operation at Safe Harbor governs and accounts for approximately 98 percent of inflow to Holtwood whenever river flow above Safe Harbor is less than about 100,000 cfs. As a result of this regulation, the Holtwood Project's peaking operation normally coincides with the Safe Harbor Project's and thus does not significantly change the progress of water down the river.

During low flow periods, the project may operate on a weekly cycle in response to market demands for power, using available storage to capture weekend inflows for use during weekday peak demand periods. During moderate to low flows, inflow to the Holtwood Project from the Safe Harbor Project on weekends may be negligible or non-existent, and the Holtwood Project is limited to capturing the relatively small amount of weekend local runoff to redistribute for weekday peaking. During high water periods, the project operates on a 24-hour basis up to its maximum hydraulic capacity. Based on long-term flow records, the river flow exceeds current station capacity (31,500 cfs) approximately 40 percent of the time. Flows in excess of plant capacity are spilled over the dam.

PPL's generation dispatchers track Susquehanna River flows, meteorological conditions, and power demands on a daily basis. These data are used to establish a generation schedule on a day-ahead basis. The dispatchers schedule overall daily generation as a function of available water and power demands and determine the overall hours of operation of the Holtwood Project.

PPL also operates the existing generating units for ancillary generation services including Area Regulation, condensing, and spinning reserve. Under Area Regulation operations, line loads and power demands drive the generation production of the Holtwood Project within predetermined or scheduled limits, which are set by PPL and PJM based on the capacity of individual generating units to provide this service.

The existing Holtwood units also provide black-start capability within the PJM grid. Black-start capability allows generating units to restart without the need for any external power source. As a result, generating units such as those at the Holtwood Project are critically important with regard to recovery after electrical system outages, and they provide the excitation necessary to restart other larger generating stations connected to the electrical grid.

2.2 APPLICANT'S PROPOSAL

2.2.1 Proposed Project Facilities and Construction Activities

PPL proposes to redevelop the project and reconfigure the fish passage facilities, as shown in figure 2 and described below:

- Develop and implement sediment and erosion control plans for construction activities.
- Excavate approximately 69,126 cubic yards (cy) of rock and 240,313 cy of soil on the land formerly occupied by the coal steam station to expand the forebay to allow more water to pass into the plant at acceptable velocity levels.
- Excavate approximately 293,055 cy of rock and 63,529 cy of soil and construct a new 240-foot-wide by 130-foot-long powerhouse adjacent to the existing powerhouse in the area that was formerly occupied by the coal burning steam electric station and install two new generating units with a total installed capacity of 80.6 MW at best gate.¹¹
- Excavate approximately 802,972 cy of rock and 4,035 cy of soil in the existing tailrace allow water to pass downstream without creating backpressure on the generating units and install cofferdams to direct flow around excavated areas.
- Restrict excavation activities during several months each year to avoid disturbing nesting eagles or shad migration as explained further in this document.
- Remove the existing skimmer wall and approximately 40,000 cy of reservoir silt and then construct a new skimmer wall with a roadway deck above the dam.

¹¹ The proposed project modifications, which include additional capacity of 80.6 MW for the two new generating units, 2.36 MW for the two new small turbine generators in the existing powerhouse bays, and 4.1 MW resulting from the proposed replacement of runners and shafts in Units 1, 2, 4, and 7, would increase the capacity of the project from 108.44 MW to 195.5 MW. The authorized capacity when the project was originally licensed on August 14, 1980, was 107.2 MW. Since that time, the runners on six units were replaced with newer, more efficient designs; the generators on three units were rewound to higher ratings; and the two water-driven exciters were retired. The net result of these modifications increased the capacity of the project from 107.2 MW to 108.44 MW.

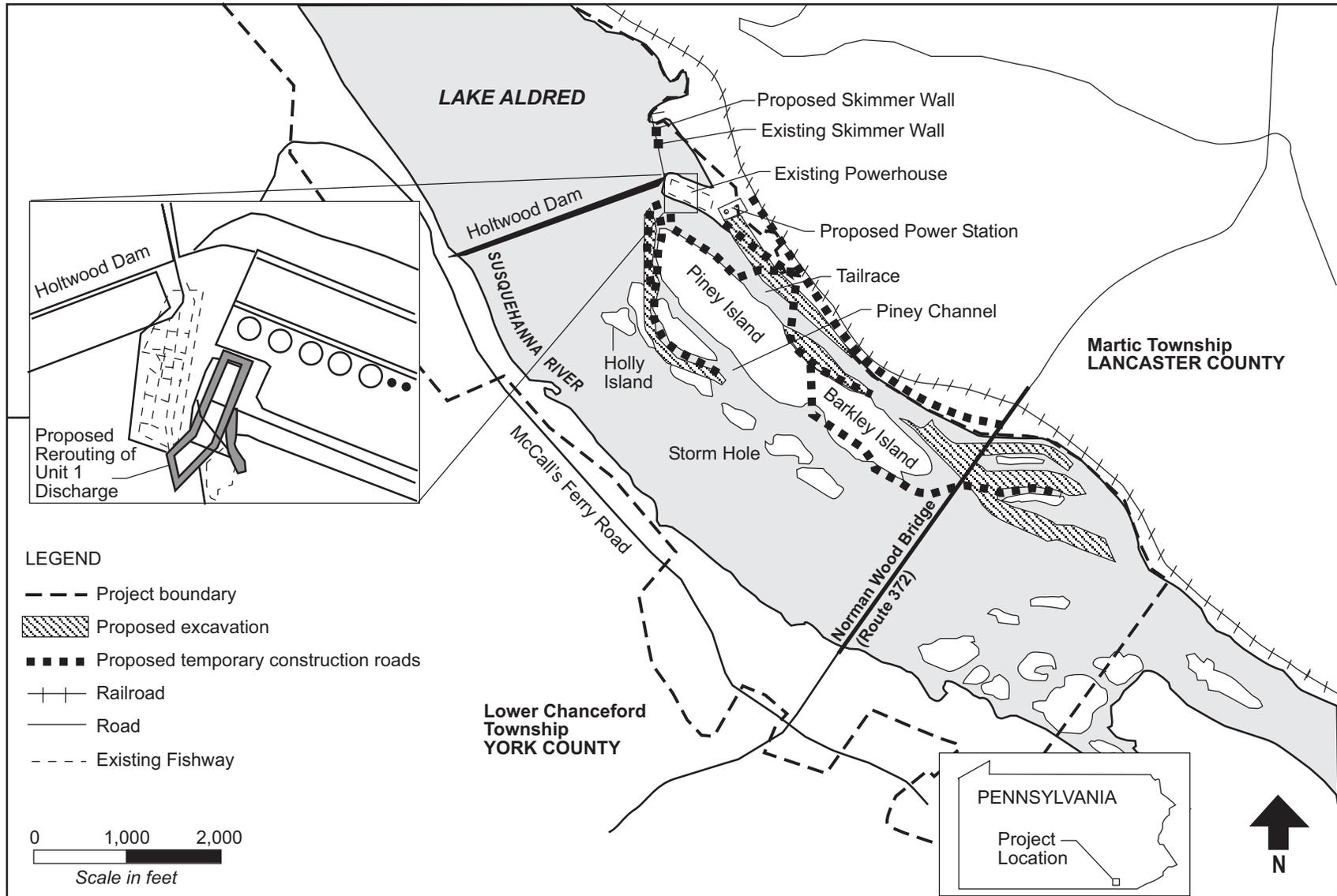


Figure 2. General view of existing and proposed facilities at the Holtwood Project. (Source: PPL, 2007a, as modified by staff)

- Install a new draft tube extension to Unit 1 to reroute the flow from Unit 1 to from the tailrace to the west side of Piney Island in order to enhance the secondary migratory fish passage route in Piney Channel.
- Excavate approximately 70,695 cy of rock from Piney Channel to control channel velocity and to reduce tailwater levels at Unit 1.
- Remove two retired plant exciter units and install two small turbine generator units (combined 2.36 MW) in the existing powerhouse bays.
- Replace the runners and shafts on Units 1, 2, 4 and 7, which would increase the turbine ratings, and thus the overall unit capacities by 4.1 MW.
- Modify the existing fish lift to enhance lift effectiveness, including changes to the attraction water inlet piping, the addition of a valve, redesign and reconstruction of fish lift entrance C, and relocation of the tailrace crowder drive.
- Install passive integrated transponder (PIT) tag readers.
- Design and add eel ramps to the fish lift entrances.
- Provide fishing and boating access at points below the dam and powerhouse and improve the existing boating access points on Lake Aldred, including: (1) a new elevated roadway over the Norfolk-Southern railroad track along the Lancaster County shore for enhanced public access to the project tailrace and river corridor lands; (2) a new public parking area along the Lancaster shore and reconstruction of the tailrace fishing area; (3) enhanced parking along the township road in York County and the construction of improved trail access to the river below the dam; (4) extension of the boat ramp at the York Furnace boat launch to improve the ramps utility on a year-round basis; and (5) improvements to the Pequea Creek boat launch area.
- Implement a settlement agreement¹² for whitewater boating mitigation (whitewater agreement).
- Construct a wetland replacement project along Landis Run in Manheim Township, Lancaster County, to mitigate for wetlands affected by the project construction.
- Field delineate and identify all existing wetlands within the areas of ground-disturbing activities using orange construction fencing prior to the start of

¹² Settlement agreement among PPL, the Greater Baltimore Canoe Club, Starrk Moon, SWW Park Alliance, Conewago Canoe Club, Susquehanna Surf Society, Topher Smith, Chris Iverson, and American Whitewater (Recreational Stakeholders) signed on June 13, 2008, and filed with the Commission on June 19, 2008.

construction activities through the completion of ground-disturbing activities and after site stabilization.

- Construct temporary and permanent access roads designed to avoid effects on existing environmental and archeological resources and provide post-construction access to recreational facilities.

2.2.2 Proposed Operational Modifications

- Implement a daily volumetric minimum flow release equal to the lesser of net daily inflow (daily inflow from the Safe Harbor Project plus intermediate tributaries, less reservoir evaporation) into Lake Aldred, or 98.7 percent of the minimum flow required by the Commission (QFERC¹³) to be released at the downstream Conowingo Project.
- Implement a continuous conservation flow of 200 cfs to the Piney Channel and the tailrace to maintain and protect existing and designated uses and water quality standards in Piney Channel.¹⁴
- Release a continuous minimum flow from the project equal to either (1) 800 cfs, or (2) net inflow to Lake Aldred, whichever is less. This is to become effective upon the latter date of initiation of Unit 1 discharge to Piney Channel or initial operation of the planned exciter replacement units in the existing powerhouse and would be implemented no later than 3 years after the date of the Commission's final order approving the Holtwood license amendment.
- Continue to use the existing configuration of flashboards to pass water through the existing 10-inch pipe on the dam to maintain the current rate of flow into the bypassed reach.
- When river flows are between 31,000 and 61,500 cfs, supply flows to the bypassed reach of approximately 1,000 cfs once per day for 1 hour, in order to sufficiently wet the roots of the white doll's daisy plant population during the dry summer months of its growing season.

¹³ "QFERC" is the target minimum release from Conowingo as stated in the Conowingo license. The schedule for QFERC is March 1 to March 31—3,500 cfs; April 1 to April 30—10,000 cfs; May 1 to May 31— 7,500 cfs; June 1 to September 14—5,000 cfs; September 15 to November 30—3,500 cfs; December 1 to February 28/29—3,500 cfs, but intermittent flows and shutdowns are allowed during this period.

¹⁴ Under the COA, the exact flow was to have been determined by the resource agencies in January 2008. In the interim, we use the PPL's suggested conservation flow of 200 cfs for our analysis.

- Implement drought operations that would release water from storage in Lake Aldred during drought conditions, if approved and as directed by the Susquehanna River Basin Commission (SRBC), to make up or compensate for about 44 acre-feet per day in new consumptive use at PPL Corporation-owned thermal generating stations in the Susquehanna River Basin. A drought condition would occur when flows in the Susquehanna River fall below a level to be determined by SRBC. Each drought condition day, the Holtwood Project would operate on a daily Area Regulation or peaking basis and would release all water entering Lake Aldred from the Safe Harbor Project and intermediate tributaries, less reservoir evaporation, plus up to the equivalent of 44 acre-feet per day of water from storage. From September 16 through December 31, PPL would operate the project to maintain minimum daily reservoir levels not lower than a rule curve that would ensure capability for makeup for the consumptive use on sub-trigger flow days without drawing down below El. 163.5 feet. This rule curve conservatively anticipates a sub-trigger river flow each day and the need to release 44 acre-feet from storage.
- Drawdown Lake Aldred below the existing minimum El. of 167.5 feet as needed during the summer recreational season (May 15 to September 15) during regional drought periods when daily net inflow to Lake Aldred is less than the project's total release obligations.
- Develop an operating plan to extend fish lift operations in the spring for upstream passage of resident (non-migratory) species.
- Provide a River Hotline with information regarding reservoir levels and develop a web site that would provide reservoir level information as measured at the dam, provide expected generation schedules, and note if drought operations are in effect.

2.2.3 Proposed Environmental Measures

- Develop a land and shoreline management plan with respect to project lands to establish long-term management objectives and to ensure the continued preservation of project lands, shoreline buffers, historic and archeological resources, and the protection of sensitive species such as the bald eagle.
- Develop and implement a historic properties management plan to protect historic and archeological resources during project construction and throughout the term of the amended license.
- Implement a long-term cooperative study and monitoring program for migratory fishes, including American eel, to ensure efficient and effective upstream and downstream passage.

- Implement a long-term monitoring program of wetlands and state threatened and endangered plants in the river bed downstream of the dam to examine the effects of reductions in spill frequency on in-river resources and determine if any adjustments to planned flow release rates are warranted to ensure the continued protection of the river area.
- Implement a post-operational environmental evaluation of the bypassed reach, tailrace, and Piney Channel including dissolved oxygen (DO) monitoring to ensure that existing and designated uses are being protected and modify conservation flow releases, if needed based on the study results.
- Implement a minimum 5-year monitoring schedule at the wetland, stream and forested riparian planting mitigation sites.
- Develop and implement a bald eagle protection plan to ensure the continued protection of eagles that nest and forage within the immediate project area.

2.2.4 Construction Schedule

Because the design phase is still in progress, only rough milestone dates for construction have been set. All work is scheduled to be completed in three construction seasons. PPL proposes to develop a final construction schedule following preparation of a plan for sequencing construction activities to avoid impacts to migration of anadromous fish and American eel and certain protected species including the bald eagle. Consistent with the provisions of the COA, PPL provided a draft construction sequence plan to Pennsylvania DEP on March 31, 2008, and filed the draft plan with the Commission on June 19, 2008. In the draft plan, PPL proposes seasonal limitations on construction activities to minimize effects on fish and wildlife.

2.2.5 Project Safety

Portions of the project have been operating for more than 100 years, including 28 years under the existing license. During this time, Commission staff has conducted operational inspections focusing on the continued safety of the structures, identification of unauthorized modifications, efficiency and safety of operations, compliance with the terms of the license, and proper maintenance. In 1996, the project was exempted from filing Emergency Action Plans and Independent Safety Inspection Reports because it was determined that failure of the dam would not endanger public safety downstream of the dam. The licensee continues to periodically inspect the project and the Commission continues to inspect the project in regard to public safety at public recreational facilities on project lands. The most recent dam safety inspection report was issued by the Commission on December 26, 2007. As part of the upcoming relicensing process, the Commission staff would evaluate the continued adequacy of the proposed project facilities under a new license. Special articles would be included in any license issued, as appropriate. Commission staff would continue to inspect the project during the new license term to ensure continued adherence to Commission-approved plans and

specifications, special license articles relating to construction (if any), operation and maintenance, and accepted engineering practices and procedures.

2.2.6 Modifications to Applicant’s Proposal—Mandatory Conditions

The following mandatory conditions have been provided and are evaluated as part of PPL’s proposal.

2.2.6.1 Section 18 Prescription

By letter dated April 16, 2008, Interior filed a preliminary fishway prescription pursuant to section 18 of the FPA, which includes Interior’s reservation of authority to prescribe fishways during the term of the amended license. The preliminary fishway prescription specifies that fishways shall be constructed, operated, and maintained to provide safe, timely and effective passage for American shad, alewife, blueback herring, American eel, and other designated resident riverine fish species at the licensee’s expense. The project already maintains and operates extensive fish passage facilities that were placed into operation in 1997, but the preliminary fishway prescription includes a number of specific prescriptions and measures designed to improve the effectiveness of the existing facilities, related to existing deficiencies and the project modifications associated with the proposed license amendment. These specific provisions are described in table 2.

Table 2. Description of Interior’s preliminary fishway prescription for the Holtwood Project.^a

Prescription	Description
1. Design populations	The specified capacity for the upstream passage facilities at Holtwood is 2.7 million shad and 10 million river herring. The design population for American eel is not known at this time, but Interior supports the licensee’s proposal to install eel ramps and monitor annual passage.
2. Operating flows	Upstream fishways shall be operational during the designated migration periods up to a flow of 100,000 cfs, as measured at the Marietta U.S. Geological Survey (USGS) gage. Downstream fishways shall be operational during the designated migration periods whenever generating units are operated at the project.

Prescription	Description
3. Fishway operating periods	<p>Upstream migration period: Shad and river herring—April 1 through June 15 American eel—March 1 through December 1 whenever river temperature is above 50 degrees Fahrenheit (°F).^b</p> <p>Downstream migration period: Shad adults—April 15 through July 1 Shad juveniles—July 1 through November 15; River herring adults—April 15 through July 1 River herring juveniles—June 15 through October 14 American eel—September 15 to February 15 whenever river temperature is above 50°F.^b</p>
4. Fishway operational procedures during new powerhouse construction.	<p>Requires the licensee to prepare a plan, in consultation with state and federal agencies, on how construction activities will be sequenced to avoid impacts to the migration of anadromous and catadromous species, and continue un-interrupted operation of the fish passage facilities.</p>
5. Inspection and site access	<p>Requires the licensee to allow access to the site for U.S. Fish and Wildlife Service (FWS) personnel or designated representatives, to inspect the fishways to determine compliance with the Fishway Prescription.</p>
6. Consultation with FWS	<p>Requires the licensee to consult with FWS on all functional and final design plans, construction plans, and hydraulic modeling studies related to the fish passage facilities.</p>

Prescription	Description
7. Fishway Operating Plan (FOP)	Requires the licensee to prepare and implement a plan related to all operations and maintenance of each fishway, including daily and seasonal operations, attraction flows, powerhouse unit sequencing and flow split between powerhouses, and fish counting/monitoring programs for anadromous, catadromous, and riverine fishes. By December 31 of each year, the licensee shall prepare an annual operations report, describing any deviations from the FOP and measures taken to correct any deviations, and shall meet with the agencies by January 31 to discuss any needed modifications to the FOP. Any fish passage enhancements or new facilities implemented after the license amendment shall be included in the FOP, and the modified FOP for these facilities shall be submitted to the agencies for approval 60 days prior to their initial operation.
8. Fish passage enhancements associated with license amendment	Requires the licensee to implement the enhancements approved by FWS concurrent with construction of the new hydroelectric generating facilities. This includes fish lift improvements related to modifying the attraction water supply, rebuilding the skimmer wall, reconstruction of fish lift entrance C, and relocation of the tailrace crowder drive; redirection of the Unit 1 discharge through the diversion wall and into Piney Channel; excavations within the project boundary to reduce velocity barriers to fish migration in the tailrace, below the tailrace, and in Piney Channel; placement of eel monitoring ramps and traps in the tailrace in Piney Channel; and implementing a spill control system approved by FWS.

Prescription	Description
9. Upstream American shad passage monitoring	Requires the licensee to implement a monitoring plan for upstream shad passage approved by FWS that would include annual fish counts and PIT tag monitoring. The licensee would monitor the effectiveness of upstream passage, including daily updates to the resource agencies, for a period of 3 years, with an annual monitoring report by December 31 of each year. Following completion of this study, the licensee would consult with the agencies to develop a plan for a radio telemetry study to assess shad behavior below the project and to determine the percentage of shad that enter Holtwood Project waters and then successfully pass through the Holtwood fish passage facilities. This study would continue for a minimum of 4 years, concurrent with fish counts and PIT tag monitoring, to determine the need for any additional or modified fish passage facilities at the project. Daily updates would be provided to the resource agencies, and an annual report would be required on the radio telemetry study by December 31 of each year.
10. Downstream American shad passage monitoring	Requires the licensee to conduct a discrete survival study for shad during downstream passage through the project, once the new powerhouse begins operation. The report on the study would be provided to the agencies within 90 days of completion of the study.

Prescription	Description
11. Upstream American eel passage	<p>a. Trigger date for initiation of eel passage measures at the Holtwood Project shall be when eel passage becomes operational at the downstream Conowingo Project, or when eel stocking into Conowingo reservoir begins as part of an agency-approved plan, or when FWS determines that available data indicate that sufficient numbers of eels are available below Holtwood to require passage.</p> <p>b. Within 1 month of the trigger date, the licensee shall meet with the resource agencies to develop a plan and schedule for a siting study for permanent eel fishway(s), with a final plan to be submitted for agency approval within 3 months of the meeting. The siting study shall be implemented on an annual basis until adequate information is available to make a siting decision.</p> <p>c. Once adequate information is available to make a siting decision, the licensee shall meet with the resource agencies to develop a plan and schedule for constructing permanent eel fishways. Within 6 months of that meeting, the licensee shall submit design plans and a schedule for resource agency approval.</p> <p>d. Within 3 months of the approval of the design plans, the licensee shall submit a plan for monitoring the effectiveness of upstream eel passage to the agencies for approval.</p> <p>e. Once the eel passage facilities are operational, the licensee shall implement effectiveness studies via PIT tagging or other approved methods, with an annual report provided to the agencies by December 31 of each year.</p>

Prescription	Description
12. Downstream American eel passage	<p>a. Trigger date for initiation of downstream eel passage measures at Holtwood shall be 3 years after eel passage becomes operational at the amended Holtwood Project, or 3 years after eel stocking into Lake Aldred begins as part of an agency-approved plan, or when FWS determines that available data indicate that sufficient numbers of eels are available upstream of Holtwood to require downstream passage.</p> <p>b. Licensee shall submit a study plan to determine the effectiveness of downstream eel passage at the project to the resource agencies for approval. The licensee shall implement the approved study plan and shall provide a report on the study within 90 days of its completion.</p>

^a Source: letter from M.T. Chezick, Regional Environmental Officer, Interior, to the Commission, filed on April 16, 2008.

^b Interior is also calling for the licensee to conduct studies on the actual timing of upstream and downstream eel passage at the project to further define the migration periods. The initial migration periods listed in the preliminary fishway prescription are based on studies in other tributaries to the Chesapeake Bay.

2.2.6.2 Water Quality Certification Conditions

The COA, included as part of the license amendment application, includes provisions related to the WQC. The COA anticipated that the licensee would file an application for WQC by December 1, 2007, and includes several “meetings and plans” that the licensee must complete as part of the WQC process (table A-1). PPL applied for WQC on January 30, 2008, and on April 15, 2008, Pennsylvania DEP noted a number of deficiencies in the application, and requested additional information, which must be corrected within 60 calendar days of the Pennsylvania DEP letter. PPL filed its response to the Pennsylvania DEP deficiency letter on June 13, 2008; however, PPL has not completed all the meetings and plans summarized in table A-1. The Pennsylvania DEP requested additional information from PPL to complete its application for WQC on August 8, 2008, and filed a copy of its letter to PPL with the Commission. The COA, however, includes proposed conditions for the WQC that the licensee has agreed to (appendix A to the COA; appendix A of this document, table A-2).

2.3 STAFF ALTERNATIVE

The staff alternative includes PPL proposed action and staff-recommended modifications and additional measures including (1) defining the extent of in-water blasting prior to construction activities that involve blasting; (2) operating the project fish lifts for upstream passage of resident species from September 1 to October 15 for 5 years following commencement of amended project operations, (3) including specific provisions for mitigation of construction effects on fish passage efficiency of shad in the plan to maintain uninterrupted fish migration during construction, (4) developing and implementing a recreation monitoring plan; (5) adding provisions to expand the land and shoreline management plan; and (6) requiring the filing of the final plans for sediment and erosion control, excavation, construction sequencing, bald eagle monitoring, and historic property management with the Commission for approval prior to the commencement of construction.

2.4 OTHER ALTERNATIVES

No other reasonable alternatives were identified by commenting entities or Commission staff.

2.5 ALTERNATIVES CONSIDERED BUT ELIMINATED FROM FURTHER ANALYSIS

In arriving at the decision to reconfigure the project as proposed, several other general alternatives were initially considered.

2.5.1 Installation of a New Powerhouse on the Western (York County) Side of the River

Installation of a new powerhouse on the western side of the Susquehanna River was suggested at the April 18, 2006, public meeting. PPL reviewed this configuration in an initial feasibility study on the redevelopment and determined that it would not be economically feasible and not practical from an operating standpoint. Locating the new powerhouse on the west side of the river would also significantly affect existing recreational uses and environmental resources in the bypassed reach. For these reasons, we do not consider this alternative in this EIS.

2.5.2 Installation of a Barrier Dam for Migratory Fish Guidance

PPL had considered constructing a barrier dam in the bypassed reach downstream of the dam to assist in guiding anadromous fish to the existing spillway fish lift entrance. This alternative was suggested in earlier resource agency comments. However, a barrier dam would affect state threatened and endangered plant species in the bypassed reach downstream of the dam and raise concern about boating safety in the vicinity of the low head dam. Therefore, we do not consider this alternative in our analysis in this EIS.

COVER SHEET

**FINAL ENVIRONMENTAL IMPACT STATEMENT FOR
AMENDMENT TO LICENSE**

HOLTWOOD HYDROELECTRIC PROJECT

Docket No. P-1881-050

**Section 3
Environmental Analysis
Pages 29 through 132**

FEIS

3.0 ENVIRONMENTAL ANALYSIS¹⁵

3.1 GENERAL SETTING

The Susquehanna River, one of America's largest rivers, is approximately 410 miles long. The river forms in upstate New York and west-central Pennsylvania and drains a watershed area of more than 27,000 square miles. It is an important tributary to the Chesapeake Bay, providing more than 60 percent of the freshwater to the Bay. The name of the river comes from an Algonquian word for "muddy water." This term may still be an appropriate description of the Susquehanna today as the river can be very turbid, particularly during higher flow events. There is also considerable run-off from agricultural areas that have long been a major contributor to nutrient loading in the Chesapeake Bay.

The Holtwood Project is located approximately 25 miles upstream of Chesapeake Bay at river mile (RM) 25 and 15 miles upstream of the 536-MW Conowingo Project located at RM 10. It is approximately 8 miles downstream of the 418-MW Safe Harbor Project located at RM 33. The 1,071-MW Muddy Run Pump-Storage Project, FERC Project No. 2355, is located in between the Holtwood and Conowingo projects and uses the Conowingo Pond as its lower reservoir. The Peach Bottom Atomic Power Station, which is located on the York County side of Conowingo Pond, withdraws cooling water from the pond.

Conowingo Pond extends upstream to the tailrace of the Holtwood powerhouse. Upstream of the Holtwood dam is a reservoir known as Lake Aldred. Lake Aldred occupies a fairly straight channel that varies in width from approximately 0.25 to 0.75 of a mile. Several islands are located throughout Lake Aldred, ranging from 500 feet to nearly a mile in length and up to 300 acres in size. The average depth of Lake Aldred is variable, although there are some very deep areas (>100 feet) along the eastern shore just above the project and some shallow areas along the shorelines and the downstream side of islands. A total of 16 tributaries enter Lake Aldred. These are primarily small streams, and only three (Pequea Creek, Conestoga River, and Otter Creek) would be considered fairly large (classified as 3rd order¹⁶). The surrounding topography is steep, with limited access points to the reservoir due to a combination of the steep topography and a Norfolk Southern rail line that runs along the Lancaster County shoreline.

¹⁵ Unless otherwise noted, the information in this section was derived from the application for amendment of license for this project (PPL, 2007a).

¹⁶ Strahler's (1952) stream order system is a simple method of classifying stream segments based on the number of tributaries upstream. A stream with no tributaries (headwater stream) is considered a first order stream. A segment downstream of the confluence of two first order streams is a second order stream. Thus, a nth order stream is always located downstream of the confluence of two (n-1)th order streams.

There is an area approximately 1-mile-long and 0.5-mile-wide immediately downstream of Holtwood dam that is directly affected by project operations. Within this area are two distinct segments, the relatively narrow, deep project tailrace and the broader, rocky area downstream of the project dam that constitutes the project bypassed reach. Several large islands are located within this section, including the approximately 0.5-mile-long Piney Island, which, in combination with Barkley Island at its downstream end, separates the tailrace from the bypassed reach. Although these were historically two distinct islands, they are now joined and are generally referred to as Piney Island in this document (see figure 2).

The area downstream of the bypassed reach is primarily rock ledge interspersed with shallow pools and some aquatic vegetation. There is also a distinct channel in the eastern portion of the bypassed reach along the western side of Piney Island (Piney Channel). The tailrace is a deep channel that remains fully wetted by backwater from Conowingo Pond when the Holtwood Project is not generating. Water currents are fast throughout the entire downriver area when the project is generating and/or spilling. Immediately below this 1-mile area, the Norman Wood Bridge (Route 372) crosses the river and the river transitions into Conowingo Pond.

3.2 SCOPE OF CUMULATIVE EFFECTS ANALYSIS

According to the Council on Environmental Quality's regulations for implementing the National Environmental Policy Act (50 CFR §1508.7), an action may cause cumulative effects on the environment if its effects overlap in space and/or time with the effects of other past, present, and reasonably foreseeable future actions, regardless of what agency or person undertakes such other actions. Cumulative effects can result from individually minor but collectively significant actions taking place over time, including hydropower and other land and water development activities.

Based on information in the license application, agency comments, other filings related to the project, and preliminary staff analysis, we identified water quality and fisheries as the resources that have the potential to be cumulatively affected by the increased capacity and improvement of fish passage at the Holtwood Project.

3.2.1 Geographic Scope

The geographic scope of the analysis defines the physical limits or boundaries of the proposed action's effects on the resources. Because the proposed action would affect the resources differently, the geographic scope for each resource may vary. For water quality, the geographic scope extends from the upstream Safe Harbor Project downstream into Chesapeake Bay, because operations at the Holtwood Project could affect river flows and operations at the downstream Conowingo Project and, in turn, flows in the 10 miles of river downstream of the Conowingo Project into the Chesapeake Bay. For fisheries resources, the geographic scope of the analysis extends from the Susquehanna River Basin upstream of the York Haven Project downstream into the Chesapeake Bay, because

fish passage success at the Holtwood Project would affect diadromous fish populations migrating from the Chesapeake Bay upstream to the basin above the York Haven Project.

3.2.2 Temporal Scope

The temporal scope of our cumulative effects analysis in the EIS includes past, present, and future actions and their possible cumulative effects on each resource. Based on the existing and proposed license term, the temporal scope looks 16 years into the future, concentrating on the effect of reasonably foreseeable future actions on the resources. The historical discussions are, by necessity, limited to the amount of available information for each resource.

3.3 PROPOSED ACTION AND ACTION ALTERNATIVES

3.3.1 Engineering Review

The following section discusses the anticipated environmental-related effects that could occur during construction mobilization, site set up, implementation of the proposed project modifications (see figure 3), and demobilization from the site.

Spillway Rubber Dam

The existing spillway is a concrete ogee spillway with a crest at El. 165.0 feet. The crest of the spillway is increased to El. 169.75 feet through the use of wooden flashboards and inflatable rubber dam sections for a total of five separate segments separated by concrete piers. Beginning at the existing powerhouse, the first segment consists of a 40-foot-long by 4.75-foot-high inflatable dam section. The second segment consists of a 300-foot-long by 4.75-foot-high inflatable dam section. The third and fourth segments consist of 387-foot-long by 4.75-foot-high inflatable dam sections. The final segment is 2,368 feet long with 4.75-foot-high wooden flashboards supported by steel pins. Since 2004, PPL has been installing 200 feet of 6-foot-high flashboards on the western end of the first segment as a public safety measure for people accessing the edge of the river directly below the dam for recreational purposes.

The second and third segments of the inflatable rubber dam have been damaged and are currently deflated. PPL has installed wooden flashboards with metal pins upstream of the inflatable bladders to maintain the increased crest of the dam as a temporary measure. The first short segment has been damaged and repaired, but needs to be replaced. PPL proposes to continue to use the existing configuration of flashboards.

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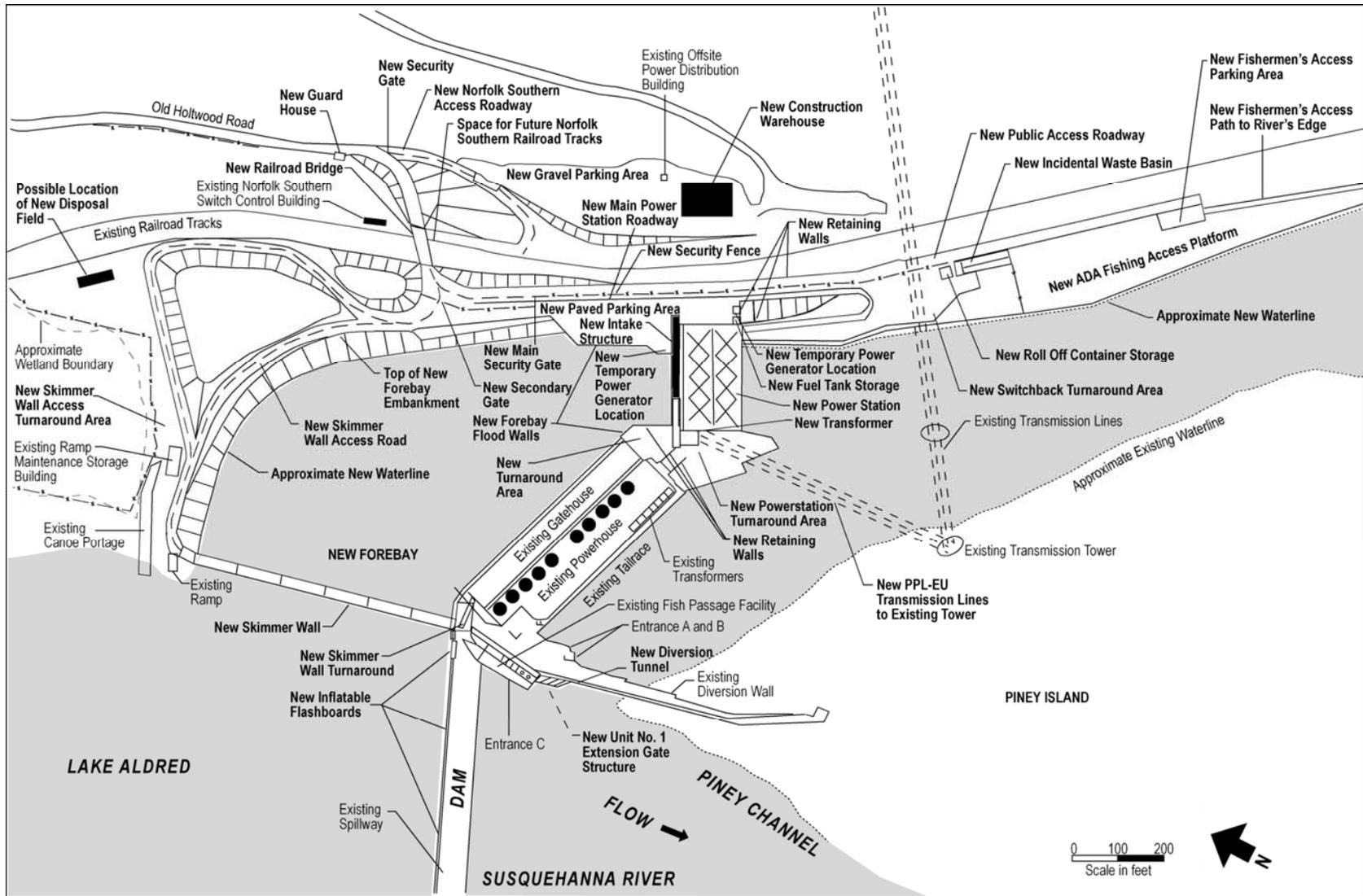


Figure 3. Detailed view of proposed and existing facilities at the Holtwood Project. (Source: PPL, 2007a, as modified by staff)

Skimmer Wall

The existing skimmer wall and timber crib piers are nearing the end of their useful life. Additionally, the arched openings are inadequately sized to accommodate the proposed project's increased flow requirements. PPL proposes to remove the existing wall and to replace it with a new 600-foot-long concrete skimmer wall in the same location and orientation as the existing wall. A total of six concrete piers would be installed to support the wall. The new wall would be fundamentally the same elevations as the existing skimmer wall such that the top elevation would be at El. 187.0 feet, extending down to El. 157.5 feet, approximately 12.25 feet below the normal maximum water surface elevation. The top of the wall would include a full-length roadway for improved access along the wall to the upper end of the fish passage facilities. The new skimmer wall would provide better site access and accommodate the increase in flow to the powerhouse.

Forebay

The existing forebay is inadequately sized to accommodate the increased flows for the proposed project. PPL proposes to expand the north and east areas by removing existing soil and rock. The forebay expansion would allow the increased flow to reach the powerhouse while maintaining the current water surface elevations upstream of the powerhouse intakes.

Intake and Powerhouse

A new powerhouse and intake would be constructed to accommodate two new turbine generator units. Because the new units would become the largest units at the expanded project, they would be operated sequentially, except during the fish passage season when other units would be operated preferentially to enhance fish passage. The reconfigured Unit 1 would provide conservation flows to Piney Channel to enhance upstream fish passage and mitigate for shallow water riverine habitat that would be lost due to tailrace excavations. As inflow increases, additional units would be brought into service, depending on any environmental constraints that may be in effect.

Turbine Generator Units

PPL evaluated units of various capacities to optimize annual generation within economic parameters, resulting in the selection of two vertical Kaplan units. The units would be located in the new powerhouse with an output of 40.3 MW each at their most efficient operating point at the rated head, for a total of 80.6 MW. PPL also proposes to replace two existing, retired water driven excitors with turbine generator units. The new units would be vertical Francis units capable of generating 1.18 MW each for a total of 2.36 MW. The units would each be directly coupled to an alternating current synchronous generator. The unit replacements would require limited physical modifications to the powerhouse and water passages. The units would not only increase

the overall capacity of the project, but would also be equipped for black-start capability. This would enhance PPL's ability to bring the electrical system back on line quickly following a major system outage.

PPL has been upgrading existing units within the powerhouse over time, including the replacement of the runners and shafts on six of the ten existing generating units (Units 3, 5, 6, 8, 9, and 10). PPL proposes to replace the runners and shafts on Units 1 and 2 in 2009, coincident with the proposed expansion of the project, and to replace the runners and shafts on Units 4 and 7 in 2010 and 2011, respectively. PPL estimates that the runner replacements would increase the total capacity of the project by 4.1 MW. The existing Holtwood powerhouse communications system would also be expanded with additional telephones, public address stations, and PPL NET computer stations for the new units.

Substation and Transmission

The new units would require the installation of a 69-kilovolt (kV) substation on the east side of the river, down river and adjacent to the existing powerhouse transformer deck. The installation would include a transmission line dead-end structure, a 69-kV motor-operated disconnect switch, generator step-up transformer foundation and oil containment, and an associated high-voltage and medium-voltage bus structure. A new 45/60/75-megavolt ampere generator step-up transformer would be installed in the new 69-kV switchyard to accommodate the new units. A centralized plant control system would be installed to allow control, monitoring, and alarming for the new units in the existing control room. The plant control system would interface with the existing Network Control System.

Diversion Wall

The existing diversion wall between the tailrace and the river channel downstream of the dam would be modified to allow the discharge from Unit 1 to pass under the existing tailrace fish lift entranceway and the deflection wall. Passing discharged water in this manner would control flows through Piney Channel to enhance fish passage on the west side of Piney Island.

Tailrace Channel

The tailrace channel would be modified to accommodate the increased discharge from the proposed project. Piney Channel would also be modified to accommodate the redirected discharge from Unit 1. These modifications would: (1) decrease hydraulic losses and subsequent backwater effects, which currently limit the existing project's generating capacity; (2) increase the tailwater flow capacity for the new units; and (3) eliminate high velocity zones, which have potentially limited fish passage effectiveness.

Related Site Work

In addition to the specific items listed above, the following additional site work would be associated with the expansion project:

- Relocation of access roads.
- Relocation of the existing powerhouse truck access.
- Replacement of the guardhouse.
- Replacement of the existing tour building.
- Replacement of the existing warehouse.
- Replacement or relocation of the ramp area maintenance storage building.
- Reconfiguration of the boat ramp and maintenance dock area.
- Relocation of off-site power.
- Relocation of telecommunications systems.
- Replacement of the wastewater treatment system and relocation of existing wastewater piping.
- Replacement of the sewage treatment system.
- Relocation of the existing sewage system piping through the existing powerhouse and new powerhouse to the new sewage treatment system.

Fish Lift Attraction Water Supply

A new intake pipe would be installed to provide at least 650 cfs directly from the forebay into the fish passage distribution system piping. The modification would enhance the fish lift attraction water supply by increasing the amount of attraction flow by at least 300 cfs, allowing the fish lifts to operate at their full attraction water design capacity of 800 cfs.

Fish Lifts

The existing fish lift entrance C located below the dam would be modified to protect the entrance gates from repeated damage during flood events. The tailrace crowder track would also be extended in an attempt to eliminate shadows in the area of the crowder where shadows appear to discourage migratory fish from entering the crowder channel. PIT tag readers would be installed at the fish lift entrances, and eel ramps would eventually be placed at the project after studies are conducted to determine the optimum locations.

Recreational Enhancements

Several recreational enhancements are proposed which would require new or modified structures as discussed in section 3.3.5, *Recreational Resources*.

Construction-related Noise

Typical noises in the Holtwood area include Holtwood warning sirens, passing freight trains, and road traffic across the Norman Wood Bridge (Route 372). Sound is buffered by the dense forests and steep sides of the Susquehanna River valley.

Excavation and construction activities would occur during 10-hour workdays Monday through Friday for approximately 2.5 to 3 years. Construction activities may continue overnight or on weekends depending on conditions. During this time, drilling would occur throughout the bulk of the work day, and blasting would likely occur once or twice per day, generally around noon and around dinner time as necessary over the 3-year construction period. Drilling would likely be the noisiest component of the construction activities, and would be avoided at night when possible. Overall, the noise from the construction would likely be relatively constant and monotonous.

The proposed construction activities would likely produce sounds with similar magnitudes as presently found at the project; however, the additional noise would be more frequent. Based on U.S. Environmental Protection Agency (EPA) criterion for protecting against hearing loss, noise levels are not a threat to health and welfare at levels below 70 decibel on the A-weighted scale (dBA) for a continuous 24-hour period. All activities located at least 1,600 feet from proposed construction projects would likely receive safe sound emission levels (table 3).

Construction-related Air Emissions

EPA and the state, through Pennsylvania DEP, regulate air quality in the proposed construction area. EPA has established National Ambient Air Quality Standards (NAAQS) for criteria pollutants that include carbon monoxide (CO), sulfur dioxide (SO₂), nitrogen dioxide (NO₂), lead (Pb), ozone (O₃), particulate matter less than 10 microns (μ) in diameter (PM₁₀), and fine particulate matter less than 2.5 μ in diameter (PM_{2.5}).

To identify an area by its air quality, EPA designates all geographic areas in the state as attainment, non-attainment, or unclassifiable. An area is designated attainment for a particular pollutant if its air quality meets the NAAQS for that pollutant. When air quality in an area meets all standards, the area is considered to be in attainment. If the concentration of a criteria pollutant in an area is found to exceed the regulated or threshold level of the NAAQS, the area is considered a non-attainment area for that particular pollutant. A designation of unclassifiable is made when there is currently insufficient data for determining attainment or non-attainment.

Table 3. Estimated decibel (dBA) levels at various distances from sound emission sources with levels above, equal to, and below the EPA criterion for noise safety. (Source: PPL, 2007a)

Distance (feet)	dBA Range					
	Siren	Route 372	Train	Train Whistle	Rock Drill	Blasting
50	130–120 ^a	80–65 ^a	90–80 ^a	100 ^a	100–90 ^a	100–90 ^a
100	124–114 ^a	75–59 ^b	84–74 ^a	94 ^a	94–84 ^a	94–85 ^a
200	118–108 ^a	68–53 ^c	78–68 ^a	88 ^a	88–78 ^a	88–79 ^a
400	112–102 ^a	62–47 ^c	72–62 ^b	82 ^a	82–72 ^a	82–73 ^a
800	106–96 ^a	56–41 ^c	66–56 ^c	76 ^a	76–66 ^b	76–67 ^b
1,600	100–90 ^a	50–35 ^c	60–50 ^c	70 ^b	70–60 ^c	70–61 ^c
3,200	94–84 ^a	44–29 ^c	54–44 ^c	64 ^c	64–54 ^c	64–55 ^c
6,400	88–78 ^a	38–23 ^c	48–38 ^c	58 ^c	58–48 ^c	58–49 ^c

^a Level is above the EPA criterion for noise safety.

^b Level is equal to the EPA criterion for noise safety.

^c Level is below the EPA criterion for noise safety.

The area considered in this EIS for the proposed expansion of the Holtwood Project is located in Lancaster and York counties in southeastern Pennsylvania. These two counties are located in Pennsylvania Air Quality Region 3 (South Central) and are both in attainment for all of the criteria air pollutants except for fine particulate matter less than 2.5 microns (μ) in diameter (PM_{2.5}) (EPA, 2008). EPA is working with Pennsylvania DEP to develop a plan to reduce PM_{2.5} emissions such that attainment is achieved by April 2010 (5 years from the date of designated non-attainment) (Pennsylvania DEP, 2007a, b).

Air emissions during construction are expected to be negligible and to be within standards for all criteria. However, the emission of fine particulate matter would hinder efforts to reduce PM_{2.5} emissions to acceptable levels in the short-term. Air emissions would result from construction equipment in the form of dust and equipment exhaust.

It is possible that dust would result from the movement of construction vehicles and equipment over roadways and in construction areas. In particular, movement of excavated material from the construction site to the retired ash basins on the hillside above the project would require transport over 1.5 miles of public roads and would likely result in some dust emissions. Visible dust emissions would be controlled using water spray on haul roads and in excavation areas as necessary.

Heavy equipment would emit diesel fuel exhaust. These emissions are expected to be minimal and are not expected to impact residences in the area. Equipment would be kept in good repair to limit emissions.

3.3.2 Geology and Soils

3.3.2.1 Affected Environment

Bedrock Geology

The project lies in a belt that is underlain with mainly pre-Cambrian schists, gneisses, quartzites, slates, and very old igneous rocks. Historically, the Susquehanna River narrowed and deepened through the Holtwood region, passing through a series of bedrock gorges. The Holtwood gorge is the largest, with a length of about 3 miles and width of about 0.5 mile.

On the river bottom on the eastern side of the Susquehanna River, just downstream of the Holtwood dam, there is a narrow chasm almost 1 mile long with vertical walls. Historical surveys have shown that, in some locations, the gorge is about 200 feet deep. The gorge may have been formed by many river potholes being formed at the upstream end of the gorge, growing and emerging, while new potholes were forming. The current gorge now forms the tailrace of the project.

Soils

Soils in the project area are mainly Manor and Mt. Airy soils, Fluvaquents, and Udifluvents. Manor soils, located along Lake Aldred and downstream of the dam on both sides of the river are coarse loams, deep and well drained. They are found on hilltops and broad side slopes on the uplands. Mt. Airy soils, occurring with Manor soils on the York County side of the river, are moderately deep, somewhat excessively drained soils, and are found on ridgetops, side slopes, and hillsides. Fluvaquents and Udifluvents are found in the area of the dam on the Lancaster County side of the river and on Piney Island. These soils have characteristics that are too variable for strict classification, but are typically found on floodplains.

Most of the shoreline along the project area consists of steep, rocky, and vegetated bank. However, a few areas along the eastern portion of Lake Aldred include more gentle slopes. These areas are generally fully vegetated except during periods of drawdown when unvegetated portions of unconsolidated deposits may become exposed. The project area downstream of the dam is primarily composed of lightly vegetated bedrock. Several steeper vegetated islands are located below the dam.

Coal silt has moved downstream as a result of prior historical coal processing activities upstream in the watershed. The location of the proposed forebay expansion and powerhouse is the former site of a generating facility that burned coal dredged from the river upstream of the dam. Coal dredging activities no longer occur, and coal silt is still present in areas upstream and downstream of the dam. An archeological and

geomorphological survey conducted in March 2006 revealed that a portion of the proposed excavation areas along Piney Island contains coal silt deposits up to 5 feet deep (Cress et al., 2006).

Erosion and Sedimentation

No significant erosion, mass soil movement, or slumping is known to occur in the immediate project area, and none was observed during the public site visit. Significant erosion is occurring upstream of the project, and a large amount of sediment has washed into Lake Aldred. The reservoir has historically retained sediment; however, USGS has determined that the sediment and nutrient storage capacity of the reservoir has been reached and that it no longer effectively traps sediments (USGS, 1997).

3.3.2.2 Environmental Effects

All work to be performed as part of the proposed project would be undertaken in accordance with best management practices and sediment and erosion control plans to be developed by PPL and local, state, and federal agencies to ensure that any release of sediments to nearby watercourses would be minimized.

The proposed action would require excavation and removal of approximately 40,000 cy of reservoir silt over the underlying bedrock to enable the construction of the foundation of the new skimmer wall. The silt would be removed by underwater dredging. The removal of these sediments could cause some of the sediments to become resuspended in the water column and pass downstream through the dam gates or powerhouse. The reconfigured skimmer wall area could alter flow patterns and velocities in the area that may result in further silt movement and release until equilibrium conditions are reached.

The proposed action would also require the excavation of approximately 362,181 cy of rock and 303,842 cy of soil to expand the forebay area and prepare the powerhouse site. Geotechnical investigations indicate that the majority of this material is bedrock, and therefore there is limited concern about sediment movement in these areas. The majority of the material would be removed in the dry, with the remainder occurring under water. Removal of loose material would be by mechanical methods and underwater dredging. Bedrock would be removed after demolition using controlled blasting techniques above and below water.

Approximately 802,972 cy of rock and 4,035 cy of soil would need to be excavated in the tailrace area to allow for the larger discharge capacity of the expanded project. Removal of loose material would be by mechanical methods and underwater dredging. Bedrock would be removed after demolition using controlled blasting techniques above and below water. Excavation of the tailrace along the edges of Piney Island and Barkley Island would involve excavation of bedrock and coal silt. The potential release of coal silts could occur during the short period of excavation. The geology and channelization of the riverbed along Piney Island would prevent any long-term erosion despite the increased tailrace flows. The excavation is also intended to

preserve the current water surface elevations in the tailrace under the higher flows and, therefore, should not increase overflow on Piney Island or affect the coal silt layer present on Piney Island.

Excavation of approximately 70,695 cy of rock is proposed downstream of the dam in Piney Channel west of Holly Island to accommodate the rerouted discharge from Unit 1 (see figure 2). The excavation is designed to reduce water levels and velocity conditions in the area, which would reduce erosion potential in Piney Channel despite higher typical flows. This area contains minimal amounts of sediment due to historical scouring during periods of flow over the spillway. Removal of loose material would be by mechanical methods and underwater dredging. Bedrock would be removed after demolition using controlled blasting techniques above and below water.

Flow modeling of the proposed excavation project indicates that water levels and velocities are not expected to increase beyond current levels downstream of the Norman Wood Bridge (Route 372). Therefore, we would not expect increased erosion along the islands downstream of the Holtwood Project.

PPL states that approximately 1,900,000 cy of excavated rock and soil will need to be disposed of on- or off-site. PPL proposes to use a retired ash basin¹⁷ located on PPL lands in Lancaster County on the hillside above the project for disposal of approximately 1,790,000 cy of excavated rock and fill. Approximately 110,000 cy of the excavated material would be reused. This includes (1) approximately 86,910 cy of rock to elevate the new roadway over the Norfolk-Southern railroad track; (2) approximately 19,260 cy of rock and fill to riprap the forebay embankment; (3) approximately 1,950 cy of rock to riprap a portion of tailrace embankment; (4) approximately 250 cy of rock to create a new formal parking area on McCall's Ferry Road; and (5) approximately 370 cy of rock and fill to armor Piney Island. Some material may also be used for the installation of cofferdams and temporary berms prior to start of construction, most of which would be removed after construction is complete. Reservoir sediments would be disposed of at a site to be defined in the sediment and erosion control plans. None of excavated materials would be deposited in the river. Appropriate measures, as defined in the proposed erosion and soil control plan, would be taken to ensure that the resulting site would not be subject to erosion and sediment transport to surrounding lands and water bodies.

The proposed construction would require the creation of several temporary access roads downstream of the dam and along the shoreline and Piney Island. Where possible, PPL plans to use existing roads, although in some cases those roads may need to be widened, and some new roadways would need to be constructed. Construction and use of these roads could potentially cause some sediment to enter the river. Access roads

¹⁷ PPL indicated in its supplemental filing of October 3, 2008, that ash basin #1 is proposed as the primary disposal area and that ash basin #2 is not currently proposed for disposal.

constructed in the river channel may be subject to wash-outs during high flow events, potentially resulting in transport of roadway material downstream. These materials would primarily consist of 2A stone, a coarse aggregate with rocks approximately 2 inches in size. The sediment and erosion control plans would contain provisions to control movement of these materials.

Construction of recreational facilities and improved access areas for fishing or boating upstream and downstream of the dam may require some small levels of ground disturbance and clearing. Proposed construction and disturbance are limited, and potential impacts due to construction would be controlled in these areas through implementation of the sediment and erosion control plans. Any effects from recreational use of these facilities would be addressed as part of PPL's ongoing maintenance of their recreational facilities.

Once construction is complete, the final grades and slopes in the vicinity of the expanded forebay and new powerhouse should be stable and resistant to erosion and sediment transport. The reconfigured tailrace channel and river channel downstream of the dam should be resistant to erosion based on the design criteria. We do not expect the increased discharge from the existing and new powerhouses or the proposed conservation release to Piney Channel from Unit 1 would increase erosion and sediment transport.

The new operating regime is expected to result in some isolated drawdowns of the reservoir slightly below El. 167.5 feet due to the combined effects of the drought plan and minimum flow proposal in dry years. We do not expect that these isolated events would increase erosion along the shoreline of Lake Aldred.

The proposed flow regime would primarily result in the release of water through the new tailrace channel, which would be sized and configured to accommodate the increased flow, rather than spilling the flows over the crest of the dam. We expect the tailrace channel would be more stable than the existing tailrace channel, with less loose material available for transport.

The sediment and erosion control plans would be developed in consultation with appropriate resource agencies and would be expected to address the concerns raised above. Implementation of the plan, including appropriate best management practices, would reduce the potential for erosion and sediment transport to occur and would also control any that does occur. Once construction is complete, we expect that newly disturbed areas would be left in a stable state and that any transported sediment would quickly settle and any turbidity would dissipate.

3.3.2.3 Unavoidable Adverse Effects

Even with approved erosion and sediment control measures in place, some temporary release of sediment would be likely to occur from construction activities and blasting at the project.

3.3.3 Aquatic Resources

3.3.3.1 Affected Environment

Water Quantity

The Holtwood Project is located about 25 miles upstream of the Chesapeake Bay (see figure 1) on the Susquehanna River. The vast majority of the flow reaching the project area is released from the Safe Harbor Project located about 8 miles upstream. Downstream of Safe Harbor dam, many tributaries enter Lake Aldred (the project reservoir). The two largest tributaries, which are Pequea Creek and the Conestoga River, only account for about 2 percent of total mean monthly flow at the Holtwood Project. Table 4 provides the mean monthly flow at Holtwood, Pequea Creek, and the Conestoga River and shows that flows are normally highest in March and April and lowest in August and September.

Table 4. Mean monthly flows (cfs) from 1931–2005 at the Holtwood Project. (Source: PPL, 2007a, as modified by staff)

Month	Susquehanna	Conestoga River ^b	Pequea Creek ^c
	River ^a		
Period of Record	1931–2005	1928–2005	1977–2005
January	40,900	477	348
February	44,600	548	259
March	76,100	686	353
April	79,600	629	293
May	48,500	454	199
June	28,900	385	158
July	16,000	313	138
August	12,600	244	108
September	14,300	229	121
October	18,200	219	146
November	29,900	287	152
December	40,600	409	216

^a From data collected by PPL at Holtwood.

^b From USGS gage no. 01576500, Conestoga River at Lancaster, PA.

^c From USGS gage no. 01576787, Pequea Creek at Martic Forge, PA.

Comparison of water surface elevation data from the Safe Harbor tailrace and the Holtwood forebay indicates that the Safe Harbor Project releases control water surface elevations at the upper end of Lake Aldred when Safe Harbor is generating, with a gradient of higher elevations to lower elevations from upstream to downstream. During periods when Safe Harbor is not generating, no gradient in water surface elevation exists between the two dams. Throughout the summer, peak generation typically occurs at the Safe Harbor Project during the afternoon (3 p.m. to 8 p.m.), with the amount of water released during the peak hours dependent on river flow. During this operation, water surface elevations can be noticeably higher (>1 feet) in the area immediately downstream of Safe Harbor dam than in the remainder of Lake Aldred. The area immediately downstream of Safe Harbor dam is characterized by a narrow channel along the eastern shoreline, a number of small islands, and many bedrock and boulder protrusions. Channel morphology in this area constricts and confines the discharge from Safe Harbor dam. Downstream from this area is a slight gradient in water surface elevation that extends downstream approximately 3 miles below Safe Harbor dam to Pequea Creek. From Pequea Creek to Holtwood dam, the river widens considerably and the water surface elevation is controlled by the Holtwood dam and operation of the hydroelectric plant. The area most influenced by the Safe Harbor Project represents a relatively small portion of Lake Aldred (about 220 acres or about 10 percent of the total reservoir).

When river flow is less than about 30,000 cfs, Holtwood generally, to the extent possible, operates on a daily peaking basis using its limited reservoir storage to collect inflows from the Safe Harbor Project and incoming tributaries, and concentrating releases during the peak electrical demand periods during the day. During extreme low inflow periods, the Holtwood Project generates power for as little as 3 to 5 hours per day in order to maintain seasonal reservoir levels as required by the existing license. Historically, during low flow periods, PPL has typically operated the Holtwood Project on a weekly cycling basis, by using the limited reservoir storage to capture inflow from the weekend to be released during weekday demand periods. Generation during the weekend may be limited. When river flows exceed approximately 25,000 cfs, the plant normally generates on a 24-hour basis or may operate for slightly fewer hours at either a best gate position or at full hydraulic capacity. Although there are no water withdrawals from Lake Aldred, many consumptive uses that occur throughout the large (26,794 square mile) drainage area above the project affect inflow to the reservoir.

Tailrace and Bypassed Reach

Downstream of the powerhouse, the tailrace area remains fully wetted by backwater from the Conowingo reservoir. Water currents reach 7.5 to 10 feet per second (fps) throughout this section when the project is generating. The water surface elevation in the tailrace fluctuates by approximately 10 feet between periods of full generation to non-generation. Some areas of the tailrace contain deep pockets greater than 70 feet deep. The bypassed reach is primarily rock ledge interspersed with shallow, interconnected pools with some vegetation and receives flow during spillage over the

dam. Table 5 shows the percent of time per month that river flow exceeds the existing hydraulic capacity of the Holtwood Project, resulting in spill at Holtwood dam.

Table 5. Percent of time flow exceeded the project hydraulic capacity under current conditions at the Holtwood Project. (Source: PPL, 2007a)

Month	Percent of Time River Flow Exceeds Existing Project Hydraulic Capacity (31,500 cfs)
January	42.7
February	36.6
March	86.6
April	91.3
May	65.3
June	29.2
July	15.1
August	8.1
September	11.0
October	17.5
November	36.1
December	47.6

Note: Data based on flows measured at Holtwood for 1917–1996.

Currently, there is no minimum flow requirement below the Holtwood Project. However, leakage through the dam and flow from a 10-inch pipe through the dam maintain a small, continuous flow in the bypassed reach. The flow rate through the pipe depends on the water surface elevation of Lake Aldred, but is estimated by PPL as approximately 11 cfs at maximum normal water elevations. Leakage through the flashboards varies based on reservoir elevation and the adequacy of seals between flashboards, but has been calculated to range between 4 and 40 cfs. When the generating units are not operating, leakage through the units maintains an estimated 210-cfs continuous flow in the tailrace.

For the downstream Conowingo Project, on June 14, 2006, SRBC approved a new Pond Management Plan (Plan) to address reservoir management during low flow periods.¹⁸ The Plan is intended to retain sufficient storage in Conowingo reservoir to

¹⁸ As of the date of this application, the plan had not been submitted to the Commission for approval.

accommodate the various uses during low flow or drought periods while sustaining adequate flows in the river downstream of the Conowingo Project to the Chesapeake Bay. Inflow to the Conowingo Project is almost totally dependant on the discharge from the Holtwood Project, except for the relatively small tributaries that flow into the impoundment below Holtwood dam and the inflow and withdraws by the Muddy Run Pump-Storage Project. During non-generation periods at the Holtwood Project, the water level in the Conowingo reservoir normally controls the tailwater elevation below Holtwood dam. The Conowingo Project has a maximum hydraulic capacity of about 85,000 cfs. Other generating facilities on the Conowingo reservoir include the 1,071-MW Muddy Run Pump-Storage Project and the Peach Bottom Atomic Power Station, which relies of water withdrawals from Conowingo reservoir for cooling purposes and has a generation capacity of over 2,100 MW. Table 6 summarizes of the maximum hydraulic capacities and usable storage volumes at nearby hydroelectric facilities.

Table 6. Maximum discharge and usable storage at nearby hydroelectric facilities. (Source: PPL, 2007a; Safe Harbor Water Power Corporation, 2008)

Project	Maximum Plant Discharge (cfs)	Usable Storage (acre-feet)
Safe Harbor ^a	113,000	68,870
Holtwood ^b	31,500	15,224
Muddy Run ^c	32,000	34,000
Conowingo ^d	85,000	33,800

^a Storage volume is based on the volume in the upper 17 feet.

^b Storage volume noted for Holtwood is between El. 163.5 feet and the top of the flashboards/ rubber dam at El. 169.75 feet. The current summer storage volume between El. 167.5 feet and El.169.75 feet is about 5,833 acre-feet.

^c The Muddy Run Pump-Storage Project has a maximum pumping discharge of 24,000 cfs.

^d Storage volume is between El. 108.5 feet and 104.5 feet; between the normal maximum level and the normal minimum level due to operational issues with the Muddy Run Pump-Storage Project.

Water Quality

The water quality of the lower Susquehanna River in the vicinity of the Holtwood Project is generally considered good and meets state water quality standards most of the time. The lower Susquehanna River, however, has had a history of high turbidity levels and sediment loading, high nutrient loading, and low DO levels in two of the larger hydroelectric project reservoirs (Safe Harbor and Conowingo projects). The project reservoir, Lake Aldred, however, is smaller and more riverine in nature than the larger

upstream and downstream reservoirs. PPL reports that recent studies on Lake Aldred indicate that reservoir stratification (which typically has resulted in low DO levels in the deeper parts of the larger Susquehanna River reservoirs) generally does not occur in Lake Aldred. DO levels in Lake Aldred consistently exceeded state standards, with the lowest level recorded in the 2006 studies at 5.27 milligrams per liter (mg/L). One factor that may also result in higher DO levels in Lake Aldred is that the upstream Safe Harbor Project has had turbine venting systems installed in two of their generating units since 1986. Those systems were installed so that Safe Harbor Project discharges would meet state standards for DO (minimum of 4.0 mg/L). Sediment loading in Lake Aldred is substantial, although long-term data for the Susquehanna River indicate that the trend is improving. Nutrient loading is also continuing in Lake Aldred, as a result of tributary or Susquehanna River inflow from upstream agricultural areas. However, the 2006 studies indicate relatively low and improving nutrient levels in the reservoir, compared to historical data.

Continuous monitoring during the summer months in the Holtwood tailrace in 2005 and 2006 revealed that DO levels are also typically high, with 99.3 percent of the samples exceeding the state standard in 2005 and 100 percent of the samples exceeding the state standard in 2006. DO levels were generally higher during periods of generation than during periods of non-generation. A turbine aeration study of existing Holtwood units found that DO could be increased from 0.2 to 0.8 mg/L depending on the gate settings and valve openings of the studied unit.

Flows and water quality may be highly variable in the bypassed reach downstream of the Holtwood dam, which also includes Piney Channel, located just to the west of Piney Island, which forms the west bank of the tailrace channel. During high flow periods, which typically occur in the spring months but may occur at any time of the year (see table 5), heavy spillage occurs over Holtwood dam, and the bypassed reach has the character of a large river with heavy rapids that probably well oxygenate the waters. During typical summer months, however, flow over the dam mostly ceases (except for leakage) and the bypassed reach becomes an area of shallow pools with often minimal flow among the pools. Under these conditions, where DO levels are controlled by the photosynthesis/respiration cycle in the pools, DO levels may range from high during the daylight hours because of photosynthesis, to low overnight as photosynthesis ceases and plant respiration occurs. Studies conducted in 1980 and 2007 found that low DO levels occasionally occur in some of the isolated pools very early in the morning, but such conditions are not common, with only two instances recorded in 2007 where DO levels fell to under 3.0 mg/L.

Fishery Resources

The fishery resources in the Holtwood Project area are substantial with both an important resident warmwater fishery, and the presence of anadromous and catadromous species that require upstream and downstream passage over the project. Primary warmwater game species that occur both in Lake Aldred and in the river downstream of

the project include smallmouth bass, walleye, channel catfish, and pan species such as redbreast sunfish, bluegill, black and white crappie, and pumpkinseed. Other common species that occur in Lake Aldred include gizzard shad, quillback, spotfin shiner, and common carp. Gizzard shad and spotfin shiner may serve as forage species for the game species. Lake Aldred supports an active boat and shoreline sport fishery for the resident species, and some fishing also occurs in the project tailrace, from the shoreline.

The Susquehanna River has had an active program for restoring anadromous fish populations for the past 35 or more years. Historically, the river supported large runs of American shad, river herring (blueback herring and alewife), hickory shad, as well as the catadromous American eel. These populations declined in the late 1800s and early 1900s because of the construction of canal feeder dams, overfishing, water pollution, and eventually the construction of the hydroelectric dams between 1904 and 1928. The upstream York Haven Project at RM 54 was the first hydroelectric dam on the river constructed in 1904. The dam, however, was a low-head structure from 6 to 22 feet high, and may have been partially passable by shad during higher-flow periods.

The Holtwood dam was constructed in 1910 at RM 25, and at 55 feet high, totally blocked upstream fish migration. Two fishways were constructed at Holtwood at the time of its initial construction—a rock ramp type fishway on the west shore of the spillway, and a pool-and-weir type fishway on the east shore of the tailrace (figure 4). Neither fishway reportedly ever passed shad successfully, but the rock ramp fishway did pass some American eel, although the numbers are not known. In 1928, the 95-foot-high Conowingo dam was constructed at RM 10 and became the downstream most dam to totally block fish migration on the river.

The modern fish restoration efforts on the Susquehanna River began in the 1950s and 1960s with a number of feasibility studies, followed by the construction of a trap and trucking facility at Conowingo dam in 1972, the initiation of fertilized shad egg stocking in the basin, the construction of a shad hatchery by Pennsylvania FBC in the mid-1970s, and the total closure of the shad fishery in the Susquehanna River and upper Chesapeake Bay by the state of Maryland in 1980. The numbers of shad returning to the river increased through the years, and by 1991 a new fish lift was constructed at the Conowingo Project, followed by new fish lifts at the Holtwood and Safe Harbor projects in 1997.

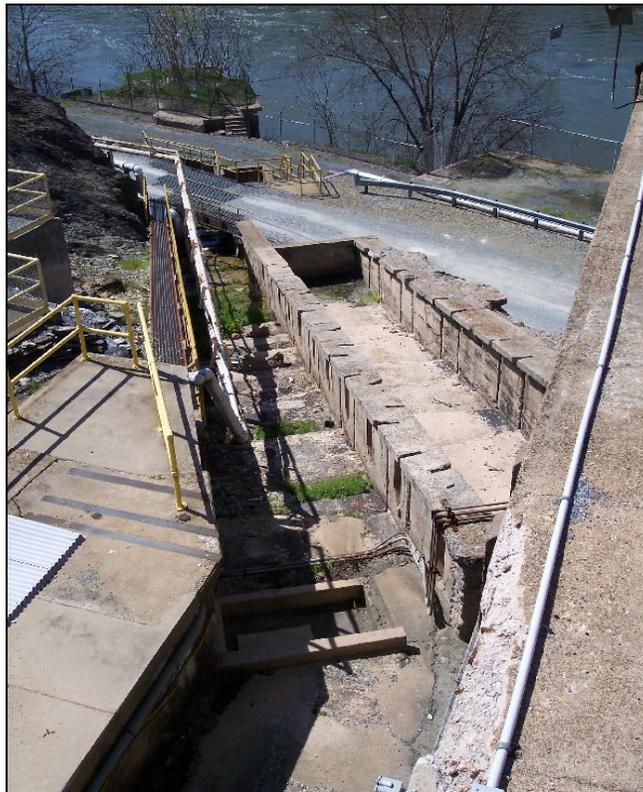


Figure 4. Abandoned Holtwood rock ramp spillway fishway (top) and tailrace fishway (bottom), constructed circa 1910. (Source: Staff)

The current fish lifts (located in the tailrace and eastern end of the spillway) at the Holtwood Project have not been substantially modified since first constructed in 1997, but the lifts have not been effective in passing shad in many years (figure 5). Table 7 summarizes the passage of American shad at the four lower river hydro projects for the past 12 years, and table 8 shows a comparison of the passage at the Conowingo and Holtwood projects. Table 8 shows that passage success at Holtwood has been variable, ranging from as high as 63 percent of the shad passed at Conowingo to as low as 3 percent of the shad passed at Conowingo. For the 12 years of concurrent operations, the average success rate has been about 32 percent. Generally, higher success rates have occurred during years with lower river flows, while lower success rates have occurred in years with higher flows, although the years with the highest average May flows (1998 and 2002) did not have the lowest success rates (table 8). During higher flow periods when Holtwood dam is spilling, fish are attracted into the bypassed reach and have difficulty finding the attraction water flow from the spillway fish lift, because of the competing higher-volume river flows over the dam. Under these conditions fewer fish enter the tailrace and area available for passage through the tailrace fish lift.

Few other anadromous species pass upstream through the lower Susquehanna projects, including Holtwood dam. The peak passage of river herring occurred at Conowingo in 1997 and 2001, when about 243,000 herring passed in 1997 and 292,000 herring passed in 2001. During those same years, only about 1,000 herring passed the Holtwood Project, less than 1 percent of the number passed at Conowingo. Since 2003, the number of herring passed at Conowingo has been less than 1,000 fish, with no herring recorded in some years. Since 2003, only sporadic herring passage has occurred at Holtwood with no herring recorded in some years. Only occasional hickory shad have been passed at Conowingo during the past 12 years, with essentially none appearing at Holtwood dam. Small numbers of striped bass have been lifted at Conowingo dam (typically in the hundreds of fish per year), and a few of those have been passed at Holtwood. Catadromous American eel elvers¹⁹ do appear at the base of Conowingo dam, and a few may be passed at Conowingo through the fish lift, although fish lifts are not effective in passing elvers and are difficult to quantify. Some of those eels that manage to pass Conowingo may appear at Holtwood.

¹⁹ Elvers are juvenile American eel that ascend the river during the spring and summer months.

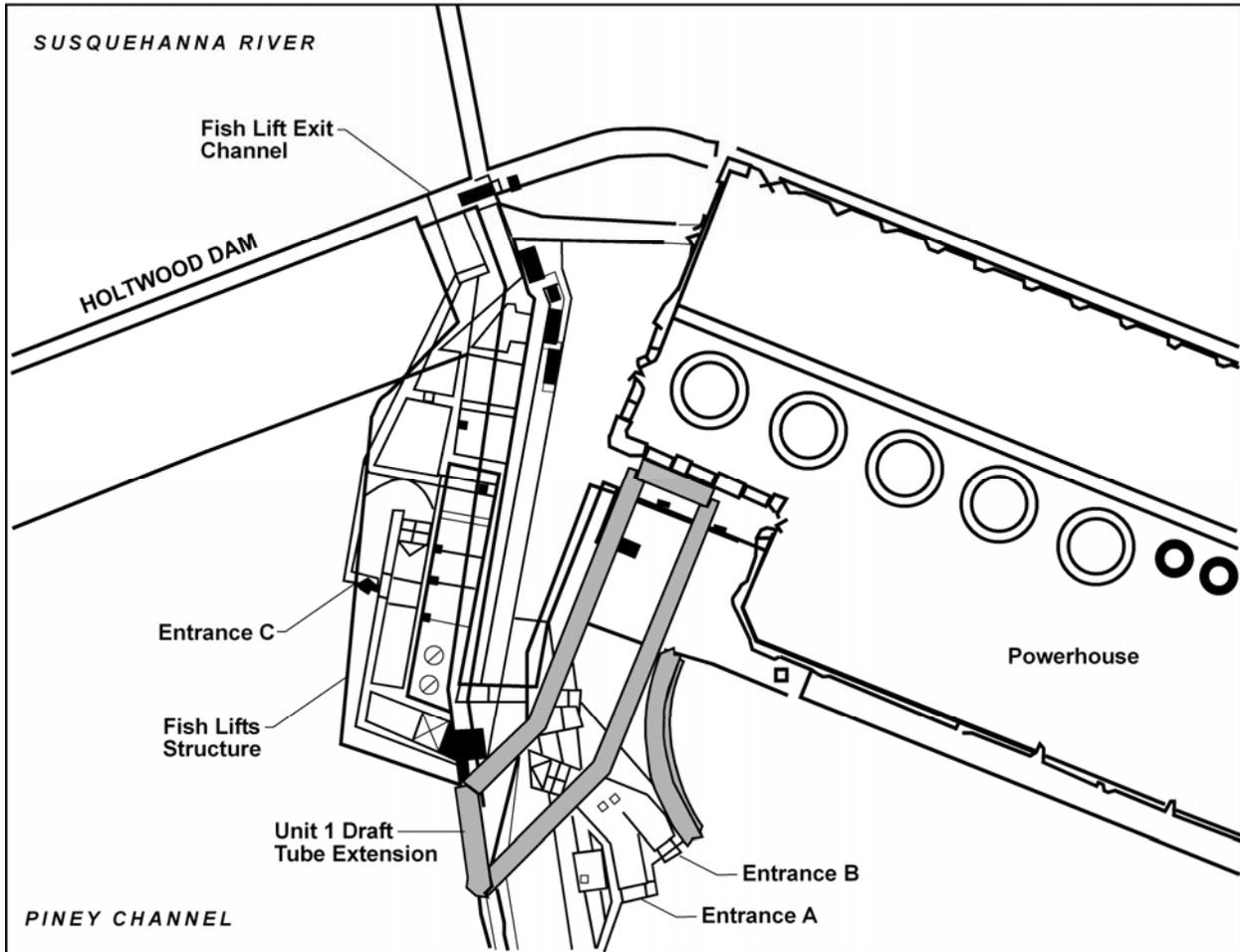


Figure 5. Upstream fish passage facilities at the Holtwood Project, showing the proposed Unit 1 draft tube extension. (Source: PPL, 2007a, as modified by staff)

Table 7. Summary of American shad passage on the Susquehanna River, 1997–2008. (Source: PPL, 2007a; Pennsylvania FBC, 2008)

Year	Conowingo^a	Holtwood	Safe Harbor	York Haven
1997	90,971	28,063	20,828	--
1998	39,904	8,235	6,054	--
1999	69,712	34,702	34,150	--
2000	153,546	29,421	21,079	4,675
2001	193,574	109,976	89,816	16,200
2002	108,001	17,522	11,705	1,555
2003	125,135	25,254	16,646	2,536
2004	109,360	3,428	2,109	219
2005	68,926	34,156	25,425	1,772
2006	56,899	35,968	24,929	1,913
2007	25,464	10,338	7,215	192
2008	19,914	2,795	1,252	21

^a This is only passage through the East Fish Lift, which releases fish into Conowingo reservoir.

Table 8. Comparison of American shad passage at the Conowingo and Holtwood projects, 1997–2008. (Source: PPL, 2007a; Pennsylvania FBC, 2008)

Year	Conowingo	Holtwood	% of Conowingo	Mean May Flow (cfs)
1997	90,971	28,063	30.8	30,630
1998	39,904	8,235	20.6	75,060
1999	69,712	34,702	49.8	20,590
2000	153,546	29,421	19.2	53,790
2001	193,574	109,976	56.8	18,750
2002	108,001	17,522	16.2	79,500
2003	125,135	25,254	20.2	42,050
2004	109,360	3,428	3.1	58,368
2005	68,926	34,156	49.6	20,855

Year	Conowingo	Holtwood	% of Conowingo	Mean May Flow (cfs)
2006	56,899	35,968	63.2	24,887
2007	25,464	10,338	40.6	32,151
2008	19,914	2,795	14.0	47,887 ^a
Average	88,451	28,322	32.0	NA

^a Based on provisional flow data from the USGS Marietta, PA, gage.

Several other species have successfully used the fish lifts in the lower Susquehanna River, including substantial numbers of game species such as walleye and smallmouth bass. From 1997 to 2007, 49 fish species have been recorded in the fish passage facilities of the lower Susquehanna River (Shiels, 2007). The species, however, that dominates fish passage through the lower river dams is the gizzard shad, which is not anadromous, but makes an upriver migration during the spring months from Chesapeake Bay, apparently for spawning. The gizzard shad, however, is not considered a game or sport species, does not support a directed fishery, and is considered by many to be useful only as a forage species for other fish during its juvenile life stage. The number of gizzard shad annually passing the lower river dams typically numbers in the hundreds of thousands and comprised about 75 percent of all fish passed over the lower river dams from 1997 to 2007 (Shiels, 2007). During this period, the number of gizzard shad annually passing Conowingo dam ranged from 305,000 to 950,000, with annual passages of 53,000 to 430,000 at Holtwood dam. The average annual gizzard shad passage at Conowingo was about 522,000 during this period, and 172,500 at the Holtwood Project (Shiels, 2007).

Freshwater Mussels

PPL conducted a mussel survey in the project area in late summer (September) 2005 (Normandeau, 2006). Areas surveyed included Lake Aldred, the tailrace, and the bypassed reach downstream of Holtwood dam. The survey found that habitat in the tailrace and bypassed reach was generally not suitable for mussels because of the predominantly bedrock/boulder substrate in those areas. No live mussels and only a few spent shells were found during surveys of the tailrace and bypassed reach, although a few live mussels were found in a small area of suitable substrate about 0.5 mile downstream of the Norman Wood Bridge (Route 372), which is the extreme lower end of the tailrace. Live species observed included one yellow lampmussel and five eastern elliptio, along with several spent shells of eastern elliptio and eastern floater. More suitable mussel habitat occurs in Lake Aldred, and four species were found during the survey, including eastern floater (most common), eastern elliptio (second most common), yellow lampmussel (uncommon), and triangle floater (only one individual observed). None of these species are listed as threatened or endangered at the state or federal level. Fish host species for these four mussel species are found in Lake Aldred.

3.3.3.2 Environmental Effects

Water Quantity

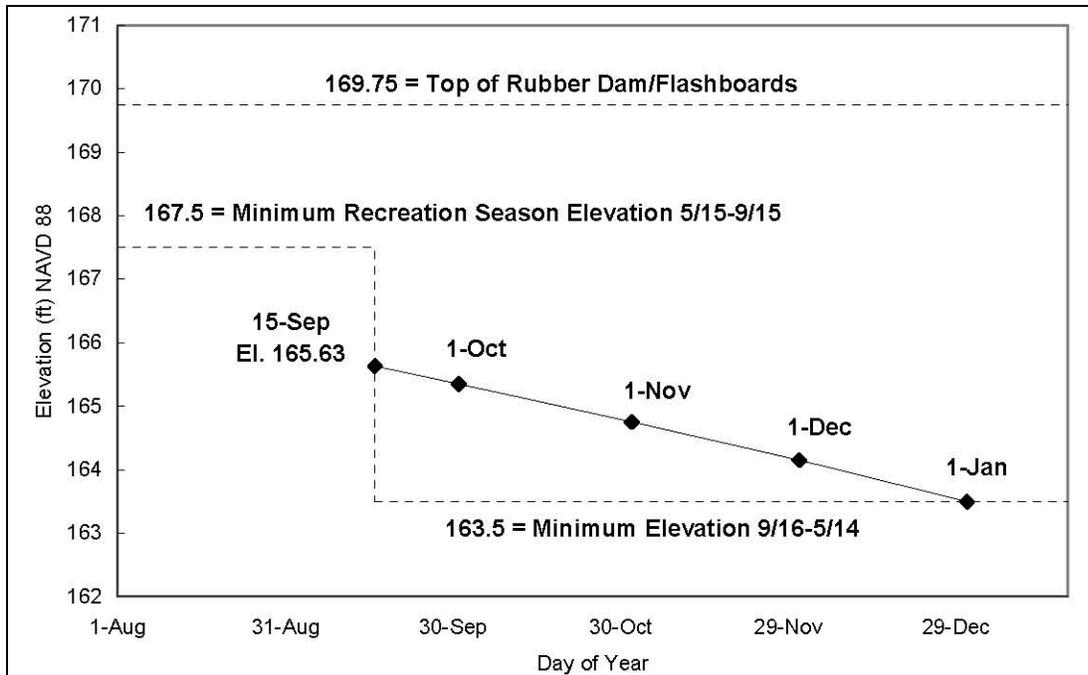
Potential effects on water quantity could occur during both the construction and operational phases of the amended project. Project construction would involve major areas of excavation related to construction of the new forebay and powerhouse, excavation to widen and deepen the tailrace to accommodate increased flows from the powerhouse, and excavation in parts of the bypassed reach including near Piney Island. Operation of the new powerhouse would double flows passing through the generating units compared to existing operations and would increase the project hydraulic capacity from 31,500 to 62,100 cfs, substantially reducing occurrences of spillage over Holtwood dam. The volume of usable storage within Lake Aldred is relatively small, especially during the summer recreation season, and would remain unchanged under the proposed action. The total amount of water released downstream on a daily basis would generally continue to be dictated by the amount of water received from the Safe Harbor Project operations and the run-off from intermediate drainages, less reservoir evaporation. Implementation of the daily volumetric minimum flow release, the 200-cfs conservation releases to Piney Channel and to the bypassed reach, and the drought operations plan would increase minimum daily and continuous discharges to the lower Susquehanna River below the Holtwood Project. The conservation releases also would provide a continuous flow to areas below the dam that (except for minor leakage) currently receive flow only when the dam is spilling.

Effects of Proposed Operations on the Water Level of Lake Aldred

As noted in section 2.2.2, PPL proposes to modify the operation of Lake Aldred so that reservoir water elevations would change slightly from current operations.

Under its proposed operations, PPL would provide a minimum flow of 200 cfs to Piney Channel and would release up to 44 acre-feet per day (about 22 cfs) from Lake Aldred during drought conditions, for compensation flows for upstream water consumption at other PPL generation facilities within the Susquehanna River watershed.²⁰ These proposed operations could result in drawdowns below the summer-time minimum El. of 167.5 feet during drought conditions, although modeling indicates that this typically would occur in late-summer or early-fall, at about the time the minimum level would change to El. 163.5 feet (September 15). Thus, PPL proposes a new rule curve for drought operations between September 15 and December 31, whereby the minimum pond level would drop to El. 165.63 feet on September 15 and then on a straight line to El. 163.5 feet on January 1 (figure 6). This would result in maintenance of higher reservoir levels during the fall months during drought year operations.

²⁰ This value includes the proposed consumptive use at the Brunner Island Steam Electric Station downstream of Harrisburg, PA, and requires approval by SRBC.



Notes: Elevations for October 1 = 165.3, November 1 = 164.7, and December 1 = 164.1.

Figure 6. Proposed post-recreation season drought operations rule curve for the 44 acre-feet compensation flows. (Source: PPL, 2007a)

The COA also provides for PPL to operate the amended project to release the lesser of either the net daily inflow to Lake Aldred or a minimum streamflow (including leakage) equal to, on a daily volumetric basis, 98.7 percent of the minimum flow required by the Commission (QFERC) to be released at the downstream Conowingo Project as shown in table 9. The inflow to Lake Aldred includes releases from the Safe Harbor Project and inflow from tributaries such as Pequea Creek and the Conestoga River that enter Lake Aldred directly, minus reservoir evaporation. The COA does not specify where this minimum release would be made from the project, except that it would include all releases, including leakage, so some of the minimum flow would likely be made through the powerhouse into the tailrace. In its draft Minimum Stream Flow Operating Procedures (MSFOP) manual filed on June 19, 2008, PPL also proposes to release the lesser of either a continuous minimum flow of 800 cfs from the project, or net inflow to Lake Aldred. MSFOP flows would begin at the latter of either the initiation of Unit 1 discharges to Piney Channel or the initial operation of the new exciter replacement units in the existing powerhouse. The settlement agreement between PPL and Exelon dated May 5, 2008, states that the provision of these flows would not be delayed beyond 3 years after the date of the Commission's final order approving the Holtwood license amendment. According to the MSFOP, this continuous minimum flow is a provision of the settlement agreement between PPL and Exelon (the Conowingo and Muddy Run

licensee), which on October 23, 2008, was filed with the Commission. No other flow recommendations have been made by commenting entities.

Table 9. Conowingo Project licensed minimum flows, and minimum flows (cfs) that would be released from the Holtwood Project to meet the 98.7 percent requirement. (Source: PPL, 2007a, exhibit B)

Period	Flow (cfs)	98.7 Percent^a
March	3,500	3,455
April	10,000	9,870
May	7,500	7,403
June 1–September 14	5,000	4,935
September 15–November 30	3,500	3,455
December 1 until end of February	1,750 ^b	1,727

^a 98.7 percent is the approximate drainage area difference between the Holtwood and Conowingo Projects.

^b During this period, the daily average minimum flow is 1,750 cfs, which can be met by intermittent flows such as up to 6 hours of no flow followed by 6 hours of flow at 3500 cfs and the rest of the day at 1,750 cfs, resulting in a daily average minimum flow of 1750 cfs.

As an alternative trigger flow for drought operations, the 7-day 10-year low flow (Q7-10 flow) has been suggested by SRBC, but the QFERC flow is higher than the Q7-10 flow of 2,743²¹ cfs and therefore more restrictive.

Our Analysis

Analyses conducted by PPL with the OASIS²² modeling indicate that except under extreme low inflow conditions, PPL would be able to operate the Holtwood Project and maintain Lake Aldred under the proposed reservoir elevations. However, the analyses showed that there would be occasions when the combination of the effects of reservoir evaporation, the conservation releases, and daily volumetric releases would cause the

²¹ This is the PPL estimated Q7-10 value at USGS gage no. 01576000 Susquehanna River at Marietta, PA upstream of the Holtwood Project, but representing about 97 percent of the drainage area at the Holtwood Project.

²² OASIS is a hydrological model developed by HydroLogics, Inc., which is widely used to model hydropower projects and reservoir systems.

summer recreational pool levels to fall below El. 167.5 feet. Three scenarios were modeled by PPL:²³

- without drought operations (about 250-cfs minimum flow);
- drought operations using the Q7-10 trigger; and
- drought operations using the QFERC trigger.

As expected, the OASIS modeling showed that the greatest effect on Lake Aldred water levels would occur under the QFERC trigger flow as compared to the other two scenarios. Table 10 shows that the greatest effect would be from September 1 to September 15. After September 15, the proposed water level drops to El. 163.50 feet (see figure 6). For comparison purposes, table 10 also provides the water levels expected in the September 1 to 15 time frames without drought operations and under the Q7-10 trigger flows. Table 11 shows that during the May 15 to October 30 period, inflow to Lake Aldred drops below the QFERC flow trigger rarely in July, about 10 percent of the time in August, 20 percent of the time during the September 1 to 15 period, and less than 10 percent of the time during the last half of September and the month of October.

Table 10. Lake Aldred water surface elevation (feet) with proposed daily volumetric minimum flow releases, conservation releases, and with drought operations with the QFERC trigger. (Source: PPL, 2007a, as modified by staff)

% Exceedance						Without Drought Operations	Q7-10
	May 15-31	June	July	August	Sept 1-15	Sept 1-15	Sept 1-15
100	167.47	167.56	167.61	166.28	165.97	166.57	166.41
99	167.67	167.67	167.67	167.48	166.13	166.79	166.62
98	167.67	167.67	167.67	167.67	166.73	167.22	167.02
97	167.67	167.67	167.67	167.67	167.17	167.58	167.48
96	167.67	167.67	167.67	167.67	167.38	167.67	167.55
95	167.67	167.67	167.67	167.67	167.67	167.67	167.67
90	168.08	167.67	168.08	168.08	167.79	168.02	167.95
85	168.08	168.08	168.08	168.29	168.08	168.11	168.08
80	168.50	168.08	168.50	168.50	168.34	168.42	168.41

Note: For comparison purposes, the September 1-15 elevation results for the without drought and Q7-10 trigger are also provided.

²³ The modeling did not include the 800-cfs minimum flow that recently was proposed as part of the Exelon-PPL Settlement Agreement.

Table 11. Inflow (cfs) to Lake Aldred based on data from USGS gage no. 01576000 Susquehanna River at Marietta, Pennsylvania. (Source: USGS, 2008)

	May 15–31	June	July	August	Sept 1–15	Sept 16–30	October
Minimum Flow	8,948	4,979	2,660	2,691	1,990	1,423	1,495
QFERC Flow	7,403	4,935	4,935	4,935	4,935	3,455	3,455
% Exceedance							
95	14,378	8,804	4,716	3,756	3,121	2,875	3,601
90	16,063	10,380	5,751	4,497	3,905	3,504	4,208
80	19,696	12,782	7,365	5,456	4,922	4,418	5,356

Note: To represent the slightly larger drainage area at Holtwood, these values were prorated by 1.0309.

Table 10 also shows that during normal and above-normal inflow conditions, the proposed action would not noticeably affect Lake Aldred water levels. During some flood events, the proposed action would have only a very minor effect on the water level in Lake Aldred because more water could be routed through the powerhouse, but during most of the larger flood events that exceed the proposed hydraulic capacity of the project, the effect would not be noticeable.

Additional effects of proposed operations on the reservoir level of Lake Aldred are addressed in *Fishery Resources* below, section 3.3.4.2 in *Terrestrial Resources*, and section 3.3.5.2 in *Recreational Resources*.

Effects of Proposed Operations on Spill Frequencies

The proposed operations would result in more flow used by generation after the construction of the new powerhouse. Under proposed conditions, the maximum generation flow would increase from the existing 31,500 to 62,100 cfs, resulting in a higher percentage of flow directed to the tailrace and a corresponding decrease of spillage at Holtwood dam.

Our Analysis

Based on flow records at Holtwood dam between 1917 and 1996, table 12 provides a summary of the expected reduction in the occurrence of spillage over Holtwood dam. PPL also plans to counteract the hydraulic and environmental effects associated with this change in flow distribution by substantial excavation of the tailrace area.

Table 12. Average monthly and annual spillage over Holtwood dam under current and proposed project operations. (Source: PPL, 2007a, exhibit B)

Month	Percent of Time River Flow Exceeds Current Capacity (31,500 cfs)	Percent of Time River Flow Exceeds Proposed Capacity (62,100 cfs)
January	42.7	18.5
February	47.2	20.7
March	86.6	51.6
April	91.3	53.3
May	65.3	26.9
June	29.2	9.7
July	15.1	6.3
August	8.1	6.1
September	11.0	6.4
October	17.5	9.2
November	36.1	14.1
December	47.6	20.6
Annual	38.2	17.2

Additional effects of proposed operations on spill frequencies are addressed in *Water Quality* and *Fishery Resources* below, section 3.3.4.2 in *Terrestrial Resources*, and section 3.3.5.2 in *Recreational Resources*.

Effects of Proposed Excavation of the Existing Tailrace Area and the Piney Channel Area on Flow Conveyance Capacities and Velocities

The tailrace channel would be widened and deepened to accommodate flows from the new powerhouse that would be twice as large as existing flows in the tailrace. PPL indicates that the tailrace excavation has been designed to limit changes to elevation and velocity in the tailrace area, so the functioning of the existing and proposed turbines are not affected and water velocities in the tailrace area do not hinder upstream fish passage.

PPL would also excavate in Piney Channel to improve the hydraulics for upstream fish passage and ensure that flow releases into the Piney Channel are distributed in the most effective way to enhance habitat protection and recreational resources including whitewater paddling recreation. The proposed diversion of the Unit 1 discharge from the tailrace to the channel on the west side of Piney Island would result in approximately 1,200 to 3,150 cfs of water flowing through Piney Channel during generation periods.

During non-generation periods PPL purposes to maintain a minimum conservation flow to the Piney Channel of 200 cfs.

Our Analysis

PPL indicates that it would need to excavate about 807,000 cy material, mostly bedrock in the tailrace area to allow for the larger discharge capacity of the expanded project. The excavation would occur between the eastern shore of the tailrace and Piney Island. The excavation is intended to preserve the current water surface elevations in the tailrace under the higher flows, and therefore should not increase overflow onto Piney Island. The excavation plan was developed by PPL after extensive bathymetric studies and modeling to ensure that water levels would not increase under proposed conditions. In addition, the plan provides for somewhat lower flow velocities through this area to ensure a suitable zone of fish passage based on criteria developed with the resource agencies. The zone-of-passage criteria are a depth of at least 3 feet over a 12-foot wide area and velocities that are ≤ 6 fps. Under the proposed conditions, there are two key areas for maintaining these criteria in the tailrace—the upper area near the powerhouses and the lower area near the downstream end of Piney Island. Figures 7 and 8 present flow velocities in these areas. Both figures indicate that even at full generation, which PPL describes as a the worst case scenario, there would be low velocity zones especially on the Piney Island side of the channel to provide better upstream shad migration routes.

Based on the same modeling, PPL developed existing and proposed tailwater rating curves (figure 9). This figure shows that in the upper reaches of the tailrace near the proposed and existing powerhouses, at the proposed maximum generation capacity of 62,100 cfs, the tailwater elevation would be slightly lower than the tailwater elevation that occurs at 31,500 cfs for the existing powerhouse.

Approximately 71,000 cy of material would be excavated downstream of the dam in Piney Channel west of Holly Island to accommodate the rerouted discharge from Unit 1 (see figure 2). Under existing conditions, during non-spillage periods, this area receives about 15 to 51 cfs from a combination of leakage through the dam, leakage from the flashboards and flow from a 10-inch-diameter pipe near the middle of the dam. Figure 10 shows that under proposed conditions when Unit 1 is operating at 3,150 cfs, most of the velocity in this area would be under 3 fps with a few areas such as near the Storm Hole whitewater feature having higher velocities in the 7 to 9 fps range. Figure 10 also shows 261 cfs or more would spread out over a large portion of the larger area below the main bypassed reach. Table 13 provides a summary of the flows and depths in the Piney Channel area based on flow releases of 3,150, 1,200, and the conservation flow value of 200 cfs from Unit 1.

Additional effects of proposed excavation of the existing tailrace area and the Piney Channel area are addressed in *Water Quality* and *Fishery Resources* below, section 3.3.4.2 in *Terrestrial Resources*, section 3.3.5.2 in *Recreational Resources*, and section 3.3.6.2 in *Land Use and Aesthetic Resources*.

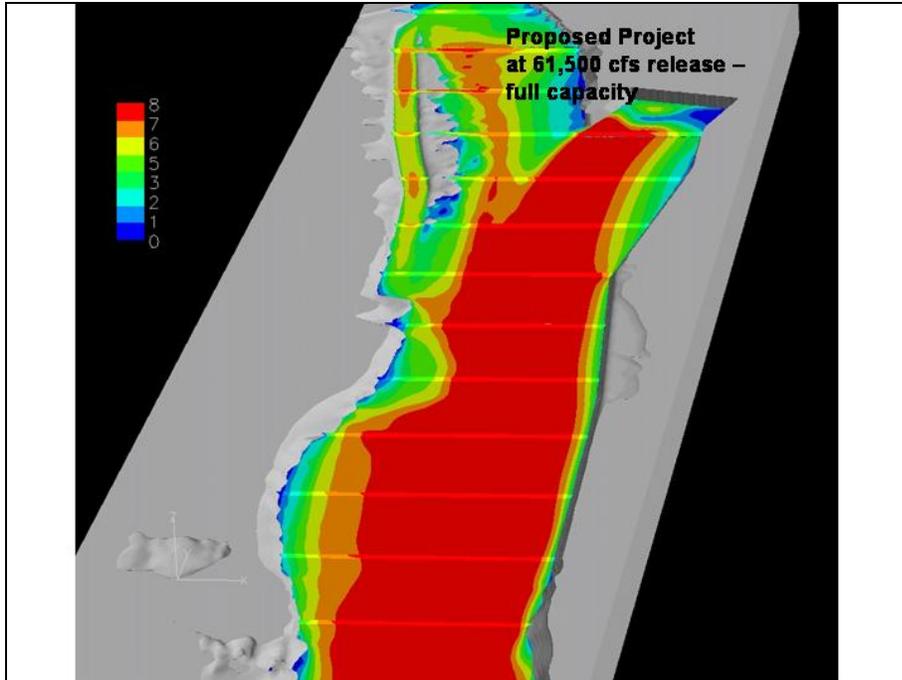


Figure 7. 3-D modeling of the upper tailrace area of the Holtwood Project under full generation. (Source: PPL, 2007a)

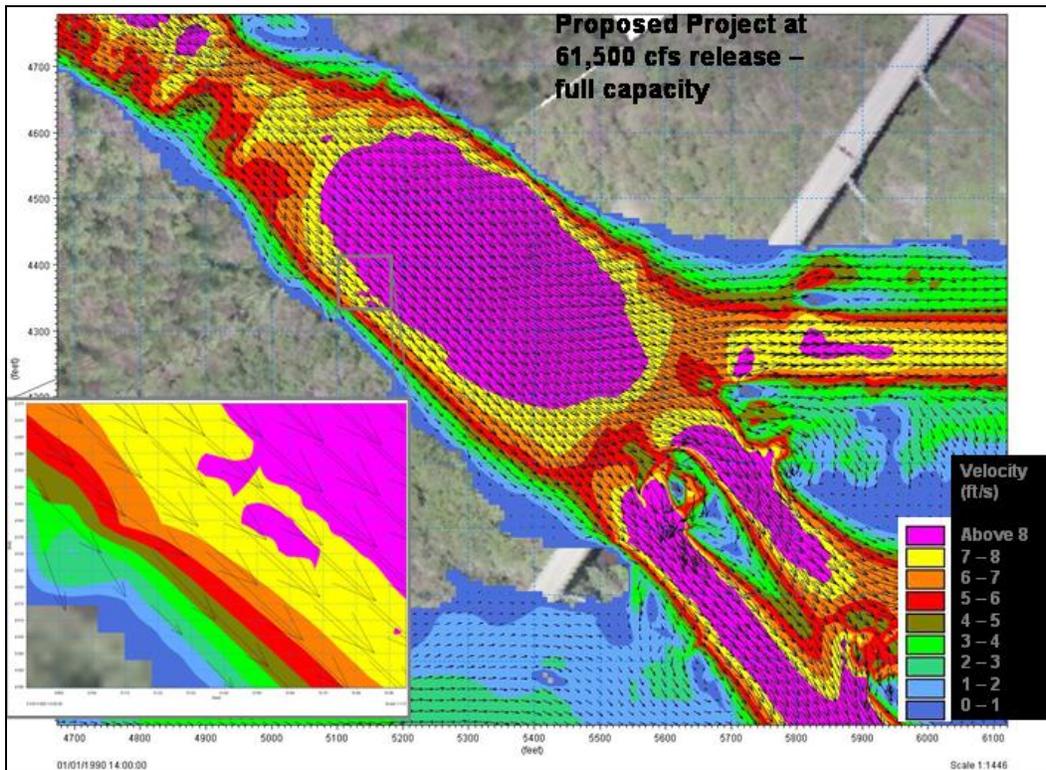


Figure 8. 2-D modeling of the lower tailrace area of the Holtwood Project under full generation. (Source: PPL, 2007a)

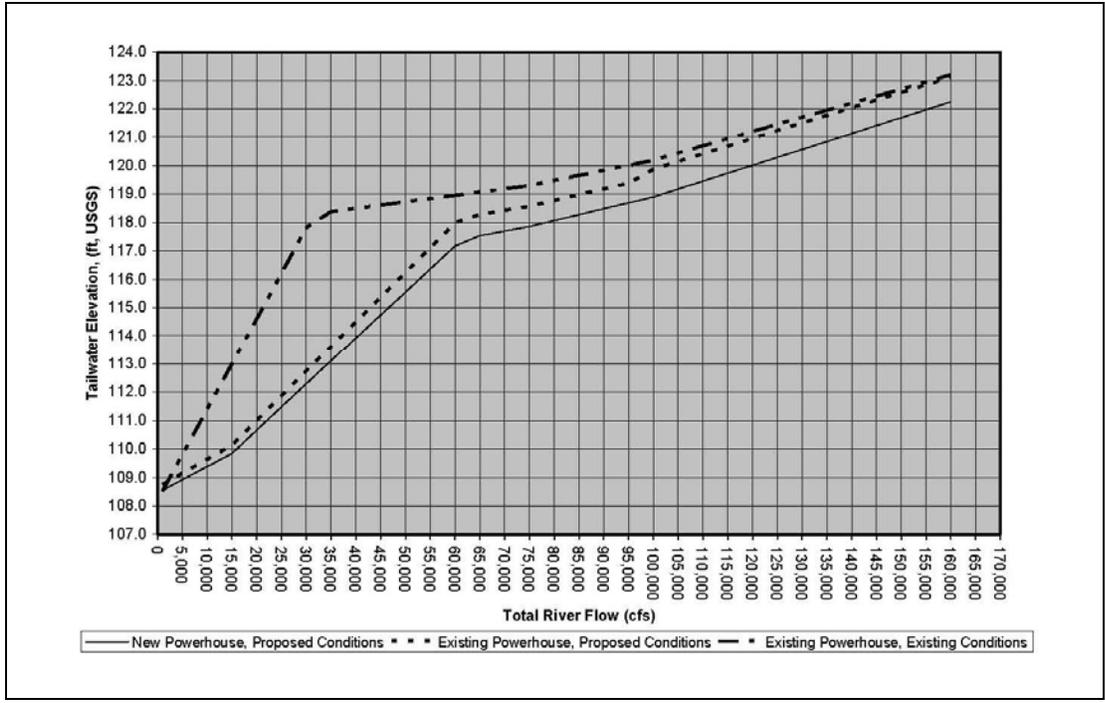


Figure 9. Calculated tailwater rating curves for existing and proposed conditions. (Source: PPL, 2007a)

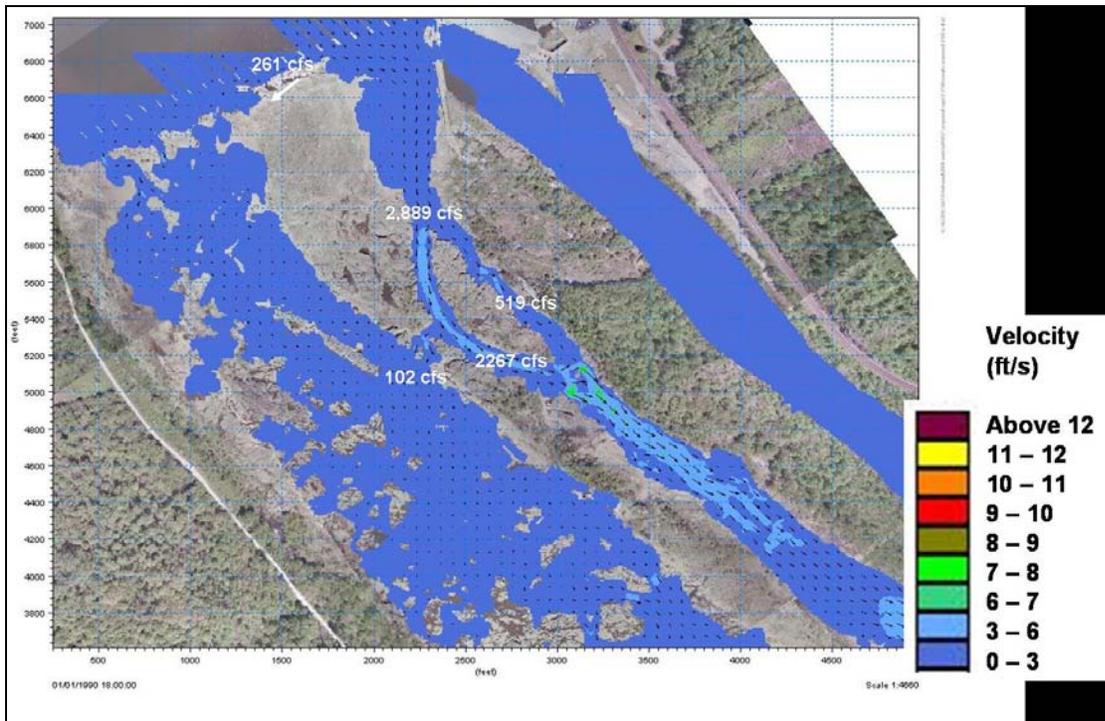


Figure 10. 2-D modeling results for velocity in the Piney Channel and bypassed reach with a proposed release of 3,150 cfs from Unit 1. (Source: PPL, 2007a)

Table 13. Flow velocities and depths in Piney Channel from Unit 1 releases.
(Source: PPL, 2007a)

Flow from Unit 1 (cfs)	General Piney Channel Velocity (feet/second)	Velocity (feet/second) near Storm Hole	General depth in Piney Channel (feet)
3,150	2 to 3	7 to 9	4 to 10
1,200	1 to 4	As high as 5	Greater than 3
200	Less than 1	About 2 to 3	Generally 1 to 3

Effects of the Proposed Operation on Inflow to the Downstream Conowingo Reservoir

Currently the Holtwood Project does not have a minimum flow requirement. However, leakage through the dam, flashboard leakage, and leakage through the generating units normally supply 220 to 250 cfs to Conowingo reservoir. Under its proposed operations, PPL would operate the amended project to release inflow to Lake Aldred or a minimum streamflow (including leakage) equal to, on a daily volumetric basis of 98.7 percent of the minimum flow required by the Commission (QFERC) to be released at the downstream Conowingo Project (table 9). In addition, during drought conditions, PPL would release up to 44 acre-feet per day (about 22 cfs) from Lake Aldred, for compensation of upstream consumptive water withdrawals at other PPL generation facilities within the Susquehanna River watershed.²⁴ In its draft MSFOP filed on June 19, 2008, PPL also proposes to begin at the latter of either the initiation of Unit 1 discharges to Piney Channel or the initial operation of the new exciter replacement units in the existing powerhouse, to release the lesser of a continuous minimum flow of 800 cfs from the project, or release the amount of flow to the Conowingo Project equal to the net inflow to Lake Aldred.

Our Analysis

The Conowingo Project is almost totally reliant on inflow from Holtwood, except for short-term fluctuations caused by operations of the Muddy Run Pump-Storage Project. Only two relatively substantial tributaries enter Conowingo reservoir downstream of Holtwood—Muddy Creek and Conowingo Creek—which in combination with smaller tributaries have a total drainage area of about 300 square miles. This equates to only slightly more than 1 percent of the total drainage area at Conowingo. The Muddy Run Pump-Storage Project, Peach Bottom Nuclear Atomic Station, and two

²⁴ Mitigated releases from Lake Aldred for upstream water withdrawals require approval by SRBC.

municipal water intakes are located on Conowingo reservoir (see figure 1). Critical operational levels for these facilities are provided in figure 11. In addition to the importance for maintaining water levels within Conowingo reservoir for these facilities, releases from Conowingo are the major source of fresh water for the upper end of the Chesapeake Bay.

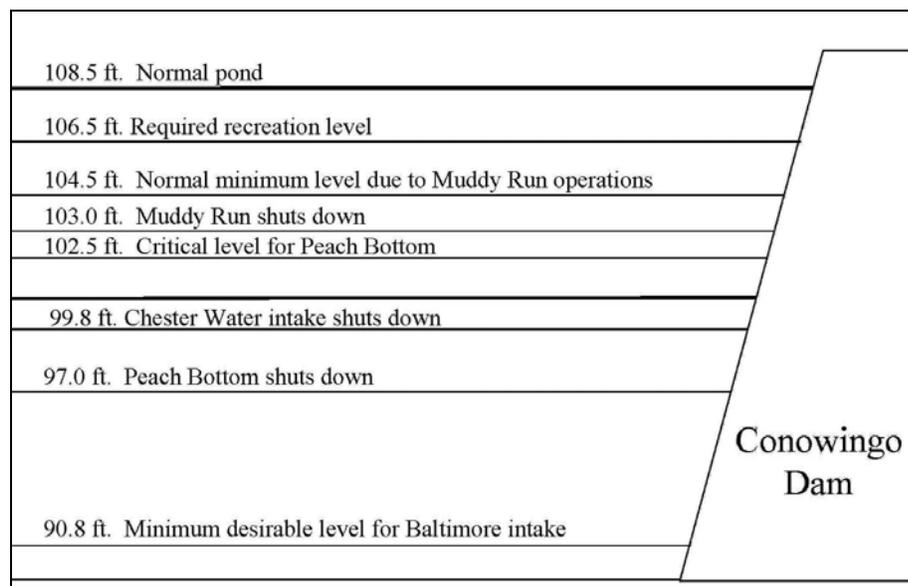


Figure 11. Critical operational elevations in the Conowingo reservoir. (Source: Brownell, 2007)

PPL conducted modeling of the existing and proposed conditions at Holtwood with use of the OASIS model to replicate the hydrology under historic and proposed management conditions based on 1930 to 2002 hydrologic data.²⁵ All of the modeling used current operation parameters for the Conowingo Project and the Muddy Run Pump-Storage Project throughout the modeling period, even though the Muddy Run Pump-Storage Project was not operational until the late 1960s. Table 14 provides a summary of the results of the modeling for the entire timeframe:

- historical Holtwood operating conditions;
- without drought operations;
- drought operations using the Q7-10 trigger; and
- drought operations using the QFERC trigger.

Hydrological modeling, no matter how detailed is not expected to be 100 percent accurate because of the numerous variables involved. However, the results of the OASIS

²⁵ As previously noted, this modeling did not include the recently proposed 800-cfs minimum flow from the Holtwood Project.

hydrological modeling shown in table 14 demonstrate that the ability of the licensees of the Conowingo Project and Muddy Run Pump-Storage Project (both owned by Exelon) to maintain Conowingo reservoir levels would substantially improve under proposed conditions with or without drought operations and in combination with the continued release of minimum flows from the Conowingo Project to the lower Susquehanna River.

Table 14. Recreation season modeled end-of-day Conowingo reservoir levels.
(Source: PPL, 2007a)

	Existing Holtwood Conditions	Without Drought Operation	With Drought Operations (Q7-10 trigger)	With Drought Operations (QFERC trigger)
1930–2002				
June median	108.50	108.50	108.50	108.50
July media	108.50	108.50	108.50	108.50
August median	108.00	108.06	108.06	108.06
September 1–15 median	107.41	107.70	107.72	107.72
June 1–September 15 minimum	100.50	101.75	101.74	101.76

Under proposed conditions, PPL would have the ability to discharge approximately 62,100 cfs from the powerhouses instead of the current 31,500 cfs. The maximum hydraulic capacity of Conowingo, as licensed, is 85,000 cfs. The combination of the discharge from Holtwood under proposed conditions and from the Muddy Run Pump-Storage Project, which has a maximum capacity of 32,000 cfs,²⁶ exceeds the capacity at Conowingo by approximately 9,000 cfs. However, based on the useable storage volume of 5,833 acre feet at Lake Aldred during the summer when inflows are normally the lowest (a mean value below 15,000 cfs), PPL could only maintain a flow rate of 62,100 cfs for under 2 hours without violating the minimum reservoir levels at Lake Aldred. A flow of 9,000 cfs (in excess of the Conowingo hydraulic capacity) for 2 hours is about 1,500 acre-feet or less than 5 percent of the usable storage of Conowingo reservoir for its normal range of operation between El. 104.5 and 108.5 feet. Therefore,

²⁶ This is the maximum generating flow, which occurs during periods of the day with maximum electrical demand. The project also withdraws water from Conowingo reservoir during off-peak periods (nights and weekends).

spillage at Conowingo reservoir should not occur under these low flow and peak demand conditions.

Under higher flow and flooding conditions, the proposed operations at Holtwood would not affect downstream conditions because of the minor amount of storage within Lake Aldred.

Additional effects of proposed excavation of the existing tailrace area and the Piney Channel area are addressed in *Water Quality* and *Fishery Resources* below, section 3.3.4.2 in *Terrestrial Resources*, section 3.3.5.2 in *Recreational Resources*, and section 3.3.6.2 in *Land Use and Aesthetic Resources*.

Water Quality

Potential effects on water quality would occur during both the construction and operational phases of the amended project. Project construction would involve major areas of excavation related to: construction of the new forebay and powerhouse, excavation to widen and deepen the tailrace to accommodate the increased flows from the powerhouse, and excavation in the bypassed reach to improve the hydraulics for fish passage. A total of about 1.9 million cy of material would be excavated and removed from the site. There would also be access road construction and operations associated with these excavation activities, to allow equipment to access the sites and remove excavated materials. Much of the area to be excavated would be bedrock, but there still would be the potential for release of fines, including during the construction and removal of the access roads.

Project operations would result in the approximate doubling of river flows passing through the generating units, compared to existing operations, with the project hydraulic capacity increasing from 31,500 to 62,100 cfs. This would substantially reduce the spillage over Holtwood dam, potentially reducing the aeration effect of that spillage. During low-flow periods, however, PPL proposes to release a 200-cfs minimum conservation flow into the Piney Channel and bypassed reach.

Our Analysis

No entities made specific recommendations for protecting water quality during construction, but PPL indicates that it is preparing an erosion and sedimentation control plan in consultation with Pennsylvania DEP and other agencies, and that it would be required to obtain National Pollutant Discharge Elimination System and section 404 permits for construction. These measures would likely protect water quality during construction, although some unavoidable runoff of sediment and fines may still occur, particularly in areas that would involve in-river construction. PPL would attempt to do as much work as possible in the dry behind cofferdams, however, because of the large area proposed for excavation and access roads, particularly at the lower end of the tailrace, some in-river work would likely be required. We recommend that PPL be required to

file its erosion and sedimentation control plan with the Commission for approval prior to the commencement of construction to ensure that appropriate erosion control measures and best management practices would be used during the construction period.

Once the amended project begins operation, river flows would be distributed differently than under current operations, with more flow passing down the tailrace and less spillage over the dam. Table 12 shows the average monthly spillage that would occur under current and proposed operations. This would reduce spillage on an annual basis from about 38 to 17 percent of the time, with the greatest monthly reductions occurring during the spring months, when water quality (DO) would not be a concern. During the summer months, when lower DO levels have occurred in the Susquehanna River, spillage is currently uncommon, although it would be further reduced under proposed operations. Aeration from summertime spillage would not likely be a significant factor under current operations, so additional reduction in this spillage under proposed operations would have little effect on water quality. Studies have indicated that DO in the isolated pools in the Holtwood bypassed reach are currently controlled by the photosynthesis/respiration cycle, and this would continue to be the case under proposed operations, for most of the bypassed reach. One exception would be in the Piney Channel, which is proposed to receive a minimum conservation flow of 200 cfs. This flow would act to improve water quality by maintaining riverine conditions in the channel, likely connecting some of the isolated pools in the area, and acting to reduce the effects of the photosynthesis/respiration cycle.

The existing generating units at Holtwood dam provide some aeration during operation (0.2–0.8 mg/L), but the proposed new units are not expected to provide that aeration benefit. During the summer months, most of the flow from the Holtwood Project would be released through the generating units, and it is expected that the new more efficient units would be preferentially operated. This could result in somewhat lower DO levels in the tailrace, and although current operations seldom result in DO levels that do not meet state standards, there is the potential that the frequency of violations could increase. Pennsylvania DEP, in its April 15, 2008 request for additional information on PPL's application for WQC, requested that PPL provide a DO monitoring plan for the tailrace, Piney Channel, and the bypassed reach. PPL, in its June 13, 2008 response to DEP, disagrees that there is any indication of a potential DO problem at the project, but at the same time proposes to conduct monitoring studies to identify whether Holtwood operations affect DO levels, and to identify measures that could be implemented to improve any lower DO levels observed. PPL proposes to conduct the studies from 2010 through 2012, so that both existing and proposed conditions can be studied. Implementation of these proposed studies, which would include DO monitoring during the summer months in the tailrace, should identify whether any increase in violations is occurring as a result of the operation of the new units, and would allow PPL to implement measures that would improve DO levels in the tailrace. Any DO monitoring plan would be prepared in consultation with Pennsylvania DEP and other agencies, and would be filed with the Commission for approval.

Fishery Resources

Proposed construction and operation of the amended project would have the potential for substantial effects on the local fishery resources, both beneficial and adverse. These would include effects of construction activities on the migration of fish through the project area, and on spawning and other life history stages of resident species; effects of proposed reservoir operations on aquatic resources in Lake Aldred; effects of proposed fish passage improvements on the efficiency and success of upstream and downstream fish passage at the project; effects of increased entrainment of both resident and diadromous fishes as a result of increased flows passing through the generating units instead of over the spillway; and effects of proposed project flow releases on aquatic resources in both the bypassed reach and tailrace channel downstream of the project.

Effects of Construction

The proposed construction would affect a large area in the vicinity of the project, including Lake Aldred immediately upstream of the dam (new skimmer wall, enlarged forebay, and new powerhouse), and large areas of river bed and shoreline excavation in the tailrace from the immediate vicinity of the powerhouse to well downstream of the Norman Wood Bridge (Route 372). Some excavations are also planned in the bypassed reach to the west of Piney Island. Construction effects would include direct disturbance and loss of aquatic habitat via excavation and placement of new facilities; mortality or disturbance of fish due to blasting, resulting in fish avoiding important habitat areas or altering migration patterns; and construction runoff of sediment or fuel/chemicals, adversely affecting water quality in the vicinity of important habitat areas. Some commenting entities have expressed concern about the scale of the construction and effects on riverine habitat, and Interior included a preliminary fishway prescription to require the licensee to file a plan detailing how it would maintain uninterrupted fish migration and operation of the fish passage facilities during construction. Interior also recommended preparation of a compensatory mitigation plan for the loss of river and wetland habitat, and later clarified that this recommendation was related primarily to ensuring that upstream passage of American shad during the construction of the Holtwood Project expansion would be no less efficient than during the previous 11 years of operation of the Holtwood fish lifts (letter from L.M. Miller, Project Leader, Mid-Atlantic Fishery Resources Office, FWS, Harrisburg, PA, to K.D. Bose, Secretary, FERC, filed September 5, 2008). This recommendation was also the subject of discussion during a section 10(j) teleconference on September 3, 2008. In its June 13, 2008, response to the Pennsylvania DEP April 15, 2008, request for additional information on PPL's application for WQC, PPL provided updates on its final excavation plans and its plans for minimizing/mitigating effects of construction on aquatic resources.

Our Analysis

PPL indicates that it would excavate about 1.9 million cy of material, most of which would be bedrock, and thus would require substantial blasting. Much of the excavation as currently proposed (figure 2) would occur in the river channel, in and along the tailrace, in the bypassed reach, and in Lake Aldred immediately above the dam. Most of these areas probably are not prime fisheries habitat (such as spawning or early nursery habitat) because of the depths or velocities (too deep or too swift), or the substrate (primarily bedrock). Some areas are also not currently wetted habitat. For example, the area where the new forebay and new powerhouse would be placed is currently a land area—the site of the former steam generating station. Thus, it is unlikely that resident fish would be substantially affected by construction activities. Some fish could be affected by blasting, by avoiding areas that are close to blasting activities, although much of the blasting work would likely be conducted in the dry behind cofferdams. The extent of in-water blasting, however, has not been provided by PPL, so there still could be some direct fish mortality by in-water blasting. PPL indicates that many of the final details of construction would not occur until a contractor is selected and final plans are formulated by the contractor. This is understandable, but PPL should file additional details of its final excavation plans with the Commission and state/federal agencies, prior to commencement of construction. Details of blasting activities should be filed and approved prior to the initiation of construction activities that involve blasting. Any fish that would avoid areas of heavy construction activities would likely continue to function in other areas that are undisturbed by construction.

Many of the areas proposed for construction, however, are used by migratory fish during their upstream and downstream migration. Upstream migrating fish use the tailrace and bypassed reach during the spring migrations, and the exit from the fish lifts deposits fish immediately upstream of the dam in the vicinity of the skimmer wall. Any blasting or excavations in these areas during fish migration periods could act to delay migration or prevent fish from continuing their migration. PPL would need to schedule construction activities to avoid the migration periods and those areas that are used by migratory fish during the migration periods. We agree with the Interior preliminary fishway prescription to require PPL to file a plan detailing how it would maintain uninterrupted fish migration and operation of the fish passage facilities during construction. In its June 13, 2008, filing in response to Pennsylvania DEP, PPL provides a draft plan for avoiding fish migration periods during construction. While this plan appears generally adequate, it should be updated as the final construction plans are prepared by the selected contractor.

We also agree with FWS that the efficiency of shad passage during project construction should be maintained at a minimum level equal to the average passage efficiency (adjusted by river flow) that has occurred since the Holtwood fish lifts began operation in 1997. FWS indicated that the average efficiency from 1997 through 2007 was 33.7 percent, which is the percentage of the shad passed at the Conowingo Project that were also passed at Holtwood. Although FWS believes that level of efficiency is not

adequate for long-term restoration of American shad to the basin, it is willing to accept that as the minimum efficiency during the 3-year construction period. Both FWS and Pennsylvania FBC also indicated, during the September 3, 2008, teleconference, that the target efficiency for each year of construction should be based on the mean May river flow, which has been shown to have a relationship to passage efficiency at Holtwood (efficiency is typically low during high flow years and higher during low flow years). Both agencies stated that any loss of upstream shad production, even for 1 year, as a result of construction-related effects on fish passage, could have effects 4 to 6 years in the future, as that year-class returns to spawn.

FWS recommends that the efficiency of upstream passage of shad at Holtwood be determined during each year of construction, based on fish lift counts at both Conowingo and Holtwood. If the minimum efficiency level is not met, then PPL should mitigate for the loss of production by those shad that failed to reach upstream spawning areas during the following year by stocking additional shad fry in the Susquehanna River. FWS presents a regression equation based on percent efficiency versus mean May river flow for the 11 years of fish passage data included in the license amendment application, and recommends that equation be used to determine the target efficiency in any year based on the mean May river flow. If the target efficiency is not met, PPL would mitigate for the number of shad that failed to achieve passage at Holtwood by stocking additional shad fry the following year, based on 2,050 fry per fish that failed to achieve passage.²⁷

We generally agree with FWS's concept for mitigating any adverse effects on passage that may occur. However, we question FWS's use of its regression equation to determine the target efficiency, because the FWS method for developing this equation may not be valid statistically. FWS states that, because the plot of fish lift efficiency (in percent) versus mean May river flow indicated a non-linear relationship, the mean May flow data was \log_{10} transformed and a "least squares" linear regression was performed on the transformed data set. Our review of this methodology indicates that, when using percent values as a dependent variable in regression analysis, an arcsine transformation of the data, not a \log_{10} transformation, should be made. This would result in a regression equation with a lower r-square value, indicating that the relationship between mean May flow and fish lift efficiency is not as strong. PPL, in its comments filed on September 11, 2008, also questions the method used by FWS to determine whether construction activities are causing a decrease in shad passage, stating that the FWS methodology is flawed and does not provide a statistically valid approach for distinguishing between the variability in passage that has occurred at Holtwood over the years, and any effects of construction. PPL also states that the number of fry per adult fish proposed by FWS (2,050) is incorrect, and that any fry replacement rate should be based on recent Susquehanna River data that show that stocking of 314 fry is required to return one adult

²⁷ FWS states that the number of fry per adult shad is based on a stock recruitment analysis reported in Atlantic States Marine Fisheries Commission (2007).

shad to the river. Further, PPL points out that any fry replacement program may be limited by the number of shad eggs that typically are available for hatchery programs on the Atlantic coast.

We agree that there may not be a good basis for the FWS's use of 2,050 fry per adult,²⁸ but at the same time PPL's suggested number of 314 fry per adult may not be appropriate. The FWS recommended providing a number of fry that would be produced by naturally spawning adults if they were trucked upstream, but the 314 fry number suggested by PPL is the estimated number of fry stocked from the hatchery that results in the return of one adult shad to the river (Susquehanna River Anadromous Fish Restoration Cooperative, 2008).

We suggest a more simplistic approach to (1) determine the target efficiencies that should occur during the construction period, and (2) mitigate any reduced passage efficiencies during the construction period. Target efficiencies would be determined by ranking the mean May flows that have occurred during fish lift operations from 1997 through 2008, and averaging the actual efficiencies that have occurred over a range of flow brackets. Table 8 shows the mean May flow and Holtwood fish passage efficiency (as percent of the Conowingo passage lifted at Holtwood) for 1997 through 2008. Table 15 ranks the mean May flows from lowest to highest, along with the corresponding fish passage efficiency at Holtwood. Those data indicate that the 12 years of operation can be divided into three groups of 4 years, based on the mean May flows. The four lowest flow years have flows ranging from 18,750 cfs to 24,887 cfs; the four mid-flow years range from 30,630 cfs to 47,887; and the four high-flow years range from 53,790 cfs to 79,500 cfs. The average passage efficiency for each of the flow brackets is 54.9 percent for low flows, 26.4 percent for mid flows, and 14.8 percent for high flows. We suggest that a more simplistic approach for determining target efficiencies for each year of construction would be as follows:

Mean May Flow (cfs)	Required efficiency
< 30,000	55%
30,000–50,000	26%
> 50,000	15%

²⁸ According to table 10.6 in Atlantic States Marine Fisheries Commission (2007), the stock recruitment analysis shown is “hypothetical,” and the primary purpose of table 10.6 is to assess the fish passage efficiencies that would be required at Holtwood and York Haven projects to achieve shad population growth in the river.

Table 15. Flows ranked, lowest to highest, with corresponding fish passage efficiency. (Source: Staff)

Mean May Flow (cfs)	Holtwood Passage as % of Conowingo Passage	Average for Flow Range
18,750	56.8	
20,590	49.8	
20,855	49.6	
24,887	63.2	54.9
30,630	30.8	
32,151	40.6	
42,050	20.2	
47,887	14.0	26.4
53,790	19.2	
58,368	3.1	
75,060	20.6	
79,500	16.2	14.8

Once the target efficiencies are determined for each year of construction, and assuming that a “shortfall” of adult fish occurs that year due to lower passage efficiency, FWS recommends that PPL mitigate that shortfall the following year by stocking shad fry equivalent to that lost production. We agree with the concept of providing mitigation for this lost production in the following year, but question whether mitigation should be provided only by stocking additional shad fry. Assuming that we use our target efficiencies stated above, and using 2008 passage data, the required passage at Holtwood would have been 5,178 shad (26 percent of the 19,914 shad passed at Conowingo). Even though no construction was occurring at Holtwood in 2008, the actual passage was 2,795 shad, or a shortfall of 2,383 shad. At 2,050 fry per fish, this would require that 4.885 million fry be stocked the following year. This number of fry is about the same as the total number of fry produced by Pennsylvania FBC in 2006, which required the collection of about 19 million shad eggs (Susquehanna River Anadromous Fish Restoration Cooperative, 2008). This illustrates that a shortfall of less than 2,400 fish may require additional fry production about equal to the entire fry production program, and that higher shortfalls could many times exceed the current program (a 5,000-fish shortfall would require production of more than 10 million fry). Using the PPL number of 314 fry-per-adult return, the required production would be 748,262 fry. Using the hatchery survival from egg to fry of about 26 percent from above, about 2.9 million eggs would be required to produce that number of fry. Based on discussions during the September 3,

2008, teleconference, the current shad egg supply on the Atlantic coast is limited, and it is doubtful that the current egg supply could support additional production for mitigating any construction-related effects.

The above example illustrates that an alternative method for mitigating any construction effects on Holtwood passage should be considered. The most logical alternative would be to truck adult fish from Conowingo in the year following a shortfall at Holtwood due to construction. Once a shortfall has been determined to have occurred at Holtwood, the resource agencies and PPL would have nearly a year to determine the best method for mitigating the shortfall the following year, and if trucking is an option that would be implemented, this would allow sufficient time for PPL to mobilize trucks and equipment and to coordinate with the Conowingo licensee on the logistics of trucking shad from Conowingo. The west lift at Conowingo is still operated to collect shad for tank spawning and may also be available for providing adult shad for trucking.

The above example also shows that it may be difficult to identify an effect of construction versus other effects on fish passage that may be occurring on the lower Susquehanna River in any one year (fast rising water temperatures, Conowingo or Muddy Run operations, etc.). Consultations among the agencies, PPL, and the Conowingo licensee immediately after the conclusion of the spring fish passage operations would be an important step in determining whether construction at Holtwood or other factors may have influenced passage efficiency at Holtwood. Thus, we conclude that to mitigate any effects of project construction on fish passage efficiency at Holtwood, PPL should prepare a mitigation plan for Commission approval, after the post-season consultations described above. We expect that during those consultations, if construction effects are identified, PPL and the agencies would determine the shortfall of shad that would need to be mitigated, using the methodology we suggest above, and then determine the best method for mitigation; either additional fry production (if agreement can be made on the number of fry to be stocked, and if an adequate egg supply is expected to be available) or trucking of adult shad from Conowingo. The final mitigation plan, with agency comments on the plan, would need to be filed with the Commission for approval by September 1 (about 2.5 months after conclusion of the spring fish passage season), in order to allow sufficient time for Commission approval and for PPL to prepare for and implement the plan in the following spring.

Regarding runoff of sediment or fuel from construction areas, PPL indicates that it is preparing erosion and sedimentation control plans in consultation with Pennsylvania DEP and other agencies, and that it will be required to obtain National Pollutant Discharge Elimination System and section 404 permits for construction. These measures would likely prevent major adverse effects on water quality that could affect fisheries habitat, although some unavoidable runoff of sediment and fuel spills may still occur, particularly in areas involving in-water construction. As we stated above, it would be appropriate for PPL to file its erosion and sedimentation control plan with the Commission for approval prior to the commencement of construction, to ensure that appropriate erosion control measures and best management practices would be used

during the construction period. Implementation of this plan should protect fisheries habitat during construction.

Effects of Proposed Reservoir Operations on Aquatic Resources in Lake Aldred

As noted above, PPL proposes to modify the operation of Lake Aldred so that reservoir levels would change slightly from current operations. PPL proposed a new rule curve for drought operations that would result in maintenance of higher reservoir levels during the fall months during drought year operations. This is described in section 3.3.3.2 under *Water Quantity*.

Our Analysis

PPL's proposed changes in its reservoir operations are not substantially different than current operations for most of the year. Aquatic resources in Lake Aldred would continue to experience drawdowns of up to about 6 feet during the early spring, but then drawdowns would be reduced to about 2 feet during the remainder of the spring and summer months. In mid-September, a 6-foot drawdown would be re-established, unless drought operations are initiated and about a 4-foot drawdown would be implemented. Thus, early-spring spawners would continue to experience deeper drawdowns, but most spring spawners and adults and juveniles rearing during the summer months would continue to experience drawdowns of only about 2 feet. Adverse effects of the existing drawdown regime in Lake Aldred have not been documented, and the reservoir continues to provide a good warmwater fishery. The only difference in the proposed reservoir operations would be the potential reduced drawdowns during the fall months during drought operations. This should have a positive effect by maintaining more aquatic habitat later into the fall period.

Effects of Proposed Fish Passage Improvements

The proposed license amendment includes several measures to improve upstream fish passage at the project, as discussed in section 2.2.1.

All of the proposed enhancements to the fish passage facilities are included in the COA between PPL and Pennsylvania DEP (table A-2), and are generally supported by the other resource agencies. Interior's preliminary fishway prescription (table 2) also requires the same fish passage enhancements as provided for in the COA. Both the COA and Interior's prescription also include measures for evaluating the efficiency of the fish passage facilities and for making further improvements if the passage efficiency does not meet agreed to targets.

For downstream passage, PPL proposes to continue its current operational protocols of a combination of spillage and turbine passage through the generating units with known higher fish survival rates. The COA and Interior's preliminary fishway prescription also include measures for evaluating the efficiency of downstream passage by requiring discrete survival studies, establishing target survival rates (only the COA

provides target survival rates at this time), and making further improvements for downstream fish passage if target rates are not met (tables 2 and A-2).

The COA and Interior's preliminary fishway prescription also include provisions for the future development of upstream and downstream passage facilities for the catadromous American eel, as well as for evaluating the efficiency of the upstream and downstream eel passage facilities.

Our Analysis

Anadromous Species

As we described above, upstream fish passage for the primary species of interest in the Susquehanna River, American shad, has not been highly efficient at Holtwood since the fish facilities went into operation in 1997. Major identified problems with the system have been attraction of shad into the bypassed reach section of the river away from the powerhouse and the fish lift entrances; probable velocity barriers in the tailrace, reducing the number of fish that reach the powerhouse and its fish lift entrances; tailrace flow patterns that reduce the chances of fish successfully finding the fish lift entrances; and internal deficiencies in the fish lift, such as an entrance/crowder channel with shadows that discourages shad from proceeding further into the facility, and an attraction water supply system that can not operate at its full design capacity without causing vortices that may confuse fish at the exit channel. Our review of PPL's proposal to address the known deficiencies with upstream fish passage (the COA), and Interior's preliminary fishway prescription, indicates that PPL and the agencies have developed an adequate plan to address the deficiencies. Implementing these measures as part of the project expansion, which in itself should improve fish passage by reducing the attraction of fish into the bypassed reach, would likely result in an overall improvement in fish passage efficiency at the Holtwood Project.

Both the COA and Interior prescription also include provisions for the evaluation of the efficiency of the fish passage facilities, and for making further improvements if the passage efficiency does not meet agreed to targets. The COA specifies what those target efficiencies should be, but the Interior prescription does not. The COA specifies that there would be Tier I and Tier II studies and target efficiencies (table A-2). The Tier I target efficiencies are that at least 75 percent of the shad that pass the downstream Conowingo Project also pass through the amended Holtwood Project, and that 50 percent of the shad pass the Holtwood Project within 5 days of passage at Conowingo. If the 3 years of Tier I studies show that these target efficiencies are not met (based on an annual average among the 3 years), PPL would consult with Pennsylvania DEP and other agencies to develop a plan for a radio telemetry study to assess shad behavior below the project and to determine the percentage of shad that enter Holtwood Project waters and then successfully pass through the Holtwood fish passage facilities. This Tier II study would continue for a minimum of 4 years, concurrent with fish counts and PIT tag monitoring, to determine if at least 85 percent of the shad that enter Holtwood Project

waters successfully pass through the Holtwood fish facilities. If that target efficiency is not met at the end of the Tier II studies, the licensee would consult with the agencies and prepare a plan for additional operational or structural modifications to the fish passage facilities at the project to improve that efficiency.

This two-tier approach for evaluating fish passage improvements at the project is a reasonable technique for assessing the efficiency of the facilities. The target efficiencies also appear reasonable, although the COA does not provide the basis for the specific efficiencies. The Holtwood Project is the second project located only 25 miles upstream from Chesapeake Bay; therefore, the efficiencies should be higher so that a large portion of the shad population is able to successfully pass the Holtwood Project and the two upstream hydroelectric projects at Safe Harbor and York Haven to reach the most suitable and the larger area of spawning and rearing habitat upstream of the dams. We conclude that the two-tier evaluation approach should be implemented as part of the license amendment, although it would be appropriate for the various study plans and any proposals for later modification of the fish passage facilities to be filed for Commission approval.

American Eel

American eel passage currently does not occur through the hydropower projects on the Susquehanna River. Only small numbers of eels have been collected downstream of the Conowingo Project in recent years, either by the existing fish lifts or by experimental devices (FWS, 2006). American eel, however, remain a target for passage in the river, and the COA and Interior's preliminary fishway prescription include measures for eel passage (see tables 2 and A-2). These measures include a stepwise program for siting, constructing, and evaluating eel fishways that would be triggered when eel passage becomes operational at the downstream Conowingo Project, or when eel stocking into Conowingo reservoir begins as part of an agency-approved plan, or when the agencies determine that available data indicate that sufficient numbers of eels are available below Holtwood to require passage.

For downstream eel passage, the COA calls for the implementation of downstream passage measures either 3 years after eel passage becomes operational at the amended Holtwood Project, or 3 years after eel stocking into Lake Aldred begins as part of an agency-approved plan, or when the agencies determine that available data indicate that sufficient numbers of eels are available upstream of Holtwood to require downstream passage. PPL would conduct a discrete survival study for downstream eel passage, and if the study finds that a minimum survival of 85 percent is not achieved at the project, PPL would consult with the agencies and propose operational or structural modifications that would improve downstream eel passage survival at the project. Any measures provided would be evaluated for passage efficiency after they become operational.

These provisions of the COA and Interior's preliminary fishway prescription would provide a reasonable approach for implementing upstream and downstream

American eel passage at the Holtwood Project, when required. There are now only small numbers of eels in the Susquehanna River, and few of those likely ascend the river as far upstream as Holtwood. Once eel passage is provided at the downstream Conowingo Project and the numbers of eels approaching Holtwood increase to the point where passage is also required at Holtwood, the measures included in the COA and Interior preliminary fishway prescription would provide for timely development of upstream eel passage, and eventually downstream eel passage.

Passage of Resident Species

PPL, through the COA, proposes to operate the fish facilities at Holtwood from April 1 through June 30 for the upstream passage of resident species, even though this period would also encompass the upstream migration of anadromous species. As we described above, the lower Susquehanna River fish facilities pass a substantial number of resident species during their current spring operations, although operating during the expanded proposed period would increase the time that the fish facilities are operational by 4 to 6 weeks. Pennsylvania FBC, in its section 10(j) comments, recommends that the Holtwood fish facilities also be operated during the fall period (September 1 to October 15) for upstream resident fish passage for a 5-year period, and then evaluate with the agencies whether changes should be made to resident fish passage operations. PPL is opposed to any operations for resident fish passage during the fall months.

Our Analysis

Increasing the period of operation of the Holtwood fish facilities would likely increase the passage of resident species, although the species most likely to benefit would be the gizzard shad, which dominates the catch during the spring passage season. There would appear to be little benefit in increasing the numbers of gizzard shad passing upstream, which already number in the hundreds of thousands of fish. Pennsylvania FBC recommends fall operation based on the premise that additional upstream movement of resident fish also occurs in the fall, and that additional fall passage data would allow evaluation of this movement. Pennsylvania FBC also states that it believes the low abundance of freshwater mussels in the lower Susquehanna River reservoirs may be related to lack of passage of the host fish species. Fall operations would allow further evaluation of the mussel/host fish linkage. PPL, however, does not propose fall operations because there is no supporting information that these operations would benefit resident species, and because of its concern about possible damage to the fish lifts during the fall months, which could in turn affect their ability to operate in the following spring. It states that if the fish lift components are damaged by fall storms (hurricanes) or other breakdowns, there may not be sufficient time to make repairs in time for the spring migration period. However, if it is required to conduct fall operations, PPL requests that it be given the option to suspend those operations to protect the fish lift components from fall storm damage, or be allowed to delay or modify spring operations to complete any required repairs.

We agree that additional spring fish facility operation could be beneficial to some resident fish species that make upstream movements during the spring, with the exception of gizzard shad that already occurs in large numbers. Substantial upstream movement of important game species such as walleye and smallmouth bass already has been documented (Shiels, 2007), and additional operation would allow more of these species to pass Holtwood dam.

The primary basis cited by Pennsylvania FBC for requiring fall operations for resident fish would be as an experiment to determine if substantial fall movements occur. Because no fall fish passage operations have occurred on the Susquehanna River, we really do not know whether any species would be available for passage, and in what numbers. PPL's concern, however, about potential damage or additional maintenance requirements for fall operations appears to be a legitimate one, and we agree that the spring operations should not be put into jeopardy.

In the draft EIS, we concluded that only 1 year of fall operations should be attempted because of the potential for fall fish lift breakdowns to affect spring operations. The agencies, however, in their comments on the draft EIS, provide information that indicates the potential for fall damage to the fish lifts as a result of fall storms/hurricanes is remote (fall flows that could damage the fish lifts have occurred only 7 percent of the time over 75 years of record). In addition, the agencies commented that the results of only 1 year of testing, as we recommended, could be influenced by unusual (either high or low) flow conditions or by strong or weak year classes that may affect the numbers of fish available for passage. We agree that 1 year of fall operations, as we initially recommended, may not provide an adequate sampling of the fall period to determine whether fall operations would benefit resident species or the re-colonization of mussels in the lower Susquehanna River. We also believe that the potential for storm damage to the fish lift during the fall period is low, and that weather forecasting, particularly for hurricanes, would provide PPL adequate warning to shut down and remove key lift components before a major flow event would occur. Thus, we now conclude that fall operations should occur on an experimental basis for a 5-year period, similar to the spring operations for resident species, followed by an evaluation of the results by the licensee and agencies to determine if additional fall operations are warranted. Any plan to continue fall operations would then need to be filed with the Commission for approval. Spring fish lift operations would still have priority over fall operations, so in the event that the fish lifts are threatened by potential storms or hurricanes during fall operations, PPL should not hesitate to shut down operations and secure important lift components so that spring operations are not affected.

Effects of Increased Entrainment and Impingement

Installation of the proposed new generating units at Holtwood would approximately double the hydraulic capacity of the project and result in a reduction of spillage at the project on an annual basis from about 38 to 17 percent of the time (table

12). This would increase the potential for both anadromous and resident fish to be impinged on the trashracks or entrained in the generating units, resulting in some increased mortality during passage through the units. The COA and Interior's preliminary fishway prescription both include provisions for monitoring downstream passage of anadromous and catadromous fish through the project, including conducting discrete survival studies. Based on the results of those studies, PPL would modify project operations or structures to meet the agreed-to target survival rates (95 percent for juvenile shad, 80 percent for adult shad, and 85 percent for American eel). Neither the COA nor the Interior prescription includes any requirements for protection of resident species, and none of the agencies provide any recommendations related to resident species.

Our Analysis

Operation of the amended project would increase the percentage of time that most of the river flow would be passing through the generating units, instead of over the spillway. That would result in greater numbers of both anadromous and resident fishes approaching and passing through the trashracks and generating units. The existing units at Holtwood have trashracks with a bar spacing of 4 inches, except that Units 8, 9, and 10 have trashracks with a bar spacing of 6 inches, installed during the adult shad outmigration period, to allow downstream passage through the trashracks and generating units. The proposed new units would have trashracks with a bar spacing of 7 inches to facilitate downstream passage of adult shad. The potential for fish impingement on the trashracks would be minimal with trashrack spacing of 4 to 7 inches. Virtually all smaller fish that would comprise the majority of the fish that would be passing downstream through the units (see below), would pass through trashracks with clear spacing of these sizes. The exception would be very large fish, which might be unable to pass through the trashrack opening, but would have the swimming ability to avoid being impinged on the racks. There is the potential for some adult American shad to be impinged on trashracks with a 4-inch spacing (it has been observed by staff at other projects), but PPL already provides trashracks with 6-inch spacing on three units for downstream shad passage. The new units would have trashracks with 7-inch spacing, further reducing the potential for impingement of adult shad and other larger fish.

The potential for greater fish entrainment at the project may not substantially increase fish mortality. Preferential operation of the new, larger, more efficient units would result in more fish friendly passage than through the existing units. The proposed units would be large (282 inches or 23.5 feet in diameter) Kaplan units, with a slow runner speed (85.7 revolutions per minute) and a maximum efficiency of 94.75 percent. The units would also incorporate other fish friendly designs, such as limiting the number of wicket gates and stay vanes, a smaller wicket gate overhang, and limiting the gaps between the runner and the discharge ring. The large unit size, slow rotation, and reducing the areas within the unit where fish strike could occur would improve fish survival during passage.

Predicted survival rates for the existing and new units are based on a literature review and some empirical data collected at Holtwood (balloon tag studies). PPL predicted survival rates for American eel, post-spawn adult shad, post-spawn herring, and juvenile shad and herring to range from 48 to 84 percent for the existing double-runner units, 66 to 90 percent for the existing single-runner units, and 88 to 98 percent for the proposed Kaplan units. For the two proposed smaller exciter replacement units (Francis units with a runner diameter of 52 inches), PPL predicted survival ranging from 23 to 89 percent for the same species. These units have a much smaller hydraulic capacity (300 cfs versus 15,000 cfs for the Kaplan units), so the likelihood for fish to be attracted to and pass through these units would be low, compared to passage through the Kaplan units.

The provisions of the COA and preliminary fishway prescription would require discrete fish survival studies for the primary anadromous and catadromous species of interest (shad and American eel), so the predicted survival rates would be verified by empirical data. Because specific target survival rates have been agreed to as part of the COA, PPL would continue to work with the resource agencies to achieve those rates, should the studies indicate those rates are not being achieved. Thus, any effects of entrainment mortality on anadromous and catadromous species would be addressed through the COA, if adopted, and it would be appropriate to include those provisions of the COA as conditions of the license.

The COA or preliminary fishway prescription, however, provides no measures for the protection of resident fish, associated with turbine entrainment. Although this was not raised as a major issue by commenting entities, we assessed this issue by reviewing the Electric Power Research Institute (EPRI) Turbine Entrainment and Survival Database (EPRI, 1997) to determine whether the resident species that occur in Lake Aldred would be subject to entrainment, and the size classes of fishes that would be entrained. EPRI (1997) reviewed the results of 43 fish entrainment studies conducted at hydroelectric projects located primarily in the northeast, southeast, and midwest United States in the early to mid 1990s. The EPRI review indicated that most of the warmwater species occurring in Lake Aldred have been entrained in other hydroelectric projects, although the extent of entrainment varied among species and from project to project. One constant observation was that typically most of the fish entrained were less than 4 inches in length and were often juvenile fish or species such as minnows that never exceed a length of 3 or 4 inches. EPRI found that overall, 90 percent of the fish entrained in the 43 studies were less than 4 inches long.

EPRI (1997) also reviewed the results of 51 turbine mortality tests at hydroelectric projects throughout the United States (multiple tests were often conducted at different units at the same project). EPRI found that survival usually exceeded 90 to 95 percent for fish less than 4 inches long (the size class most likely to be entrained), although survival was reduced as fish length increased. Large, slow-speed Kaplan turbines, similar to the larger units proposed at Holtwood, typically showed the highest survival rates, usually exceeding 90 percent. This is consistent with PPL's prediction that survival rates would be higher in the Kaplan units. Because it is likely that most of the resident

species that would be entrained at Holtwood would be less than 4 inches long, and a relatively high percentage of those fish entrained would survive passage, there is little basis for requiring any fish protection measures at the project specifically for resident species, or for requiring mitigation for any resident fish mortality that may occur. Resident fish would still be afforded some protection, however, by the measures provided for anadromous and catadromous species, because those measures would be operational from about April 15 through at least late-fall (table 2), when most resident fish movement would likely occur.

Effects of Proposed Project Flow Releases

The proposed amendment would result in the re-distribution of flows at Holtwood, with higher flows being passed down the tailrace channel (from the existing 31,500 cfs to the proposed 62,100 cfs), a reduction in the spillage over the project dam, a minimum conservation flow release of 200 cfs into the Piney Channel, a release of the Unit 1 generation flows of about 1,200 to 3,150 cfs to the Piney Channel instead of to the tailrace, a continuous release to the bypassed reach approximately equal to the existing leakage from the dam, and a drought release of 44 acre-feet per day from storage if approved by SRBC. There would also be habitat modification associated with some of the releases. The tailrace channel would be widened and deepened to accommodate the higher flow in the tailrace and ensure that adequate zones of passage for fish migration (areas of adequate depths and water velocities that do not exceed fish swimming speeds) are maintained in the tailrace. Excavations would also occur in Piney Channel to improve the hydraulics for upstream fish passage and ensure that flow releases into the Piney Channel are distributed in the most effective way for habitat protection. The major increase in tailrace flows is an integral part of the project expansion, but the additional releases into Piney Channel and the bypassed reach, and the drought operations, are part of the COA.

The COA also provides for PPL to operate the amended project to release a minimum streamflow (including leakage) equal to, on a daily volumetric basis, 98.7 percent of the minimum flow required by the Commission to be released at the downstream Conowingo Project or the net daily inflow into Lake Aldred. The COA does not specify where this minimum release would be made from the project, except that it would include all releases, including leakage, so some of the minimum flow would likely be made through the powerhouse into the tailrace. PPL also now proposes to release a continuous minimum flow of 800 cfs from the project, or net inflow into Lake Aldred, whichever is less, which would begin at the latter of either the initiation of Unit 1 discharges to Piney Channel or the initial operation of the new exciter replacement units in the existing powerhouse. No other flow recommendations have been made by commenting entities for the protection or enhancement of aquatic habitat downstream of the project.

Our Analysis

The aquatic habitat in the tailrace channel can currently be characterized as a deep run, with a mostly bedrock substrate and a strong current during project operation, but minimal current and more pool-like character when the project is shut down (there is no minimum flow requirement but about 210-cfs leakage occurs through the existing generating units). The tailrace remains wetted (and deep in many locations) during shutdowns because the downstream Conowingo reservoir backwaters into the tailrace upstream to the Holtwood powerhouse. The water surface elevation fluctuates about 10 feet between full operation and project shutdown (PPL, 2007b). The tailrace serves as a migratory corridor for diadromous species, plus adult and juvenile resident fishes likely use the tailrace channel for foraging. Spawning probably does not occur in the channel because of excessive depths, high velocities, fluctuating water levels, and unsuitable substrate. Under proposed operations, the tailrace channel aquatic habitat would remain essentially the same, although the tailrace would be widened and deepened in some locations to accommodate the higher powerhouse flows. The predominantly bedrock channel would remain, with water surface elevations and velocity fluctuating depending on powerhouse operations. The tailrace would continue to serve as a migratory corridor, although passage conditions would improve with the excavations to ensure adequate zones of passage. Resident species would likely continue to use the modified tailrace as they do under existing conditions.

Piney Channel currently only receives substantial flows when the Holtwood dam is spilling or the spillway fish lift is in operation and attraction water is being released. The channel runs through bedrock outcrops and when watered is being spilled, the channel is riverine in nature with rapids and riffles, and in fact is used by whitewater boaters. During periods of no spill over Holtwood dam, and only leakage from the dam, the channel is dewatered in many locations with some isolated shallow pools. When watered during the spring migration period, American shad and other fish use Piney Channel as a migratory route to approach Holtwood dam and access the spillway fish lift. Resident species may also use the channel for foraging, but probably not for spawning because of the fast flows and bedrock substrate. Under proposed operations, Piney Channel would receive a minimum conservation flow and an additional flow from the discharge of Unit 1, plus excavations would be made to ensure adequate fish passage and proper distribution of flows.

PPL (2007b) modeled various flows versus weighted usable area, an index of habitat, for several resident species and life stages (smallmouth bass, walleye, channel catfish), and found that habitat suitability was generally highest at flows of about 200 to 500 cfs. However, flows as high as 1,200 cfs and 5,000 cfs would provide the highest suitability (based only on depth and velocity) for smallmouth bass and walleye spawning, respectively, although the reach would probably not provide the best spawning substrate for either species. At Piney Channel flows of up to 3,150 cfs, PPL (2007b) concluded that suitable conditions for upstream shad passage would occur, although certain areas would require excavation to ensure that passage barriers do not occur at some flow levels.

Provision of flows to Piney Channel ranging from a minimum conservation flow of 200 cfs to a maximum Unit 1 discharge of 3,150 cfs would enhance aquatic habitat in the channel, while also providing improved fish passage through the channel up to the spillway fish lift at Holtwood dam. This would be a major enhancement for a channel that currently is dewatered for much of the year, during non-spill periods. PPL, however, has not specified a proposed flow release schedule for the channel. We expect that higher flow releases via the Unit 1 discharge would occur during the spring months, to coincide with the shad migration season, with lower flows scheduled for the summer period. The actual operation of Unit 1 would also likely depend on electrical demand. PPL provided a draft MSFOP in its June 13, 2008, response to Pennsylvania DEP, but that manual did not provide a specific schedule for releases into Piney Channel, because it would depend on a number of operating factors. So, it appears that Piney Channel would experience a range in habitat conditions associated with the range of flows noted above.

The remainder of the bypassed reach below Holtwood dam (west of Piney Channel) currently receives substantial river flows (into the hundreds of thousands of cfs) when the Holtwood dam is spilling, but flashboard leakage flows of only about 20 cfs plus a flow of about 11 cfs through a pipe during low-flow periods. When the dam is spilling heavily, the reach has the characteristics of a large river with high velocities and heavy rapids, but when spill ceases, the reach becomes a series of isolated pools with substantial wetland areas and scrub-shrub growth in the downstream end of the reach. Some of the isolated pools maintain sufficient water quality and have adequate substrate to support spawning by nest-building centrarchid species (bluegill, redbreast sunfish) during periods of low or no spill (PPL, 2007b). Fish use of the reach during heavy spill conditions is not known, because conditions are too dangerous to sample during those periods. American shad, however, are known to migrate into the reach during the spring migration period, which is one of the reasons for the low efficiency of the existing project fish lifts.

The current habitat conditions in the bypassed reach would continue with the amended project, although the periods of spillage and associated riverine conditions would be substantially reduced, from about 38 percent to 17 percent of the time on an annual basis. Thus, the period of time that the reach would remain as a series of isolated pools and wetlands, some that contain rare plant species, would increase. PPL proposes to maintain current leakage flow into the reach, so habitat conditions should remain the same as currently occurs during the summer months, although for a greater period of time during the year. It is not clear, however, how PPL would specifically maintain the current leakage flow, except that it would continue to operate the existing 10-inch pipe and would allow continued leakage through the flashboards.

The reach would continue to receive heavy spill flows during the spring runoff and other periods of high flows, but spillage would cease faster than under current conditions. This would enhance the spring shad migration by reducing the attraction into the bypassed reach, allowing fish to more easily locate the entrances to the fish lifts and improve their efficiency in moving shad past the Holtwood Project.

Freshwater Mussels

Few mussels were found in areas downstream of Holtwood dam during the licensee's surveys, but unsuitable (bedrock) substrate may be the primary reason for the low numbers. Better mussel habitat occurs in Lake Aldred and four species were found during the reservoir surveys. No commenting entities made specific recommendations regarding measures for freshwater mussels, but Pennsylvania FBC commented that mussel populations in the lower Susquehanna River reservoirs are depressed. It believes this may be the result of a severed or weakened host fish linkage caused by these hydropower facilities, related to the historical lack of fish passage up the river, and the inability of host fish species to distribute glochidia to colonize upstream areas.

Our Analysis

Construction and operation of the amended project should have minor effects on mussel populations in the area. None of the areas proposed for excavation or major construction activities are known to contain suitable mussel habitat or concentrations of mussels. Mussel populations in Lake Aldred would not be affected by project operation, because the proposed reservoir operations would remain essentially the same as now, with the exception of slightly higher minimum reservoir levels during the fall months, if drought operations are implemented. This should be a small benefit to mussels in that more aquatic habitat would remain wetted later into the fall. Regarding Pennsylvania FBC's concern about the historical lack of passage for fish host species, the proposed amended project includes several enhancements for fish passage, including additional operation of the fish lifts at Holtwood for resident fish passage. Many of the fish host species for the mussel species that occur in Lake Aldred also occur in the reservoir and in the Susquehanna River, and would be available for passage through Holtwood and upstream projects.

3.3.3.3 Cumulative Effects

Based on information in PPL (2007a), agency comments, other filings related to the project, and staff analysis, we identified water quality and fisheries as the resources that have the potential to be cumulatively affected by the increased capacity and improvement of fish passage at the Holtwood Project. For water quality, we proposed that the geographic scope would extend from the upstream Safe Harbor Project downstream to Chesapeake Bay, and for fisheries we proposed a geographic scope of the Susquehanna River Basin upstream of the York Haven Project downstream to the Chesapeake Bay. Some commenters on the scoping document (FWS) recommend that the geographic scope for this analysis be expanded, and we will attempt to discuss potential cumulative effects on a wider geographic area to the extent that available information in the record allows. We choose a temporal scope looking ahead 16 years, concentrating on the effects of reasonably foreseeable future actions on the resources.

Water Quality

In section 3.3.3.1, we discussed that the lower Susquehanna River has had a history of high turbidity levels and sediment loading, high nutrient loading, and low DO levels in two of the larger hydroelectric project reservoirs (Safe Harbor and Conowingo projects). DO is the primary water quality parameter that could be cumulatively affected by hydropower operations in the lower Susquehanna River. The high sediment and nutrient loading is primarily associated with the large amount of agricultural lands and active farming in the middle and lower Susquehanna River basin, and some runoff from the more populated urban areas such as Harrisburg, York, and Lancaster. Once river flows reach the larger reservoirs of the lower river, however, water velocities decrease, less mixing occurs within the water column, and stratification sets up whereby the colder deeper parts of the reservoir no longer mix with the warmer surface waters, due to differences in density. The DO in the deeper part of the reservoir (the hypolimnion) is consumed by normal decay processes, and because the hypolimnion and the surface waters (the epilimnion) can no longer mix, DO levels in the hypolimnion drop to very low levels (often zero), while the epilimnion maintains relatively high DO levels. Stratification occurs in both the Safe Harbor and Conowingo reservoirs, but generally not in Lake Aldred because of its more riverine nature and lower storage capacity.

Low DO levels occur in the hypolimnion of both the Safe Harbor and Conowingo reservoirs, and because both projects withdraw water from the hypolimnion for power generation, they may release waters low in DO. As a result of previous studies and regulatory action on this issue, both Safe Harbor and Conowingo have installed turbine aeration systems on at least some of their generating units. The success of these systems is not precisely known, although recent water quality data from Lake Aldred indicate that DO levels in Lake Aldred consistently exceed state standards, with the lowest level recorded in 2006 studies at 5.27 mg/L. This is an indication that Safe Harbor is not releasing low DO waters into Lake Aldred. Holtwood flow releases are also well oxygenated. Continuous monitoring during the summer months in the Holtwood tailrace in 2005 and 2006 revealed that DO levels are typically high, with 99.3 percent of the samples exceeding the state standard (4.0 mg/L) in 2005, and 100 percent of the samples exceeding the state standard in 2006. Data on DO levels downstream of Conowingo are not immediately available.

The proposed amended project would continue operations similar to current operations, although more flow would be passed through the generating units because of the capacity expansion. Waters released from Holtwood should continue to have relatively high DO levels, although there is the potential for slightly lower DO levels in the releases from the new units, because those units may not oxygenate the flows during passage, as now occurs with the existing units (reportedly 0.2–0.8 mg/L). This, however, may have little effect on DO levels within Conowingo reservoir and downstream of Conowingo because of the large storage capacity of Conowingo. During summertime low-flow periods, Conowingo has essentially total control over the Susquehanna River flows into the lower river and Chesapeake Bay. Based on our review of gage data from

the Conowingo USGS gage (no. 01578310), Conowingo is able to cease generation for an entire weekend, except for the minimum flow, and resume generation on Monday morning as power demand increases. Flow releases from Holtwood, which would be at a minimum 98.7 percent of the minimum flow requirement at Conowingo, or a continuous flow of 800 cfs, would likely have little effect on Conowingo operations, would not likely have any effect on the stratification in Conowingo reservoir, and in turn would not affect the DO in the Conowingo releases. During the summer months, the minimum release from Holtwood would be 4,935 cfs (the Conowingo minimum flow requirement is 5,000 cfs), and this could assist Conowingo in meeting its minimum flow requirement without utilizing storage, but may not be of sufficient volume to have any effect on stratification in the reservoir. If any effects of the Holtwood releases were to occur, however, by acting to break up the stratification, these effects would be beneficial, in that bottom waters would be re-oxygenated prior to release below Conowingo.

Considering that proposed Holtwood operations would actually release more flow downstream on a more continuous basis than current summer peaking operations, and those releases should continue to be well-oxygenated, we conclude that these operations would not cumulatively affect water quality in the lower Susquehanna River and Chesapeake Bay, except potentially in a positive way.

Fisheries

As we described previously, the current fish passage facilities at Holtwood are not effective in passing a high percentage of the shad that are passed at the downstream Conowingo Project. The average efficiency of the Holtwood facilities during the first 12 years of operation has been only 32 percent of the fish passed at Conowingo, with some years well below that average. Because Holtwood is only the second of four lower river hydro dams that shad must pass before reaching the larger areas of suitable spawning habitat in the basin, the efficiency should be higher. Simple math illustrates that, if all the fish facilities on the lower river were 90 percent efficient, only about 66 percent of the fish approaching Conowingo dam would be successful in passing the fourth dam (York Haven). The deficiencies of the Holtwood fish passage facilities are well documented, so PPL proposes substantial enhancements to that system as part of the proposed amendment. The amendment itself should improve fish passage by diverting flows out of the bypassed reach and into the tailrace where fish would have a greater chance of finding the fish lift entrances. The other enhancements were described in section 3.3.3.2 and include improvements to the mechanics of the fish lifts, and measures to improve passage in the bypassed reach that would bring more fish into the vicinity of the fish lift entrance. These enhancements should substantially improve the efficiency of the upstream fish passage facilities at Holtwood, but the PPL proposal also includes a program for monitoring passage, and if passage efficiency does not meet agreed-to targets, PPL would make operational or structural modifications to improve efficiency.

For downstream passage, Holtwood is also an important project in that it is one of four projects that downstream migrants from the upper basin must pass before reaching

the Chesapeake Bay and Atlantic Ocean. PPL proposes to monitor survival of downstream migrants past the project, and to make additional operational or structural changes to improve survival, if required. So, for anadromous and catadromous species, the proposed amendment and associated fish passage improvements should have a positive cumulative effect on these populations, in turn positively affecting any fisheries that may develop for these species, once the management agencies decide to re-open the fisheries. These improvements should allow more fish to reach spawning grounds in the upper basin (or in the Sargasso Sea, for American eel), and to in turn successfully emigrate from the Susquehanna River to the Chesapeake Bay and Atlantic Ocean.

For resident fish species, PPL proposes to expand the period of operation for upstream passage of resident species, while measures provided for downstream passage of anadromous and catadromous species should also provide some level of protection for resident species, related to turbine entrainment. Although it is unclear what the benefits may be for additional passage of resident species, additional passage of these species would somewhat restore the connectivity of fisheries habitat in the lower Susquehanna River, and may result in a positive cumulative effect on resident species.

3.3.3.4 Unavoidable Adverse Effects

Project construction would involve a large amount of excavation in and near the riverbed. Although PPL would use sedimentation and control measures and best management practices during construction, there still is the potential for some runoff of sediment and fines from the site to the river, or generation during in-river construction, having localized effects on water quality and aquatic habitat.

Project operation would result in some unavoidable fish entrainment and mortality, although the overall effects on the local fish populations are not expected to be substantial.

3.3.4 Terrestrial Resources

3.3.4.1 Affected Environment

Upland Vegetation

The oak, hickory, pine forest association reaches its northern limit in the lower Susquehanna watershed. Historically, these species dominated the area, but have since become less common because of the conversion of land for agricultural, timber harvest, residential and commercial uses, and disease (in the case of chestnut). Vegetation located around Lake Aldred today is considered to be second and third growth timber dominated by hickories and pitch pine, as well as white, chestnut, and scarlet oaks. Softwood stands consisting of eastern hemlock, eastern red cedar, eastern white pine, and ornamental species such as Scotch pine also can be found in various sections of the project area.

Wetlands

Wetlands are extremely limited on the shoreline of the reservoir, largely due to relatively abrupt shoreline topography. National Wetlands Inventory maps indicate that wetlands are clustered near the Conestoga Islands, and also on the east shoreline of Lake Aldred in Martic Township. The majority of these small palustrine forested (PFO) and palustrine scrub/shrub wetlands range from less than 1 acre to 3 acres in size. National Wetlands Inventory maps also indicate two palustrine emergent wetland (PEM) areas associated with Weise Island totaling approximately 17 acres in size. In addition, soil surveys of Lancaster and York counties indicate the predominance of Mt. Airy and Manor soils which are moderately deep, somewhat excessively drained soils, generally found on ridgetops, side slopes, and hillsides. These soil series rarely form hydric soils, and therefore would be unlikely to enable the development of wetlands.

Wetland surveys that PPL completed in 2005 and 2006 found additional wetlands and expanded the known boundaries of most National Wetlands Inventory-mapped wetlands. Most of the larger islands in Lake Aldred were classified as completely PFO, which are dominated by woody vegetation at least 20 feet tall. Shoreline PEM, typically dominated by low growing herbaceous vegetation, are not numerous or extensive in the project area. Where these wetlands do occur, they rely on regular wetting by reservoir water level fluctuations. In contrast, the PFO in the project area are above the influence of daily fluctuations and rely primarily on annual flooding and overbank flows to maintain wetland structure and function. The wetlands functions include providing habitat for wildlife, endangered species, and fish, as well as stabilizing the shoreline.

The remnants of an old canal in York County have since filled in and now serve as a linearly shaped palustrine scrub/shrub wetland, dominated by woody vegetation less than 20 feet tall. Hydrology is maintained by trapped runoff and intercepted groundwater, not reservoir fluctuations or annual river floods. Below Holtwood dam an approximately 34-acre "riverbed emergent marsh" contains a patchy mosaic of equal parts rock, open water, and PEM. Although plant diversity is low in this area, the wetland remains partially submerged throughout the year because of its mid-channel location, and pools within it serve as fish rearing habitat. Other wetlands below Holtwood dam are labeled "erosional remnant wetlands" and have developed in scoured-out depressions of bedrock that trap water from precipitation and high river flows. In 2006, additional wetlands were mapped downstream of the dam and in a retired ash basin where excavated material may be disposed. Some emergent wetlands have formed along ledge areas in the tailrace that were excavated in 1997 to reduce fish stranding problems. These areas experience wide fluctuations in water levels due to changing flows in the tailrace during operational activities.

Special-status Plant Species

PPL contacted Pennsylvania DEP and conducted field surveys to identify special status plant species that may occur in the project area. Four state-listed species were

found on project property: scarlet ammannia, American holly, sticky goldenrod, and white doll's daisy. In addition, St. Andrew's cross, which is being reviewed for rarity and potential future listing, was found. A summary of the status, habitat requirements, and occurrence within the project area for each species is presented in table 16.

Table 16. Special-status plant species with the potential to occur in the Holtwood Project area. (Source: PPL, 2007a)

Common Name (Scientific Name)	Status	Habitat Association in Proposed Project Region	Known or Potential Occurrence in Project Area
Scarlet ammannia (<i>Ammannia coccinea</i>)	SE	PEM wetlands and riverine shorelines with deep muddy soils	Observed in PEM wetlands surrounding Lake Aldred
White doll's daisy (<i>Boltonia asteroides</i>)	SE	Moist, well-drained soils with full sun to partial shade	Observed throughout the bypassed reach
Vasey's eupatorium (<i>Eupatorium godfreyanum</i>)	TU	Open woods and disturbed open sites	Observed on Piney Island
St. Andrew's cross (<i>Hypericum stragulum</i>)	TU	Dry woodlands, dry sandy soil	Observed on Piney Island
American holly (<i>Ilex opaca</i>)	ST	Moist, well-drained soils with full sun to partial shade	Observed on Piney Island and several other islands in the bypassed reach.
Sticky golden-rod (<i>Solidago spatulata</i> ssp. <i>Randii</i> var. <i>racemosa</i>)	SE	Gravelly soil with full sun	Observed on rocky outcrops within the bypassed reach

Notes: SE – Pennsylvania Endangered

ST – Pennsylvania Threatened

TU – Tentatively Unknown (state of Pennsylvania classification of plant species believed to be in danger of population decline, but which cannot presently be included within another classification due to taxonomic uncertainties, limited evidence within historical records, or insufficient data.)

Wildlife

The forested area surrounding Lake Aldred provides habitat for a variety of woodland species such as red and gray fox, raccoon, red and gray squirrel, chipmunk, turkey, opossum and white-tailed deer. Species such as the yellow-billed cuckoo, black-

capped chickadee, house wren, song sparrow, white-breasted nuthatch, brown creeper, and an assortment of woodpeckers were abundant along the wooded shorelines of the project lands. Warblers, tanagers, and orioles were also observed using the forests during migration in late May 2005. Wildlife that inhabit the non-forested cover types and suburban areas of the project area include American robin, eastern bluebird, woodchuck, skunk, mourning dove, and rock dove.

Two retired ash basins are located on PPL lands within a mile from the powerhouse, and PPL currently proposes these sites as the locations for disposal of excavated materials. The habitat immediately surrounding these locations is forested and contains similar woodland species as found along Lake Aldred. The oldest ash basin is approximately 32 acres, has been capped with topsoil, and is now used as an agricultural field. The more recently retired ash basin is approximately 43 acres and is now grassland-savannah, with a dominant autumn and Russian olive stand. The wildlife in the habitat would be similar to those found in the non-forested cover types described above. A thin wetland marks the northern boundary of the more recently retired ash basin. Common yellow throat was heard singing from this wetland during the avian surveys of 2006. In addition, avian surveys recorded prairie warbler, blue-wing warbler, yellow-breasted chat, and white-eyed vireo using the retired ash basins and forested edges.

The open water area of Lake Aldred provides habitat to a variety of aquatic-dependent wildlife. Mud imprints along the shores of the reservoir indicate that mammals such as mink and raccoon use the margins of the reservoir for foraging. Several river otter or muskrat middens were observed below the dam. The 2006 springtime bird surveys revealed a diversity of migrating warblers and other songbirds using the upland habitat in York and Lancaster counties, as well as the vegetated islands below Holtwood dam (i.e., Piney Island). A heron feeding ground is located just downstream of the Piney/Barkley Island complex. A dozen or more great blue heron feeding among the shallow riffles below the Norman Wood Bridge (Route 372) is not uncommon on a daily basis. Resident bald eagles and osprey, which are discussed in greater detail below, use the reservoir and river downstream of the dam. Turtle species such as snapping turtles, red-eared sliders, painted turtles, common map turtles, and wood turtles were all seen basking along the reservoir shores in late May 2005.

Between the Holtwood facility and the mouth of the Susquehanna River in the Chesapeake Bay, the wildlife community is similar to that surrounding Lake Aldred. The Chesapeake Bay provides habitat for a wide variety of birds that stop at the bay during spring and fall migrations. The Atlantic coast is one of four main migratory flyways in North America and the bay is an important resource for raptors, songbirds, and shore birds that migrate along this route. In addition, about one million swan, geese, and ducks winter on the bay (FWS, 2008).

Wetlands provide ideal habitat for amphibians and pollinating insects. Many frogs take advantage of the erosional remnant wetlands that lay in rock depressions, protected from predatory fish. Gray tree frogs were heard calling at these erosional remnant

wetlands on islands downstream of Holtwood dam, and the pools contained tadpoles of numerous amphibian species during the early summer. Later in the summer, frog species such as the pickerel, green, leopard, and bull frog were observed along tributaries and wetlands. Butterflies were plentiful during the flowering periods for wetland vegetation. Prominent species such as the monarch, viceroy, tiger swallowtail and zebra swallowtail were among the species observed from August to September 2005.

Sensitive Wildlife

Sensitive wildlife species include those listed by the state of Pennsylvania as threatened, endangered, proposed threatened, proposed endangered, or at risk. The project area does not contain any species that are federally listed as threatened or endangered, or critical habitat for such species.

PPL consulted with the Pennsylvania Game Commission and Pennsylvania FBC to identify sensitive wildlife species with the potential to occur in the project area. Five species—three birds and two reptiles—were identified. Table 17 presents these species, their habitat requirements, and notes on their occurrence within the project area.

Table 17. Special-status wildlife species with the potential to occur in the Holtwood Project area. (Source: PPL, 2007a)

Common Name (Scientific Name)	Status	Habitat Association in Proposed Project Region	Known or Potential Occurrence in Project Area
Bald eagle (<i>Haliaeetus leucocephalus</i>)	ST	Nests in mature forests with ample supply of fish in immediate vicinity	Two active nests in the project area
Osprey (<i>Pandion haliaetus</i>)	ST	Nests in mature forests with ample supply of fish in immediate vicinity	Two active nests in the project area
Prothonotary warbler (<i>Protonotaria ctirea</i>)	SR(P)	Nests in wooded areas near water, especially swamps and flooded areas near large rivers	No sightings in the project area, but sightings reported along the Susquehanna River north of the project, and suitable habitat exists in the project area.
Red-bellied turtle (<i>Pseudemys rubriventris</i>)	SE	Deep, slow moving water with sandy substrate and aquatic vegetation	No habitat in the project area due to lack of submerged aquatic vegetation

Common Name (Scientific Name)	Status	Habitat Association in Proposed Project Region	Known or Potential Occurrence in Project Area
Rough green snake (<i>Opheodrys aestivus</i>)	SE	Wet meadows and woodlands areas along lakes and streams	No sightings in the project area
Notes: SE Pennsylvania Endangered			
ST Pennsylvania Threatened			
SR(P) Pennsylvania Rare (Proposed)			

3.3.4.2 Environmental Effects

Wetlands

PPL conducted wetlands surveys that indicate wetlands are present within the tailrace and along the shores of Piney Island. Construction activities would include tailrace excavation and clearing for access roads. These activities could affect wetlands by removing vegetation, altering hydrologic characteristics, and compressing soils.

PPL states that its construction plans minimize effects on wetlands to the greatest extent possible. During the application preparation process, PPL worked with the Corps, Pennsylvania DEP, and Pennsylvania Department of Conservation and Natural Resources (Pennsylvania DCNR) to discuss potential effects of the proposed amendment on wetlands and to identify ways to minimize these effects.

The excavation of some wetland areas would be unavoidable. Excavation of the project tailrace would remove a total of 0.73 acre (31,694 square feet) of wetlands. The majority of these wetlands (30,300 square feet) are PFO and the remainder is PEM. Construction of the lower tailrace access road and access road on Piney Island would temporarily remove 0.5 acre (21,860 square feet) of PFO wetlands.

Improvements to recreational facilities at the Pequea Boat Ramp, the tailrace, and along McCall's Ferry Road in York County would also affect wetlands and floodplain forest areas. Approximately 400 square feet of forested floodplain would be converted to a fishing platform in the tailrace. Expansion of the Pequea Boat Ramp would affect 0.7 acres (30,620 square feet) of floodplain forest. Approximately 0.1 acre (6,000 square feet) of upland forest understory would be converted into a parking area along McCall's Ferry Road.

To minimize the temporary effects associated with the access roads associated with excavation in the tailrace, PPL would remove the road following construction and develop and implement a plan to reclaim the affected wetland habitat. PPL had proposed to mitigate permanent wetland effects by restoring wetland function to areas around the York Furnace Boat Ramp on Lake Aldred or at another suitable location. In comments on the draft EIS, PPL indicates that it would construct a wetlands mitigation project along

Landis Run in Manheim Township and would provide further details following consultation with Pennsylvania DEP.

PPL's proposed mitigation for amendment effects on wetlands and uplands area would include creating more than 2.1 acres (90,000 square feet) of new wetlands; enhancing more than 1.5 acres (65,000 square feet) of PFO wetland with riparian buffer tree plantings along Landis Run; enhancing approximately 1.8 acres (78,000 square feet) of upland forested buffer plantings; removing three dams on Pequea Creek, Groff Run, and the Conestoga River; restoring 3,200 linear feet of streambed on the Pequea Creek; and planting 5 acres (217,800 square feet) of forested riparian buffer adjacent to the Susquehanna River on existing PPL lands currently in agricultural production.

FWS commented that a visit to the proposed mitigation site²⁹ in September 2007 indicated that existing hydrologic conditions at the site were not suitable for the creation of wetlands. It also noted that the levels of excavation required to improve hydrologic conditions and challenges with enforceability make the site unacceptable. FWS recommends that PPL develop and implement a wetland mitigation plan that would create, restore, or preserve wetlands and riverine habitat. FWS recommends that PPL submit the plan to FWS and other resource agencies for approval prior to construction.

Our Analysis

Construction of the proposed project would remove approximately 0.73 acre of PFO wetlands and temporarily affect a combined 0.5 acre of PFO and PEM wetlands at the construction site within the tailrace and on Piney Island. Permanent effects would occur to wetlands within the tailrace excavation area, which includes three small islands in the middle of the tailrace and shoreline along the downstream end. The construction of access roads for the excavation sites would temporarily affect wetlands along the northeastern shore of Piney Island. Changes in project operations would have indirect effects on wetlands by changing existing patterns of scour and inundation. The wetland near the retired ash basin would not be affected as it is outside of the area where excavated material would be deposited.

Disturbance to wetlands would result in a loss of wetland function, including wildlife habitat, flood attenuation, and retention of sediment and nutrients. If PPL prepares and implements a wetland mitigation plan that would result in the creation, enhancement, or protection of wetlands, as recommended by FWS, the effects of the loss of wetland functions would be minimized.

The proposed operations would divert water that currently flows over the Holtwood dam and into the bypassed reach through the new powerhouse and into the excavated tailrace. The magnitude of high flows within the bypassed reach would be

²⁹ We assume that this comment is in reference to a visit to the proposed York Furnace Boat Ramp wetland restoration site.

reduced. The spatial arrangement of wetlands in the bypassed reach is highly variable from one year to the next, depending on patterns of sediment deposition following the springtime floods. These wetlands could be affected by proposed operations that could change the current level of water supply to the bypassed reach and alter past patterns of sediment disposal. Increased flows in the tailrace could also affect wetlands if there is a subsequent change in inundation frequency for shoreline vegetation. Additionally, increased flow releases could lower the water level in Lake Aldred and affect wetlands located on the reservoir margins.

PPL states that the proposed project would alter the present hydrology experienced by the wetlands in the bypassed reach, but the excavation within the tailrace would allow the channel to contain increased flow volumes without increasing the water surface elevation. Within the bypassed reach, spill events during the growing season are infrequent. This would not change following construction. PPL also notes the proposed project would direct flows from the Unit 1 generating turbine into Piney Channel. These flows are expected to deposit sediment and create additional sites for wetland development. PPL states that increases in flow releases associated with the proposed project would not affect the hydrology of Lake Aldred, except during severe drought conditions that only occur every 50 to 100 years. PPL does not expect any change in vegetation structure that may occur during drought years to be permanent, because upland species would not survive water levels associated with the predominant hydrologic conditions at the reservoir.

The proposed project operations would not create changes in water surface elevations in the tailrace or in Lake Aldred that would affect wetlands. Proposed operations would likely affect wetland areas in the bypassed reach because they would reduce scouring flood flows and alter patterns of sediment deposition. The release of water from Unit 1 into the Piney Channel could create new wetland areas, offsetting the affects in the bypassed reach. However, because the formation of new wetlands would be variable from year to year, these affects have not been quantified. The implementation of a wetland mitigation plan that would create, enhance, or protect wetlands, as recommended by FWS, would minimize the overall effects on wetland functions in the project area.

Special-status Plants

Four sensitive plant species—American holly, St. Andrew's cross, white's doll daisy, and sticky golden rod—are located near areas where construction activities would occur. American holly is located on Piney Island and could be affected by the construction of access roads. The other two species occur in the bypassed reach and Piney Channel. Proposed excavation within Piney Channel could affect these species. A fifth species, Scarlet ammannia, is located in PEM wetlands along the perimeter of Lake Aldred and could be affected by fluctuating reservoir levels.

PPL surveyed and mapped the occurrence of American holly on Piney Island and used the maps when designing the plans for access roads to minimize effects on this species to the greatest extent practical. PPL estimates that approximately four American holly saplings would be removed and that no effects on St. Andrew's cross would occur. Along the southwestern side of Piney Island, an access road would remove approximately 3 percent of the white doll's daisy population. No proposed construction activities would occur in areas with sticky golden rod. PPL proposes to prepare a plan, for Pennsylvania DCNR approval, that would restore habitat for American holly and white doll's daisy temporarily affected by construction. The proposed plan would also incorporate measures to control the spread of noxious weeds in areas disturbed by construction.

Pennsylvania DCNR commented that proposed project construction would have direct effects on American holly and white doll's daisy, and notes that it is working with PPL to develop an active management and monitoring plan for American holly, white doll's daisy, and sticky golden rod. Pennsylvania DCNR commented that both white doll's daisy and sticky golden rod occur in the bypassed reach and could be affected by project operations that would reduce scouring associated with flood flows and reduce flows in the bypassed reach during summer months. In response to DCNR comments, PPL has agreed to provide irrigation flows of approximately 1,000 cfs for 1 hour on days when river flows are between 31,000 and 61,500 cfs. Based on previous flows in low, moderate, and high flow years, PPL expects that the frequency that it would need to supply irrigation flows to the bypassed reach would range from 0 days per month in low flow years to 14 days in June in a high flow year.

Our Analysis

PPL has made reasonable efforts to develop construction plans and facility designs that avoid effects on sensitive plants. However, construction of the proposed project would affect American holly and white doll's daisy. These effects would occur at the individual plant level and would not affect the entire population. Implementation of a monitoring and adaptive management plan, developed in consultation with Pennsylvania DCNR, would mitigate effects on special-status plants associated with proposed construction.

White doll's daisy and sticky golden rod both occur in the bypassed reach and grow in areas scoured by seasonal floods. Scarlet ammannia occurs along the margins of Lake Aldred in PEM wetlands. New hydrologic conditions in these areas resulting from operations of the proposed project could affect these species.

PPL states that a reduction of flood scouring in the bypassed reach would likely affect white doll's daisy. However, because sticky golden rod occurs at a higher elevation, which is typically dry but receives scouring during very high floods, PPL states that the proposed project would not affect this species. At the request of Pennsylvania DCNR, PPL has agreed to include sticky golden rod in the special-status species monitoring and adaptive management plan. PPL also notes that during severe drought

years, required conservation flow releases may lower the level of Lake Aldred. However, because reservoir levels would return to the normal level, PPL does not expect the proposed project to affect scarlet ammannia.

The proposed project would reduce seasonal flood flows in the bypassed reach, thereby decreasing scouring of areas colonized by white doll's daisy and sticky golden rod. Decreased scour could make this habitat suitable for other species that could outcompete the species of concern. Additionally, flows directed from Unit 1 into the Piney Channel could spill into the bypassed reach, inundating some white doll's daisy. The reduction of flows over the Holtwood dam would also affect white doll's daisy during the summer growing season when these plants require occasional root wetting. The implementation of the irrigation flows would mitigate this effect. Proposed project operations would not affect the upland area on Piney Island where American holly and St. Andrew's cross occur. Following severe drought years, the return of typical reservoir levels would re-water PEM wetlands occupied by scarlet ammannia. Additionally, these periods are expected to be short-term and rare, with more typical conditions returning with increased precipitation following the drought. Drops in Lake Aldred reservoir levels would not affect the long term viability of this population. Consultation with Pennsylvania DCNR to develop and implement a monitoring and adaptive management plan for white doll's daisy and sticky golden rod would mitigate effects on special status plants associated with the proposed project operations.

Wildlife

Construction activities could affect wildlife by removing habitat and disturbing wildlife with increased noise and human activity. Loss of habitat and increased disturbance could reduce breeding and foraging success, indirectly causing mortality or population declines. Collisions with vehicles and effects from the use of explosives could directly cause mortality.

PPL acknowledges that construction would affect wildlife through disturbance associated with loud noises and human activity. Excavation within the tailrace would remove shallow pools that are used as foraging areas for predatory wildlife, including great blue heron, mink, river otter, and raccoon. Additionally, depositing excavated rock into the retired ash basins would remove the agriculture field and grassland habitats, reducing food sources for deer, raccoon, wild turkey, and other grassland birds. However, the deposited rock would provide shelter for reptiles and small mammals. Following construction, PPL would remove all temporary access roads and restore these habitats with the planting of native species.

FWS commented that effects on riverine habitats associated with excavation in the tailrace have not been quantified. FWS recommends PPL mitigate for the effects on wildlife associated with the removal of the shallow pools in the tailrace by restoring, enhancing, or protecting similar habitat.

Our Analysis

Construction activities associated with the proposed project would create an unavoidable disturbance to some wildlife, a temporary loss of 9 acres of upland forest, and a permanent loss of approximately 6 acres (261,360 square feet) of upland forest habitat. During construction, large, mobile wildlife species, including great blue heron, would likely temporarily avoid the areas because of construction noise and habitat disturbance. Because the construction sites do not provide unique habitat in the area, these wildlife species are likely to use other habitats nearby. Some small and less-mobile species, such as small rodents and snakes that use forested habitats, could be affected more because of vegetation removal, the construction of access roads, and construction traffic. Excavation in the tailrace would eliminate some shallow pool habitat that provides foraging area for birds and mammals that eat fish and aquatic invertebrates. This habitat is not unique to the area and may be replaced by similar areas associated with flow releases in Piney Channel; however, use levels suggest it is a valuable resource for local wildlife. Quantifying the net loss (or gain) of such habitat under proposed flow conditions would enable PPL to more accurately assess these effects. If areas temporarily affected by construction activities are restored, as proposed by PPL, effects on wildlife would be reduced. Additionally, if PPL quantifies the loss of shallow pool habitat and prepares and implements an appropriate mitigation plan that protects, enhances, or preserves similar habitat, as recommended by FWS, effects of construction on wildlife could be further reduced.

Operation of the proposed project could affect wildlife if fluctuating water levels in Lake Aldred or the Susquehanna River downstream of Holtwood dam modify the character of existing habitat or food supply. In addition, wildlife also could be affected by operational activities on project lands including vegetation management and recreational use.

PPL acknowledges that during severe drought years, the water level in Lake Aldred could fall below current levels of normal fluctuation. Under these conditions, small wildlife species accessing the edge of the reservoir, like turtles, amphibians, and small mammals, would have to travel a greater distance between the water and surrounding vegetation. However, these periods are expected to be short-term and rare, with more typical conditions returning with increased precipitation following the drought.

PPL proposes to develop a land and shoreline management plan to protect plant and wildlife species on project lands. FWS recommends that PPL prepare, file, and implement a shoreline management plan for project lands, but recommends that the plan include lands within 330 feet of the high water mark and measures to protect wildlife habitat within this buffer area.

Operation of the proposed project is expected to improve fish passage at the Holtwood Project, increasing the number of shad that reach spawning areas. Increasing the shad population would increase food availability for animals that prey on fish, including eagles, osprey, and heron. Low water levels in Lake Aldred associated with

extreme drought years would affect species that frequently travel between the water and terrestrial vegetation. Increased travel time between vegetative cover and the water could make these animals more susceptible to predation and desiccation. Lower reservoir levels could also expose breeding areas for some amphibians or dewater basking areas for turtles. However, as noted by PPL, these effects are expected to be temporary and rare. Landscape management and recreational activities associated with the project could affect wildlife in areas surrounding the project waters. If PPL develops and implements a shoreline protection plan, as recommended by FWS, effects on wildlife could be reduced.

Special-status Wildlife

Two active bald eagle nests and two active osprey nests are located in the vicinity of project facilities. Suitable nesting habitat for prothonotary warbler is also present in the project area. Construction activities, including the blasting of bedrock and the operation of large vehicles have the potential to disturb these species, causing them to abandon nests. Bald eagles are protected under the Bald and Golden Eagle Protection Act (16 U.S.C. § 668 et seq.) from reduced productivity, nest abandonment, or injury that may occur as a result of construction noise.

PPL revised the original construction plans to reduce effects on a new bald eagle nest on Piney Island. New construction plans maintain an appropriate buffer distance between construction activities and the new nest site, as well as the other bald eagle and osprey nests in the project area. PPL has prepared a draft eagle monitoring and management plan in consultation with FWS. PPL filed the draft plan with the Commission on June 19, 2008, with its responses to the Commission's additional information request. Additionally, to avoid effects on nesting eagles and osprey, PPL proposes to sequence the timing of construction activities such that no work would occur within the buffer area during the nesting season. PPL maintains that the project would not affect PFO wetlands, the preferred habitat for prothonotary warbler.

FWS recommends that PPL finalize and implement the eagle monitoring and management plan prior to the commencement of construction.

Our Analysis

Bald eagles vary in their susceptibility to disturbance. Some eagles are not easily disturbed by the presence of human activity, while others tolerate very little activity before leaving the area. The new eagle nesting pair on Piney Island is at the southern end of the island, near the Norman Wood Bridge (Route 372) across the river. Because this nest location is subject to frequent highway noise, the pair of eagles that built it are likely more tolerant to noise than other nesting pairs. Nevertheless, blasting and hauling bedrock out of the tailrace is expected to be noisy. Implementation of an eagle protection plan, as proposed by PPL and recommended by FWS, that includes seasonal restrictions on activities, nest buffers, noise reduction measures, monitoring of eagle behavior, and streambank stabilization measures to protect nest trees, would minimize effects on bald eagles. The implementation of similar measures would also minimize effects to osprey.

Although PPL states that the project would not affect PFO wetlands, and therefore not affect prothonotary warbler, the three islands in the tailrace that would be removed are classified as PFO. If the removal of these areas occurs outside of the breeding period for the prothonotary warbler, or if PPL surveys the area and confirms the absence of nests prior to excavation, effects to the warbler could be minimized.

Operations of the proposed project are not expected to affect terrestrial habitat used by sensitive species. Surface water elevation is expected to remain similar to past levels within the tailrace and along Lake Aldred. As such, project operations would not affect habitat that supports bald eagles, osprey, and prothonotary warbler. Potential increases in fish populations associated with the proposed modifications to the project would provide more food for the eagle and osprey.

3.3.4.3 Cumulative Effects

Implementation of the proposed project is expected to improve fish passage at Holtwood. Improved fish passage would provide access to spawning habitat further up the Susquehanna River for anadromous species. Successful spawners and smolts would migrate down stream to the mouth of the Susquehanna River in the Chesapeake Bay, where they spend several years in the marine environment. Over time, if the proposed fish passage improvements are successful, fish populations in the Chesapeake Bay would increase, which would increase the food supply for fish eating birds and mammals in the Bay and lower Susquehanna River Basin.

3.3.4.4 Unavoidable Adverse Effects

Construction of the proposed project would permanently remove about 1.24 acres (54,000 square feet) of wetlands and 6 acres (261,360 square feet) of upland forest.

3.3.5 Recreational Resources

3.3.5.1 Affected Environment

Recreation Areas

The public has access to the shoreline within the project boundary for recreational activities, with the exception of areas containing project works. PPL provides formal public access to the project as part of the Holtwood Environmental Preserve, and at other recreation areas administered by various state and local agencies and organizations. Figure 12 identifies lands and formal recreation sites within the Holtwood Environmental Preserve, and recreation sites administered by other entities in proximity to the Holtwood Project boundary.

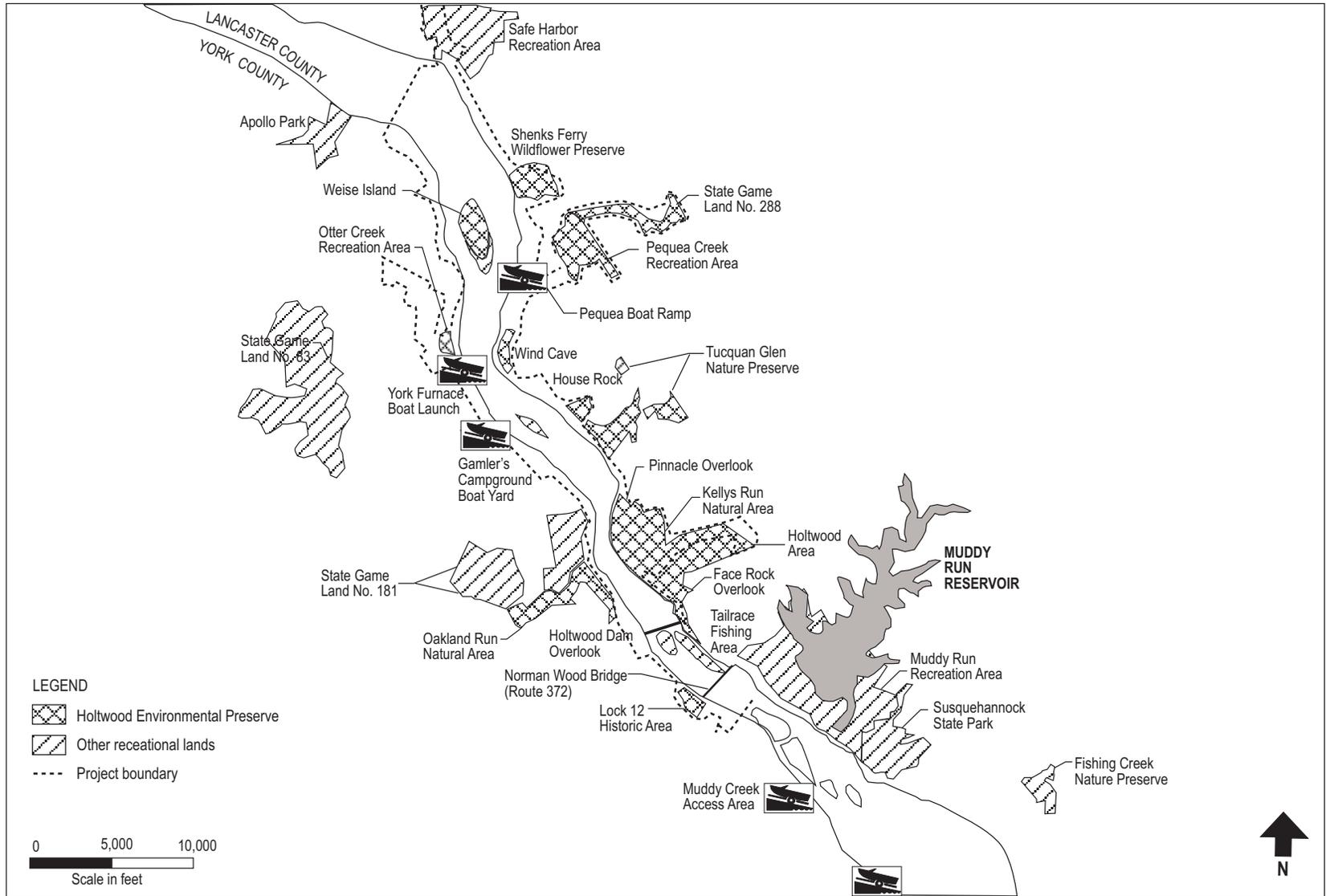


Figure 12. Location of public recreation areas at the Holtwood Project. (Source: PPL, 2007a, as modified by staff)

Holtwood Environmental Preserve

Following is a description of the recreational facilities associated with the Holtwood Environmental Preserve.

Otter Creek Recreation Area—The Otter Creek Recreation Area, located within the project boundary, includes facilities for camping, picnicking, boating, and hiking. The Otter Creek campground includes 90 campsites, and adjacent to the campground, the camp office and store, flush toilets, and showers. Hiking trails in the vicinity include the Otter Creek Trail, Game Land Trail, Urey Trail, and Mason-Dixon Trail. The Otter Creek picnic area is located along the waterfront adjacent to the campground. The York Furnace boat ramp is located near Route 425 and Indian Steps Road, with parking space for 26 cars and 32 cars with trailers. The Urey Overlook, accessible to the public only on foot via the Urey and Mason-Dixon Trail, provides a picturesque view of Lake Aldred, Weise Island, and surrounding area. PPL's property extends up the Otter Creek ravine for approximately 2 miles and includes 190 acres that have been designated as a natural area to remain in a generally undisturbed condition. Rustic trails into this area provide access for hikers and anglers.

Lock 12 Historic Area—The Lock 12 Historic Area, located within the project boundary, has facilities for picnicking and historic appreciation. The site includes the restored Lock 12 of the abandoned Susquehanna and Tidewater Canal, a restored limekiln, a picnic area with 14 tables and related facilities, including permanent toilets.

Holtwood Tailrace Fishing Area—The tailrace fishing area, located within the project boundary, is lighted and is normally open to the public for fishing at all hours, year-round. Anglers enter from a parking area south of the plant and fish from the shoreline downstream from the plant. Walkways and steps provide access for anglers.

Holtwood Area—The Holtwood Area, partially located within the project boundary, has facilities for picnicking, outdoor sports, hiking, and environmental education. This area has two picnic areas, each with a pavilion seating 100 people and associated facilities, a large field sports area, hiking trails (including Kellys Run Trail and Conestoga Trail), Holtwood Arboretum, and the Holtwood Environmental Center.

Pinnacle Overlook—The Pinnacle Overlook is located within the project boundary atop a bluff some 500 feet above Lake Aldred. The view of the central portion of Lake Aldred and surrounding river hills is considered one of the premier vistas along the Lower Susquehanna. The Pinnacle Overlook includes a picnic area with six tables and facilities.

Kellys Run Natural Area—The Kellys Run Natural Area, located partially within the project boundary, includes 125 acres of woodland situated between the

Pinnacle Overlook and the Holtwood Area. Within the Kellys Run Natural Area is the 8.5-mile-long Kellys Run-Pinnacle Trails system, including a portion of the Conestoga Trail. Interior has designated the 2-mile-long Kellys Run Trail linking the Holtwood Area and the Lake Aldred waterfront at the mouth of Kellys Run as a National Recreation Trail.

Pequea Creek Recreation Area—The Pequea Creek Recreation Area, located within the project boundary, includes a campground located on the south side and a picnic area located on the north side of Pequea Creek and about 3 miles of hiking trails. The campground has 103 camping sites for travel trailers, recreational vehicles and tents, a group camping area, a large pavilion, an office and store, flush toilets and showers, and a game room. The picnic area has 50 tables, a play area, and portable toilets.

Pequea Boat Ramp—PPL owns and maintains Pequea boat ramp located within the project boundary at the mouth of Pequea Creek, on the east side of the railroad. The Pequea boat ramp includes two boat launching ramps and an adjoining paved parking area with space for 60 cars with trailers and an additional 17 cars. PPL leases a portion of land from the railroad company for use of an access road leading from the Pequea boat ramp parking area across railroad company land and under the railroad bridge to a filled-in waterfront area between the railroad and Lake Aldred. This area serves as a fishing area and is one of the most popular shoreline fishing sites along Lake Aldred. For safety, PPL has installed and maintains chain-link fence between the fishing area and the railroad.

Shenks Ferry Wildlife Preserve—The 40-acre Shenks Ferry Wildflower Preserve, located within the project boundary upstream from the Pequea boat ramp, is one of the most popular attractions in Lancaster County. The preserve is renowned for its large variety of spring wildflowers, with at least 73 species in bloom between mid- March and the end of May.

Face Rock Overlook—The Face Rock Overlook is located on project land above and inland from the Holtwood dam and power plant. The overlook offers a scenic view of the Holtwood power facilities and the river downstream, and has picnic facilities, parking and water. This area is temporarily closed during national security alerts because of adjacent transmission facilities.

Holtwood Dam Overlook—The Holtwood Dam Overlook, located within the project boundary at the right (west) abutment of Holtwood dam, provides a view of the dam, power plant and fish lift, and the river area downstream. The overlook has been closed for security purposes since September 11, 2001.

Counselman Run Natural Area—The Counselman Run Natural Area is located outside of the project boundary, midway between the Otter Creek Recreation Area and Holtwood dam. This 50-acre site, accessible by foot from the

Mason-Dixon Trail, contains large old-growth trees and large stands of native rhododendron.

Oakland Run Natural Area—The Oakland Run Natural Area is located about 1 mile north of Holtwood dam outside of the project boundary, adjoining State Game Lands No. 181 and extending up Oakland Run to Wallace Run. The Mason-Dixon Trail, minor trails, and unimproved roads provide access to the area. This 145-acre site contains a bald eagle nest and large old-growth trees and large stands of native rhododendron.

Islands—The wooded islands within the project boundary in Lake Aldred are used for picnicking, hiking, and hunting. No facilities are provided, but PPL provides trash and debris removal and general maintenance on a routine basis. The southern end of the largest island, Weise Island, has a natural sandy beach and is very heavily used during the recreation season. The construction of temporary duck blinds is permitted. The interiors of the islands are left undisturbed for wildlife habitat, erosion control, and for hiking in a natural environment.

Holtwood Portage and Tailwaters—Canoers and kayakers coming downriver are directed by large signs to the portage area, located within the project boundary, on the Lancaster County shore of Lake Aldred about 800 feet upstream from Holtwood dam. The portage area has a telephone from which boaters may call the Holtwood Project control room to request that licensee personnel transport the boaters and their craft around Holtwood dam to the Muddy Creek boat access, about 1 mile downstream from the dam on the York County side.

PPL conducts maintenance activities on its recreational lands and facilities, including tree cutting; hiking trail and picnic area maintenance; water and electric systems; boat dock installation, removal, and maintenance; boat launch ramp maintenance; debris removal; portable toilet installation and maintenance; and maintenance of information and public safety signs.

Other Recreational Access

PPL leases lands outside the project boundary to clubs, societies, and other organizations or businesses for public purposes compatible with the objectives of the Holtwood Environmental Preserve. These leases add up to almost 80 acres of lands that support recreational and educational uses adjacent to the project boundary. Several commercial facilities also provide access to Lake Aldred.

Private access from shoreline residences is available from the 70 residential properties leased by PPL to individuals. Several commercial facilities also exist to provide access to Lake Aldred. These include commercially operated marinas, boatyards, and campgrounds. A private launch area is located on the north shore and Pequea Creek Boat Club and Arrowhead Marina are located on the south shore of Pequea Creek. Gamler's Marina is a privately owned facility adjoining

the Indian Steps Museum to the south. In addition to the marina, the site includes campsites, vacation cottages and a restaurant.

Recreational Use

Most recreational use of the project occurs at formal access sites. Shoreline anglers and whitewater boaters appear to be the two unique user groups that regularly access the project using informal trails, generally in the area of the bypassed reach on the western shore downstream of the dam. People generally park on the side of the gravel surfaced McCall's Ferry Road, north of Lock 12 Historic Area, and follow informal trails to the bypassed reach.

Sightseeing and hiking are the most popular recreational activities at the sites within the Holtwood Environmental Preserve, followed by camping, recreational boating and fishing. Table 18 summarizes the estimated annual recreational use at the Holtwood Environmental Preserve by recreation site during the period 2001 through 2006. Based on these data, recreational use has declined at the project during this period a total of 73 percent, from 528,100 visitor days in 2001 to 142,100 in 2006. During 2006 for the sites for which data were provided, Pequea boat ramp received the most use (25 percent), followed by the Holtwood Area and Pinnacle Overlook (both at 14 percent).

Lake Aldred is popular for boating, angling, and water-skiing. It provides opportunities for walleye, bass, catfish, panfish, and muskellunge angling. Formal public boat access to the reservoir is provided at York Furnace and Pequea boat launches and shoreline access is available at these sites, as well as Otter Creek Recreation Area.

Portages around the project dam average about a dozen annually and vary in size from one or two canoes or kayaks to large groups such as the Susquehanna Sojourn, occurring annually every June, where 50 to 75 canoes and water-craft require portaging services.

Land-based recreation activities within the project boundary include hunting, hiking, sightseeing and wildlife watching, camping, and picnicking, among others. Hunting for waterfowl, pheasant, rabbit, squirrel, and deer is permitted on 2,200 acres of land surrounding the project, including lands within the Holtwood Environmental Preserve.

Sightseeing activities are enhanced by various scenic vistas throughout the project area, such as Urey, Pinnacle, and Face Rock overlooks. Birdwatchers congregate to see migrating warblers in early spring, nesting bald eagles and ospreys in late spring, and herons on the river in August. The Shenks Ferry Wildflower Preserve is a popular site for viewing the 73 species of wildflowers that bloom from mid-March through May. Educational exhibits, programming, and public outreach are provided at the Holtwood Environmental Center, Lock 12 Historic Area, and via the Holtwood hotline (800-354-8383).

Table 18. Estimated recreation use at the Holtwood Environmental Preserve by recreation site (2001–2006).
(Source: PPL, 2007a)

Site Name	2001	2002	2003	2004	2005	2006
Otter Creek Campground	82,400	73,900	90,400	47,600	21,100	15,000
Otter Creek Picnic Area	41,700	27,400	26,500	6,600	2,900	2,000
York Furnace Boat Ramp	68,900	64,000	55,600	9,600	11,400	4,600
Lock 12 Historic Area	51,500	57,900	118,600	100,800	33,200	14,300
Holtwood Tailrace Fishing Area	16,100	15,300	10,400	6,100	4,200	5,000
Holtwood Area	41,000	44,300	47,000	38,400	36,700	19,700
Pinnacle Overlook	36,900	31,400	20,900	39,900	28,000	19,300
Pequea Boat Ramp	63,000	47,900	38,300	30,100	44,900	35,600
Pequea Creek Recreation Area	62,400	68,000	59,400	25,400	37,700	15,500
Face Rock Overlook	64,300	106,200	128,600	17,300	11,400	11,000
Total	528,100	536,200	595,700	321,800	231,400	142,100

Lake Aldred Reservoir Elevations

Lake Aldred extends from the Holtwood dam up the Susquehanna River a distance of approximately 8 miles to the base of the Safe Harbor Project. During the recreation season, between May 15 and September 15, PPL maintains the reservoir between El. 169.75 feet and El. 167.5 feet, as required under the existing FERC license. The minimum operating level during the remainder of the year is El. 163.5 feet. Under existing recreation season operating levels (between El. 169.75 and El. 167.75 feet), public boat launches on Lake Aldred are useable, and the majority of Lake Aldred is navigable and clear of major boating hazards. Rocks and shallows are generally found near the shores and islands.

Recreational uses downstream of the project include shoreline fishing (primarily in the tailrace fishing area) and whitewater boating (primarily in the bypassed reach). The tailrace channel remains fully wetted by backwater from Conowingo Pond, regardless of project operations. When the project is not generating, leakage through the units into the tailrace is about 210 cfs. During project releases, water velocities are 2.5 to 7.5 fps in the upper portion of the tailrace and the tailrace becomes more shallow near the Norman Wood Bridge (Route 372), causing velocities to increase to 7.5 to 10.0 fps for a 1,000-foot section of river. This general area, known as Cully's Falls, is relatively shallow, and local anglers indicate that it is a good location to catch smallmouth bass.

When discharges from the Safe Harbor Project exceed 31,500 cfs, the existing hydraulic capacity of the Holtwood Project, water spills over the dam into the project bypassed reach. This area is subject to a wide variety of flows on an annual basis, and during the summer months, there is typically little to no spill over the dam. During periods of spill, the eastern side of the bypassed reach, the Piney Channel, creates numerous natural eddies, riffles, and runs as water is passed through the canyon-like walls that form the boundaries of the channel. The remaining western side of the bypassed reach consists of braided channels with pools, riffles, and runs. The pools in the upper two thirds of the area are shallow with a rocky bottom, while the pools in the lower third are mostly contiguous with emergent vegetation. During times of no spillage or low flows, anglers and sightseers access the riverbed along the exposed rocks of the project bypassed reach.

As stated previously, public recreational access is provided to the tailrace area at Holtwood Tailrace Fishing Area. Recreational use of the tailrace area is estimated to include both sightseeing (estimated at about 35 percent) and angling use (estimated at about 65 percent). See section 3.3.3, *Aquatic Resources*, for discussion regarding fisheries within the project, including Lake Aldred and the tailrace area.

Whitewater Boating

At flows approaching 50,000 cfs or greater, the project bypassed reach downstream to the Norman Wood Bridge (Route 372) is favorable for whitewater

boating. As identified by the Susquehanna Surf Guide (Lauks, 2008) and American Whitewater (American Whitewater et al., 2007), there are three named whitewater features in Piney Channel, three features in the bypassed reach downstream of the dam, and five named features downstream of the Norman Wood Bridge (Route 372), just over 1 mile downstream of the project. During periods of spill, these eleven named waves and hydraulics, as well as other features, provide opportunities for intermediate, advanced, and expert whitewater boaters. While the length of the reach is short, the number and quality of the play features are considered to be exceptional, and draw significant use from around the region (American Whitewater et al., 2007).

Table 19 provides an estimate of the boatable flow ranges under existing conditions for each of the whitewater boating features. Table 20 summarizes the estimated average number of boating days by month at each of the identified whitewater boating features downstream of the project. Under existing conditions, the project experiences flows of 50,000 cfs or greater about 84 days per year, with about 49 of these days occurring during March through May.

Table 19. Estimated boatable flow range at primary whitewater features.
(Source: PPL, 2007a)

Whitewater Boating Feature	Stage (Susquehanna at Harrisburg) ^a		Flow Range at Harrisburg ^b (cfs)		Approximate Flow Range at Holtwood ^c (cfs)	
	Low	High	Low	High	Low	High
Storm Hole	5.5	6.7	50,384	79,801	50,000	80,000
Playspot	6	7.5	62,789	98,809	60,000	100,000
Yesterday	7	No limit	86,978	No limit	90,000	No limit
Playspot II	7.5	9.5	98,809	144,901	100,000	150,000
Powerline	7.5	No limit	98,809	No limit	100,000	No limit
Rumble Pit	7	8.5	86,978	122,055	90,000	120,000
Pleasant Surprise	7.5	9.5	98,809	144,901	100,000	150,000
Rock N Roll	8	10	110,493	156,230	110,000	160,000
Accelerator	10	12.5	156,230	212,857	160,000	220,000
Mama Bear	11	No limit	178,816	No limit	180,000 ^d	No limit
Bear Trap	13.5	No limit	235,923	No limit	240,000 ^d	No limit

^a Lauks, 2008.

^b Based on USGS gage no. 01570500.

^c Holtwood flow assumed equal to Harrisburg flow as approximation and rounded.

^d Mama Bear and Bear Trap are located at the upper end of Conowingo Pond and are affected by the combined plant and bypassed reach flow.

Table 20. Estimate of average number of boating days under existing conditions. (Source: PPL, 2007a)

Whitewater Boating Feature	Average Available Boating Days by Month												
	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Total
Storm Hole	3.4	3.7	8.3	9.2	6.7	2.0	1.0	0.3	0.6	1.3	2.9	4.5	43.8
Playspot	2.9	3.6	8.2	8.9	5.5	1.4	0.6	0.2	0.4	1.1	2.3	3.6	38.6
Yesterday	2.6	3.1	9.1	8.4	3.1	0.8	0.2	0.1	0.2	1.0	1.5	2.6	32.9
Playspot II	1.3	1.5	4.4	3.7	1.6	0.3	0.1	0.1	0.1	0.5	0.7	1.3	15.5
Powerline	2.1	2.4	7.4	6.7	2.5	0.6	0.2	0.1	0.1	0.8	1.1	2.0	26.0
Rumble Pit	1.2	1.6	3.9	3.6	1.9	0.3	0.1	0.1	0.1	0.4	0.7	1.3	15.0
Pleasant Surprise	1.3	1.5	4.4	3.7	1.6	0.3	0.1	0.1	0.1	0.5	0.7	1.3	15.5
Rock N Roll	1.1	1.2	3.8	3.2	1.3	0.3	0.1	0.1	0.1	0.4	0.7	1.1	13.3
Accelerator	0.4	0.4	1.4	1.4	0.5	0.1	0.0	0.0	0.0	0.2	0.2	0.4	5.0
Mama Bear	0.5	0.5	1.8	1.9	0.4	0.2	0.0	0.1	0.1	0.2	0.2	0.3	6.1
Bear Trap	0.1	0.3	0.7	0.6	0.1	0.1	0.0	0.0	0.1	0.0	0.1	0.1	2.2
Average	1.5	1.8	4.9	4.7	2.3	0.6	0.2	0.1	0.1	0.6	1.0	1.7	19.4
Any ^a	6.5	7.5	19.0	19.3	11.1	3.0	1.2	0.4	0.8	2.5	4.7	7.6	83.6

^a Indicates any one feature available.

3.3.5.2 Environmental Effects

Recreation Enhancements

As part of the proposed project redevelopment, PPL proposes to provide additional fishing and boating access at points below the dam and powerhouse and to improve the existing boating access points on Lake Aldred, including: a new elevated roadway over the Norfolk-Southern railroad, a new parking area and reconstruction of the tailrace fishing area, improvements to boat ramps at York Furnace boat launch, and improvements to the Pequea Creek Recreation Area.

For the elevated roadway, PPL proposes to create a bridge over the Norfolk-Southern railroad track along the Lancaster County shore. The proposed elevated roadway would provide recreational access to a new parking area between the railroad right-of-way and the Holtwood tailrace. Two parking areas would be constructed to allow parking for 20 cars, with three accessible parking spaces. The railroad bridge and parking areas would be located above the normal high water level. From the parking area, an accessible trail would provide access to a fishing platform along the Holtwood tailrace. PPL proposes to leave in place one of the abutments from the southern temporary tailrace bridge to serve as a tailrace fishing platform.

For the York County parking area, in the area where white water boaters currently park, PPL would provide formal parking along the existing McCall's Ferry Road in York County and improve trail access from the parking area to the bypassed reach downstream of the Holtwood dam. The parking area (about 17 spaces) would be created by widening McCall's Ferry Road by 27.5 feet over a 137-foot-long area. This area would be outside of a 600-foot buffer from the existing eagle nest on the York County shore.

At the York Furnace boat launch, PPL proposes to extend the two existing boat ramps down to El. 160 feet. At Pequea Creek Recreation Area, PPL proposes to undertake parking and boat launch improvements in coordination with a plan by Pennsylvania Department of Transportation to replace the existing bridge over Pequea Creek. PPL initially proposed to expand the Pequea Creek Boat Launch area to include the addition of 27 boat trailer spaces, three car parking spaces, one additional boat ramp that extends down to El. 160 feet, and an accessible fishing platform and dock. Based on consultation with the resource agencies, PPL proposes to reduce the number of parking spaces to 18 boat trailer spaces in order to minimize fill volume in the floodplain zone.³⁰ Due to the lost parking spaces during the revision of the plan, PPL proposes to consult with the resource agencies to attempt to secure lands upland of the rail line crossing at Pequea Creek to provide the boat trailer parking spaces.

³⁰ PPL provided the revised plan for the Pequea Creek Boat Launch in its supplement filing of October 3, 2008.

Our Analysis

PPL's proposed construction of project facility modifications and recreation enhancements would restrict public access during construction of the recreation facilities where enhancements are implemented and in the areas around the project structures and tailrace and bypassed reach where channel excavation would occur. Restricted access would displace recreation use of about 15,000 recreation days³¹ during the 3-year construction period in the tailrace area. The construction-related effects on recreational opportunities, such as angling, sightseeing and whitewater boating, would be short-term. Some minor displacement of recreation use at the York Creek boat launch and Pequea boat ramp and the parking area would occur, but the proposed construction would occur during the fall and winter periods, when recreational use of this area would typically not be as great as during the primary recreation season. See also below, *Lake Aldred Reservoir Elevations* and *Downstream Recreational Opportunities*, for further discussion of potential effects of project operations on recreational opportunities and access.

After the construction period, the proposed recreation improvements would enhance recreation opportunities at the project, especially at downstream locations. The proposed improvements, such as the proposed elevated access road to the project tailrace and the new parking area and tailrace fishing access area, would provide enhanced public access for recreation at the project tailrace and river corridor lands. The proposed enhancements would improve the boat launching areas and extend the boat ramps to accommodate lower reservoir elevations that would occur during some periods under the proposed action. The proposed parking area and trail access to the river below the dam would help to enhance recreation access to this area.

Lake Aldred Reservoir Elevations

PPL's proposed modifications to project operations could affect reservoir elevations and associated recreation access and use of Lake Aldred. PPL proposes to change the existing license conditions to allow drawdowns below the existing minimum level (El. 167.5 feet, as required under the existing license) from May 15 to September 15 during drought operations (see section 3.3.3, *Aquatic Resources*). The minimum El. 163.5 feet during the non-recreation season would remain unchanged. For drought operations, PPL proposes a new rule curve between September 15 and December 31, whereby the minimum pond level would drop to El. 165.6 feet on September 15 and then on a straight line to El. 163.5 feet on January 1 (see figure 6, in section 3.3.3, *Aquatic Resources*). PPL also proposes to provide a River Hotline with information regarding reservoir level (measured at the Holtwood dam), and to develop a website that would provide reservoir level information, expected generation schedules, and whether drought operations are in effect.

³¹ Based on the recreation day visitor estimates for 2006.

Our Analysis

The proposed operations would result in water surface elevations below the existing minimum surface El. 167.5 feet during the recreation season (May 15 through September 15). Table 21 summarizes the minimum elevations that would occur under the proposed action, based on OASIS modeling for the period January 1930 through September 2002 under non-drought and alternative drought operational scenarios (see also section 3.3.3, *Aquatic Resources*). Under all scenarios, during the May 15 through end of July time period there would be occasions when the reservoir elevations would go below El. 167.5 feet, with the lowest, worst case scenario of about El. 166 feet (under QFERC drought operations), or 1.5 feet below that which would currently occur under the existing license during this period.

Table 21. Summary of Lake Aldred minimum elevations under proposed conditions.^a (Source: PPL, 2007a, as modified by staff)

	Non-Drought ^b		Drought Q-710 ^c		Drought QFERC ^d	
	Min. Elevation	% Time below El. 167.5 feet	Min. Elevation	% Time below El. 167.5 feet	Min Elevation	% Time below El. 167.5 feet
May 15–31	167.46	1	167.47	1	167.47	1
June	167.55	0	167.56	0	167.56	0
July	167.61	0	167.62	0	167.61	0
August	166.76	1	166.64	1	166.28	2
Sept. 1–15	166.57	3	166.41	4	165.97	5

^a Based on OASIS modeling for the period January 1930 through September 2002 (73 years).

^b Based on operations with the proposed daily volumetric minimum flow release and the conservation releases, without drought operations.

^c Based on operations with the proposed daily volumetric minimum flow release and the conservation releases, and with drought operations assuming a Q7-10 trigger flow.

^d Based on operations with the proposed daily volumetric minimum flow release and the conservation releases, and with drought operations assuming a QFERC trigger flow.

In May 2005, PPL drew the lake levels down for maintenance and also conducted an assessment of navigation hazards and access limitations at low lake levels, including the potential 165-foot elevation that would occur at the end of the recreation season during the drought period. Four areas in particular were identified as having potential for concentrated boating hazards: below Safe Harbor dam, Weise Island, the York Furnace boat launch, and Duncan Island. At El. 165.5 feet, the assessment showed that (1) there would be a small area around Duncan Island where navigation hazards would occur, and (2) the rocks in front of the York Furnace boat launch would be inundated but may not be adequately submerged to prevent boaters from striking them.

In addition, the area below Safe Harbor dam was identified as a navigational challenge at any water level.

In terms of the boat launch access, at El. 165 feet, the York Furnace boat ramp would probably require extension further into the channel, and the boarding docks would likely need to be repositioned accordingly. Gamler's Campground has two separate boat launches, one near the boat yard and one near the campground, and the assessment indicated that both would probably be unusable at El. 165 feet. Most of the private boat ramps would probably not be useable, and many private docks were dewatered at water surface El. 165 feet. The four boat launches at Pequea Creek (PPL's Pequea boat ramp and a private launch located on the north shore, and Pequea Creek Boat Club and Arrowhead Marina located on the south shore) would likely be useable, and the canoe portage would likely be unaffected at water surface El. 165 feet.

The areas around Duncan Island and below Safe Harbor dam are locations where boating hazards would occur at even higher reservoir elevations. The boating hazards in front of York Furnace boat launch could create an additional boating hazard area, compared to what currently occurs at higher reservoir elevations. However, this area could be marked and/or the final design for the proposed modifications to the York Furnace boat launch area could incorporate measures to address this potential boating hazard.

The public boat ramps were determined to be marginally functional at El. 165 feet, and most of the private boat ramps along the shoreline used by residents would probably not be useable at water surface El. 166.5 feet. In addition, the assessment indicated many private docks were dewatered at water surface El. 165 feet.

PPL's proposed modifications to the boat ramp access area, specifically modifications to extend the boat ramps, would help ensure that recreational boating access would continue to be provided at the project during the periods when lower reservoir elevations may occur. The functional elevation of the end of the boat ramps would need to be sufficient to provide boating access during the summer recreation season (i.e., May 15 through September 15), so that recreational boating access would still be provided during the primary recreation season (the period it occurs under existing operations), which under the modeled elevation would be about El. 166 feet during this period. The proposed extension of the boat ramps would address the potential adverse effects of reduced reservoir elevations on public boating access during drought operations at the project.

During the remaining period (September 16 through May 14), the minimum reservoir elevation would remain the same as under the existing condition of El. 163.5 feet. The reservoir would be lowered similar to under existing conditions during the fall period, except under drought condition operations. PPL's proposed rule curve for drought operations would result in the maintenance of higher reservoir levels during the fall months during drought year operations, and would help reduce potential

adverse effects of a sudden decrease in reservoir elevations during the fall shoulder season recreation period.

PPL's proposed measures to provide reservoir level and anticipated generation information at the project, through the telephone hotline and website, would provide the means to provide the public easily accessible information regarding reservoir elevations at the project. This would allow the public to take better advantage of recreational opportunities at the project reservoir.

Downstream Recreation Opportunities

PPL's proposed tailrace excavation and proposed changes to project operations would affect whitewater boating, angling and other recreation activities in the project's tailrace and bypassed reach and the reach immediately downstream of the project. PPL's proposed project modifications and operations would reduce the instances of spillage at Holtwood dam and would alter the timing, duration, and magnitude of flows in the tailrace, Piney Channel, and the bypassed reach as compared to existing conditions (see section 3.3.3, *Aquatic Resources*).

Construction activities associated with the project structures and tailrace excavation would cause the closure of the tailrace and bypassed reach and restrict public access to these areas during the construction period. This closure would displace recreational opportunities in this area, such as tailrace angling and sightseeing, and whitewater boating opportunities, during this period.

Effects on Angling and Sightseeing Opportunities

Although discharges into the tailrace would be approximately double under the proposed action compared to what is currently released, tailrace excavation would be designed to accommodate the increased volume, such that there would be no net change in water level experienced in the tailrace area under the proposed operations. Flows within the bypassed reach would occur less frequently and in smaller magnitude than under existing conditions. The exception would be in the Piney Channel area, where the proposed diversion of flows from Unit 1 would occur. In addition, PPL proposes to maintain a minimum flow of 800 cfs (see section 3.3.3, *Aquatic Resources*). Therefore, during non-generation periods, Piney Channel would have more consistent and deeper water as compared to existing conditions. Under existing conditions during non-spill periods, the channel is typically comprised of small pools among the rocks. The conservation release would help to connect and replenish the pools in Piney Channel on a more consistent manner.

The proposed action would have both beneficial and adverse effects on recreational angling and sightseeing opportunities within the project bypassed reach. Decreased spillage frequency would increase the periods when the bypassed reach rock outcroppings are accessible for sightseeing and angling activities. However, there could be a decrease in fishing opportunities in the bypassed reach, where pools would not be

replenished as frequently from water spillage as under existing conditions. Also, decreased spillage would result in fewer viewing opportunities related to water flows in the bypassed reach.

Effects on Whitewater Boating Opportunities

American Whitewater et al. (2007) states the proposed operations would result in a reduction of about 52 percent (or 40 days) when whitewater boating opportunities would occur downstream of the project. American Whitewater et al, states channel excavations could directly or indirectly adversely affect whitewater play features and flow availability by changes in the flow volume, velocity, direction, and/or complexity. In addition, American Whitewater, et al, states the proposed modifications could directly impact whitewater features by dewatering downstream features through flow diversion, or altering features through changes in flow direction or complexity.

The Pennsylvania FBC states support for preserving of certain whitewater features for recreational kayakers, creating additional features, and providing prescribed boating releases to preserve the quality of kayaking opportunities.

Under the whitewater agreement, PPL would fund the design of two whitewater features and would submit the proposed final design and proposed schedule for implementation to the Commission for approval, including documentation of consultation conducted with Pennsylvania DEP and recreational stakeholders. Within one year of completion of the whitewater boating features, PPL would conduct an assessment of the whitewater features, including assessment of the characteristics of the features at various flows and determination as to whether the features meet their fundamental purpose as designed, which would be filed with the Commission. PPL would provide additional funding for feature maintenance over the term of a new license should the need arise. In the event that any of the features are determined to have an adverse effect on fish passage or to impair the operations of the project, PPL would upon approval from the Commission, remove the features or conduct corrective measures and engage in negotiations with the recreational stakeholders to arrive at alternative provisions to address whitewater paddling concerns.

Within 1 year of completion of the channel modifications, PPL would develop and file with the Commission a report describing any project-related adverse effects on the recreational value of the existing whitewater feature known as Storm Hole, including documentation of consultation with recreational stakeholders and Pennsylvania DEP. If the assessment identifies significant project-related adverse effects, PPL would include in the report proposed corrective measures, including a proposed schedule for implementing of these measures. PPL would implement the approved corrective measures.

In terms of the timing of the proposed whitewater boating flows, the whitewater agreement stipulates that PPL would operate Unit 1 with restricted Area Regulation whenever river flow exceeds 30,000 cfs as measured at the USGS gage at Marietta, PA,

during October through May and whenever river flow exceeds 45,000 cfs during June through September. These triggers were derived to produce 264 hours of boatable flow conditions on an annual average basis. On weekdays, these releases would be scheduled for a minimum 3-hour period within a 4-hour window prior to dusk. On weekends, the releases would be scheduled for a minimum 6-hour period between 10 a.m. and 6 p.m. PPL would consult annually by May 1 with the boaters to schedule an additional 18 hours of Unit 1 operations to provide boating flows at the new features. In the event that the scheduled hours coincide with Unit 1 operations discussed above, PPL would be under no obligation to reschedule the planned additional boating hours. PPL would be able to deviate from these proposed whitewater boating flows during periods when net inflow to the Holtwood facility is less than the minimum flow obligations established in the WQC, upon the declaration of a generation emergency in the PJM Interconnection, or in the event of an emergency as defined in the WQC.

Once the rerouting of Unit 1 is complete, PPL proposes to post the planned Unit 1 operating schedule and any available information on the scale and duration of anticipated spills over the dam, on a company web site on a day-ahead basis.

Our Analysis

Under the proposed action, the frequency of spill events to the bypassed reach would be reduced by about 5 percent in August to about 38 percent in April and May as compared to existing conditions (see table 12, in section 3.3.3, *Aquatic Resources*). Table 22 summarizes the boatable flow range that would be available for each of the primary whitewater boating features downstream of the project under PPL's proposed conditions. The whitewater boating features downstream of the project generally require minimum spillage flows of between approximately 18,500 and 203,500 cfs, or a river flow between 50,000 and 235,000 cfs under existing conditions. Under proposed conditions, these features would remain available at flows ranging from 70,000 to 240,000 cfs, as a result of water diverted to the proposed powerhouse and the rerouting of Unit 1 flows to the Piney Channel area.

As part of a controlled flow study conducted in May 2006, participants were provided two controlled flow releases of 3,150 cfs and 7,000³² cfs in Piney Channel and asked to rate the overall experience for navigability, quality of features, and aesthetics. Overall, participants indicated that 3,150 cfs, while navigable, was generally not favorable for whitewater boating opportunities. The whitewater feature known as Storm Hole, located near the downstream tip of Holly Island, begins to show optimum configuration, including size of standing waves, presence of eddies, etc., at flows of approximately 7,000 cfs under the current Piney Channel configuration. Based on the whitewater boating assessment, PPL's proposed excavation above Storm Hole is not

³² Project flow conditions of 50,000 cfs would result in a flow of approximately 7,000 cfs in Piney Channel.

expected to significantly change the feature. Two whitewater features, Mama Bear and Bear Trap, would be generally unaffected by the proposed project operations. These features are located downstream of the convergence of the project tailrace, Piney Channel, and the bypassed reach, and are therefore affected by total project flows, irrespective of the distribution of such flows downstream of the project.

Table 22. Estimated boatable flow range at primary whitewater features under the proposed operations. (Source: PPL, 2008)

General Location	Whitewater Boating Feature	Approximate Flow Range at Holtwood ^a	
		Low	High
Piney Channel	Storm Hole	70,000	100,000
	Playspot	90,000	130,000
	Yesterday	110,000	No limit
Bypassed reach	Playspot II	130,000	170,000
	Powerline	130,000	No limit
	Rumble Pit	110,000	140,000
Downstream of Norman Wood Bridge (Route 372)	Pleasant Surprise	130,000	170,000
	Rock N Roll	140,000	190,000
	Accelerator	190,000	240,000
	Mama Bear	180,000	No limit
	Bear Trap	240,000	No limit

^a Flow range accounts for diversion to new powerhouse and Unit 1 discharge to Piney Channel.

Table 23 summarizes the change to the expected number of boating days at each play feature on an annual basis as compared to existing conditions.

Table 23. Summary of changes to annual whitewater boating days by whitewater boating feature. (Source: PPL, 2008)

General Location	Whitewater Boating Feature	Condition		
		Existing	Proposed	Change
Piney Channel	Storm Hole	43.8	24.4	-19.4
	Playspot	38.6	17.8	-20.8
	Yesterday	32.9	21.9	-11.0
Bypassed reach	Playspot II	13.6	7.8	-5.9
	Powerline	26.0	15.1	-10.9
	Rumble Pit	15.0	9.5	-5.5
Downstream of Norman Wood Bridge (Route 372)	Pleasant Surprise	13.6	7.8	-5.9
	Rock N Roll	13.3	7.1	-6.2
	Accelerator	4.6	2.7	-1.9
	Mama Bear	6.1	6.1	0
	Bear Trap	2.6	2.6	0
Total existing features		210.1	122.8	-87.5
Average existing features		19.1	11.2	-7.9
Any ^a existing features		83.6	50.5	-33.2
Additional new features ^b			69.6	
Total all old and new features		210.1	192.4	-17.7
Average old and new features		19.1	16	-3.1

^a Indicates any one feature available.

^b Includes 2 new features, assumed functional at spills of 62,100 cfs.

PPL's proposed measures under the whitewater agreement would provide the means to mitigate for the reduction in the existing whitewater boating opportunities at the project, as a result of the change in project operations as compared to existing conditions. PPL's proposed whitewater boating access enhancements would provide enhanced public access to the project reaches downstream of the project. The proposed flow information would help to inform whitewater boaters and other recreation visitors of the potential whitewater boating flow opportunities downstream of the project. The proposed provision of whitewater boating flows for 264 hours (equivalent of 33 days x

8 hours per day = 264 hours) would replace the 264 hours of boating opportunities that would be lost under the proposed operations. The creation of the two new whitewater features would replace features where use would be diminished by the reduced flows in the bypassed reach.

Recreation Use Monitoring

Interior recommends that PPL, after consultation with FWS, Pennsylvania FBC, Pennsylvania Game Commission, Pennsylvania DEP, and Pennsylvania DCNR, monitor recreational use of the project areas to determine whether existing access facilities are meeting demands for public use of fish and wildlife resources. Interior recommends that monitoring studies begin within 6 years of issuance of the amended license, and that every six years during the term of the license, PPL file a report with the Commission on the monitoring results, that would include (1) the annual recreation use figures; (2) a discussion of the adequacy of the applicant's recreation facilities; (3) a discussion of the need for additional recreation facilities at the project site; (4) any recreation plans proposed by the applicant to accommodate or control visitation in the project area; and (5) documentation of agency consultation and agency comments on the report.

PPL in its reply comments filed on June 19, 2008, states that it routinely monitors recreational use at the project and periodically files with the Commission a FERC Form 80, and that recreational facilities are periodically inspected by Commission staff and reviewed for adequacy and public safety. PPL states that these standard provisions of the existing project license adequately address Interior's recommendations in this matter.

Our Analysis

The proposed actions would entail modifications to existing recreation facilities and implementation of additional new facilities at the project. In addition, PPL's proposed modification to project operations, including potential modification of reservoir elevations and flow regime below the project, would have the potential to alter recreation opportunities at the project, such as boating access and available flows.

While PPL is required to submit a Form 80 Licensed Hydropower Development Recreation Report every 6 years, this report would not require annual recreation use estimates and other information specific to monitoring of the proposed changes to recreation opportunities at the project, such as assessment of the adequacy of the boating access ramps under the proposed operational changes. In addition, during the construction period, recreational use and access would be restricted and would affect recreational opportunities at the project during this period. A recreation use monitoring plan would provide the means to monitor the potential effects of the proposed action on recreational use and access at the project, both during project construction and post construction in terms of potential effects of the proposed operations.

Specifically, an effective recreation monitoring plan would include provisions for the development, in consultation with FWS, Pennsylvania FBC, Pennsylvania Game Commission, Pennsylvania DEP, and Pennsylvania DCNR, and implementation of a recreation monitoring report to include:

- estimates of annual project-related recreation use visitation;
- assessment of the effects of proposed project construction on recreation opportunities and access at the project during the construction period;
- assessment of the effects of project operations, i.e., reservoir elevations and provision of flows downstream of the project dam, on recreation access and opportunities at the project;
- assessment of the adequacy of the existing project's recreation facilities;
- assessment of the need for additional recreation facilities at the project site;
- description of any recreation plans proposed by PPL to accommodate or control visitation in the project area; and
- documentation of agency consultation and agency comments on the report.

The monitoring plan would also include provisions for filing the recreation use monitoring report with the Commission for review annually during the construction period associated with the proposed action, and every 6 years, in conjunction with the filing of the Form 80 report, following the completed construction of the proposed project.

3.3.5.3 Unavoidable Adverse Effects

Construction activities would result in the unavoidable restriction to some existing recreational facilities during the 3-year construction period.

3.3.6 Land Use and Aesthetic Resources

3.3.6.1 Affected Environment

Land Use

The lands within the project boundary comprise about 6,320 acres, including 2,400 acres of lakebed under Lake Aldred, and are almost entirely owned and managed by PPL. The lands on and immediately surrounding the Holtwood Project are largely wooded but contain recreational areas, scattered residential neighborhoods and farmland. No significant agricultural activities occur on project lands with the exception of roughly 300 acres of land that are leased by PPL to private individuals. In all but about 5 percent of the shoreline, there is at least a 200-foot forested buffer around the river within the project boundary.

Portions of the project area below the Holtwood dam and powerhouse are backwatered from the downstream Conowingo Project and are included within the FERC boundary of that project. Within this joint project area, PPL has developed and manages recreational access, and has been responsible under its existing license for managing lands and waters within this area, except for limited lands owned by Exelon.

PPL owns a majority of the land around Lake Aldred and leases portions of it to individuals and local organizations. Numerous cottages and several businesses are located around the reservoir. Lands are currently leased to individual families for cottage sites. PPL's policy is not to award any additional leases for summer cottages or other uses that might conflict with the objectives of maximum public use and maintaining the attractive environment of the Holtwood Environmental Preserve (see section 3.3.5, *Recreational Resources*). However, to accommodate as many valid recreational uses as possible, it is also PPL's policy not to cancel existing leases, as long as private use of cottages are compatible with recreational and environmental programs and facilities and otherwise meet legal requirements. Lessees are required to obtain PPL's permission for any building additions and tree removal.

Until 1999, a coal-burning steam electric plant occupied the land adjacent to the Holtwood hydroelectric station. The land where the coal plant was located has not been developed, and currently essentially exists as a brownfield.

Aesthetics

Views within the project area include project facilities, including the Holtwood dam. The existing project powerhouse is located on the east side of the river along the Lancaster County shoreline.

The project lands include many areas of high aesthetic value because of their topography, geology, and vegetation. Portions of the Tucquan Creek, a tributary to Lake Aldred, are designated as Scenic River sections under the Pennsylvania Scenic Rivers Program. Tucquan Creek from the headwaters near Rawlinsville, Pennsylvania, to the confluence of Clark Run near River Road is designated as a scenic segment, while the segment from River Road to the confluence at the Susquehanna River in Lake Aldred is designated as a wild segment.

The Otter Creek tributary gorge and the Muddy Creek area include some of the largest stands of virgin mixed mesophytic forest east of the Appalachian Mountains. The stands include an important Eastern Hemlock component, while in higher elevations, the stands include more oaks. The Kellys Run and Oakland Run sites also contain mature ravine forest, and are notable for their rock outcrops.

Overlooks in the area include the Pinnacle Overlook, offering a clear view of the upper, narrow part of the Susquehanna River canyon and notable for the scenic cliff exposures and pine-oak forest, and the Urey Overlook, also offering striking cliffs and views of the river. Other overlooks, such as at Face Rock, provide additional views of the Susquehanna River and the Holtwood Project.

3.3.6.2 Environmental Effects

Land Use

PPL's proposed construction activities would restrict recreational access and change land use at the project.

PPL proposes to develop and implement a lands and shoreline management plan, in consultation with the resource agencies in order to develop long-term management objectives and implement a long-term management program for project lands to ensure the continued preservation of project lands, shoreline buffers, historical and archeological resources, and the protection of sensitive species, such as the bald eagle.

Interior also recommends that PPL develop a shoreline management plan specifically for licensee-owned lands abutting project waters within 330 feet of the high water elevation (a distance that encompasses the preferred buffer zone width for species of concern avian and terrestrial at the project). This buffer zone would include measures for the protection of resources needed for project-related purposes, such as protection of fish and wildlife habitat, providing public access for recreation, and protecting sensitive, unique, or scenic areas. Interior recommends that the plan include, but need not be limited to: (1) a description of those lands covered by the plan, including a drawing or map showing their location relative to project facilities or project waters and measures to include those lands within the project boundary; (2) a description of how the land would be managed and used for each parcel of shoreland covered by the plan; (3) a discussion of how the plan addresses the following considerations: selection of lands that are largely undisturbed and free from any observable past alterations that may have impaired their ability to provide the necessary protection and enhancement of wildlife and plant species; selection of additional lands to provide additional buffering capacity against adjacent land disturbances in ecologically sensitive areas; selection of lands that would protect riparian corridors; and (4) an implementation schedule.

Interior recommends that PPL prepare the plan after consultation with FWS, Pennsylvania FBC, Pennsylvania Game Commission, Pennsylvania DEP, Pennsylvania DCNR, and affected or interested municipalities or organizations.

Our Analysis

PPL's proposed construction activities associated with the proposed project would result in potential short-term effects on land resources within the project. The proposed action would involve the construction of temporary access roads for project construction vehicles, closure to the public of land areas that provide recreational access during the construction period, and physical changes to the configuration of the tailrace channel as a result of the proposed excavation. Construction of temporary access roads would result in the removal of some trees and ground clearing activities associated with the proposed construction and creation of temporary access roads. We discuss the

potential effects of the construction of the temporary access roads in section 3.3.4.2, *Terrestrial Resources*.

The proposed action would also result in long-term effects on land use as a result of the proposed new powerhouse, new tailrace area, and proposed new and modifications to recreational facilities and access at the project (see also section 3.3.5, *Recreational Resources*). Under the proposed action, the new powerhouse would be built adjacent to the existing powerhouse on lands previously occupied by a coal-burning plant. In addition, PPL proposes to make some of the temporary access roads permanent, to serve as recreational access roads. The other roads would be removed and replanted with native species to restore disturbed areas.

A land and shoreline management plan for lands within the project boundary would provide the means to help ensure that project lands are managed for the protection of project resources and purposes. PPL does not provide specific details on what its proposed land and shoreline management plan would include, but proposes to develop, in consultation with resource agencies, and implement a land management program for project lands. Interior's recommendation includes measures to establish a shoreline buffer zone on licensee-owned land for the protection of project resources. Some of these lands are within and some lands are outside of the existing project boundary. In addition, Interior recommends that the buffer zone include lands within 330 feet of the high water elevation, stating that this distance would encompass the preferred buffer zone width for species of concern, avian and terrestrial, at the project.

The purpose of the shoreline management plan would be to develop and implement measures to protect resources needed for project-related purposes, such as protection of fish and wildlife habitat, providing public access for recreation and protection of sensitive, unique, or scenic areas. Within the existing project boundary, in all but about 5 percent of the shoreline, there is at least a 200-foot forested buffer around the river. The shoreline buffer may not necessarily need to extend the 330-foot along the entire project reservoir and reach immediately downstream of the project in order to provide adequate protection of project resources. These areas may be less or greater than a 330 foot buffer zone, depending on project resources and access. Therefore, assessment of the lands needed for inclusion within the project boundary for project purposes and protection of resources affected by the project as part of the development of the plan would help to establish the locations where such a shoreline buffer would require adjustment of the existing project boundary. In addition, this assessment would identify locations where the existing project boundary may not encompass new project-related recreation access facilities that are developed as part of the proposed action, such as the new tailrace access area and access road.

Development and implementation of a lands and shoreline management plan in consultation with FWS, Pennsylvania FBC, Pennsylvania Game Commission, Pennsylvania DEP, Pennsylvania DCNR, and affected or interested municipalities or organizations, including the assessment and inclusion of lands necessary for the

protection of project-related resources and purposes within the project boundary, would provide the means to help ensure long-term protection and appropriate management of project lands. We conclude that an effective plan should include: (1) assessment of the lands to be included within a shoreline buffer (including rationale for extending the shoreline buffer beyond that which currently exists at the project) and lands to be included within the project boundary for the protection of project resources, such as protection of fish and wildlife habitat, providing public access for recreation, and protecting sensitive, unique, or scenic areas; (2) a description of those lands covered by the plan, including any proposed revisions to the project boundary and revisions to exhibit G, if necessary; (3) a description of measures to be implemented for the management and use of project lands; (4) measures for the coordination of the plan with other resource management plans and programs for the project, such as the historic properties management plan, long-term monitoring program of wetlands and state threatened and endangered plants, and the bald eagle protection plan; (5) measures to revise and update the plan; and (6) a schedule for implementation of the plan and associated management measures.

Aesthetics

During the proposed 3-year construction period, construction-related activities, including the construction of the new powerhouse and excavation of the forebay and area downstream of the powerhouse, would have significant short-term effects on aesthetic resources within the project. We discuss the effects of construction activities on noise and air emissions in section 3.3.1, *Engineering Review*. Therefore, we discuss effects on the visual resources in this section. In addition, PPL's proposed project operations would slightly alter the elevations at Lake Aldred and alter flows downstream of the project, and proposed modifications and new project facilities would result in long-term changes to the aesthetics associated with the project area.

Our Analysis

The proposed excavation activities downstream of the project and the construction of temporary access roads would result in the clearing and alteration of vegetation and changes in the topography at the project. Temporary access roads would be built wide enough in some stretches for two trucks to pass one another and would be located in various locations around and downstream of the existing powerhouse. During the construction period, the two to three trailer-mounted lights, each consisting of four flood lights on roughly 30-foot stands, for evening and overnight work would be visible from various locations within and adjacent to the project, including the Face Rock Overlook and the Norman Wood Bridge (Route 372). These construction-related activities would all result in short-term adverse effects on aesthetic resources in the project during the construction period. In addition, recreational sightseeing and aesthetic viewing of the project reach downstream of the project would be displaced

during the construction period, due to the closure of this area to recreational access (see also section 3.3.5, *Recreational Resources*).

The proposed excavation activities would permanently alter the topography of the areas of excavation. The excavation of the forebay would alter a portion of the site of the old coal fired steam electric station. Excavation downstream of the project would slightly widen the channel and would remove small portions of Piney and Barkley Islands and the Lancaster County shoreline. Additionally, a portion of Piney Channel, the channel on the western side of Piney Island, would be excavated. After construction activities are completed, some of these roads would be removed, while others would remain to serve as recreational access roads or would be replanted with native species to restore disturbed areas.

The portions of the impoundment are characterized by a steep topography and would be minimally affected by the potential reservoir level drawdowns during drought conditions. However, in areas that have a more gradual slope, lower reservoir elevations resulting from implementation of the daily volumetric releases and conservation releases during drought operations could increase exposed mudflats along portions of the shore and sandbars extending from islands. These mudflats and sandbars would be visible from boats, the shore, and from the scenic overlooks. However, since these lower elevations would typically occur primarily during drought periods during the late recreation season, they would not result in significant adverse effects on aesthetic resources.

The proposed conservation releases into Piney Channel would alter the aesthetics of the channel from an area typically comprised of intermittent and isolated pools to an area that is more completely wetted and riverine in nature. The bypassed reach would receive fewer occasions of spillage, altering the aesthetic viewing nature of the bypassed reach to receive fewer viewing occasions of high flows.

3.3.6.3 Unavoidable Adverse Effects

No unavoidable adverse effects were identified.

3.3.7 Cultural Resources

3.3.7.1 Affected Environment

Section 106 of the National Historic Preservation Act of 1966, as amended (NHPA), requires that the Commission evaluate the potential effects of its proposed actions on properties listed or eligible for listing on the National Register. The Commission must take into account whether any historic property could be affected

within the project's area of potential effects (APE).³³ The APE for the proposed amendment to the Holtwood Project includes Piney Island, Piney Channel, Upper and Lower Bear Islands, the project tailrace area, the new or improved recreational areas, and proposed stream and wetland mitigation areas.

Prehistoric Overview

Three major cultural stages or periods delineate the prehistoric developments in the eastern United States:

- Paleo-Indian Period—10,000 B.C. or more to 8,000 B.C.
- Archaic Period—8,000 B.C. to 1,000 B.C.
- Woodland Period—1,000 B.C. to 1550 A.D.

A fourth, the Historic Period, describes the time of European-Indian contact. These periods represent distinctly different adaptations to the environment, and each is characterized by certain distinctive cultural, social, economic, and technological changes. The past 12,000 years or more reveal slow, steady evolutionary growth and change.

From an archaeological perspective, Lancaster County is part of the Middle Atlantic Culture Province of the Eastern Woodlands.

Paleo-Indian Period—10,000 B.C. or more to 8,000 B.C.

During the Paleo-Indian Period, cold-adapted animals of the Pleistocene era were prevalent (woolly mammoth, mastodon, certain species of bison, caribou and others). Indians subsisted primarily by hunting and foraging. They ranged over considerable distances in search of food and suitable materials for tools and were likely organized into loosely knit bands of individuals related by kinship. Settlements were relatively small and temporary, and located where food and water could easily be obtained. Although several Paleo-Indian artifacts have been recovered at sites along the river in both Lancaster and York counties and on a few of the river islands, no Paleo-Indian site has been excavated in Lancaster County or in south-central Pennsylvania.

Archaic Period—8,000 B.C. to 1,000 B.C.

The nearly 7,000-year span of time that constitutes the Archaic Period in American prehistory in Lancaster County was characterized by an environment that was

³³ The area of potential effects is defined in the Advisory Council on Historic Preservation's regulations (36 CFR 800.16[d]) as "geographic area or areas within which an undertaking may directly or indirectly cause alterations in the character or use of Historic Properties, if any such properties exist."

becoming warmer, and by the human adaptation to a deciduous broadleaf forest inhabited by modern animal species.

Excavations on Bear Island between the Holtwood and Conowingo dams, on Piney Island located just south of the Holtwood dam, Duncan Island, and Fisherman's Run at the south end of Washington Boro yielded significant sites that have provided important insights into the Late Archaic cultures of Lancaster County and the Lower Susquehanna Valley as a whole.

The Archaic Period is considered a time of "settling in," a period of restricted wandering as band territories became established. It is the longest and most varied of the three prehistoric periods. Archaic sites and surface collections representing this stage of cultural development are common throughout Lancaster County, including base camps, hunting camps, rockshelters, etc. Settlements were often large, with numerous Archaic sites occurring along the Susquehanna River, on the islands, along all the tributary drainages and in a variety of different ecological niches.

Woodland Period—1,000 B.C. to 1550 A.D.

Four major developments used to define the Woodland Period are the rise of agriculture, settled village life, the development of pottery, and the presence of the bow and arrow. As plant cultivation diffused from a Mexican source, the native populations north of Mexico began to place greater emphasis upon plants as a food source. The diffusion of a pottery-making tradition from the Mid-Atlantic coastal region into the Susquehanna Valley possibly occurred as early as 1,000 to 1,200 B.C. The shift from carved soapstone bowls to clay-fired pottery is illustrated by a flat bottom, straight sided ceramic vessel found in the late 1950s on the lower end of Bear Island.

From 1200 to 1550 A.D., an indigenous population of people lived along the fertile flood plains of the Susquehanna River and its larger tributary streams in the area, forming what is known as the Shenks Ferry Culture. There are more than 40 sites in Lancaster, Lebanon, and York counties thought to be of the Shenks Ferry Culture, including some on PPL property.

During the early period of their settlement, Shenks Ferry people lived in circular, bark-covered huts in open sites and locations. By about 1450 A.D., however, the villages were built closely together within stockaded walls for defensive purposes. Around 1550 A.D., Susquehannock Indians that had been living along the Susquehanna River to the north began moving down and settling in the same areas that were inhabited by the Shenks Ferry people. Shortly thereafter, evidence of the Shenks Ferry people as a separate culture disappears from the archeological record.

Historic Overview

Europeans came into contact with the Susquehannock Indians when Captain John Smith journeyed up the Susquehanna River in 1608. When the Europeans arrived, the

Susquehannock Native Americans were avid traders and supplied the overseas market with furs in exchange for guns, brass kettles, steel knives, glass beads, rum, and other objects. In 1681, King Charles II granted William Penn the land between the 39th and 42nd degrees of north latitude and from the Delaware River westward for five degrees of longitude. Penn began purchasing the claims to the land of the Indians who lived there. The influence of European culture and disease, and battles with the Iroquois for the supremacy to trade with the Swedish, Dutch, and English uprooted the Susquehannock lifestyle, and by 1789, all of the claims in the Commonwealth of Pennsylvania had been purchased.

Religious sects seeking religious freedom, including Mennonites, Moravians, Dunkards, Scotch-Irish Presbyterians, Quakers, and members of the Church of England, were some of the first settlers to the area. Germans were particularly attracted to the interior region of Pennsylvania, including Lancaster, Berks, Northampton, and Lehigh counties, and transformed the area into a rich farming region. By the 1750s, the southeast area of Pennsylvania had been developed into an exceptional farming area and produced surpluses for export, adding to Pennsylvania's wealth. In York County, Germans generally settled in the limestone valleys, Quakers settled in the northern part of the county, and Scotch-Irish and English settled in the southern part.

Battles of the Civil War occurred in York County, including the farthest northward thrust of the Confederate Army. Confederate forces pushed across the county as far as the Susquehanna River, but were barred from significant further advance when the bridge at Wrightsville was burned.

Fostered by the completion of the Susquehanna and Tidewater Canal in 1840, commerce and transportation depended heavily on the rivers in Pennsylvania. The 42.5-mile canal consisted of 27 lift locks, 2 guard locks, 4 dams, 5 culverts, and 6 aqueducts and stretched from Wrightsville, Pennsylvania, to Havre de Grace, Maryland. From there, steam tugs towed canal boats to Philadelphia and Baltimore. While operational, the canal allowed the mule-drawn coal and lumber boats to navigate around the 230-foot fall of the Susquehanna River. The canal system was abandoned in 1894, concurrent with the advent of the railroad. The remains of lock number 12, a 17-foot-wide, 170-foot-long lock, lie in the project area. Although parts of the lock are gone, such as hinged wooden gates that fit to each end of the lock, the schist-stone walls of the lock remain. The Lock 12 Historic Area is currently used for its historical and educational value.

Constructed between 1905 and 1910, the Holtwood Project was placed in commercial service in October 1911 with five units in operation. Between 1912 and 1924, five additional units were installed, raising the station output to 107.2 MW nameplate rating.

In 1924, two 25-MW steam turbine generators were installed at the site. These units were fueled with anthracite coal that was dredged from the river in Lake Aldred. These units operated until 1972, when they were shut down and retired due to age and

lack of emissions control equipment. In 1955, an additional 80-MW steam turbine generator was installed. This unit was also fueled with anthracite coal dredged from the river in both Lake Aldred and Lake Clarke above Safe Harbor dam. Dredged coal was used until 1973, after which all fuels were transported to the plant by truck. The third steam turbine unit was shut down and retired in 1999 due to age, economics and pending environmental regulation. All plant facilities associated with the coal-burning operations were demolished in 2000.

Known Historic Properties

Most of the land and water area within the project boundary³⁴ and a small amount of land owned by PPL outside the project boundary comprise the Holtwood Environmental Preserve. These areas in the preserve include approximately 5,000 acres, and provide for both active and passive recreational opportunities and for the protection of natural areas along the River. The areas include Shenks Ferry Glen Wildflower Preserve, Lock 12 Historic Area, Holtwood Pinnacle Overlook, Otter and Pequea Creek Recreational Areas and Lake Aldred (see figure 12). Each of these areas is managed to benefit environmental resources and provide recreational and educational opportunities. In addition, there are other PPL-owned woodland tracts adjacent to the reservoir, and below the dam and powerhouse. Previous studies have identified five sites within the Holtwood Environmental Preserve that are listed on the National Register. These sites are described below and a more detailed description of each site can be found in the Holtwood Initial Consultation Document.

The Big and Little Indian Rock Petroglyphs (listed April 3, 1978) are located in the Susquehanna River, about 4,000 feet downstream from Safe Harbor dam. These petroglyphs consist of human, animal and geometric forms carved and pecked into the mica-schist outcrops. Although all authorities agree that they are of Indian origin, their dating is still uncertain.

The Shenks Ferry site (listed March 3, 1982) is located north of Pequea, in Martic Township, Lancaster County. The site is currently the only clear example of Shenks Ferry peoples being acculturated by Susquehannocks in the sixteenth century.

Duncan Island (listed May 10, 1984) is located in Lake Aldred about 3 miles upstream from Holtwood dam. Previous investigations have identified diagnostic artifacts, possibly 8,000 B.C. to 1,000 B.C., at this site.

Indian Steps Cabin (also known as Indian Steps Museum, listed March 9, 1990) is located near York Furnace, in Lower Chanceford Township, York County. John E. Vandersloot, a York attorney, built Indian Steps Cabin in 1912 as a memorial and museum dedicated to a culture with which he had become deeply fascinated. Indian

³⁴ Excluding the land and water area at and in the immediate vicinity of the powerhouse and the dam.

Steps Museum is among the oldest in the country entirely devoted to American Indian cultures.

Colemanville Covered Bridge (listed December 11, 1980) is located at the Fox Hollow Road crossing of Pequea Creek, in Conestoga and Martic townships, Lancaster County. The bridge is one of a group of some 30 Lancaster County covered bridges that the Pennsylvania Historic and Museum Commission nominated for inclusion in the National Register as thematic resources. The county of Lancaster owns the Colemanville Covered Bridge. It was erected in 1856, is 170 foot long with a road width of 15 feet, and was washed off its abutments by the Agnes Flood, lifted back with the help of two cranes, repaired by Amish carpenters, and dedicated December 10, 1973. The bridge was subsequently moved a short distance downstream and placed on new, higher abutments. The bridge continues in use to automobile traffic and appears to be in excellent condition.

The Holtwood Hydroelectric Plant is designated as an American Society of Mechanical Engineers International Historic Engineering Landmark for the installation of the first Kingsbury thrust bearing. The thrust bearing supports the entire weight of the rotating components of the turbine and generator, approximately 220 tons. The first bearing was installed on Unit 5 in 1912 and was dedicated in 1987. Kingsbury style bearings are installed on all the main turbines at the Holtwood Project. Given its status as an International Historic Engineering Landmark, the project also is eligible for the National Register. PPL assessed the historical significance of the Holtwood Project and concluded that the Holtwood dam and powerhouse may be eligible for listing in the National Register. PPL submitted a completed Pennsylvania Historic Resource Survey Form to the Pennsylvania SHPO on May 22, 2008.

Archaeological Sites

Previous archaeological studies have identified Piney Island as a place of great significance for archaeological resources. PPL conducted a geomorphological survey, with archaeological sampling, of Piney Island in 2006. The purpose of the survey was to identify those areas of the island where there are established soils with the potential to contain diagnostic artifacts. Cress et al. (2006) indicates that large portions of Piney Island contain very deep deposits of recent fill and coal dust and thus show low potential for adverse effects to intact archaeological sites. Only one area, located on the northeast edge of the island, was found to contain soils that show the potential for intact archaeological resources. The survey also included Upper and Lower Bear Island and determined that portions of those islands also have established soils with the potential to contain diagnostic artifact. The SHPO in letters dated May 30, 2008, and June 6, 2008, has noted that the areas proposed for the stream and wetland mitigation have a high probability for archaeological content.

Areas of Tribal Concern

The archaeological record indicates that the Susquehanna River area has been inhabited by Native Americans for at least 10,000 years, as shown in the range of prehistoric sites within the project area. There was a very clear and strong presence of Native Americans in the Susquehanna River valley when the earliest European explorers first entered the region, and it continued well into the period of European settlement. This presents a well-justified traditional connection on the part of different Native American groups to the land that includes the project area.

Under section 106 of the NHPA, the Commission is obligated to seek out any federally recognized Indian tribes that may have a traditional cultural or religious connection to land under its jurisdiction and to involve them in the consultation. The Seneca Nation of Indians and Towanda Band of Senecas have been identified as having a traditional connection to the project area. PPL invited representatives from these tribes to comment on the initial consultation document and the draft license application, and neither tribe has notified PPL or the Commission that they have any interest in the proposed action.

3.3.7.2 Environmental Effects

Archaeological Properties

The proposed action has the potential to affect archaeological resources by means of new construction and erosion. Given the different land-use histories of the areas that may be affected, the potential for adverse effects on archaeological properties at the project is conditioned by the land use history of the different specific areas in which construction is proposed. Each of the areas that may be subject to proposed actions will be considered in turn.

A new powerhouse would be constructed where a parking lot adjacent to the original powerhouse now exists. Excavation significantly below grade would be required. A recent geomorphological and archaeological survey (Cress et al., 2006) included a review of the logs of 30 borings conducted in the proposed construction area. The review of these boring logs revealed that the area has no potential to contain intact cultural material. This action therefore has no potential to adversely affect archaeological properties.

Piney Island, immediately downstream of the powerhouse, is the location of several proposed actions. With the addition of a second powerhouse using the existing tailrace, PPL would need to increase the hydraulic capacity of the tailrace. PPL proposes to accomplish this by making the tailrace both deeper and wider, including excavating a portion of Piney Island that forms the western border of the tailrace. To provide the heavy equipment needed to excavate the tailrace channel, PPL proposes to create access roads along the shorelines of Piney and Barkley Islands. Given the

potential for significant archaeological sites on Piney Island, each of these proposed actions has the potential to adversely affect archaeological properties.

Piney Island is a low-lying island within the main channel of the Susquehanna River, and as such it is subject to frequent floods which, over time, have altered the island's soil stratigraphy. In addition, Piney Island lies immediately downstream of a large riverbed coal mining operation, and previous pedestrian surveys have identified extensive layers of coal dust. The likelihood that there are soils that feature a mature stratification is, therefore, not assured across the island.

Any excavation or ground-disturbing activities within the area of intact soils may constitute an adverse effect on archaeological properties. The SHPO, by letter dated January 22, 2007, advised that no further testing was needed at the site unless ground disturbing activities were proposed in this or in other areas that may contain archeological resources.

In conjunction with the proposed powerhouse redevelopment, PPL proposes certain recreational enhancements, including improvements to existing facilities including fishing access at points below the dam and powerhouse and potential enhancements to existing boating access points. All work is expected to take place within existing recreation areas. No adverse effects on archaeological properties are expected.

The Corps noted in its letter of September 23, 2008, that the SHPO had not had an opportunity to review the revised plans for proposed recreational areas and stream and wetland mitigation areas. The Corps further noted that PPL is conducting an additional archaeological survey of about 2 acres, including these areas that would involve ground-disturbance. The findings of the survey and any SHPO review would be addressed in the historic properties management plan being developed by PPL in consultation with the SHPO.

An issue was raised about the potential for proposed changes to affect water velocities downstream of the project and whether these could create erosion on Bare Island, approximately 1.5 mile downstream of the Holtwood Project. Bare Island is known to contain archeological resources. As described in section 3.3.3.2, *Aquatic Resources*, under *Water Quantity*, water velocities downstream are not expected to increase as a result of the proposed action. However, PPL did evaluate this area in 2006 and concluded that soil that may contain archeological resources was stable and well armored against erosion by bedrock outcroppings (Cress et al., 2006).

Historic Buildings and Structures

The proposed action has the potential to affect the Holtwood dam complex. A new diversion tunnel is proposed that would divert water from Unit 1 (the most upstream unit on the existing powerhouse) through the existing diversion wall. This would involve enlarging the opening through which Unit 1 currently discharges into the tailrace and constructing a tunnel through the existing, modern diversion wall. This

would change the existing powerhouse and therefore has the potential to adversely affect the historic property.

The proposed new powerhouse has the potential to affect the visual and spatial character of the existing dam and powerhouse complex by introducing a new structure and an enlarged forebay. The effect of the change in the visual character of the existing complex is mitigated by the design of the addition that replicates the function and appearance of the existing powerhouse and forebay. In addition, the new powerhouse would complement the existing powerhouse in scale and massing. Neither the new diversion tunnel nor the addition of a new powerhouse would alter the characteristics that would qualify the Holtwood dam and powerhouse complex for listing in the National Register. PPL and the Pennsylvania SHPO are developing an historic properties management plan to protect historic and archaeological resources during project construction and throughout the term of the license. The plan should be completed and accepted by the Commission prior to the commencement of construction.

3.3.7.3 Unavoidable Adverse Effects

No unavoidable adverse effects were identified.

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COVER SHEET

**FINAL ENVIRONMENTAL IMPACT STATEMENT FOR
AMENDMENT TO LICENSE**

HOLTWOOD HYDROELECTRIC PROJECT

Docket No. P-1881-050

**Section 4
Developmental Analysis
Pages 133 through 136**

FEIS

4.0 DEVELOPMENTAL ANALYSIS

In this section, we estimate the economic benefits of the project and estimate the cost of various environmental measures and the effects of these measures on project operations.

Under its approach to evaluating the economics of hydropower projects, as articulated in *Mead Corporation, Publishing Paper Division* (72 FERC ¶ 61,027, July 13, 1995), the Commission employs an analysis that uses current costs to compare the costs of the proposed project and likely alternative power, with no consideration for potential future inflation, escalation, or deflation beyond the order issuance date. This economic analysis provides a general estimate of the potential power benefits and costs of the project and reasonable alternatives to project-generated power.

For our economic analysis of the Holtwood Project, we used the assumptions, values, and sources shown in table 24. All dollars are year 2008 unless specified otherwise.

Table 24. Assumptions for the economic analysis of the Holtwood Project.
(Source: PPL, staff)

Parameter	Value
Energy value	64.00 mills/kWh ^a
Capacity value	\$110/MW-day ^b
Period of analysis	16 years ^c
Discount rate	7.75 percent ^d
Federal tax rate	35.0 percent ^e
Local tax rate	6.5 percent ^e
Insurance rate	0.25 percent
Term of financing	20 years
O&M costs	\$4,500,000 ^f
Net investment	\$13,393,000 ^g

^a Value taken from PJM web site for Aggregate Locational Marginal Price.

^b Value taken from PJM news release dated May 15, 2008, citing capacity auction results for the period June 2011 through May 2012.

^c Given that PPL has requested a 16-year extension to the current license term, we have set the analysis period equal to 16 years.

^d Discount rate based on interest rate provided by PPL in exhibit D of its application.

- ^e PPL provided a combined federal and state tax rate of 41.5 percent in exhibit D of its application. We divided this into a typical federal tax rate of 35.0 percent and a state tax rate of 6.5 percent.
- ^f PPL provided a value for the O&M cost in exhibit D of its application in 2007 dollars. We escalated this value by 2.5 percent per year to adjust to 2008 dollars.
- ^g PPL provided a value for the net investment in exhibit D of its application as of September 1, 2007. We escalated this value by 2.5 percent per year to adjust to 2008 dollars.

4.1 ECONOMICS OF THE NO-ACTION ALTERNATIVE

Based on the information in table 24, the existing project produces approximately 594,849 MWh of energy per year, which we value at approximately \$42,374,420. The existing project provides a net annual benefit of \$35,499,540 (59.68 mills/kWh).

4.2 ECONOMICS OF THE PROPOSED ALTERNATIVE

The proposed project modifications, including license application costs, all construction costs associated with the existing and proposed generating equipment and the fishway modifications, and environmental enhancement measures, would result in a capital expenditure of approximately \$285,126,300 (excluding interest during construction) with an incremental increase in annual O&M costs of approximately \$717,500.

The resulting project would produce an additional 360,834 MWh of energy per year valued at \$26,638,620. The annual costs would increase by approximately \$53,260,340. The expanded project would provide a net annual benefit of \$8,877,820 (9.29 mills/kWh), which is \$26,621,720 lower than the no-action alternative.

4.3 ECONOMICS OF THE STAFF-RECOMMENDED ALTERNATIVE

Staff reviewed the proposed project, including the proposed environmental measures and identified a few minor additions that would increase the total cost by \$21,750. Thus, the completed project, as proposed by PPL with minor staff recommendations, would provide a net annual benefit of \$8,856,070 (9.26 mills/kWh), which is \$26,643,470 lower than the no-action alternative.

4.4 COMPARISON OF ALTERNATIVES

Table 25 summarizes the benefits, costs, and annual net power benefits of the alternatives.

Table 25. Summary of developmental costs, benefits, and annual net power benefits for the Holtwood Project alternatives. (Source: Staff)

	No-Action	Proposed Action	Staff-Recommended Alternative
Installed capacity (MW)	107.2	195.5	195.5
Annual generation (MWh)	594,849	955,683	955,683
Annual power value (mills/kWh)	\$42,374,420 (71.24)	\$69,013,040 (72.21)	\$69,013,040 (72.21)
Annual cost (mills/kWh)	\$6,874,880 (11.56)	\$60,135,220 (62.92)	\$60,156,970 (62.95)
Annual net benefit (mills/kWh)	\$35,499,540 (59.68)	\$8,877,820 (9.29)	\$8,856,070 (9.26)

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COVER SHEET

**FINAL ENVIRONMENTAL IMPACT STATEMENT FOR
AMENDMENT TO LICENSE
HOLTWOOD HYDROELECTRIC PROJECT
Docket No. P-1881-050**

Section 5
Staff's Conclusions
Pages 137 through 154

FEIS

5.0 STAFF'S CONCLUSIONS

5.1 COMPREHENSIVE DEVELOPMENT AND RECOMMENDED ALTERNATIVE

Sections 4(e) and 10(a) of the FPA require the Commission to give equal consideration to all uses of the waterway on which a project is located. When we review a hydropower project, we consider the water quality, fish and wildlife, recreation, cultural, and other non-developmental values of the involved waterway equally with its electric energy and other developmental values. In deciding whether, and under what conditions a hydropower project should be licensed, the Commission must determine that the project will be best adapted to a comprehensive plan for improving or developing the waterway. This section contains the basis for, and a summary of, our recommendations for conditions to be included in any amendment to the license for the Holtwood Project.

Based on our independent review and evaluation of the environmental and economic effects of the proposed action, the proposed action with additional staff-modifications and recommended measures, and no action, we recommend the proposed action with additional staff-recommended measures, as the preferred alternative. We recommend this alternative because (1) issuing an amendment to the project license would allow PPL to continue operating the project as a beneficial and dependable source of electric energy; (2) the project, with an increased installed capacity of 195.5 MW, would eliminate the need for an equivalent amount of fossil-fuel-produced energy and capacity, which helps conserve these nonrenewable resources; and (3) the recommended environmental measures would protect water quality, enhance fish and wildlife resources, and improve public use of project recreation facilities and resources.

Measures Proposed by Holtwood

We recommend including the following environmental measures proposed by PPL in any amended license issued by the Commission for the Holtwood Project.³⁵

- Erosion and sedimentation control plans.
- A DO monitoring plan for the Holtwood tailrace, included in the plan and schedule for providing minimum streamflows in the tailrace, that would maintain and protect existing and designated uses and implement water quality standards (described below), and file the plan with the Commission for approval prior to the commencement of operation of the amended project.

³⁵ Final plans and design drawing must be filed with the Commission for approval, must be prepared in consultation with the Corps, Pennsylvania DEP, Pennsylvania FBC, and FWS, and must include agency comments on the plan or design drawings. We do not repeat these provisions in the bulleted list of recommended measures.

- A plan detailing how the licensee would maintain uninterrupted fish migration and operation of the fish passage facilities during construction of the amended project.
- Final design drawings for any structural improvements to the project fish passage facilities, and the parts of the annual FOP that would include any changes in the operations of the fish passage facilities.
- A monitoring plan for upstream shad passage that includes Tier I and Tier II studies and associated effectiveness targets, consistent with the requirements of Interior's fishway prescription and WQC.
- A plan for discrete survival studies to determine survival of downstream migrating juvenile and adult shad that includes survival targets consistent with the requirements of Interior's fishway prescription and WQC.
- A plan and schedule for a siting study for permanent upstream eel fishway(s), consistent with the requirements of Interior's fishway prescription and WQC, including criteria for triggering the study. The final plan must also include mechanisms for development of future permanent eel fishways (including schedule) after the completion of siting studies, and for monitoring the effectiveness of the permanent fishways.
- A plan and schedule for a discrete survival study to determine the effectiveness of downstream eel passage at the project, consistent with the requirements of Interior's fishway prescription and WQC, including criteria for triggering the study, and fish survival targets that would indicate adequate effectiveness. The final plan must also include mechanisms for development of future operational or structural measures to improve downstream eel passage, and for monitoring the effectiveness of any measures implemented.
- Operation of the project fish lifts from April 1 through June 30, for a period of 5 years, after the initiation of amended project operation, for the upstream passage of resident species. Resident fish passage would be monitored during these operations, and at the end of resident fish passage operations, the licensee would consult with the agencies to determine if any operational modifications should be made for resident fish passage. Any plan to modify operations for resident fish passage would be filed with the Commission for approval.
- A final MSFOP for all operations and maintenance related to providing minimum streamflows, including daily and seasonal operations, the location and volume of each minimum flow release from the project, powerhouse unit sequencing and flow split between the two powerhouses and between the tailrace and Piney Channel, procedures for measuring and reporting minimum flows, procedures for determining net inflow to Lake Aldred and flows to the tailrace, Piney Channel, and the bypassed reach, as well as emergency procedures.

- Operation of the amended project to release a minimum streamflow (including leakage) equal to, on a daily volumetric basis, 98.7 percent of the minimum flow required by the Commission to be released at the downstream Conowingo Project, with a minimum continuous flow of 800 cfs from the project. If inflow to Lake Aldred is less than the required minimum streamflow, the amended project shall release a minimum flow equal to the inflow. PPL may request a waiver of this minimum flow requirement if necessary for the construction of the new powerhouse or fish passage facilities.
- Continue to use the existing configuration of flashboards to pass water through the existing 10-inch pipe on the dam to maintain the current rate of flow into the bypassed reach.
- When river flows are between 31,000 cfs and 61,500 cfs, supply flows to the bypassed reach of approximately 1,000 cfs once per day for 1 hour sufficient to wet the roots of the white doll's daisy plant population during the dry summer months of its growing season.
- A plan and schedule for providing minimum streamflows in the bypassed reach that would maintain and protect existing and designated uses and implement water quality standards. The plan must include procedures for monitoring water quality in the bypassed reach and for making modifications to the streamflows, consistent with the WQC.
- A plan and schedule for providing minimum streamflows in Piney Channel and in the tailrace that would maintain and protect existing and designated uses and implement water quality standards. The plan must include procedures for monitoring water quality in Piney Channel and the tailrace and for making modifications to the streamflows, consistent with the WQC.
- A final plan and schedule for excavations within Piney Channel, the tailrace, and bypassed reach, prior to commencement of construction.
- A long-term monitoring program of wetlands and state threatened and endangered plants in the river bed downstream of the dam, to examine the effects of reductions in spill frequency on in-river resources and to determine if any adjustments to planned flow release rates are warranted to ensure the continued protection of the river area.
- Construction of a wetland replacement project along Landis Run in Manheim Township, Lancaster County, to mitigate for wetlands affected by the project construction.
- Field delineate and identify all existing wetlands within the areas of ground-distributing activities, using orange construction fencing, prior to the start of construction activities through the completion of ground-disturbing activities and after site stabilization.

- Implement a minimum 5-year monitoring schedule at the wetland, stream and forested riparian planting mitigation sites.
- A final bald eagle protection plan, to ensure the continued protection of eagles that nest and forage within the immediate project area, that should be filed prior to the commencement of construction.
- A historic properties management plan to protect historic and archeological resources during project construction and throughout the term of the amended license, filed with the Commission prior to the commencement of ground-disturbing activities.

Modified and Additional Measures Recommended By Staff

- A plan detailing in-water and in-the-dry blasting activities approved by the Commission prior to the initiation of construction activities involving blasting.
- Operation of the project fish lifts for upstream passage of resident species from September 1 to October 15 for 5 years following commencement of amended project operations, to be followed by an evaluation of fall fish lift operations for resident species.
- Inclusion in the plan for uninterrupted fish migration during construction specific measures to mitigate for adverse effects from construction on upstream fish passage efficiency for shad.
- A land and shoreline management plan to establish long-term management objectives for project lands and to ensure the continued preservation of project lands, shoreline buffers, historic and archeological resources, and the protection of sensitive species, such as the bald eagle, that includes: (1) an assessment of the lands to be included within a shoreline buffer (including rationale for extending the shoreline buffer beyond that which currently exists at the project) and lands to be included within the project boundary for the protection of project resources, such as protection of fish and wildlife habitat, providing public access for recreation, and protecting sensitive, unique, or scenic areas; (2) a description of those lands covered by the plan, including any proposed revisions to the project boundary and revisions to exhibit G, if necessary; (3) a description of measures to be implemented for the management and use of project lands; (4) measures for the coordination of the plan with other resource management plans and programs for the project, such as the historic properties management plan, long-term monitoring program of wetlands and state threatened and endangered plants, and the bald eagle protection plan; (5) measures to revise and update the plan; and (6) a schedule for implementation of the plan and associated management measures.
- A recreational use monitoring plan that includes (1) estimates of annual project-related recreation use visitation; (2) assessments of the effects of proposed project construction on recreation opportunities and access at the project during the

construction period, the effects of project operations, i.e., reservoir elevations and provision of flows downstream of the project dam, on recreation access and opportunities at the project, the adequacy of the existing project's recreation facilities, and the need for additional recreation facilities at the project site; and (3) a description of any recreation plans proposed by PPL to accommodate or control visitation in the project area.

The following discussion describes the basis for staff-recommended measures, as well as for not recommending measures recommended by other entities.

Final Excavation Plans

PPL filed plans for excavations in the Susquehanna River in the vicinity of the Holtwood Project, as part of the information provided to Pennsylvania DEP on June 13, 2008, as part of the WQC process. Although it is likely that the final excavation plans may not differ substantially from these latest filed plans, details must be provided so that final assessment of potential impacts on water quality, fisheries, and wildlife can be made, and appropriate mitigation measures required as part of the compliance activities for the proposed amendment. Specific plans for in-water or in-the-dry excavations/blasting must be submitted and approved prior to the initiation of construction activities that involve blasting. The costs for preparing these final plans can not be estimated, because this planning would be part of PPL's and its selected contractor's final design and planning for the project. The plan should be prepared in consultation with Pennsylvania DEP, Pennsylvania FBC, and FWS, and filed with the Commission well prior to construction, so that staff has the opportunity to make adjustments to this planned excavation, if required, in order to protect water quality and aquatic habitat.

Construction Period Measures

Project construction would involve major excavations and heavy construction activities in the Susquehanna River in the vicinity of the Holtwood Project. PPL has estimated that 1.9 million cy of rock and other material would be excavated for the project. A construction project of this magnitude within and adjacent to the Susquehanna River would have the potential for adversely affecting water quality and fishery resources. The primary concerns related to this construction are effects on water quality due to release of sediment and fines, particularly for in-water construction, the effects of excavation/blasting on the migration of anadromous and catadromous species through the area, and effects on the operation of the fish passage facilities. PPL indicates that it is preparing erosion and sedimentation control plans in consultation with Pennsylvania DEP and other agencies, and that it will be required to obtain National Pollutant Discharge Elimination System and section 404 permits for construction. The plans and the other permits may well prevent major adverse effects on water quality that could affect fisheries habitat, but Commission staff should have the opportunity to review the erosion and sedimentation control plans to ensure that appropriate measures are being

implemented. There would be minimal additional cost for PPL to file the erosion and sedimentation control plans with the Commission prior to commencing construction.

PPL provided preliminary plans on how fish migration and fish passage operations would be maintained during the period of construction. These would include limiting major construction activities near the primary migratory routes to the project or in close proximity to fish passage facilities during the migration season, but the final details that would be developed by PPL's contractor would need to be provided, to ensure that migration and fish passage operations are not interrupted. Interruption of fish migration past the project would have major effects on the overall anadromous fish population in the basin, if fish are unable to reach upstream spawning grounds or do not successfully emigrate from the basin during the fall months. We expect that the cost to prepare and file these plans would be minor, because they would be part of PPL's overall final design and planning for the project.

As a result of additional consultations with the FWS during the section 10(j) process, we also now recommend that PPL prepare a plan to mitigate for any adverse construction effects that would reduce the efficiency of the Holtwood fish lifts during the 3-year construction period. PPL should prepare this plan for Commission approval, after consultations among the agencies, PPL, and the Conowingo licensee immediately after the conclusion of the spring fish passage operations. We expect that during those consultations, if construction effects are identified, PPL and the agencies would determine the shortfall of adult shad that would need to be mitigated, using the staff-proposed methodology described in section 3.3.3.2 of this EIS, and then determine the best method for mitigation, either additional fry production or trucking of shad from Conowingo. The final mitigation plan, with agency comments on the plan, would need to be filed with the Commission for approval by September 1 (about 2.5 months after conclusion of the spring fish passage season), in order to allow sufficient time for Commission approval and for PPL to prepare for and implement the plan in the following spring. There would be some additional cost for PPL to consult with the agencies and prepare the mitigation plan, although these consultations could occur at the same time as other consultations that may be required during the construction period. Substantial additional costs could occur if PPL was to implement additional fry stocking or adult shad trucking from Conowingo, but these costs would only occur if an adverse construction effect on fish passage were documented and trigger implementation of these measures. If adverse effects do not occur, these measures would not be implemented. These measures, if implemented, would protect shad passage during the construction period and ensure that upstream shad production is not reduced as a result of construction.

Fish Passage Improvements and Monitoring

The amended project would include major improvements to the upstream fish passage facilities at the project. These improvements should rectify several of the deficiencies in the facilities seen since they first went into operation in 1997, and have

resulted in low passage efficiencies. PPL and Pennsylvania DEP have agreed to the improvements through the COA, and Interior's preliminary fishway prescription essentially requires the same improvements as provided in the COA. Associated with the improvements, both the COA and preliminary fishway prescription include provisions for evaluation of the efficiency of the improved facilities, along with a mechanism for making additional operational or structural changes to the facilities in the future, if target efficiencies are not met. Provisions are also included for evaluation of downstream fish passage, development of American eel passage facilities, and evaluation of these facilities, with a mechanism for making changes in the facilities if target efficiencies are not met. We conclude that all of these provisions would substantially improve the efficiency of fish passage at the project, but at the same time the Commission should be included in the process for making these improvements, particularly if the improvements involve making changes to project structures (the fish passage facilities) or operations, which must be approved by the Commission. Thus, we recommend that final design plans, study plans for evaluation studies, and plans for any future modifications be filed with the Commission for approval. We can not estimate the total cost of all potential fish passage improvements and studies that may be implemented, because we do not know what those future improvements or studies may be. Even though the estimated costs of initial fish passage improvements proposed as part of the license amendment are substantial, the benefit to migrating fisheries would be well worth the cost of improving the currently inefficient fish passage system.

Fish Lift Operation for Resident Species

PPL, through the COA, proposes to operate the fish facilities at Holtwood from April 1 through June 30 for the upstream passage of resident species. Pennsylvania FBC, in its section 10(j) comments, recommends that the Holtwood fish facilities also be operated during the fall period (September 1 to October 15) for upstream resident fish passage for a 5-year period, and then evaluate with the agencies whether to make changes to or continue resident fish passage. Current spring fish lift operations for anadromous species pass substantial numbers of resident species, including the primary game species in the lower Susquehanna River, the walleye and smallmouth bass. Typically, spring fish lift operations occur from mid to late-April until early-June, so expanding this operation as proposed would add an additional 4 to 6 weeks of operation. This could result in additional substantial upstream passage of resident species. It is not known, however, the extent of resident fish passage that may occur during the fall operations recommended by Pennsylvania FBC. Undoubtedly some movement would occur, and these operations would allow evaluation of that movement. PPL, however, expressed concerns about operating in the fall, related to potential damage to lift components that could occur during that operation, with an insufficient period available before the following spring's operation to make necessary repairs.

In the draft EIS, we concluded that only 1 year of fall operations should be attempted because of the potential for fall fish lift breakdowns to affect spring operations.

The agencies, however, in their comments on the draft EIS, provide information that indicates the potential for fall damage to the fish lifts as a result of fall storms/hurricanes is remote, and that only 1 year of testing, as we recommended, could be influenced by unusual (either high or low) flow conditions or by strong or weak year classes that may affect the numbers of fish available for passage. We agree that the potential for storm damage in the fall is low, and that 1 year of fall operations as we initially recommended may not provide an adequate sampling of the fall period to determine whether fall operations would benefit resident species or the re-colonization of mussels in the lower Susquehanna River. Thus, we now conclude that fall operations should occur on an experimental basis for a 5-year period, similar to the spring operations for resident species, followed by an evaluation of the results by the licensee and agencies, to determine if additional fall operations are warranted. Any plan to continue fall operations would then need to be filed with the Commission for approval. Springtime operations for anadromous species should remain the priority for fish lift operations at the project, and experimental fall operations should not jeopardize spring operations. PPL would experience additional costs by operating the fish lifts during the fall, although the costs would likely be lower than during the spring months when the peak of the anadromous fish and gizzard shad runs occur. These fall operations, however, would allow determination of whether important resident fish movement occurs in the fall.

Project Minimum Flow Releases

The proposed amendment would result in the re-distribution of flows at Holtwood, with higher flows being passed down the tailrace channel (from the existing 31,500 cfs to the proposed 62,100 cfs), with a reduction in the spillage over the project dam. The licensee is also proposing a minimum conservation flow release of 200 cfs into the Piney Channel, a release of the Unit 1 generation flows of about 1,200 to 3,150 cfs to the Piney Channel instead of to the tailrace, a continuous release to the bypassed reach approximately equal to the existing leakage from the dam, and a drought release of 44 acre-feet per day from storage if approved by SRBC. There would also be habitat modification (channel excavations) associated with some of the releases, and the total minimum streamflow from the project (including leakage) would be equal to, on a daily volumetric basis, 98.7 percent of the minimum flow required by the Commission to be released at the downstream Conowingo Project, or inflow to Lake Aldred, whichever is less. There would also be a continuous minimum flow from the project of 800 cfs, as per the recent agreement with the licensee of the downstream Conowingo Project. Because the current project has no minimum flow requirements (except for leakage) the proposed and recommended minimum flows would have positive effects on downstream water quality and aquatic habitat.

PPL, however, has not provided details on how some of these releases would be made. For example, it is not clear what the schedule for Unit 1 releases into Piney Channel would be, and how leakage flows would be maintained in the bypassed reach. The licensee provided a draft MSFOP in its June 13, 2008 response to Pennsylvania DEP,

which included many details of how minimum flow releases would be provided. However, this plan was in draft form and did not include agency comments on the plan. There also appears to be recent additions to the proposed minimum flows (for example the continuous minimum flow of 800 cfs). Therefore, we recommend that a final MSFOP be filed with the Commission for approval, which would include PPL's specific plans for minimum flow releases into the tailrace, Piney Channel, and bypassed reach, plans for monitoring minimum flows, and for making future modifications to those flows. We would not expect that preparation of a final plan would add to the project costs as PPL would need to provide a final plan to Pennsylvania DEP.

Tailrace DO Monitoring Plan

Amendment of the project would result in a major re-distribution of flows from the bypassed reach into the tailrace, and installation of new generating units and a new powerhouse adjacent to the existing powerhouse. The licensee provided data that show the existing generating units provide some aeration during water passage through the units of from 0.2 to 0.8 mg/L. The new units, which would be of modern, more efficient design, would not likely provide any aeration through the units. Assuming that these units, would be preferentially operated during the low-flow summer months, their operation could result in reduced DO levels in the tailrace compared to existing conditions. Current DO levels in the tailrace generally meet state standards, but PPL has already proposed to conduct water quality monitoring in the tailrace, in response to Pennsylvania DEP concerns about potential DO reductions when the new units become operational. We agree that a DO monitoring program should be conducted in the tailrace once the amended project begins operation, to ensure that DO levels continue to meet state standards. If state standards are not maintained, the licensee would be required to implement measures to improve DO in the project tailrace releases. We estimate that a DO monitoring plan would add about \$5,000 to the cost of the minimum streamflow implementation plan to maintain and protect existing and designated uses and implement water quality standards. This would be a reasonable cost for ensuring that state DO standards are continued to be met in the project tailrace.

Wetlands Mitigation Plans

Construction of the proposed project would permanently eliminate 1.24 acres (54,000 square feet) of wetlands. PPL proposes to replace the lost wetlands at a suitable location to be determined in consultation with the Corps and Pennsylvania DEP. In its comments on the draft EIS, PPL indicates that it has agreed to construct a wetlands mitigation project along Landis Run in Manheim Township and that details would be provided to the Commission after they are finalized in consultation with Pennsylvania DEP. We agree that PPL would need to replace wetlands that would be eliminated by construction of the new facilities. FWS also recommends that PPL prepare and implement prior to project construction a revised detailed compensatory mitigation plan to offset any unavoidable effects on fish and wildlife habitat, including river and wetland

habitat due to project construction and operation approved by FWS, Pennsylvania DEP, Corps, and Pennsylvania FBC. We conclude that the project-wide plans proposed by FWS are not needed and would be duplicative of proposed plans that address the effects of the proposed amendment. We discuss our recommendations relative to FWS's recommended compensatory mitigation plan in section 5.2, *Recommendations of Fish and Wildlife Agencies*.

Protection of Special-status Plants

Construction of the new facilities would affect American holly and white doll's daisy special-status plants. Pennsylvania DCNR requested and PPL has agreed to provide irrigation flows of approximately 1,000 cfs for 1 hour on days when river flows are between 31,000 and 61,500 cfs. PPL proposes and Pennsylvania DNR recommends a long-term monitoring program of wetlands and state threatened and endangered plants in the river bed downstream of the dam to examine the effects of reductions in spill frequency on in-river resources and determine if any adjustments to planned flow release rates are warranted to ensure the continued protection of the river area and special status plants. Although we do not expect operations to affect special-status plant populations, individual plants would be disturbed by some of the construction activities. Therefore, we recommend that the final monitoring plan be filed with the Commission for approval. The cost of the proposed irrigation flows and monitoring plan are included in PPL's overall cost estimate for the construction and operation of the project as amended.

Whitewater Boating

The proposed amendment would reduce flows over the Holtwood dam and affect existing opportunities for whitewater boating in the bypassed reach downstream of the project. The whitewater agreement specifies flows that would provide 264 hours of whitewater boating, similar to existing conditions, and calls for the construction of two new features that would replace features where use would be diminished by the reduced flows over the dam. The whitewater agreement provides for future maintenance of the new features as well as an evaluation of the potential effect of the features and boating flows in Piney Channel and the tailrace on the migratory fish program. Although the estimated cost of providing whitewater flows and features is considerable, continuing to provide comparable whitewater experiences is valuable to the well-established local boating organizations.

Recreational Enhancements and Monitoring

The proposed amendment would restrict public access to existing recreational facilities during the 3-year construction period and could reduce boating access to Lake Aldred during drought operations. PPL proposes a suite of recreational enhancements to existing recreational facilities, including extending public boat ramps on Lake Aldred as well as several new facilities to provide additional boating and fishing access downstream of the project. The proposed enhancements would allow boating access to Lake Aldred

during the infrequent periods when operations under drought conditions cause reservoir levels to go below the levels accessible by the existing public boat ramps. The new and expanded facilities would help to meet future demand for recreation on the project waters. The costs for these facilities are included in PPL's overall construction estimate and would be justified by the public benefit of increased recreational opportunities at the project. However, we note that recreational use has declined over the past 5 years and recommend, in addition to the proposed facilities, that PPL develop and implement a recreational use monitoring plan. We expect the estimated annual cost for recreational use monitoring would be relatively minor over the term of any amended license.

Historic Property Management Plan

The proposed amendment would involve excavation near areas that contain archeological sites and would alter the physical characteristics of the Holtwood dam and powerhouse complex. PPL proposes to prepare a historic property management plan in consultation with the SHPO. Implementation of a historic property management plan would ensure that construction activities would avoid archaeologically sensitive areas and that the designs for new powerhouse and dam features would avoid altering the characteristics that qualify the dam and powerhouse for listing in the National Register. Therefore, we recommend that PPL file the final historic property management plan with the Commission for approval. The estimated cost of such a plan is included in PPL's overall cost of construction and operation of the amended project.

5.2 RECOMMENDATIONS OF FISH AND WILDLIFE AGENCIES

Under the provisions of section 10(j) of the FPA, each hydroelectric license issued by the Commission shall include conditions based on recommendations provided by federal and state fish and wildlife agencies for the protection, mitigation, or enhancement of fish and wildlife resources affected by the project.

Section 10(j) of the FPA states that, whenever the Commission believes that any fish and wildlife agency recommendation is inconsistent with the purposes and the requirements of the FPA or other applicable law, the Commission and the agency shall attempt to resolve any such inconsistency, giving due weight to the recommendations, expertise, and statutory responsibilities of such agency. In response to our Ready for Environmental Analysis notice, the following fish and wildlife agencies submitted recommendations for the project: Interior (letter filed April 16, 2008) and Pennsylvania FBC (letter filed May 2, 2008).

Table 26 lists the federal and state recommendations filed subject to section 10(j), and whether the recommendations are adopted under the staff alternative. Environmental recommendations that we consider outside the scope of section 10(j) have been considered under section 10(a) of the FPA and are addressed in the specific resource sections of this document and the previous section.

Table 26. Analysis of fish and wildlife agency 10(j) recommendations for the Holtwood Project. (Source: Staff)

Recommendation	Agency	Within the scope of section 10(j)	Annualized cost	Adopted?
1. For a period of 5 years beginning when the new hydroelectric units become operational, operate the fish passage system from April 1 through June 30 to allow passage of resident fish.	Pennsylvania FBC	Yes	a	Yes
2. For a period of 5 years beginning when the new hydroelectric units become operational, operate the fish passage system from September 1 to October 15, to allow passage of resident fish.	Pennsylvania FBC	Yes	\$13,080	Yes, followed by evaluation of that passage.
3. During the first 5 years, beginning when the new units become operational, count and identify resident fish and provide daily and annual monitoring reports by December 31 to the resource agencies.	Pennsylvania FBC	No, not a specific measure to protect fish and wildlife resources.	\$8,050	Yes
4. At the end of the first 5 years of operation of the new units, discuss whether modifications to the fish passage system operation for resident fish are necessary and/or whether to continue to operate the fish passage system as it was operated during the initial 5-year period.	Pennsylvania FBC	Yes	\$630	Yes

Recommendation	Agency	Within the scope of section 10(j)	Annualized cost	Adopted?
5. Continue to participate in the Holtwood Fish Passage Technical Advisory Committee as required under the 1993 Settlement Agreement including an annual fish passage report.	Interior	No, not a specific measure for the protection of fish and wildlife.	a	Yes
6. Develop and implement a plan to minimize unavoidable impacts to river and wetlands from project construction and operation.	Interior	Yes	a	Yes
7. Develop and implement an eagle management and monitoring plan.	Interior	Yes	a	Yes
8. Prepare and implement prior to project construction a revised detailed compensatory mitigation plan to offset any unavoidable effects on fish and wildlife habitat, including river and wetland habitat, due to project construction and operation approved by FWS, Pennsylvania DEP, Corps, and Pennsylvania FBC.	Interior	Yes, following clarification by FWS during the 10(j) process that this measure was only related to maintaining shad passage during construction.	b	Yes
9. Develop and implement a post-construction monitoring plan for compensatory mitigation projects approved by FWS, Pennsylvania DEP, Corps, and Pennsylvania FBC.	Interior	Yes, following clarification by FWS during the 10(j) process that this measure was only related to maintaining shad passage during construction.	b	Yes

Recommendation	Agency	Within the scope of section 10(j)	Annualized cost	Adopted?
10. Develop a shoreline management plan for licensee-owned lands abutting project waters within 330 feet of the high water elevation that encompasses the preferred buffer zone width for the protection of avian and terrestrial species of concern.	Interior	Yes	a	Yes, in part.

^a These costs are included in PPL's overall cost of environmental measures.

^b These costs cannot be estimated at this time, but would be dependent on the magnitude of any losses that may occur.

The Commission staff made a preliminary determination that part of two recommendations by Interior and part of one recommendation by Pennsylvania FBC may be inconsistent with the purpose and requirements of the FPA or other applicable laws.

Evaluation of Resident Fish Passage

Pennsylvania FBC recommends an evaluation of the 5 years of resident fish passage during the spring and fall periods at the end of the 5-year period, and whether modifications to the fish passage system are necessary for resident fish, and absent modifications, to continue to operate the fish passage system as it was operated during the initial 5-year period. We agree that there should be an evaluation of the 5 years of springtime resident fish passage, and now agree with 5 years of experimental fall operations to determine if fall operations would serve any biological benefit, followed by an evaluation of whether resident fish passage should continue during the fall period. If operations indicate little passage during the fall period, fall passage may not be required. We estimate that the cost of operating the fish lifts during the fall period would be \$13,080 per year, and if minimal passage is occurring, there would be little biological basis for continuing this operation. The Pennsylvania FBC recommendation does not allow for the potential termination of fall operations, so while we agree with 5 years of fall fish lift operation, we also believe that this operation should only continue if there is a biological basis for doing so.

Development of Compensatory Mitigation Plans

Interior recommends development of a plan to minimize unavoidable impacts to the river and wetlands from project construction and operation, and a revised detailed compensatory mitigation plan to offset any unavoidable impacts on fish and wildlife habitat, including river and wetland habitat, due to project construction and operation.

We did not recommend these plans in the draft EIS because we believe that they would be duplicative of other plans that we recommend for development associated with construction and operation of the amended project. However, as a result of additional consultations with the FWS during the section 10(j) process, FWS clarified that this recommendation for a compensatory mitigation plan was related primarily to assuring that upstream passage of American shad during the construction of the Holtwood Project expansion would be no less efficient than during the previous 11 years of operation of the Holtwood fish lifts. We agree that the efficiency of shad passage during project construction should be maintained at this minimum level, and generally agree with FWS's concept for mitigating any adverse effects on passage that may occur. Thus, we now recommend that PPL prepare a plan to mitigate for any adverse construction effects that would reduce the efficiency of the Holtwood fish lifts during the 3-year construction period. PPL should prepare this plan for Commission approval, after consultations among the agencies, PPL, and the Conowingo licensee immediately after the conclusion of the spring fish passage operations. The plan would be filed with the Commission for approval by September 1 for any construction year that the target fish passage efficiency is not met. Mitigation would occur in the following spring and could involve either additional shad fry hatchery production or trucking of additional adult shad from the Conowingo Project.

Shoreline Management Plan

PPL proposes to develop a land and shoreline management plan for project lands. Interior recommends that PPL develop a shoreline management plan specifically for licensee-owned lands abutting project waters within 330 feet of the high water elevation (a distance that encompasses the preferred buffer zone width for species of concern, avian and terrestrial, at the project). However, within the existing project boundary, in all but about 5 percent of the shoreline, there is at least a 200-foot forested buffer around the river. Although we generally agree with FWS about the provisions that should be included in a shoreline management plan, we disagree that all project lands within 330 feet of the high water elevation need to be included in the plan. We conclude that the shoreline buffer would not need to extend the 330-feet along the entire project reservoir and reach immediately downstream of the project to provide adequate protection of project resources. These areas may be less or greater than a 330-foot buffer zone, depending on project resources and access. Therefore, assessment of the lands needed for inclusion within the project boundary for project purposes and protection of resources affected by the project as part of the development of the plan would help to establish the locations where such a shoreline buffer would require adjustment of the existing project boundary. In addition, this assessment would identify locations where the existing project boundary may not encompass new project-related recreation access facilities that are developed as part of the proposed action, such as the new tailrace access area and access road. For these reasons, we determined that the part of the FWS recommendation dealing with the 330-foot buffer to be included in the shoreline management plan may be

inconsistent with the public interest standard of section 4(e) and the comprehensive planning standard of section 10(a) of the FPA.

5.3 CONSISTENCY WITH COMPREHENSIVE PLANS

Section 10(a)(2) of the FPA, 16 U.S.C., § 803(a)(2)A), requires the Commission to consider the extent to which a project is consistent with federal or state comprehensive plans for improving, developing, or conserving a waterway or waterways affected by the project. We reviewed 5 state and 8 federal plans that are applicable to the Holtwood Project, located in Pennsylvania. No inconsistencies were found.

- National Marine Fisheries Service. 2000. Fishery Management Report No. 36 of the Atlantic States Marine Fisheries Commission: Interstate Fishery Management Plan for American eel (*Anguilla rostrata*). Prepared by the American Eel Plan Development Team. April 2000. 78 pages.
- National Marine Fisheries Service. 2000. Technical addendum 1 to amendment 1 of the interstate fishery management plan for shad and river herring. February 9, 2000. 6 pages.
- National Marine Fisheries Service. 1999. Fishery Management Report No. 35 of the Atlantic States Marine Fisheries Commission: Shad and river herring [includes alewife (*Alosa pseudoharengus*), Blueback herring (*Alosa aestivalis*), Alabama shad (*Alosa alabamae*), American shad (*Alosa sapidissima*), and Hickory shad (*Alosa mediocris*)]—Amendment 1 to the Interstate Fishery Management Plan for shad and river herring. April 1999. 77 pages.
- Pennsylvania Department of Environmental Resources. 1990. The Pennsylvania scenic rivers program scenic rivers inventory. Harrisburg, Pennsylvania. April 1990.
- Pennsylvania Department of Environmental Resources. 1988. Pennsylvania 1988 water quality assessment. Harrisburg, Pennsylvania. April 1988. Three volumes.
- Pennsylvania Department of Environmental Resources. 1986. Pennsylvania's recreation plan, 1986-1990. Harrisburg, Pennsylvania. 224 pp. and appendices.
- Pennsylvania Department of Environmental Resources. 1983. Pennsylvania state water plan. Harrisburg, Pennsylvania. January 1983. 20 volumes.
- Susquehanna River Basin Commission. 1987. Comprehensive plan for management and development of the water resources of the Susquehanna River Basin. Harrisburg, Pennsylvania. June 1987. 153 pp. and appendices.
- U.S. Fish and Wildlife Service. 1992. Chesapeake Bay American eel fishery management plan. Annapolis, Maryland. December 18, 1992.
- U.S. Fish and Wildlife Service. 1989. Chesapeake Bay Alosid (shad and river herring) management plan. Annapolis, Maryland. July 1989.

- U.S. Fish and Wildlife Service. 1986. Canadian Wildlife Service. North American waterfowl management plan. Department of the Interior. Environment Canada. May 1986.
- U.S. Fish and Wildlife Service. 1983. Northern states bald eagle recovery plan. Denver, Colorado. pp76. and appendices.
- U.S. Fish and Wildlife Service. No date. Fisheries USA: the recreational fisheries policy of the U.S. Fish and Wildlife Service. Washington, D.C. 11 pp.

We also reviewed a draft comprehensive plan by SRBC that would replace the 1987 comprehensive plan for the Susquehanna River.

- Susquehanna River Basin Commission. 2008. Comprehensive Plan for the Water Resources of the Susquehanna River Basin. Draft plan issued for comment in May 2008. 112 pp. plus appendices.

The Susquehanna River Basin Compact was enacted in December 1970 as Public Law 91-575 and joined the federal government and the states of New York, Pennsylvania, and Maryland as equal partners for a period of 100 years to manage the Susquehanna basin's water resources through proper planning, development and regulation. The Compact created SRBC as the single administrative agency to develop, effectuate, coordinate and adopt plans, policies, and programs related to water resources of the basin. SRBC was authorized to adopt a comprehensive plan for the immediate and long-term development and use of the water resources of the basin. The comprehensive plan provides a framework for SRBC to manage and develop the basin's water resources and serves as a guide for all SRBC programs and activities.

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Section 6

Literature Cited

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7.0 LIST OF PREPARERS

Federal Energy Regulatory Commission

Blake Condo—Project Coordination and Aquatic Resources and Terrestrial Resources (Fishery Biologist; M.S., Biology, B.A.S., Wildlife and Fishery Science)

Hillary Berlin—Recreation and Cultural Resources (Environmental Biologist; M.P., Environmental Planning; B.A., Economics)

Joseph Enrico—Fisheries (Environmental Protection Specialist; B.S., Marine Science)

Robert Grieve—Team Leader (Fishery Biologist; B.S., Fishery Biology)

Linda Stewart—Engineering (Civil Engineer; M.S., Civil Engineering, B.S., Civil Engineering)

Louis Berger Group

Peter Foote—Aquatic Resources (Senior Fisheries Biologist; M.S., Fisheries Biology; B.S., Wildlife Biology)

John Hart—Water Resources (Hydrologist; B.A., Physics)

Kenneth Hodge—Engineering, Economic Analysis, and Geology and Soils (Senior Engineer; B.S., Civil Engineering)

Coreen Johnson—Editorial Review (Technical Editor; B.A., English Education)

Karen Klosowski—Recreation and Land Use/Aesthetics (Recreation and Land Use Specialist; B.S., Parks and Recreation; M.L.A., Landscape Architecture; M.U.R.P., Regional Planning)

Tyler Rychener—Terrestrial Resources and Threatened and Endangered Species (Environmental Scientist; M.S., Plant Biology; B.S., Biology)

Patricia Weslowski—Project Coordination and Cultural Resources (Task Manager and Preservation Planner; M.P.A., Public Administration; B.A., Political Science)

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8.0 LIST OF RECIPIENTS

Town Official
Town of Colonie
Colonie Memorial Town Hall
Newtonville, NY 12128

M. Pepper
Assistant Counsel
Pennsylvania Department of
Environmental Protection
909 Elmerton Ave.
Harrisburg, PA 17110

James Spontak
Program Manager
Pennsylvania Department of
Environmental Protection
South Central Regional Office
909 Elmerton Avenue
Harrisburg, PA 17110

Shirley Koty
President
Conewago Canoe Club
3617 Lisburn Road
Mechanicsburg, PA 17055

Geologist
Cultural Education Center
Geological Survey
Albany, NY 12230-0001

Executive Director
Delaware River Basin
P.O. Box 7360
West Trenton, PA 08628

Section Chief
Environmental Protection Agency
Region 3
1650 Arch Street
Philadelphia, PA 19103-2029

Grace Musumeci
Environmental Protection Agency
Region 2
290 Broadway, Floor 25
New York, NY 10001

Director EPA
Office of Ecosystem Protection
Water Quality Branch
1 Congress Street, Suite 1100
Boston, NY 02114

Jay Ryan, Partner
Van Ness Feldman P.C.
3800 County Road 94 #4101
Manvel, TX 77578

Regional Engineer
Federal Energy Regulatory Commission
New York Regional Office
19 W 34th St., Rm 400
New York, NY 10001-3006

James J McNulty
Federal Energy Regulatory Commission
Acting Secretary
P.O. Box 3265
Harrisburg, PA 171053265

Lisa Tucker, Partner
Kirkpatrick & Lockhart Preston Gates
Ellis LLP
1601 K Street, NW
Washington, DC 20006

County of Lancaster
P.O. Box 83480
Lancaster, PA 17608-3480

Director
Marine Sciences Research Center
State University of New York
Stony Brook, NY 11794-0001

Brent Bolea
Assistant Attorney General
Maryland Energy Administration
1623 Forest Drive
Annapolis, MD 21403

Michael Brent Hare
Maryland Department of Natural
Resources
Maryland Energy Administration
1623 Forest Drive
Annapolis, MD 21403

Shawn Seaman
Maryland Department of Natural
Resources
Maryland Energy Administration
1623 Forest Drive
Annapolis, MD 21403

N.Y. State Energy Research &
Development Authority
Commissioner
286 Washington Avenue Ext
Albany, NY 12203-6371

Regional Director
Northeast Regional Office-DOC/NOAA
1 Blackburn Drive
Gloucester, MA 01930-2237

Director
New York Department of
Transportation
Region 4
1530 Jefferson Rd
Rochester, NY 14623-3110

Director
New York Public Service Commission
3 Empire State Plaza
Albany, NY 12223-1000

Lawrence J. Frame
New York State Canal Corporation
Office of Canals - Thruway Admin.
Hdqtrs.
200 Southern Blvd
Albany, NY 12209

Office of the Commissioner
New York State Department of
Environmental Conservation
625 Broadway, 14th Floor
Albany, NY 12233-0001

Mark S. Woythal
New York State Department of
Environmental Conservation
625 Broadway
Instream Flow Unit
Albany, NY 12233

William Little
Associate Attorney
New York State Department of
Environmental Conservation
625 Broadway
Albany, NY 12233-1500

David Lemon
Fisheries Biologist
New York State Department of
Environmental Conservation
1285 Fisher Avenue
Cortland, NY 13045

Rose Staples
Executive Assistant
Devine Tarbell & Associates, Inc.
970 Baxter Boulevard
Portland, ME 04103

Director
PA Department of Conservation &
Natural Resources
400 Market Street
P.O. Box 8551
Harrisburg, PA 17105-8551

Emilee Boyer
Environmental Review Specialist
PA Department of Conservation &
Natural Resources
400 Market Street
P.O. Box 8552
Harrisburg, PA 17105

Rebecca Bowen
Ecological Services
PA Department of Conservation and
Natural Resources
P.O. Box 8552
400 Market Street
Harrisburg, PA 17105

Pennsylvania Department of Agriculture
2301 N Cameron St
Harrisburg, PA 17110-9405

Pennsylvania Dept. of Environmental
Protection
Southwest Regional Office
400 Waterfront Drive
Pittsburgh, PA 15222-4739

Director
Pennsylvania Dept. of Environmental
Protection
P.O. Box 8460
Harrisburg, PA 17105-8460

Thomas L. Denslinger
Pennsylvania Dept. of Environmental
Protection
P.O. Box 8555
Harrisburg, PA 17105-8555

Jason Oyler
Pennsylvania Fish & Boat Commission
P.O. Box 67000
Harrisburg, PA 17106-7000

Dennis T. Guise
Pennsylvania Fish & Boat Commission
450 Robinson Lane
Bellefonte, PA 16823-8133

Andrew L. Shiels
Chief/FPS
Pennsylvania Fish & Boat Commission
17 Shiloh Road
State College, PA 16801

Laurie E. Shepler
Pennsylvania Fish & Boat Commission
Counsel
P.O. Box 67000
Harrisburg, PA 17106

Pennsylvania Game Commission
2001 Elmerton Ave
Harrisburg, PA 17110-9762

Pennsylvania Office of Attorney
General
Atty. General
16th floor
Strawberry Square
Harrisburg, PA 17120

John M. Cincilla
Manager, PPL Companies
2 N 9th Street
Allentown, PA 18101-1139

Michael Helfrich
Stewards of the Lower Susquehanna,
Inc.
Lower Susquehanna Riverkeeper
324 W Market Street
York, PA 17401

David M. Davidson
Director
Stewards of the Lower Susquehanna,
Inc.
324 W. Market Street
York, PA 17401

Richard Cairo
Susquehanna River Basin Commission
1721 N Front Street
Harrisburg, PA 17102-2315

Michael G. Brownell
Chief Water Management
Susquehanna River Basin Commission
1721 North Front Street
Harrisburg, PA 17102-2391

Thomas Beauduy
Counsel
Susquehanna River Basin Commission
1721 North Front Street
Harrisburg, PA 17102

Michele DePhilip
The Nature Conservancy of
Pennsylvania
Director, Freshwater Conservation
2101 N. Front St
Building #1, Suite 200
Harrisburg, PA 17110

Mark Bryer
The Nature Conservancy
5410 Grosvenor Lane, Suite 100
Bethesda, MD 20814

Commanding Officer
U.S. Coast Guard
MSO Pittsburgh
1150 Kossman Bldg., 100 Forbes Ave.
Pittsburgh, PA 15222-1371

Commanding Officer
U.S. Coast Guard
MSO Buffalo
1 Fuhrmann Blvd
Buffalo, NY 14203-3105

Commanding Officer
U.S. Coast Guard
MSO Long Island Sound
120 Woodward Ave
New Haven, NY 06512-3628

Commanding Officer
U.S. Coast Guard
MSO Philadelphia
1 Washington Ave
Philadelphia, PA 19147-4335

Andrew Tittler
U.S. Department of the Interior
Office of the Solicitor
One Gateway Center, Suite 612
Newton, MA 02458-2802

Alexander R. Hoar
U.S. Fish and Wildlife Service
300 Westgate Center Drive
Hadley, MA 01035

David Densmore
U.S. Department of the Interior
U.S. Fish and Wildlife Service
Pennsylvania Field Office
315 S. Allen St. Suite 322
State College, PA 16801

Larry M. Miller
Project Leader
U.S. Fish and Wildlife Service
P.O. Box 67000
1601 Elmerton Ave
Harrisburg, PA 17106-7000

Director
U.S. Department of Transportation
Control & Planning Division
50 Wolf Rd., 6th Floor
Albany, NY 12205

U.S. Department of the Interior
315 S Allen St Ste 322
State College, PA 16801-4851

David A Stillwell
U.S. Fish and Wildlife Service
New York Field Office Region 5
3817 Luker Rd
Cortland, NY 13045

Cynthia Wilkerson
U.S. National Park Service
Northeast Region - U.S. Custom House
200 Chestnut Street
Philadelphia, PA 19106-2912

Charles Schumer
United States Senate
313 Hart Senate Office Building
Washington, DC 20510

Hillary Rodham Clinton
United States Senate
476 Russell Senate Office Building
Washington, DC 20510

Upper Chesapeake Watershed Assoc.
138 W Lanvale Street
Baltimore, MD 21217-4120

Chief Engineer
U.S. Army Corps of Engineers
North Central Office
111 N Canal Street, Lobby 6
Chicago, IL 60606-7291

Commander
U.S. Army Corps of Engineers
North Atlantic Division-CENAD-ET-P
26 Federal Plaza # 2109
Brooklyn, NY 10278

District Engineer
U.S. Army Corps of Engineers
NY District - Jacob Javits Fed. Bldg.
26 Federal Plaza
New York, NY 10278-0004

District Engineer
U.S. Army Corps of Engineers
550 Main Street
Cincinnati, OH 45202

U.S. Army Corps of Engineers
Wm. S. Moorhead Fed. Bldg.-Pittsburgh
1000 Liberty Ave
Pittsburgh, PA 15222-4004

Regulatory Branch
U.S. Army Corps of Engineers
Buffalo District
1776 Niagara Street
Buffalo, NY 14207-3111

Bob Dach
Hydropower Program Manager
U.S. Bureau of Indian Affairs
Natural Resources
911 NE 11th Avenue
Portland, OR 97232

U.S. Bureau of Indian Affairs
Solicitor's Office
1849 C ST NW, Rm 2353
Washington, DC 20240-0001

Dan Haas
U.S. Department of Interior
Room 260, Custom House
Second and Chestnut Streets
Philadelphia, PA 19106-2904

West Virginia Dept. of Education &
Arts
Division of Culture & History
Capitol Complex
Charleston, PA 25305

Pat Strong
Baltimore District Corps of Engineers
Regulatory Branch
P.O. Box 1715
Baltimore, MD 21203

Dennis O'Donnell
VP, Asset Management
Olympus Power, LLC
67 Park Place East
Morristown, NJ 07960

County of York
York County Courthouse
28 E Market Street
York, PA 17401-1501

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Appendix A

Consent Order and Agreement Measures

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APPENDIX A
CONSENT ORDER AND AGREEMENT MEASURES

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Table A-1. Summary of meetings and plans required to be implemented in conjunction with the application for Water Quality Certification. (Source: COA, dated November 21, 2007)

Consent Order Paragraph	Description
3.a.1	By November 30, 2007, PPL Holtwood, LLC (PPL or licensee) is to provide the resource agencies a report on spillway crest control alternatives and a recommended plan for approval.
3.a.2	Final modeling reports for the fish passage facilities must be provided to the resource agencies by November 30, 2007.
3.a.3	Final design plans and schedule for all structures and excavations must be provided to agencies for approval by January 31, 2008.
3.a.4	PPL is to meet with agencies by January 31, 2008, to discuss operation of fish lifts for resident species from September 1 to October 15.
3.a.5	By January 31, 2008, PPL is to provide agencies a Minimum Stream Flow Operations Procedures (MSFOP) manual to agencies for approval. This would provide detailed information on how the project would provide minimum flows, turbine sequencing, flow split between powerhouses, etc.
3.a.6, 7, 8, 9	These paragraphs require that PPL meet with agencies by January 31, 2008, to discuss a plan and schedule for passing minimum flows.
3.a.10, 11, 12	These paragraphs require that PPL provide, by February 28, 2008, a plan and schedule for implementing and monitoring minimum flows at the project, for agency approval.
3.a.13	By March 31, 2008, PPL is to provide agencies a plan, for approval, for sequencing construction to prevent impacts to anadromous fish runs.
3.a.14	By March 31, 2008, PPL is to provide agencies a fishway operating plan (FOP), for approval, that would provide details of how fish facilities would be operated and monitored.
3.a.15 and 16	By March 31, 2008, PPL is to meet with agencies to discuss a plan and schedule for determining effectiveness of upstream shad passage, and a discrete survival study for shad downstream passage.

Consent Order Paragraph	Description
3.a.17	By June 30, 2008, PPL is to provide the agencies for approval, a plan to monitor upstream effectiveness of shad passage using passive integrated transponder (PIT) tags, including installation of PIT tag readers at Conowingo dam, if possible.
3.a.18	By June 30, 2008, PPL is to provide the agencies for approval, a plan to monitor the downstream passage survival of shad.
3.b	PPL to construct a new boat launch at Pequea Creek Access Site to replace one lost as a result of Pennsylvania Department of Transportation construction. By January 31, 2008, PPL is to meet with the agencies regarding plans for the launch, and within 30 days of the meeting provide plans for agency approval.
3.c	Allows PPL to withdraw its application for Water Quality Certification (WQC) should it withdraw the license amendment application.
3.d	PPL shall include the provisions of appendix A of the Consent Order and Agreement (COA) (proposed WQC conditions) in the final license amendment application.
3.e	PPL will not challenge the final WQC conditions if they are substantially the same as appendix A to the COA.
3.f	PPL may challenge the final WQC conditions if they are substantially different from appendix A to the COA.
3.g	PPL may challenge any final WQC conditions that are not set forth in appendix A to the COA.
3.h	Should any agency seek to require Safe Harbor to provide a minimum flow from the upstream Safe Harbor Project, PPL shall not participate in Safe Harbor's decision, nor shall oppose the effort to provide a minimum flow.

Table A-2. Summary of the proposed Water Quality Certification conditions in appendix A of the Consent Order and Agreement.³⁶ (Source: COA, dated November 21, 2007, as modified by staff)

Condition Number	Description
I. A, B, C	Defines final agency action and PPL's right to challenge; operational modifications of the adaptive management requirements of the permit; and structural modifications.
II. A. 1 ^a	Requires the licensee to prepare and implement a FOP related to all operations and maintenance of each fishway, including daily and seasonal operations, attraction flows, powerhouse unit sequencing and flow split between powerhouses, and fish counting/monitoring programs for anadromous, catadromous, and riverine fishes. By December 31 of each year, the licensee shall prepare an annual operations report, describing any deviations from the FOP and measures taken to correct any deviations, and shall meet with the DEP ^b and agencies by January 31 to discuss any needed modifications to the FOP. Any fish passage enhancements or new facilities implemented after the license amendment shall be included in the FOP, and the modified FOP for these facilities shall be submitted to the DEP and agencies for approval 60 days prior to their initial operation.
II. A. 2 ^a	Requires the licensee to implement the enhancements approved by the DEP concurrent with construction of the new hydroelectric generating facilities. This includes fish lift improvements related to modifying the attraction water supply, rebuilding the skimmer wall, reconstruction of fish lift entrance C, and relocation of the tailrace crowder drive; redirection of the Unit 1 discharge through the diversion wall and into Piney Channel; excavations within the project boundary to reduce velocity barriers to fish migration in the tailrace, below the tailrace, and in Piney Channel; placement of eel monitoring ramps and traps in the tailrace and spillway; and implementing a spill control system approved by the U.S. Fish and Wildlife Service. <i>These enhancements must be operational no later than the beginning of operation of the amended project.</i>

³⁶ Where water quality conditions are similar to Interior's preliminary fishway prescription, but in some cases expand on Interior's prescription, these additional measures are shown in italics throughout this table.

Condition Number	Description
II. B. 1 ^a	<p>Requires the licensee to implement a monitoring plan for upstream shad passage approved by the DEP that would include annual fish counts and PIT tag monitoring. The licensee would monitor the effectiveness of upstream passage, including daily updates to the resource agencies, <i>beginning the first year of operation of the amended project</i>, for 3 years, with an annual monitoring report by December 31 of each year. Following completion of this “Tier I” study, <i>unless the results indicate that at least 75 percent of the shad that pass the downstream Conowingo Project pass through the amended Holtwood Project, and that 50 percent of the shad pass the Holtwood Project within 5 days of passage at Conowingo (annual average over the 3 years)(Tier I requirements)</i>, the licensee would consult with the DEP and agencies to develop a plan for a radio telemetry study to assess shad behavior below the project and to determine the percentage of shad that enter Holtwood Project waters and then successfully pass through the Holtwood fish passage facilities. This “Tier II” study would continue for a minimum of 4 years, concurrent with fish counts and PIT tag monitoring, to determine the need for any additional or modified fish passage facilities at the project. Daily updates would be provided to the DEP and resource agencies, and an annual report would be required on the radio telemetry study by December 31 of each year. <i>If at the end of each year of the Tier II study less than 85 percent of the shad entering Holtwood Project waters successfully pass upstream through the project, the licensee shall prepare a plan for operational changes to enhance passage in the following year, if studies indicate that such changes could enhance passage. If at the end of the Tier II monitoring period the fish passage efficiency remains at less than 85 percent, the licensee shall prepare a plan for structural changes to enhance passage, if studies indicate that such changes could enhance passage.</i></p>

Condition Number	Description
II. B. 2 ^a	<p>Requires the licensee to conduct a discrete survival study for shad during downstream passage through the project, once the new powerhouse begins operation. The report on the study would be provided to DEP and agencies within 90 days of completion of the study. <i>If the study results indicate that project operations can achieve a minimum survival of 95 percent for juvenile shad and 80 percent for adult shad, those operational measures shall be incorporated into the FOP. If the study results indicate that project operations cannot achieve a minimum survival of 95 percent for juvenile shad and 80 percent for adult shad, the licensee shall consult with the DEP and agencies and propose operational or structural modifications that would be implemented in the year following the year that lower survival is documented. Any modifications shall be incorporated into the FOP by submitting plans to the DEP and agencies for approval 60 days prior to their initial operation.</i></p>

Condition Number	Description
II. C. 1 ^a	<ul style="list-style-type: none"> a. The trigger date for initiation of upstream eel passage measures at Holtwood shall be: when eel passage becomes operational at the downstream Conowingo Project, or when eel stocking into Conowingo reservoir begins as part of an agency-approved plan, or when the DEP and other agencies determine that available data indicate that sufficient numbers of eels are available below Holtwood to require passage. b. Within 1 month of the trigger date, the licensee shall meet with DEP and resource agencies to develop a plan and schedule for a siting study for permanent eel fishway(s), with a final plan to be submitted for DEP and agency approval within 3 months of the meeting. The siting study shall be implemented on an annual basis until adequate information is available to make a siting decision. c. Once adequate information is available to make a siting decision, the licensee shall meet with DEP and resource agencies to develop a plan and schedule for constructing permanent eel fishways. Within 6 months of that meeting, the licensee shall submit design plans and a schedule for resource agency approval. d. Within 3 months of the approval of the design plans, the licensee shall submit a plan for monitoring the effectiveness of upstream eel passage to the agencies for approval. <i>PPL shall implement the plan as approved by DEP.</i> e. Once the eel passage facilities are operational, the licensee shall implement effectiveness studies via PIT tagging or other approved methods, with an annual report provided to the agencies by December 31 of each year.

Condition Number	Description
II. C. 2 ^a	<p>a. The trigger date for initiation of downstream eel passage measures at Holtwood shall be 3 years after eel passage becomes operational at the amended Holtwood Project, or 3 years after eel stocking into Lake Aldred begins as part of an agency-approved plan, or when DEP determines that available data indicate that sufficient numbers of eels are available upstream of Holtwood to require downstream passage.</p> <p>b. <i>Within 6 months of the trigger date</i>, licensee shall submit a study plan <i>for a discrete survival study</i> to determine the effectiveness of downstream eel passage at the project to the resource agencies for approval. <i>The plan shall include balloon tag studies or other methods approved by DEP and the agencies.</i> The licensee shall implement the approved study plan and shall provide a report on the study within 90 days of its completion.</p> <p>c. <i>If the study results indicate that project operations can achieve a minimum survival of 85 percent for downstream-migrating eels, those operational measures shall be incorporated into the FOP. If the study results indicate that project operations cannot achieve a minimum survival of 85 percent for downstream-migrating eels, the licensee shall consult with the DEP and agencies and propose operational or structural modifications that would be implemented in the year following the year that lower survival is documented. Any modifications shall be incorporated into the FOP by submitting plans to the DEP and agencies for approval 60 days prior to their initial operation.</i></p> <p>d. <i>For structural modifications, the licensee shall prepare a plan for measuring the effectiveness of the modifications, and submit to DEP and agencies for approval 60 days prior to their initial operation.</i></p>

Condition Number	Description
II. D	<p>During the first 5 years of operation of the amended project, the licensee shall operate the fish passage system for the passage of resident fish species from April 1 to June 30. All resident fish shall be identified and counted, with daily reports made available to the agencies, and an annual report by December 31 of each year of operation. At the FOP meeting prior to the end of the 5-year period, the licensee and agencies shall discuss whether any modifications to the fish passage system is needed to accommodate resident fish.</p>
III. A	<p>Requires the licensee to prepare and implement a MSFOP^c for all operations and maintenance related to providing minimum streamflows, including daily and seasonal operations, powerhouse unit sequencing and flow split between powerhouses and tailrace/Piney Channel, procedures for measuring and reporting minimum flows, procedures for determining net inflow to Lake Aldred and flows to the tailrace, Piney Channel, and the spillway, as well as emergency procedures. PPL shall implement the MSFOP as approved by DEP, and shall provide the approved MSFOP to the agencies. By December 31 of each year, the licensee shall prepare an annual MSFOP report, describing any deviations from the MSFOP and measures taken to correct any deviations, and shall meet with the agencies by January 31 to discuss any needed modifications to the MSFOP. Any required modifications to the MSFOP shall be implemented within 30 days of the request for the modification consistent with the approval of the DEP. PPL may request a waiver of the minimum streamflow requirements if necessary for the construction of the new powerhouse or fish passage facilities, and may deviate from the minimum streamflow requirements of the certification in the event of an emergency, followed by a notification to DEP within 24 hours and a report on the emergency within 15 days. DEP may require amendments to the MSFOP to maintain and protect existing and designated uses, and implement water quality standards, with the amendments to be reviewed and approved by the agencies and implemented by PPL consistent with DEP approval.</p>

Condition Number	Description
III. B	<p>Upon Commission approval of the license amendment, PPL shall operate the amended project to release a minimum streamflow (including leakage) equal to, on a daily volumetric basis, 98.7 percent of the minimum flow required by FERC to be released at the downstream Conowingo Project. If inflow to Lake Aldred is less than the required minimum streamflow, the amended project shall release a minimum flow equal to the inflow. PPL may request a waiver of this minimum flow requirement if necessary for the construction of the new powerhouse or fish passage facilities.</p>
III. C	<p>PPL shall implement a plan and schedule, approved by DEP, for providing minimum streamflows in the spillway area that would maintain and protect existing and designated uses and implement water quality standards. PPL shall implement a minimum flow monitoring plan for the spillway, and shall annually report the monitoring results by December 31 of each year, as part of the MSFOP annual report. After 3 years of operation, if monitoring indicates that existing or designated uses and water quality standards are not being maintained, DEP may require PPL to propose a plan and schedule to modify minimum flow releases, if operational changes would help to maintain and protect existing and designated uses and implement water quality standards. The plan and schedule shall be submitted to the resource agencies within 6 months of the notification that the plan is needed. PPL shall implement the plan as approved by DEP. Three years after the implementation of operational measures, if monitoring results indicate that existing or designated uses and water quality standards are still not being maintained, DEP may require PPL to propose a plan and schedule for additional modifications to minimum flows in the spillway area using operational or structural changes. The plan and schedule shall be submitted to the resource agencies within 6 months of the notification that the plan is needed. PPL shall implement the plan as approved by the DEP, and if structural changes are made, the plan must include an evaluation of the effectiveness of those structural changes.</p>

Condition Number	Description
III. D	<p>PPL shall implement a plan and schedule, approved by DEP, for providing minimum streamflows in the Piney Channel and the tailrace from Lake Aldred that would maintain and protect existing and designated uses and implement water quality standards. PPL shall implement a minimum flow monitoring plan for the Piney Channel and the tailrace, and shall annually report the monitoring results by December 31 of each year, as part of the MSFOP annual report. After 3 years of operation, if monitoring indicates that existing or designated uses and water quality standards are not being maintained in the Piney Channel and the tailrace, DEP may require PPL to propose a plan and schedule to modify minimum flow releases, if operational changes would help to maintain and protect existing and designated uses and implement water quality standards. The plan and schedule shall be submitted to the resource agencies within 6 months of the notification that the plan is needed. PPL shall implement the plan as approved by DEP. Three years after the implementation of operational measures, if monitoring results indicate that existing or designated uses and water quality standards are still not being maintained in the Piney Channel and the tailrace, DEP may require PPL to propose a plan and schedule for additional modifications to minimum flows in the Piney Channel and the tailrace using operational or structural changes. The plan and schedule shall be submitted to the resource agencies within 6 months of the notification that the plan is needed. PPL shall implement the plan as approved by the DEP, and if structural changes are made, the plan must include an evaluation of the effectiveness of those structural changes.</p>
^a	<p>These water quality conditions are similar to Interior's preliminary fishway prescription, but in some cases expand on Interior's prescription. These additional measures are shown in <i>italics</i>.</p>
^b	<p>All references to DEP mean Pennsylvania DEP.</p>
^c	<p>For all conditions where PPL is required to prepare a plan, the conditions also include a provision that in the event PPL fails to provide a plan as required, Pennsylvania DEP would prepare the plan in consultation with the other resource agencies and require PPL to implement it.</p>

COVER SHEET

**FINAL ENVIRONMENTAL IMPACT STATEMENT FOR
AMENDMENT TO LICENSE**

**HOLTWOOD HYDROELECTRIC PROJECT
Docket No. P-1881-050**

**Appendix B
Comments on the Draft Environmental Impact Statement for the
Holtwood Hydroelectric Project
Project No. 1881-050**

FEIS

APPENDIX B
COMMENTS ON THE DRAFT ENVIRONMENTAL IMPACT
STATEMENT
FOR THE
HOLTWOOD HYDROELECTRIC PROJECT
PROJECT NO. 1881-050

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The U.S. Environmental Protection Agency (EPA) issued the notice of availability of the draft environmental impact statement (EIS) on July 18, 2008, and comments on the draft EIS were due on September 8, 2008.

In this appendix, we summarize the written comments received; provide responses to those comments; and indicate, where appropriate, how we modified the text in the final EIS. We group the comment summaries and responses by topic for convenience. The following entities filed comments on the draft EIS.

Commenting Entity	Filing Date
New York State Department of Environmental Conservation	August 7, 2008
U.S. Department of the Interior	August 12, 2008
America Whitewater	August 15, 2008
Pennsylvania Fish & Boat Commission	August 18, 2008
Exelon Corporation	August 18, 2008
Maryland Department of Natural Resources	August 25, 2008
National Marine Fisheries Service	September 8, 2008
U.S. Army Corps of Engineers	September 30, 2008

Statutory and Regulatory Requirements

Comment 1: The Department of the Interior (Interior) notes that under section 1.3, the draft EIS does not mention the Fish and Wildlife Coordination Act that provides the basic authority for the Fish and Wildlife Service's (FWS's) involvement in evaluating impacts to fish and wildlife from proposed water resource development projects.

Response: In section 1.3 of the EIS, we describe the sections of the Federal Power Act (FPA) that require the Commission to address and include Interior's fishway prescriptions and FWS's section 10(j) recommendations in any license amendment issued for the project. Our analysis is limited to the statutory and regulatory requirements that affect the Commission's licensing actions.

Comment 2: The Corps noted that it received the section 404 permit application from PPL on February 12, 2008, and requests that the EIS include a reference to the Rivers and Harbor Act of 1899 and section 404 of the Clean Water Act to section 1.3.

Response: We added the information about the section 404 permit to the table in section 1.3 and the status of the permit application to section 1.3.3 of the EIS. We did not include a reference to the Rivers and Harbors Act of 1899 because it does not affect the Commission's licensing actions.

Comment 3: Although Interior notes that there may not be any designated Essential Fish Habitat (EFH) affected by the proposed project, the federal fishery resource agencies still have an interest in the management of diadromous fish that use the freshwater habitat of the Susquehanna River and provide ecological, economic, and social benefits along the East Coast of North America.

Response: We understand the importance of the Susquehanna River as existing and potential freshwater habitat for diadromous species that occur along the Atlantic coast, and as the largest source of freshwater for the Chesapeake Bay, which supports many of these same species as well as other estuarine and marine species.

Comment 4: NMFS commented that both the federally listed (endangered) shortnose sturgeon and the candidate species Atlantic sturgeon have been documented downstream of the Conowingo Project, but because adequate sturgeon passage is not available at Conowingo, those species are unlikely occur between the Conowingo and Holtwood Projects or upstream of Holtwood. However, if either species is encountered at the Holtwood Project, the National Marine Fisheries Service (NMFS) should be informed. In addition, if suitable sturgeon passage occur, in the future at the Conowingo Project, coordination with NMFS will be required regarding the effects of the Holtwood Project on these species.

Response: If either the shortnose sturgeon or Atlantic sturgeon is encountered at the Holtwood Project, we will notify NMFS and coordinate with your agency as needed.

Comment 5: The Corps requested that section 1.3.5 of the EIS include a reference to the Bald Eagle Management and Monitoring Plan dated July 2008.

Response: This section deals with federally listed threatened and endangered species. We discuss the bald eagle management and monitoring plan in section 3.3.4.2 in our analysis of potential effects on special-status wildlife.

Proposed Action and Alternatives

Comment 6: Interior notes that section 2.1, *No-action Alternative*, should include the fact that the license term would not be extended to 2030 and relicensing would begin in 2009.

Response: We added this information to the description of the no-action alternative in section 2.1.

Comment 7: Interior notes that the description of the applicant's proposal in section 2.2, *Applicant's Proposal*, fails to mention the proposed license extension and points out that this information is important to the definition of the temporal scope of the draft EIS as defined on page 29 in section 3.2.2.

Response: Section 1 of the EIS clearly states that PPL requested an extension of its current license term of 16 years to 2030 based on the substantial costs of the proposed action and environmental measures. Based on the requested license term, we used 16 years as temporal scope of our cumulative effects analysis and as the period of analysis in our economic analysis. The Commission will determine the license term at the time it decides whether or not to approve the proposed action.

Comment 8: In reference to the last bullet on page 16 in section 2.2.1, PPL clarifies that it intends to continue to use the existing configuration of flashboards on Holtwood dam and to pass water through the existing 10-inch pipe on the dam to maintain the current rate of flow to the spillway area.

Response: We revised the text in section 2.2.1 of the final EIS to reflect PPL's intent to continue to use the existing configuration of flashboard and now include this revised proposed measure under proposed operational modifications.

Comment 9: PPL indicates that in a letter dated August 20, 2008, it has agreed to construct a wetlands mitigation project along Landis Run, Manheim Township, Lancaster County, and that details of this proposal will be provided to the Commission after it is finalized with the Pennsylvania Department of Environmental Protection (DEP).

Response: We revised the description of this proposed measure in section 2.2.1 of the final EIS and included this updated information in the analysis of wetlands mitigation in section 3.

Comment 10: PPL comments that the draft EIS did not include its proposed measure to provide moisture to the root zone of the white doll's daisy, a state threatened and endangered plant species, during the summer months.

Response: We acknowledge this oversight and, in response, we revised section 2.2.2 of the final EIS to include a bullet under proposed operational modifications describing this measure, and now provide an analysis of this measure in section 3.3.4, *Terrestrial Resources*.

Comment 11: The Corps requested that the final EIS include the following proposed measures: (a) all existing wetlands within the project area shall be accurately field-delineated and identified using orange construction fencing prior to the start of construction activities and up to the time that earth disturbance activities are completed and the site has been stabilized; (b) implement a minimum 5-year monitoring schedule at the wetland, stream and forested riparian planting mitigation sites; and (c) implement an approved Erosion and Sedimentation Control Plan.

Response: We note that PPL's proposal already includes erosion and sediment control plans, and we revised the final EIS to include the other two measures in section 2.2.1,

Proposed Facilities and Construction Activities, and section 2.2.3, Proposed Environmental Measures.

Engineering Review

Comment 12: PPL notes that it does not propose to construct barrier dams in the bypassed reach and requests that reference to barrier dams be deleted in the final EIS.

Response: We understand that PPL had proposed to install barrier dams in the draft Exhibit E, but has since eliminated this proposal based on concerns raised by resource agencies during consultation on this matter. We deleted the discussion of barrier dams in the final EIS.

Comment 13: The Corps commented that the draft EIS states that PPL proposes to use two retired ash basins located on PPL lands in Lancaster County on the hillside above the project for disposal of approximately 1,790,000 cy of excavated rock and fill and that the 404 permit application revisions dated August 21, 2008, indicate that basin # 1 is the primary disposal area and basin #2 indicates not available for disposal.

Response: We revised the final EIS to indicate that only one ash basin would be used for disposal of excavated rock.

Aquatic Resources

Comment 14: Exelon Corporation notes that the draft EIS at pages 17 and 52 characterizes PPL's commitment to release 800 cubic feet per second (cfs) or net inflow, whichever is less, as effective upon the later date of initiation of Unit 1 discharge to Piney Channel or initial operation of the planned exciter replacement units in the existing powerhouse. Exelon states that while this characterization is accurate, section 7 of the settlement agreement between PPL Holtwood and Exelon executed on May 5, 2008, further clarifies that in no event, however, shall the provision of these flows be delayed beyond 3 years after the date of the Commission's final order approving the Holtwood license amendment.

Response: We revised the description of the proposed operational modification in section 2.2.2 and in the water quantity analysis in section 3.3.3.2 of the final EIS to include this provision.

Comment 15: PPL notes that footnote number 22 on page 53 of the draft EIS states that the modeling did not include the 800-cfs minimum flow that recently was proposed as part of the Exelon-PPL Settlement Agreement. However, PPL notes that the minimum flow proposed in the PPL-Exelon settlement agreement is equal to 800 cfs or inflow and since it is inflow-based, it would not result in additional drawdown at Lake Aldred in the OASIS modeling.

Response: We revised the footnote number 22 on page 53 of the final EIS to reflect agreement with this comment.

Comment 16: Maryland Department of Natural Resources (Maryland DNR) notes that in table 9, the minimum flow from the Conowingo Project for the period of December 1 until the end of February is listed as 3,500 cfs. However, because this can be an intermittent flow with up to 6 hours of no flow for each 6 hours of flow at 3500 cfs, the daily average minimum flow is effectively 1,750 cfs, so the table should be corrected accordingly. PPL also made a similar comment about the minimum flows for the months of December, January, and February.

Response: We corrected table 9 in the final EIS to clarify the minimum flow for the months of December, January, and February.

Comment 17: Interior comments that while the description of inflow to the project on page 60 of the draft EIS is true over longer periods of time, the EIS should note the role of the Muddy Run reservoir in regulating water levels, for short periods, in the Conowingo reservoir and inflows downstream.

Response: We revised the text in the water quantity analysis in section 3.3.3.2 of the final EIS to indicate that the inflow and withdraw from the Muddy Run Pump-Storage Project has short-term effects on the reservoir level of the Conowingo reservoir.

Comment 18: Maryland DNR also notes on page 60 of the draft EIS that there is a statement that PPL would operate the amended project to release inflow to Lake Aldred, and indicates that this should be corrected to state that this inflow would be released to Conowingo Pond from Lake Aldred.

Response: We revised the text in the water quantity analysis in section 3.3.3.2 of the final EIS to state that during low flow conditions, the flow released to the Conowingo Project would be equal to the net inflow to Lake Aldred.

Comment 19: Interior points out an inconsistency on pages 67 and 68 regarding whether FWS established target survival rates for fish passage effectiveness, which, as pointed out on page 68, FWS did not.

Response: We corrected page 67 of the final EIS to clarify that the Interior fishway prescription does not include target survival rates.

Comment 20: The Pennsylvania Fish & Boat Commission, the New York State Department of Environmental Conservation, and Maryland DNR provide additional information about the value of providing for the upstream passage of resident fish, including walleye, during the fall. The agencies request that Commission staff reconsider the limited 1-year period of fall passage evaluation and ask that the Commission instead require evaluation over a 5-year period. The agencies base their request on the need to

(1) avoid atypical flow conditions that might occur during fall season, (2) better comport with the 5-year evaluation of resident fish passage during the spring, (3) average out the effect of year-class strength of a given species in the fall; and (4) better understand the recolonization of freshwater mussels via their fish hosts. The agencies note PPL's concern about potential damage to fish passage facilities operating during the fall and indicate that fall storms of a magnitude sufficient to cause damage to fish passage facilities operating during the fall occurred only 7 percent of the time over the past 75 years.

Response: We reconsidered the agency recommendations for fall fish lift operations for resident fish, based on the new information provided by the agencies. As a result, we changed our recommendation and now recommend 5 years of experimental fall fish lift operations. We revised the relevant sections of the final EIS to reflect the change in our recommendation.

Terrestrial Resources

Comment 21: The Corps commented that the draft EIS does not adequately address the avoidance and minimization of adverse effects on terrestrial resources that was accomplished as a result of early coordination with the resource agencies. The Corps also requested that Kleinschmidt, PPL's consultant, prepare a summary of the avoidance and minimization measures that were performed and that this information be incorporated in the final EIS.

Response: We revised the final EIS to address consultation during the application preparation process. The applicant did not provide the detailed information on avoidance and minimization measures that were performed as agreed to during consultation and therefore we did not include that information in the draft EIS. Our focus is on the measures proposed for the amendment and their environmental impacts.

Comment 22: The Corps commented that the discussion on wetlands is lacking in necessary detail, including functions and values and direct and indirect impacts

Response: We revised the final EIS to address wetland functions and values and direct and indirect impacts

Comment 23: The Corps requested that the final EIS include square footage/acreage of impacts in addition to cubic yards of material excavated and/or discharged into Waters of the United States, including wetlands, throughout the document

Response: We revised the final EIS to include square footage of effects on wetlands.

Comment 24: The Corps requested that the final EIS remove reference to wetland mitigation at the York Furnace site and provide additional detail about the current proposed mitigation package.

Response: We revised the final EIS to include details within PPL's current mitigation package. However, we did not remove reference to the York Furnace site because that discussion is part of the project history and provides context for comments received from some agencies.

Recreational Resources

Comment 25: American Whitewater commented on the number of days of whitewater boating provided for in the whitewater settlement agreement. American Whitewater notes that the rationale behind the whitewater settlement agreement may not be entirely clear, as evidenced by the descriptions of the proposed provision of whitewater boating flows on pages 109 and 110 of the draft EIS. American Whitewater clarifies that the provision of 264 hours is designed to mitigate for the loss of 33 days (33 x 8 hours per day = 264 hours) of whitewater boating and not 11 days as stated in the draft EIS. However, because boaters generally prefer more and shorter releases, the settlement agreement calls for the 264 hours of releases to be spread over an average of 68 days.

Response: We revised the final EIS to reflect this clarification.

Comment 26: American Whitewater questions the characterization in the draft EIS of the creation of two new whitewater features as enhancements. American Whitewater states that the constructed features, which are less valuable than natural features, simply provide 264 hours of paddling opportunities that approval of the license amendment would otherwise eliminate. Therefore, American Whitewater disagrees with the statement in the draft EIS that they would create enhanced whitewater boating conditions beyond those that currently exist within the area downstream of the spillway.

Response: We revised the final EIS to state that the creation of the two new whitewater features would replace features where use would be diminished by the reduced flows over the spillway.

Comment 27: PPL states that it does not understand the Commission staff rationale for requiring recreational use monitoring and annual reporting during the construction period. PPL states that the expected effect is that there would be no use of unavailable facilities on a temporary basis, and continued use, or potentially a temporary increase in use, of unaffected recreation facilities.

Response: Recreational use monitoring during the construction period would provide the means for the Commission staff to monitor the extent and duration of potential effects of the construction on recreational use associated with the project's recreational facilities and resources. This information would help Commission staff to ensure that adequate public recreational access is provided during the construction period. Therefore, we maintain our recommendation in the final EIS that PPL monitor recreational use at the project annually during the construction period.

Comment 28: PPL states its intent to submit to the Commission a plan to transfer up to 3,500 acres of PPL-owned lands, including project lands, to the Lancaster County Conservancy and its intent to develop a land management plan to assess recreational and preservation needs are appropriate, and anticipates, the development of this plan as a provision of the proposed lands transfer. PPL also states that it anticipates that it will propose to the Commission, with resource agency support, significant changes to management of project recreational facilities that will then require Commission reconsideration of the scope of future recreational monitoring and studies as outlined in the draft EIS.

Response: The draft and final EIS address the current proposal put forth by PPL. In the event that PPL files with the Commission additional proposal(s) related to project lands and recreational facilities, the Commission would assess those proposals at that time, including the potential needs for modification of future recreational monitoring and studies that may be required as part of a license.

Comment 29: PPL requests that the Commission staff reconsider the recommendation to submit in-water and in-the-dry blasting plans for approval prior to the initiation of construction, as this could delay construction activities that do not involve blasting.

Response: We revised the final EIS to recommend submission and approval of in-water and in-the-dry blasting plans prior to initiation of blasting activities, rather than prior to initiation of construction, as requested, with the understanding that blasting cannot begin until the Commission has approved the blasting plans.

Comment 30: In addition, as project plans continue to be revised, the final EIS needs to address the most recently revised plans, including the re-design of the Pequea Boat Ramp and the proposed compensatory wetland mitigation package.

Response: The EIS has been revised to reflect the most recent information submitted to the Commission related to the re-design of the Pequea Boat Ramp and the proposed compensatory wetland mitigation package.

Comment 31: Page 101, section 3.3.5.2, *Environmental Effects, Recreation Enhancements*—Your current descriptions for enhancements do not clearly identify the proposed impacts to Waters of the United States and adjacent forested riparian buffers in association with constructing of these enhancements. Specifically in regard to the Pequea Creek proposed improvements, the current proposal as described in your narrative does not identify any impacts. The current proposal for the Pequea Boat Ramp expansion would require the discharge of dredged or fill material into approximately 2.4 acres of the Susquehanna River for the construction of a boat ramp, handicap accessible pier and boat and trailer parking. The Corps has advised PPL that it should look to further minimize these impacts. PPL has agreed to redesign the Pequea Boat Ramp and parking to minimize impacts to Waters of the United States. The revised impacts should be clearly

addressed in the EIS as well as the direct and indirect impacts associated with the other recreational enhancements;

Response: We updated the EIS to include the revised PPL proposal, developed in consultation with resource agencies, to reduce the number of vehicle parking spaces to 18 spaces at the location where the 27 spaces were previously proposed. Discussions about the potential effects of the boat ramp expansion on wetlands are discussed in section 3.3.4.2, *Terrestrial Resources*.

Comment 32: Page 114, section 3.3.6.2, *Environmental Effects, Land Use*—Please elaborate on the primary and secondary impacts associated with your statement "Construction of temporary access roads would result in the removal of some trees." In this same section, you conclude that an effective plan should include five listed measures; however, you do not give a date for submission or implementation of this "Lands and Shoreline Management Plan." We recommend this be included in the final EIS and FERC license.

Response: We discuss the potential effects of the construction of the temporary access roads in section 3.3.4.2, *Terrestrial Resources*, and added a reference back to that section in the recreation effects discussion of the final EIS.

The final EIS discusses the management plans recommended by staff as part of the environmental assessment in the EIS document. The time for submittal of the plans to the Commission would be required in the license amendment order issued for the project. The time for implementation of the plans would be covered under the schedule proposed in the submitted plans, as approved by the Commission.

Cultural Resources

Comment 33: The Corps notes that the SHPO had not reviewed the additional recreational areas or the new wetland mitigation locations where previous surveys suggest high probability of archaeological material and had stated that PPL is conducting surveys of these areas in September 2008. The Corps requests that the findings of these additional surveys be addressed in the final EIS.

Response: We revised sections 1.3.7 and 3.3.7 of the EIS to expand the APE and indicate that PPL is conducting additional surveys and that SHPO review and comment are pending.

Comprehensive Development and Recommended Alternative

Comment 34: the Corps requested that the description of the Wetland Mitigation Plan be modified to state a suitable location for mitigation would be determined in consultation with the Corps and Pennsylvania DEP, and not FWS. The Corps also requested that this description of the Wetland Mitigation Plan include details present in

the current draft of the plan and that a complete applicant prepared mitigation package be incorporated in the EIS.

Response: The final EIS was modified to reflect this change in agencies to be consulted. A final Wetland Mitigation Plan has not been filed with the Commission, so no further details were added to the section of the final EIS. However, details of the current draft of the plan, as provided by the Corps, were included in the Affected Environment section and our analysis in section 3.3.4.

Comment 35: The Corps requests revising footnote 31 of the draft EIS to include the Corps.

Response: We revised the footnote in section 5.0 as requested.

Comment 36: The Corps comments that the list of proposed measures in section 5.0 of the EIS should include the dates for the submission of the various plans.

Response: The dates for submission of the various plans will be specified in the license conditions required in any order approving the amendment, and will be consistent with dates included in the COA.

Comment 37: The Corps suggests revising the first bullet under measures proposed by PPL in section 5 to include “approved” erosion and sediment control plans.

Response: We provide a footnote that indicates that final plans must be filed with and approved by the Commission.

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